



homeforward

YEAR 24

FY2023 Moving to Work ANNUAL REPORT

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Section I. Introduction

Moving to Work (MTW) is a demonstration program that offers public housing authorities (PHAs), like Home Forward, the opportunity to develop and pilot innovative, locally designed housing and self-sufficiency strategies for low-income families by allowing exemptions from existing public housing and tenant-based Housing Choice Voucher regulations. The program permits PHAs to combine operating, capital, and tenant-based assistance funds into a single agency-wide funding source. The purpose of the MTW program is to give PHAs and HUD the flexibility to design and test various approaches for providing and administering housing assistance that accomplish three primary goals:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for families earning low incomes.

Home Forward has been designated an MTW agency since 1998. The 2016 Consolidated Appropriations Act extended the MTW demonstration through fiscal year 2028 for Home Forward. This allowed Home Forward to continue to utilize MTW flexibility to support our mission of assuring that the people of the community are sheltered. Our Fiscal Year 2023 Moving to Work Report details how Home Forward has used its MTW flexibility to achieve these goals, allowing us to respond quickly and specifically to the needs of our community.

Long Term MTW Goals and Objectives

In 2023, Home Forward released a new strategic plan that reaffirms our commitment to equity, diversity, inclusion, and systemic change. The development of the strategic plan included input from staff, the board of directors, our Resident Advisory Committee, and partners. Being agile, responsive, creative, and innovative with this plan defines Home Forward's position as a leader within the housing stability ecosystem, and our commitment of building in mission and equity alignment across the entire supply chain of affordable housing production, acquisition, and preservation. We aim to improve our systems of offering seamless pathways for accessing housing stability and quality of life resources for the people we serve. The plan identifies key priority areas that Home Forward will make progress on over the next three years of the strategic plan. Our key priorities include: 1) improving service to residents and program participants; 2) supporting employees; and 3) leading within the housing stability ecosystem. While Home Forward works towards housing our community with MTW flexibility, we also strive to hold ourselves accountable to our community, partners, and funders. Our goals reflect the significance and importance of serving our community, currently and for generations to come.

MTW Goals and Objectives for the Year

The Portland metro region continues to experience a challenging housing market. As a reaction to the state's housing rental crisis, the Oregon state legislature invested \$1.4 billion in affordable housing and homelessness during the 2023 legislative session. Many households earning low-incomes continue to face the economic impacts of the COVID-19 pandemic, and Black, Indigenous, and people of color households have been disproportionately impacted. The economic impacts of COVID-19 exacerbated deep disparities in housing stability by income and race.

Home Forward used our Moving to Work flexibility to respond to the COVID-19 public health emergency. We received approval in our 2021 Moving to Work Plan to continue implementing flexibilities that HUD provided during the pandemic, including: self-certification of income (Activity 21) and modernizing HCV/PBV oral briefings (Activity 22). We also continue to intentionally dedicate organizational capacity towards the U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. Home Forward is in the process of converting our public housing portfolio to a voucher-based platform through RAD, a tool that enables the preservation of this critical affordable housing infrastructure for generations to come. This effort has created a significant body of work for the entire organization over the past decade, and that work continues. The subsidy conversion transitions the

public housing portfolio to a more stable funding source and gives Home Forward the ability to rehabilitate buildings and address long-standing capital needs while continuing to serve the same vulnerable population. We recognize RAD impacts current residents who call our buildings home and we have expended organizational capacity to effectively communicate and prepare for the transition.

Home Forward's ongoing MTW activities continue to increase housing choice in our challenging rental market. Our broader payment standard range allows us to tailor payment standards more closely to the reality of the market in different neighborhoods. The number of families in FY2023 living in high opportunity neighborhoods increased by over 1,620 households from FY2016, in large part due to investments made possible by our Local Project-Based Voucher Program activity. Home Forward has also used our Program Based Assistance activity to assist with a rental assistance grant at Mamook Tokatee, an affordable housing property sponsored by the Native American Youth and Family Center, which provides culturally specific services to Native and Indigenous households; this work follows on a successful effort at Nesika Illahee, a similar affordable housing development in the Cully neighborhood of Northeast Portland.

Using single-fund flexibility, Home Forward continues to partner with a local non-profit, Metropolitan Public Defenders, to provide legal consulting to participants and residents. The Record Relief and Expungement program helps reduce barriers for households and communities that are historically and currently disproportionately affected by the criminal justice system. This Home Forward pilot project has been replicated locally and recognized nationally.

Overview of Home Forward's MTW Activities

- 01 Large scale reform of how we calculate rents.
- 02 Alignment of our self-sufficiency programs into one consolidated, locally tailored program.
- 03 Creation of a local subsidy program, blending Section 8 and public housing funds to subsidize units.
- 06 Allowing alternate inspection standards for partner-based programs.
- 07 Accepting an owner's self-certification of minor repairs.
- 08 Setting rent reasonableness and conducting inspections at Home Forward-owned properties.
- 09 Measures to improve landlord acceptance of Section 8 vouchers in the community.
- 10 Creation of a local project-based voucher tailored to meet the needs of our community.
- 11 Alignment of the utility allowance adjustment process for public housing and Section 8.
- 13 Flexibility to establish payment standards between 80% and 160% of Fair Market Rents.
- 14 Offer limited rent assistance to help families access and/or retain stable housing.
- 15 Set aside vouchers with limited preferences aligned with supportive services for increased success.
- 16 Allocation of up to 400 project-based vouchers to support Portland Housing GO Bond.
- 17 Reform of rent calculations for Mod Rehab single room occupancy units.
- 18 Flexibility to permit property owners under project-based voucher contract to transfer contract.
- 19 Temporary changes to inspection protocols during emergencies.
- 20 Streamlining transfers between public housing and Housing Choice Voucher program.
- 21 Allows temporary self-certification of income during emergencies.
- 22 Allows Housing Choice Voucher/project-based voucher briefings to be done by alternative means.
- 23 Clarifies scope of using staff rather than third parties with respect to HCV/PBV units.
- 24 Limits circumstances in which HCV assistance may be terminated.
- 25 Authorizes use of flexible funding assistance for preservation and expansion of affordable housing.
- 26 Provides greater flexibility to support households in leasing up with their voucher.
- 27 Allows self-certifications and delay of receipt of documentation for income verification.

Non-MTW Activities

Home Forward's goals and objectives for FY2023 also included several activities that do not rely on MTW flexibility but are key to continuing to be innovative in the ways we serve our community.

Regional Efforts

Home Forward partners closely with regional partners to maximize resources and efficiency in programs to better serve our residents and participants. Some highlights of this work over the past year include:

- Collaboration with the Joint Office of Homeless Services (JOHS) and 19 different service agency partners to house over 700 households referred from Multnomah County's Coordinated Entry Systems with tenant-based assistance through Emergency Housing, Mainstream and Housing Choice voucher programs;
- Partnering with Oregon Department of Human Services and partners in Multnomah County's Homeless Youth Continuum to house youth experiencing homelessness through our Foster Youth to Independence and Family Unification Program voucher programs;
- Began implementing the Stability Voucher program in partnership with Multnomah County's Coordinated Entry system and the Native American Rehabilitation Association with goal of addressing over-representation of Native identifying persons experiencing unsheltered homelessness in Multnomah County;
- Received approval for and began implementing the Veterans Affairs Supportive Housing Collaborative Case Management project in partnership with the VA, JOHS, and the Native American Rehabilitation Association. The project will improve VASH utilization while helping address the over-representation of Native-identifying veterans experiencing homelessness in Multnomah County.
- Implemented and expanded new locally funded Regional Long Term Rent Assistance program in partnership with JOHS and service agency partners;
- In partnership with the Portland Housing Bureau, JOHS, developers, and community sponsors, leased up new units with Project Based Vouchers (PBVs).

General Obligation Bonds

City of Portland Housing Bond: In November 2016, Portland voters passed the city's first housing bond, dedicating \$258.4 million to create over 1,300 permanently affordable homes. Home Forward is participating in the Portland GO Bond in various ways:

1. Rent Assistance: Home Forward aligned approximately 400 Housing Choice Vouchers with this effort to ensure deep affordability for households residing in these affordable homes.
2. Asset Management: Home Forward's asset management team is overseeing third-party property management on behalf of the City of Portland.
3. Development and Long-term Ownership of City-Purchased Site: During FY2023, Home Forward continued to make progress on construction for a new development at SE 30th and SE Powell in Portland, to be known as the Hazel Ying Lee Apartments. The development will provide 206 units of housing for individuals at or below 60% AMI. Of the 206 units, 50 will benefit from Project-Based Vouchers and 30 will be designated as Permanent Supportive Housing for families who have previously experienced homelessness. Construction is expected to be complete in April 2024.

Metro Regional Housing Bond: Voters in the three-county area (including Multnomah County which is served by Home Forward) approved an affordable housing bond in November 2018. The Metro Regional Housing Bond plans to create 3,900 affordable units with 1,600 of these homes deeply affordable to households at or below 30% AMI. Half of the homes created will have two or more bedrooms to ensure access by families. Home Forward has committed more than 100 Housing Choice Vouchers to this effort to ensure deep affordability for affordable housing created in Multnomah County using Metro Bond proceeds.

As of December 31, 2023, Home Forward projects with Metro GO Bond allocations include:

1. Redevelopment of Dekum Court (under construction as of December 2023): 187 units total; includes the project-basing of 40 replacement vouchers created through a 40 Section 18 Demolition / Disposition approval and 27 RAD Transfer of Assistance units. 61 units income and rent-restricted at 30% AMI; 126 units income and rent-restricted at 60% AMI.
2. Killingsworth Housing (began construction February 2024): 84 units total; 28 units income and rent restricted at 30% AMI; 56 units income and rent restricted at 60% AMI.
3. Hattie Redmond (fully operational as a 100% Permanent Supportive Housing project as of December 2023): 60 units total, all of which come with state-funded rental assistance and

supportive services. 60 units income restricted at 30% AMI and state vouchers are rent restricted at 60% AMI.

4. Troutdale (slated for construction start in June 2024): 85 units total; 35 units income and rent restricted at 30% AMI; 50 units income and rent restricted at 60% AMI.

Metro Supportive Housing Services Bond: Voters in the three-county area (including Multnomah County which is served by Home Forward) approved a measure in May 2020 to provide long-term rental assistance and aligned supportive services to populations experiencing chronic homelessness. This effort has resulted in significantly increased capacity for local supportive housing efforts, with a three-county goal of connecting at least 5,000 households experiencing homelessness to permanent supportive housing and stabilizing at least 10,000 households at risk of experiencing homelessness in permanent housing. This effort has been guided by a Strategic Plan to Advance Racial Equity, Diversity and Inclusion, which aims to serve people of color at higher rates with affirming and effective services. Home Forward has supported this effort by building, overseeing, and directly administering the Regional Long-term Rent Assistance effort, which Home Forward modeled in part on the federal Housing Choice Voucher program, informed by local adjustments using the Moving to Work program. Home Forward has also advised on jurisdictional efforts to connect the referral and distribution model with the Coordinated Entry system as well as other local systems of care and has been a partner on systems change efforts as the program becomes fully utilized.

Public Housing Strategy

As of December 31, 2023, Home Forward operates 369 apartment homes as public housing, a specific subset of affordable housing that receives federal operating subsidy and capital funding. The buildings, and the deep rent subsidies they provide, are an important resource for Home Forward and the people we serve. Unfortunately, given waning federal support, mounting capital needs, and growing demand for affordable housing, the public housing program itself severely limits our ability to reinvest in these homes and meet the preservation challenges each apartment community faces. Under Home Forward’s strategic plan, we will focus on using our development expertise to advance innovative solutions that expand supply and address community needs. To that end, we will continue to prioritize transitioning our public housing units to project-based vouchers by deploying the tools available including the Rental Assistance Demonstration (RAD), Faircloth to RAD, and Section 18 regulatory mechanisms.

Section II. General Housing Authority Operating Information

A. Housing Stock Information

i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) was in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A			

* Figures in the “Planned” column should match the corresponding Annual MTW Plan.

** Select “Status at the End of Plan Year” from: Committed, Leased/Issued

ii. Actual Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
Alberta Alive	25	25	Committed	No	New construction with Community Development Partners. Will include 25 Project-Based VASH
Findley Project	20	20	Committed	No	New construction with Do Good Multnomah. Will include 20 Project-Based VASH
Las Adelitas	8	8	Committed	No	New construction with Hacienda CDC. Will include 8 Project-based Vouchers for families leaving homelessness and communities of color
Anna Mann House	12	12	Committed	No	Substantial Rehab and New construction with Innovative Housing Inc. Will include 12 Project-based Vouchers for low-income families and seniors
The Susan Emmons	48	48	Committed	No	New construction with Northwest Housing Alternatives. Will include 48 Project-based Vouchers for chronically homeless individuals, seniors with a disability
Starlight (formerly Westwind Apts)	70	0	Committed	No	New construction with Central City Concern. Will include 70 Project-based Vouchers for chronically homeless individuals
NE Prescott	8	0	Committed	No	New construction with CDP/NAYA. Will include 9 Project-based Vouchers for low-income families and communities of color
Stark Street	16	0	Committed	No	New construction with Human Solutions. Will include 16 Project-based Vouchers for families experiencing homelessness
SE Powell	50	0	Committed	No	New construction with Home Forward. Will include 50 Project-based Vouchers for families experiencing homelessness
RiverPlace Phase 2	20	0	Committed	No	New Construction with Bridge Housing, Inc. Will include 20 Project based VASH for homeless veterans
Joyce Hotel	66	0	Committed	No	New construction with CPAH. Will include 66 Project-based Vouchers for chronically homeless individuals
	343	113	Planned/Actual Total Existing Project-Based Vouchers		

* Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

** Select "Status at the End of Plan Year" from: Committed, Leased/Issued

Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:

All PBV projects remain committed and in various phases of construction and/or development.

iii. Actual Other Changes to MTW Housing Stock in the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR
N/A

iv. General Description of All Actual Capital Expenditures During the Plan Year

Narrative general description of all actual capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR								
Community	Activity	Scattered Site Sales Proceeds	Capital Fund	Asset Repositioning Fee	MTW Funds	% of Capital Fund	Total Expended	% of Total Expended
PHA Wide	15% Administrative Allowance		802,200			6.84%	403,140	14.17%
Various Properties	PH Discretionary Fund		83,080			0.71%	0	0.00%
Various Properties	Fleet Vehicles		343,000			2.93%	126,561	4.45%
Various Properties	Smart Burner Installation		215,750			1.84%	69,809	2.45%
Celilo Court	Security Systems Upgrade		1,251,700			10.68%	1,085,615	38.17%
Lexington Court	Lead Testing		9,044			0.08%	9,044	0.32%
Holgate House	Boilers/Water Heaters		39,500			0.34%	39,500	1.39%
Holgate House	Resealing/Pointing		95,000			0.81%	0	0.00%
Ruth Haefner	Sewer Lines Replacement		100,000			0.85%	0	0.00%
Schiller Way	Radon Mitigation		90,550			0.77%	90,550	3.18%
Schiller Way	Security Cameras and LED Lighting		600,000			5.12%	0	0.00%
Schiller Way	Roofing and Ventilation		861,309			7.35%	795,299	27.96%
Schiller Way	Full Envelope Project		681,698			5.82%	0	0.00%
Sequoia Square	Full Envelope Project		1,872,100			15.97%	0	0.00%
Gretchen Kafoury Commons	Full Envelope Project		900,000			7.68%	0	0.00%
St Francis Apartments	HVAC Replacement		550,000			4.69%	0	0.00%
Fairfield Apartments	Development Project		50,000			0.43%	50,000	1.76%
Grace Peck Apartments	Development Project		750,000			1.49%	175,000	6.15%
Troutdale Housing	Development Project		3,150,000			25.60%	0	0.00%
Total Capital Expenditures Budget			\$11,719,931	-	-	100%	\$2,844,519	100%

B. Leasing Information

i. Actual Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	4,339	4,140	362	345
MTW Housing Choice Vouchers (HCV) Utilized	114,912	129,900	9,576	10,825
Local, Non-Traditional: Tenant-Based	2,100	2,140	175	178
Local, Non-Traditional: Property-Based	60	60	5	5
Local, Non-Traditional: Homeownership	0	0	0	0
Planned/Actual Totals	121,411	136,765	10,118	11,397

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).

**"Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

Please describe any differences between the planned and actual households served:

Public Housing unit months leased was higher than planned due lower than expected unit turnover. Public Housing averaged an occupancy rate of 98% for FY 2023. Housing Choice Vouchers unit months leased was higher than planned due to continuing high demand for rental assistance and low voucher turnover for FY 2023. Local, Non-Traditional Tenant-Based unit months leased was higher than planned due to increased households assisted with rent arrears payments via Short Term Rent Assistance and Emergency Rent Assistance.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned^^	Actual	Planned^^	Actual
Tenant-Based	Program Based Assistance / 14	2,100	2,140	175	178
Project-Based	Program Based Assistance / 14	60	60	5	5
Homeownership	Program Based Assistance / 14	N/A	N/A	N/A	N/A
Planned/Actual Totals		2,160	2,200	180	183

* The sum of the figures provided should match the totals provided for each Local, Non-Traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
14 Program Based Assistance / Client Services	Less Than 1	2

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	Due to the shortage of subsidized units throughout the county, we continue to have long waiting lists and subsequently have no issues leasing units. We had a 98% occupancy rate in FY 2023.
MTW Housing Choice Voucher	With the current rental market's low vacancy rates, participants continue to face barriers in utilizing their voucher; nonetheless, 80.4% of voucher holders were able to successfully utilize their voucher. Of those successfully able to utilize their voucher, 82.9% were able to do so in the initial 120 days provided by Home Forward. Home Forward increased payment standards in 2022 and is making another material payment standards investment in 2024. To achieve a successful leasing rate, Home Forward operates various programs to help participants pay for security deposits including a tenant education class which provides a one-time payment toward a security deposit.

	Home Forward also maintains a Housing Search Advocate on staff to assist families and households with barriers to housing and continues a Records Relief and Expungement Clinic to reduce barriers for justice-involved households.
Local, Non-Traditional	There were no issues utilizing funds in our Local, Non-Traditional Programs. Due to escalating rent increases outpacing income gains, we are seeing households need longer periods of assistance to stabilize resulting in fewer unduplicated households being served than historically.

C. Waiting List Information

i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Public Housing	Site-based	2,832	Partially Open*	Yes
MTW Housing Choice Voucher	Community-Wide	1,465	Partially Open*	Yes
MTW Housing Choice Voucher	Site-Based	5,766	Partially Open*	No
Tenant-Based Local, Non-Traditional MTW Program	Other (see below)	0	Open	No
Project-Based Local, Non-Traditional MTW Program	Site-Based	0	Closed	No

Please describe any duplication of applicants across waiting lists:

404 households are duplicated across the MTW Public Housing and MTW Housing Choice Voucher (Community-Wide) waitlists. The MTW Housing Choice Voucher (Site-Based) is a Project-Based voucher waitlist (see Activity 10), with waitlists kept by partner agencies administering the PBV contract. Additional households may be duplicated between MTW Public Housing, MTW Housing Choice Voucher (Community-Wide) and MTW Housing Choice Voucher (Site-Based).
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Our MTW Public Housing waiting list is currently closed except for households needing an ADA accessible unit or applicants who have a documented terminal illness with a life expectancy of less than 12 months. Our Community-Wide MTW HCV waitlist is currently closed except for applicants who have a documented terminal illness with a life expectancy of less than 12 months. Our Tenant-Based Local, Non-Traditional program is our Program Based Assistance program (described in detail in Activity 14). This program largely contracts funds to partner agencies, which then manage the participant selection process, sometimes in partnership with Home Forward.

ii. Actual Changes to Waiting List in the Plan Year

Please describe any actual changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW Public Housing	Home Forward opened waiting lists throughout various public housing and former public housing properties during fall 2023. We continue to maintain preferences for households needing an ADA accessible unit or applicants who have a documented terminal illness with a life expectancy of less than 12 months. Several waiting lists also include a preference for referrals made by community partners. Another list includes a preference for people experiencing homelessness and certain scores on tools used to assess vulnerability for housing instability.

MTW Housing Choice Voucher (Community-Wide)	Our MTW Housing Choice Voucher tenant-based waiting list is community-wide and opened during summer 2023. Access to the waitlist is currently closed except for applicants to the Family Unification Program, Foster Youth to Independence Program, Mainstream Voucher program (referred from Coordinated Entry), those who are eligible for Home Forward's preference for families referred from Multnomah County's Homeless Family System of Care, and those who have a documented terminal illness with a life expectancy of less than 12 months.
MTW Housing Choice Voucher (Site-Based)	Our MTW Housing Choice Voucher project-based voucher waiting lists are site-based and are partially open. There are 94 lists in the community, maintained by each building with its own preferences. Some of these lists are currently open, some are closed, and some are closed except to applicants needing an ADA accessible unit or who have a documented terminal illness with a life expectancy of less than 12 months.

D. Information of Statutory Objectives and Requirements

i. 75% of Families Assisted Are Very Low Income

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based"; "Local, Non-Traditional: Property-Based"; and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	0
49%-30% Area Median Income	178
Below 30% Area Median Income	0
Total Local, Non-Traditional Households Admitted	178

Note: Households are required to be at or below 50% area median income to be eligible to receive assistance through Home Forward's local, non-traditional program. Referrals are made through partner agencies who verify eligibility, but Home Forward doesn't track household income levels and our partner agencies don't provide income data when submitting data for the households they serve as part of these programs.

ii. Maintain Comparable Mix

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)					
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	1,411	1,964	0	3,375	42.4%
2 Person	410	1,296	0	1,706	21.4%
3 Person	342	925	0	1,267	15.9%
4 Person	232	608	0	840	10.5%
5 Person	136	292	0	428	5.4%
6+ Person	97	254	0	351	4.4%
TOTAL	2,628	5,339	0	7,967	100.0%

* "Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.

Please describe the justification for any “Non-MTW Adjustments” given above:

MIX OF FAMILY SIZES SERVED (in Plan Year)				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	42.4%	6,245	59.1%	39.4%
2 Person	21.4%	1,712	16.2%	-24.3%
3 Person	15.9%	1,037	9.8%	-38.3%
4 Person	10.5%	714	6.8%	-35.6%
5 Person	5.4%	420	4.0%	-26.4%
6+ Person	4.4%	436	4.1%	-6.2%
TOTAL	100%	10,564	100.0%	

** The “Baseline Mix Percentage” figures given in the “Mix of Family Sizes Served (in Plan Year)” table should match those in the column of the same name in the “Baseline Mix of Family Sizes Served (upon entry to MTW)” table.

^ The “Total” in the “Number of Households Served in Plan Year” column should match the “Actual Total” box in the “Actual Number of Households Served in the Plan Year” table in Section II.B.i of this Annual MTW Report.

^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the “Total” number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

Several factors have created slight changes to the mixes of family sizes we serve. We increased our project-based vouchers, primarily in partnership with community agencies serving highly vulnerable people. We have also completed RAD conversions on the majority of our existing Single Room Occupancy/Mod Rehab program, which added over 350 1-person households.

In addition, Home Forward’s demographics relating to family size on the waitlist versus households leaving have changed, and as units turnover, smaller households sizes are selected from the waitlist as they make up a larger majority of waitlist households than in previous years. 44% of households that left Home Forward were 1-person households, and 1-person households made up a combined 70% on all waitlists. There continues to be many 6+ person households represented on Public Housing and HCV waitlists that account for the increase in larger family size from the established baseline.

iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year

Number of households, across MTW activities, that were transitioned to the MTW PHA’s local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
Rent Reform / 01	420	Households that have earned or permanent income that results in area median income (AMI) above 50% and/or has voluntarily exited housing assistance. (Households Duplicated Across MTW Activities) Total Households Transitioned to Self Sufficiency
GOALS / 02	34	
MOD Rehab RAD / 17	53	
	34	
	507	

* Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.

Section III. Proposed MTW Activities

All proposed activities that are granted approval by HUD are reported on in Section IV as “Approved MTW Activities.”

Section IV. Approved MTW Activities Implemented Activities

01 Rent Reform

Approved FY2012, Implemented FY2012, Amended FY2014, FY2015, FY2020 & FY2021

In FY2012, Home Forward implemented a large-scale reform of rent calculation methods, applicable to all MTW public housing and Housing Choice voucher households, as well as VASH voucher holders. The simplified method distinguishes between the populations of seniors / people with disabilities and “work-focused” households. The fundamental premise is that deductions are eliminated from the subsidy calculation and the total tenant payment is determined using a percentage of gross income.

In early 2013, the federal government-imposed sequestration: across-the-board reductions in federal funding. In response to these funding cuts, Home Forward amended the activity in FY2014 to increase the percentage of income used to calculate rent. The amended percentages are reflected below.

For seniors and people with disabilities, rent is calculated based on 28.5% of gross income. All deductions are eliminated, and this group will have triennial income re-certifications. We define those aged 55 and older as “senior”, and households fall into this population category if the head, co-head or spouse listed on the lease is 55 or older or is disabled under the current HUD definition used by Home Forward. This group has a \$0 minimum rent and utility reimbursements are allowed. All households that do not fall into the population category above are considered work-focused households. All deductions are eliminated, and this group will have biennial income re-certifications. The percentages of income used to calculate the tenant portion of rent are as follows:

- Years 1 and 2: rent is based on 29.5% of gross income, with no minimum rent. Utility reimbursements are allowed
- Years 3 and 4: rent is based on 29.5% of gross income. Utility reimbursements are allowed. (FY2021 Modification)
- Years 5 and 6, and biennially thereafter: rent is based on 31% of gross income. Utility reimbursements are allowed. (FY2021 Modification)

The following policies apply to all households:

- The proration of subsidy for mixed families is simplified so that a flat \$1 monthly reduction in assistance is applied to the household, regardless of the number of ineligible members.
- The ceiling rent for public housing is now automatically set to match Housing Choice voucher payment standards. There will be no flat-rent option.
- Home Forward has created a separate “release of information” form to supplement the HUD Form 9886, to obtain a release of information that covers the appropriate biennial or triennial review cycle.

MTW authorization:

- Attachment C, Section B(3) – Definition of Elderly Family
- Attachment C, Section D(2)(b) – Rent Policies and Term Limits
- Attachment C, Section D(2)(e) – Rent Policies and Term Limits
- Attachment C, Section D(3)(b) – Eligibility of Participants
- Attachment D, Section B(2) – Rent Structure and Rent Reform
- Attachment D, Section D(1) – Establishment of a local Section 8/Housing Choice Voucher

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

- For Housing Choice voucher households where the gross rent of the unit exceeds the applicable payment standard, Home Forward will approve the tenancy at initial occupancy so long as the household share does not exceed 50 percent of the household's gross income. (FY2017 Modification)
- When a Housing Choice voucher household is approved to move and the identified unit has a gross rent that exceeds the payment standard, Home Forward will use the existing income verification on file to test for affordability. Home Forward will not require a re-examination to verify income for this purpose unless the family requests it.
- When a Housing Choice voucher household reports a change in family size, if the household has resided in their unit for at least 12 months, Home Forward will require an interim review. Any changes to voucher size, payment standard and subsidy calculation will be effective 120 days after the interim review. (FY2015 Modification)
- The earned income disallowance is eliminated.
- All Family Self-Sufficiency (FSS) participants are included in the rent reform calculation.
- Home Forward will use actual past income to determine annual income for participant families. (FY2015 Modification)
- All income sources used to determine a household's public housing rent or Housing Choice voucher assistance will be the same as currently defined by HUD, with the following exceptions:
- The value of any asset or the value of any income derived from that asset will not be used in the rent calculation, except when the asset makes regular payments (quarterly or more often) to the resident or participant. However, the value of assets or the value of any income derived from assets will be used to determine initial eligibility. Home Forward will allow households to self-certify assets with a net value of \$5,000 or less. (FY2015 Modification)
- All earned income of full-time students aged 18 and over will be excluded from the rent calculation, unless they are the head, co-head, or spouse of the household.
- Student financial assistance will be considered only for the purpose of determining eligibility. Student financial assistance will not be used to determine annual income for rent and subsidy calculation.
- All adoption assistance payments will be excluded from the rent calculation.
- Households will have the option to not report income that is not used in the rent calculation, such as foster care payments. However, Home Forward will accept income reporting of such sources for use in determining affordability of a unit. Home Forward permits families to rent units where the family share is up to 50% of their gross income.
- Households may apply for a hardship review if their total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy. Housing Choice voucher participants who choose to rent housing where the total shelter costs exceed 50% of total monthly income at the time of initial lease-up in that unit will not generally qualify for hardship review; however, all households have the right to request a hardship and exceptions may be made. The committee will have a menu of remedies to reduce a qualifying household's burden.
- Home Forward may deny all rent increase requests, or pause the processing of all rent increase requests, from landlords of tenant-based Housing Choice Voucher holders for reasons other than non-compliance with rent reasonableness in rent setting. Home Forward will implement this approach based upon a consideration of the following factors:
 - A consideration of financial and administrative impact on Home Forward;
 - Rent burden on tenants participating in the Housing Choice Voucher program;
 - Impact on participating landlords; and
 - Other compelling situations which may include the declaration of a state of emergency.

Rent reform has been fully implemented. Currently, all MTW public housing and Housing Choice voucher households, as well as VASH voucher holders, are on the rent reform calculation. The earliest group of work-focused households transitioned to the third level of rent payment beginning in FY2017. Home Forward continues to monitor hardship requests, household and agency financial impacts and staff feedback to prepare for any changes that may need to be made to the activity.

Home Forward temporarily denied all rent increase requests, or paused processing rent increase requests, from landlords of Tenant Based Voucher holders for rent increases that would go into effect during calendar year 2021 in response to the COVID-19 public health emergency. Home Forward implemented this modification by pausing processing rent increase requests from landlords of Tenant Based voucher holders that would have taken effect during calendar year 2021 in response to the COVID-19 public health emergency.

Home Forward implemented this approach based upon a consideration of the following factors:

- A consideration of financial and administrative impact on Home Forward;
- Rent burden on tenants participating in the Housing Choice Voucher program;
- Impact on participating landlords; and
- Other compelling situations which may include the declaration of a state of emergency.

Authority to implement this approach derives from Section D(2)(e) of Attachment C to the HUD-Home Forward MTW Agreement. Section D(2)(e): “The Agency is authorized to implement alternative review and/or approval procedures for rent increases.”

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2011: \$140,228	FY2023: \$104,489	\$88,339	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2011: 5,340 hours	FY2023: 3,979 hours	3,364	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity. Through our quality control process, every error that is identified is corrected.				
Average error rate in completing task	FY2015: 7.5%	FY2023: 7.5%	5.1%	Outcome Achieved
Increase in tenant share of rent (Standard Metric: CE#5)				
Total annual tenant share of rent	FY2012: \$25,342,942	FY2023: \$40,798,077	\$46,169,540	Outcome Achieved
Increase in household income (Standard Metric: SS#1)				
Average earned income of households	FY2011: \$3,324	FY2023: \$4,030	\$6,284	Outcome Achieved
Increase in positive outcomes in employment status (Standard Metric: SS#3) Note: Because Home Forward has implemented biennial and triennial review schedules, the number of households who report an increase in earned income each year is reduced.				
Number of heads of households who: 6) Other (defined as having an increase in earned income)	FY2011: 866 heads of households	FY2023: 525 heads of households	748 heads of household	Outcome Achieved
Percent of work-focused households who: 6) Other (defined as having an increase in earned income)	FY2011: 16% of work-focused households	FY2023: 16% of work-focused households	13% of work-focused households	Outcome Not Achieved

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)				
Number of households receiving TANF assistance	FY2012: 229 households receiving TANF (2.0%)	FY2023: 100 households receiving TANF (1.0%)	1,361 (9.9%) households	Outcome Not Achieved
Reducing the per unit subsidy costs for participating households (Standard Metric: SS#6)				
Average amount of subsidy per household	FY2012: \$524 per household	FY2023: \$971	\$1,096	Outcome Not Achieved
Households transitioned to self-sufficiency (Standard Metric: SS#8)				
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2014: 521 households	FY2023: 450 households	420 households	Outcome Not Achieved
Displacement prevention (Standard Metric: HC#4) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not believe this metric is an accurate measure of this activity, but we have included it at HUD's request.				
Number of households at or below 80% AMI that would lose assistance or need to move	FY2011: 233 households	FY2023: 0 households	0 households	Outcome Achieved
Increase in resident mobility (Standard Metric: HC#5) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not use rent reform to impact mobility, but we have included it at HUD's request.				
Number of households able to move to a better unit and/or neighborhood of opportunity (defined as low poverty census tracts where poverty is below 17.1%)	FY2013: 3,092 (28.4%) households lived in better neighborhoods	FY2023: 3,041 (26.4%) households	3,957 (28.8%) households	Outcome Achieved

Agency Specific Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Maintain stability for seniors and people with disabilities				

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Shelter burden (rent ¹ + utility allowance divided by gross income) for seniors and people with disabilities	Before implementation, shelter burden was 27%	FY2023: Shelter burden will remain below 29%	28%	Outcome Achieved
Increased contribution to rent				
Total tenant payment (rent + utility allowance) for work-focused households	Before implementation: Section 8 average - \$267 Public housing average - \$249	FY2023: Section 8 average \$438 Public housing average \$392	Section 8 average - \$509 Public housing average - \$409	Outcome Achieved
Increased income in work-focused households				
Average income for work-focused households, as percentage of Median Family Income (MFI)	Before implementation, average income for work-focused households was 16.4% MFI	FY2023: 18% MFI	18.2% MFI	Outcome Achieved

Home Forward's Yardi Voyager database continues to serve as the source for household income and total tenant rent payment information. The baseline data for hours required to conduct rent calculation and income reviews was collected through staff interviews and workflow analysis.

Hardship Requests

At the time of implementation, Home Forward offered a "phase-in" hardship for households who had high medical or childcare costs or had many dependents. On an annual basis, those households can apply for an extension to the phase-in hardship, which if approved, reduces their rent portion in proportion to the amount of expenses or the number of dependents. From January 2023 through December 2023 (FY2023), 2 households requested an extension of the phase-in hardship, and they were both approved. The annual cost to the agency of the phase-in hardship is approximately \$1,500.

Households may apply for a hardship review if their total monthly shelter burden costs exceed 50% of the total monthly income used to determine their rent subsidy. In January 2023, we updated payments standards and as a result, no hardship requests were approved because shelter burden did not exceed 50% of gross income.

MTW Flexibility

Home Forward has used our MTW flexibility to structure our rent reform calculation with several aspects that differ from the standard calculation (described above). This includes eliminating deductions, changing the percentage of income used to calculate rent, simplifying the calculation, and moving to triennial reviews save significant staff time. Additionally, Home Forward has exercised its authority to amend the definition of an elderly family to age 55. This supports the statutory objective of creating incentives for self-sufficiency by ensuring that households defined as work-focused can be reasonably expected to increase employment and earnings over time.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

¹ For purposes of these metrics, Housing Choice Voucher rents are calculated with gross rent capped at payment standard.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

To keep pace with the rental housing market and to ensure our voucher holders can find housing throughout our community, Home Forward continues to evaluate and raise payment standards. This has raised the average subsidy for our households and is necessary to continue to provide stable housing in this market. At this time, we are not considering a change of strategy, but will continue to maintain our payment standard structure to reflect the market as much as possible.

The COVID-19 pandemic continued to cause significant income loss for households on rent reform. The increase in temporary assistance as well as the reduction in earned income decreased the number of households able to transition into self-sufficiency.

02 GOALS – Home Forward’s Family Self-Sufficiency Program Approved FY2014, Implemented FY2014

In our FY2014 Plan, Home Forward proposed an activity to align existing self-sufficiency programs into one consolidated program, which we refer to as the GOALS (Greater Opportunities to Advance, Learn and Succeed) program. This program is tailored to meet the needs of our community and be efficient for staff to administer. GOALS program requirements are the same regardless of funding source, program, or property, with a few minor exceptions for site-based programs.

The key elements of the GOALS program are as follows:

- The rent reform calculation (Activity 01) is used for all GOALS participants.
- Participants who are engaged in a designated program intended to increase the family’s economic independence (such as an employment or training program) will receive a preference on the GOALS waiting list. 100% of the GOALS slots may be filled with participants utilizing this preference.
- Home Forward will allow the GOALS contract to be in the name of any adult member of the household.
- The traditional escrow account used in HUD Family Self-Sufficiency (FSS) programs has been replaced with a managed savings account. Any rent paid by a participant household above \$350 (known as the “strike point”) will be placed into the managed savings account. The monthly amount placed into a family’s managed savings account is limited to the difference between the strike point and the family’s ceiling rent (for public housing families) or voucher payment standard (for Section 8 families).
- The length of time on the program will be five years, with the opportunity to extend for an additional two years. Eligibility for the two-year extension follows current policy and HUD guidelines.
- Participants graduate and have access to the funds in their managed savings account when they have completed their training plan and fulfilled the obligations identified in their contract.
- Families who leave the program prior to graduation will forfeit any money accrued in their managed savings account.
- At properties where participation in GOALS was mandatory, the property will continue to utilize a site-based preference on the GOALS waitlist to encourage participation in the family self-sufficiency program at these sites.
- When funding is available, a safety net of \$1,500 (either in lump sum or \$250/month for six months) will be provided through MTW flexible funds for public housing families graduating from the site-based programs who move to non-subsidized units. The same safety net will be provided for Section 8 participants who give up their voucher prior to reaching zero assistance. Due to sequestration funding cuts, this safety net has not yet been announced or made available to families.
- When a public housing resident reaches ceiling rent, or a housing assistance payment for a voucher participant drops to zero, deposits into the family’s managed savings account will cease. Families can continue to participate in the program for an additional six months, but no savings will accrue during this time. If the family is still at ceiling rent or zero assistance after six months, they will graduate from the program. If the family’s income decreases to a level that housing assistance is reinstated during that six-month period, they may begin to earn escrow again, and continue participation in the program if the contract determines they are still eligible.
- Staff implementing the GOALS program will be funded by a combination of HUD-funded FSS Coordinator money, grant funding, and agency budgeting. FSS Coordinator funds will be used

MTW authorization:

- Attachment C, Section E – Family Self Sufficiency Programs
- Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Statutory objective:

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

only for FSS Coordinator salaries, as directed by the respective NOFAs (Notice of Funding Availability).

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request.				
Total cost of task	FY2017: \$512,070	FY2023: \$820,261	\$797,904 ²	Outcome Acheived
Staff time savings (Standard Metric: CE#2) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save staff time through this activity, but we have included it at HUD's request.				
Total time to complete task	FY2017: 18,509	FY2023: 18,928	15,400	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity.				
Average error rate in completing task	FY2017: 2%	FY2023: 2%	2%	Outcome Achieved
Increase in resources leveraged (Standard Metric: CE#4)				
Amount of funds leveraged	FY2017: \$190,507	FY2023: \$191,500	\$528,130	Outcome Achieved
Increase in household income (Standard Metric: SS#1)				
Average earned income of households	FY2017: \$12,472	FY2023: \$12,750	\$22819	Outcome Achieved
Increase in household savings (Standard Metric: SS#2)				
Average amount of escrow of households	FY2017: \$2,295	FY2023: \$2,350	\$6753	Outcome Achieved
Increase in positive outcomes in employment status (Standard Metric: SS#3) ³				
Number of heads of households:	FY2017:	FY2023:	FY2023:	
1) Employed full-time	187	187	218	Outcome Achieved
2) Employed part-time ⁴	120	120	54	Outcome Not Achieved
3) Enrolled in an educational program	129	130	40	Outcome Not Achieved
4) Enrolled in a job-training program	81	82	85	Outcome Achieved

² Home Forward uses our MTW flexibility to include coordinators at our site-based programs in our overall GOALS FSS program. This is shown here as an increase in staffing costs and hours since we're now able to include these costs under the combined program. In addition to site-based coordinators, there are 8 traditional coordinators supported via HUD-funded FSS coordinator funds.

³ Households may be counted in more than one category in the employment statuses shown above. For example, a household may be considered unemployed while enrolled in an educational program.

⁴ Home Forward did not track full-time vs part-time employment prior to implementation. For the purposes of this baseline metrics, all employed households were counted as employed full-time. We have updated these metrics with the part-time employment statistics.

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
5) Unemployed	155	155	127	Outcome Achieved
6) Other (defined as having completed an education or job training program)	54	55	62	Outcome Achieved
Increase in positive outcomes in employment status (Standard Metric: SS#3)				
Percentage of workable households:	FY2017	FY2023	FY2023	
1) Employed full-time	40%	40%	55%	Outcome Achieved
2) Employed part-time ⁵	27%	27%	14%	Outcome Not Achieved
3) Enrolled in an educational program	28%	28%	10%	Outcome Not Achieved
4) Enrolled in a job-training program	18%	18%	21%	Outcome Achieved
5) Unemployed	33%	33%	32%	Outcome Achieved
Households removed from TANF (Standard Metric: SS#4)				
Note: This metric is measured as a point in time count, which does not account for individual households who give up TANF assistance, graduate from the GOALS program, and are then replaced by income GOALS participants who have not yet given up TANF assistance.				
Number of households receiving TANF assistance	FY2017: 61 households	FY2023: 60 households	43 households	Outcome Achieved
Households assisted by services that increase self-sufficiency (Standard Metric: SS#5)				
Number of households enrolled in GOALS	FY2017: 462 households enrolled	FY2023: 462 households enrolled	399 households enrolled	Outcome Not Achieved
Reducing per unit subsidy costs for participating households (Standard Metric: SS#6)				
Average amount of subsidy per household	FY2017: \$671 per household	FY2023: \$809 per household	\$834 per household	Outcome Achieved
Increase in tenant share of rent (Standard Metric: SS#7)				
Tenant share of rent	FY2017: \$1,926,589	FY2023: \$2,674,948	\$2,982,316	Outcome Achieved
Households transitioned to self-sufficiency (Standard Metric: SS#8)				
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2017: 27 households	FY2023: 28 households	34 households	Outcome Achieved

MTW Flexibility

Home Forward has used MTW flexibility to create an economic opportunity program that is tailored to serve our community. Aspects that use MTW flexibility are described above, and include use of a strike point escrow system, use of the rent reform calculation for participants, and modifications to the graduation process.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks for part-time employment and educational programs were not met but exceeded for full-time employment job-training programs, and completion of education and job-training programs. At this time, we are not considering a change of strategy and remained focused on increasing each family's economic independence.

03 Local Blended Subsidy
Approved FY2012, Implemented FY2012

Home Forward has created a local blended subsidy (LBS) program to improve the financial viability of adding “banked” public housing units back into the portfolio. Public housing operating subsidy alone is often insufficient to support bringing these units back to properties. The LBS program uses a blend of MTW Section 8 and public housing operating funds to subsidize units reserved for families earning 80 percent or below of AMI. These units may be new construction, rehabilitated, or existing housing.

The LBS program combines tenant paid rent, Section 8 funds, and public housing funds, resulting in a total per unit rent amount. Rents are set by an internal process to determine the amount of subsidy that will meet property needs and are subject to completion of rent reasonableness tests. Home Forward uses the payment standard as the maximum rent for LBS units, or up to 125% of Fair Market Rents in the case of service-enriched units. This leveraging of resources allows for a more adequate revenue stream and increases the number of households that can be served.

MTW authorization:

- Attachment C, Section B(1) – Single Fund Budget with Full Flexibility
- Attachment C, Section C(2) – Local Preferences and Admission and Continued Occupancy Policies and Procedures
- Attachment D, Section B(3) – Local Unit Based Subsidy Program

Statutory objective:

Increase housing choice for low-income families

Home Forward has utilized the LBS program for 284 units at three properties. This includes 130 units at Bud Clark Commons, 45 units at Madrona Place, and 109 units at Stephens Creek Crossing. As part of our Public Housing Conversion Strategy, Bud Clark Commons and Madrona Place received RAD approval in September 2015. One of the first steps in the RAD conversion process is the Commitment to Enter into a Housing Assistance Payment (CHAP), which was completed in October 2015 for these two properties. Stephens Creek Crossing was also included in the July 2015 RAD application and will convert only after HUD has confirmed a feasible conversion plan for Home Forward’s entire public housing portfolio.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Additional units of housing made available (Standard Metric: HC#1)				
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2023: 239 units made available	239 units made available	Outcome Achieved
Units of housing preserved (Standard Metric: HC#2)				
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	FY2023: 45 units preserved after full implementation	45 units preserved	Outcome Achieved
Increase in resident mobility (Standard Metric: HC#5)				
Number of households living in better neighborhoods (defined as low poverty census tracts where poverty is below 17%)	Before implementation, 0 households	FY2023: 109 households	109 LBS households located in better neighborhoods	Outcome Achieved
Increase in resources leveraged (Standard Metric: CE#4)				

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Amount of funds leveraged	Before implementation, \$0	FY2023: \$11,145,307	\$11,145,307 in leveraged debt, equity and increased services	Outcome Achieved

MTW Flexibility

This activity uses single fund budget flexibility and authorization to develop a local unit-based subsidy program to create the administrative and funding structure for LBS. This increases housing choice for low-income families by allowing Home Forward to add financially viable, subsidized units back into its portfolio. LBS has allowed Home Forward to leverage debt, equity, and increased services at these three properties. Additionally, the ability to create local preferences, and admission and continued occupancy policies and procedures allows Home Forward to manage the units to provide similar protections as public housing and adapt the rules for efficiency and local needs. This supports the objective to increase efficiencies in Federal expenditures.

Home Forward understands and is committed to our obligation to continue to serve substantially the same number of families as if we had not participated in the MTW demonstration. We are aware of the pressure our LBS activity may place on the agency to continue to meet our baseline households served, and we carefully consider this information before moving forward with implementation strategies. We are continuing to explore and develop alternative options for local rent assistance programs that will serve a significant need in our community and will also support our ability to meet our baseline households served once LBS is fully implemented.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

06 Alternate Inspection Requirements for Partner-Based Programs
Approved FY2012, Implemented FY2012

Home Forward aligns our housing resources with the services of jurisdictional and community partners to maximize impact and effectiveness. To reduce costs and increase efficiencies, Home Forward uses alternate inspection standards for programs where we contract out resources to be administered by partners. Rather than requiring full Housing Quality Standards (HQS) inspections, Home Forward requires that these units meet the habitability standards, unit inspection requirements, and lead-based paint visual assessment requirements required by the US Department of Housing and Urban Development's Homelessness Prevention and Rapid Re-Housing Program. Staff from jurisdictional and community providers can arrange for and conduct required inspections themselves, in conjunction with other required visits to the assisted units.

MTW authorization:

- Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Statutory objective:
 Reduce cost and achieve greater cost effectiveness in Federal expenditures

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Before implementation, \$35,500	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Before implementation, 500 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because this metric was established after implementation, Home Forward does not anticipate a change in the error rate.				
Average error rate in completing a task	FY2014: 4%	FY2023: Less than 5%	Less than 1%	Outcome Achieved

MTW Flexibility

Home Forward uses MTW authority to allow alternative inspection requirements for units assisted with rent assistance that we have contracted to community partners. These alternate inspection requirements ensure housing standards while increasing efficiency and cost effectiveness.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**07 Landlord Self-Certification of Minor Repairs
Approved FY2013, Implemented FY2013**

In many cases, units may fail an initial or annual inspection due to minor items, such as cracked socket plates or closet doors that are off track. Requiring a Home Forward inspector to make a trip back to a unit to verify such minor repairs is inefficient and costly. Home Forward has implemented a policy that in cases where there are no more than four minor deficiencies, we may accept an owner’s certification that required repairs were made. This allowance is made at Home Forward’s discretion, and in cases where all deficiencies are minor items as determined by an approved list maintained by Home Forward.

In FY2023 inspectors continued to use the option for landlords to self-certify minor repairs rather than completing a reinspection. The option continued to be used at the inspector’s discretion.

MTW authorization:

- Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Before implementation, \$140,092	FY2023: \$124,902	Less than \$119,544 to complete re-inspections	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Before implementation, 1,326 hours	FY2023: 1,095 hours	816 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.				
Average error rate in completing a task	FY2015: 0%	FY2023: Less than 3%	Less than 1%	Outcome Achieved

MTW Flexibility

This activity uses alternate criteria – in the form of an owner’s written certification – to verify the correction of deficiencies in a unit that failed its initial or annual Housing Quality Standards inspection as a result of four or fewer minor (as defined by Home Forward) deficiencies. This policy increases efficiencies and saves the agency the cost of these re-inspections.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

08 Inspections and Rent Reasonableness at Home Forward-Owned Properties

**08 Inspections and Rent Reasonableness at Home Forward-Owned Properties
Approved FY2013, Implemented FY2013**

Home Forward owns over 4,000 units of affordable housing in Multnomah County. Many of these units have project-based Section 8 vouchers attached, and additional units are rented to families that are utilizing tenant-based Section 8 vouchers. In cases where a voucher holder is renting a unit we own, Home Forward utilizes our own staff to perform inspections and determine rent reasonableness.

In cases where Home Forward both owns and manages the unit, we hire a third party to conduct quality control inspections and rent reasonableness testing at a sample of these units. This ensures standards are being met while mitigating any conflict of interest.

MTW authorization:

- Attachment C, Section D(5) – Ability to Certify Housing Quality Standards
- Attachment C, Section D(2)(c) – Rent Policies and Term Limits

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Prior to implementation, \$17,750	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Prior to implementation, 370 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.				
Average error rate in completing a task	FY2015: 0%	FY2023: Less than 5%	Less than 1%	Outcome Achieved

MTW Flexibility

Home Forward uses MTW authority to set rent reasonableness and inspect units we own, in place of contracting with a third party to do so. This results in cost savings for the agency.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**09 Measures to Improve the Rate of Voucher Holders Who Successfully Lease-Up
Approved FY2010, Implemented FY2010**

Since 2010, Home Forward has implemented a variety of measures to improve landlord acceptance of Housing Choice Vouchers in our community and the ability of voucher holders to successfully lease up. Based on much of Home Forward’s work, the Oregon State Legislature passed HB2639 in July 2014. The legislation prohibits landlords from discriminating against renters who have vouchers and offers landlords access to a state-managed Landlord Guarantee Fund for financial damages when a voucher holder vacates a unit.

Home Forward has two additional initiatives focused on improving landlord participation and the leasing success of voucher holders:

- We provide vacancy loss payment to owners through the end of the month after the move-out month when vacancies are unforeseen or unexpected (such as a death or unannounced vacate) and the owners have not received proper notice of the intent to vacate. In FY2023, \$17,919 in vacancy loss payments were provided for 33 units. The average payment was \$543.
- The Landlord Incentive Payment targets new landlords. Home Forward makes a one-time payment of \$200 to new landlords, defined as those who have not worked in partnership with us for the past two years. In FY2023, 104 new landlords received incentive payments, totaling \$20,800.

MTW authorization:

- Attachment C, Section B(1) –
- Single Fund Budget with Full Flexibility
- Attachment C, Section D(1)(d) – Operational Policies and Procedures
- Attachment C, Section D(3)(b) –
- Eligibility of Participants
- Attachment D, Section D(1) – Establishment of a Local Section 8 / Housing Choice Voucher Program

Statutory objective:
Increase housing choice for low-income families

In the last few years, leasing success rates have fallen because of an extremely tight rental market, rapidly rising rents, and an overall lack of affordable units. Even with the above measures in place and legislation preventing discrimination against voucher holders, leasing success rates have fallen below our 2009 baseline. To keep pace with the market and ensure neighborhood choice for voucher holders, Home Forward most recently increased payment standards in July 2022.

We have implemented a variety of policy changes (which do not require MTW flexibility) to make the voucher program more appealing to landlords. These include:

- Allowing flexible lease terms based on an individual landlord’s standard practice (including month-to-month)
- Accepting electronic Requests for Tenancy Approval from landlords to speed the process
- Posting tools for landlords on our website so landlords can assess whether their unit is likely to pass rent reasonable and affordability tests

Finally, we are working to provide more support for voucher holders. Our participant orientation places an increased focus on housing search, tenant rights and responsibilities, and opportunity neighborhoods, in hopes of helping voucher holders be better prepared for their housing search.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Households assisted by services that increase housing choice (Standard Metric: HC#7)				
Number of households receiving services aimed at increasing housing choice	Before implementation, 0 households	FY2023: 230 households	444 households	Outcome Achieved

Additional Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Improve voucher success rate				
Issued voucher success rate	FY2009: 74%	FY2023: 80%	84.6%	Outcome Achieved
Decrease in lease-up time				
Average number of days for a voucher holder to lease up	Before implementation, 51 days	FY2023: 50 days	62 days	Outcome Not Achieved

MTW Flexibility

Home Forward has made changes to operational policies and procedures and funds these activities through our single-fund budget flexibility. This activity works to increase landlord participation in the program, and therefore, increase housing choice for low-income households.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023. Home Forward continues to issue vouchers with an initial 120 days to search, in recognition of the competitive market and the length of time it is taking to lease up.

10 Local Project-Based Voucher Program Approved FY2012, Implemented FY2012

Home Forward has created a project-based voucher (PBV) program tailored to meet the needs of the local community. We currently administer over 2,400 PBVs in the community via 94 separate contracts. The program continues to represent our focus on coordinating with jurisdictional partners and enhancing the supply of permanent supportive housing for households with barriers to housing.

In FY2015, Home Forward changed the operating subsidy at four of our high-rise buildings from public housing to project-based Section 8 funding, as part of our preservation strategy to renovate ten buildings. These four buildings accounted for 654 units and serve seniors and persons with disabilities. The MTW flexibility to place project-based vouchers at these buildings, as well as through service providers and jurisdictional partners, has ensured that affordable housing remains available to some of the most vulnerable households in our community. The objective of the project-based voucher program is to provide housing certainty for low-income, high-barrier households who would be unlikely to succeed with a tenant-based voucher. With that in mind, we are focusing project-based vouchers on buildings with on-site services, ideally in opportunity areas, offering tenants affordable rents and access to community resources. Some of the original project-based voucher contracts expired in the past few years, and Home Forward has made it our policy to offer renewals only to owners who have agreed to set waiting list preferences for one or more vulnerable populations, and to make services available to those households. This will result in all project-based voucher buildings offering affordable housing with services to those most in need as contracts are renewed.

MTW authorization:

- Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project-Based Program
- Attachment C, Section D(4) – Waiting List Policies
- Attachment C, Section D(2) – Rent Policies and Term Limits
- Attachment C, Section D(1)(e) – Operational Policies and Procedures

Statutory objective:

- Increase housing choice for low-income families
- Reduce cost and achieve greater cost effectiveness in Federal expenditures

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Additional units of housing made available (Standard Metric: HC#1)				
Number of new housing units made available for households at or below 80% AMI	FY2011: 1,100 units	FY2023: 1,820 units made available	1,820 units	Outcome Achieved
Units of housing preserved (Standard Metric: HC#2)				
Number of units preserved for households at or below 80% AMI that would otherwise not be available	Prior to implementation: 0 units	FY2023: 654 units preserved	654 units preserved	Outcome Achieved
Decrease in wait list time (Standard Metric: HC#3)				
Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity				
Average applicant time on wait list in months	FY2014: 15 months	FY2023: 42 months	38 months	Outcome Achieved

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Displacement prevention (Standard Metric: HC#4) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity				
Number of households at or below 80% AMI that would lose assistance or need to move	FY2015: 904 households	FY2023: 900 households	1,508 households	Outcome Achieved
Increase in Resident Mobility (Standard Metric: HC#5)				
Number of households able to move to a better unit and/or neighborhood of opportunity (defined as low poverty census tracts where poverty is below 17%)	FY2011: 93 households	FY2023: 400 households	285 households	Outcome Not Achieved
Agency Cost Savings (Standard Metric: CE#1)				
Total cost of task in dollars	Prior to implementation: \$30,720	FY2023: \$27,995	\$18,261	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Prior to implementation, 917 hours	FY2023: 660 hours	240 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity				
Average error rate in completing task	FY2015: 2%	FY2023: Less than 5%	Less than 1%	Outcome Achieved
Increase in tenant share of rent (Standard Metric: CE#5) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity				
Total annual tenant share of rent	FY2014: \$3,570,859	FY2023: \$6,930,000	\$6,535,683	Outcome Not Achieved

MTW Flexibility

The PBV program increases housing choice and affirmatively furthers fair housing by preserving existing affordable housing and focusing on the needs of populations that tend to be less successful in the tenant-based program, including participants with disabilities, extremely low incomes, or backgrounds that may create high barriers to housing. Most of the PBV buildings offer services for specific populations, which help households not only to obtain suitable housing, but also to access additional services that give the household stability in the community. Below is a list of the ways Home Forward utilizes MTW authority for the local PBV program:

- Home Forward exceeds the traditional 25% limit of PBVs in a single building and allows project-based vouchers to be awarded to more than 25% of units in each complex.
- Home Forward has modified waitlist policies to allow each PBV building to maintain its own site-based waiting list with its own preferences. It would not be practical or cost effective for Home Forward to manage so many separate PBV waiting lists with separate preferences. Multiple waitlists also ensure that there are almost always open waitlists at any point in time.

- Home Forward does not provide a preference on the tenant-based waiting list for PBV residents and requires PBV residents to apply for and remain on the tenant-based waitlist to transfer to a tenant-based voucher unit.
- Home Forward modifies screening and eligibility requirements to differ from the traditional criteria at certain PBV properties which offer supportive services, therefore increasing housing choice for participants who might otherwise be ineligible for Section 8 housing. Home Forward determines an applicant's eligibility for a specific PBV property based on the capacity of the service provider who owns or contracts to manage the property.
- Home Forward has modified owner proposal selection procedures for PBV units to increase Permanent Supportive Housing in our community by awarding PBV units via a local competitive process in collaboration with the City of Portland and Multnomah County. This local process includes issuing a Notice of Funding Availability and accepting proposals from housing developers and owners across the County. This effort ensures that PBVs are aligned with capital and services funding made available from our jurisdictional partners.
- The local competitive process may be waived and PBVs may be awarded based on a formal approval and resolution process by Home Forward's Board of Commissioners when the property is owned directly or indirectly by Home Forward, subject to HUD's requirements regarding subsidy layering. The owned units would not be subject to any required assessments for voluntary conversion.
- Home Forward has adopted the local city and county site selection standards for PBV units to ensure alignment with jurisdictional partners regarding site selection for low-income housing aimed at ending homelessness. Site selection standards are designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations of 20% or less.
- Home Forward has modified subsidy standards regarding under- and over-housing to ensure full utilization of PBV units. Subsidy standards are the same for PBVs as those used for tenant-based vouchers, but exceptions are granted when there are no appropriately sized households on the waiting list to fill a vacant unit.
- Home Forward has modified lease terms, renewal options, and termination policies to limit owners' ability to terminate tenancy without cause, maximizing housing choice for the families in those units. After the initial term, PBV leases convert to a month-to-month agreement unless owners and tenants agree to a longer term, and owners may not refuse to renew leases without cause. Owners of PBV units may not terminate tenancy without cause, except as follows:
 - The owner of a PBV unit may terminate tenancy for a family if Home Forward terminates the family's assistance for any reason to ensure that another low-income applicant can be served. However, instead of terminating tenancy, the owner may request Home Forward's approval to amend the PBV contract to remove a unit occupied by a zero-subsidy family or amend the PBV contract to substitute a different unit with the same number of bedrooms in the same building.
- Home Forward modified the way contract rents are determined for PBV units by limiting PBV contract rents to a maximum of the payment standard less any applicable tenant paid utility allowance, ensuring that PBV units are affordable even to zero-income households.
- Home Forward adapted the timing of applying payment standard adjustments for PBV participants. Any increase in payment standards to the PBV units is applied on the next anniversary date of the PBV Housing Assistance Payments Contract, following the effective date of the increase. Any decrease in payment standards to the unit is applied beginning on the second anniversary date of the PBV Housing Assistance Payments Contract following the effective date of the decrease. Home Forward also applies any changes to the utility allowance at the same time as the payment standard adjustments.
- Home Forward uses an alternate rent setting policy that allows the Rent Assistance Director, with Board approval, to set exception payment standards that are greater than 110% (up to a maximum of 160%) of Fair Market Rents for service-enriched buildings entering into new project-based voucher contracts, without requesting HUD approval. The payment standard granted applies to any unit under the project-based voucher contract serving a highly vulnerable population with intensive services. Data is required of the owner to verify the value of the services being provided, and this cost will not be included when conducting rent reasonableness tests.

- Home Forward uses an alternate rent setting policy that allows the Rent Assistance Director to set exception payment standards up to a maximum of 160% of Fair Market Rents (pursuant to Activity 13 “Broaden Range of Approved Payment Standards”) without requesting HUD approval for:
 - Home Forward-owned units that utilize Rental Assistance Demonstration (RAD) PBVs, or
 - Units that utilize special purpose voucher PBVs.
- This authority, applicable only to specific projects or developments and not to the broader payment standard zone or geographic region, enables Home Forward to maximize the ability to leverage private investments in support of Home Forward’s affordable housing development and rehabilitation to address the ongoing affordable and supportive housing supply crisis.
- Home Forward allows Home Forward staff to conduct inspections, set rents and determine rent reasonableness for Home Forward-owned units that utilize PBVs. When Home Forward both owns and manages the unit, it hires a third party to conduct quality control testing of inspections and rent reasonableness determinations for a sample of these units. This activity is also described under Activity 08: Inspection and Rent Reasonableness at Home Forward-Owned Units.
- Home Forward has eliminated the cap limiting project-basing to up to 20% of the amount of budget authority allocated to the agency by HUD in the voucher program.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

The decrease in resident mobility to low-poverty census tracts reflects the overall affordability trends that have impacted the Portland metro area for the past several years. At this time, we are not considering a change of strategy, but will continue to maintain our payment standard structure to reflect the market as much as possible.

**11 Align Utility Allowance Adjustment Procedures
Approved FY2011, Implemented FY2011**

In our FY2011 MTW Plan, Home Forward received approval to align the public housing process for calculating and implementing utility allowance adjustments with that of Section 8. Previously, the public housing utility allowance process required Home Forward to conduct engineering surveys to determine energy consumption, which was cumbersome and costly. Additionally, public housing protocol required that a re-certification be completed for each resident when there were adjustments to the utility allowance.

MTW authorization:

- Attachment C, Section C(11) – Rent Policies and Term Limits

Statutory objective:
Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Aligning the utility allowance adjustment process with that of Section 8 allows public housing to adopt the methodology of using HUD’s standard calculation, which is based on the type of utility and type of building. As in the Section 8 program, public housing staff will review the utility allowance adjustments annually, with the adjustment going into effect at the resident’s next regular review.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Before implementation, \$8,000 per year	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete task	Before implementation, approximately 393 hours	FY2023: 0 hours	0 hours	Outcome Achieved

MTW Flexibility

The standard public housing utility allowance process requires engineering surveys to determine energy consumption, and that a re-certification be completed for each resident when there is a utility allowance adjustment. Our MTW flexibility allows us to align the public housing process with that of Section 8, resulting in agency cost and staff time savings.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

13 Broaden Range of Approved Payment Standards Approved FY2015, Implemented FY2015, Amended FY2017

Regulations require that payment standards are set between 90% and 110% of Fair Market Rents, as defined by HUD for the geographic area in which the housing authority is operating. Multnomah County is a large geographic area with rents that differ throughout several submarkets. When rental market conditions tighten, it is not uncommon for 110% of Fair Market Rent to fall short of what is needed to rent a quality unit in large, and often higher opportunity, areas of Multnomah County. In addition, payment standards that are too high in particular neighborhoods can create concentrations of poverty. We will always need to balance the opportunity created with higher payment standards with the increased per family costs associated with higher payment standards. Higher payment standards can put limits on our ability to respond to the overwhelming need in our community but given the nature of the rental market in Multnomah County, the flexibility to set payment standards up to 160% of FMR may be necessary to create reasonable choice for participant families, particularly in lower-poverty, higher-opportunity areas. Home Forward received HUD approval to amend our activity in FY2017 to set payment standards between 80%-160% of Fair Market Rents (FMR) without prior HUD approval; an increase in previous MTW flexibility of FMR range of 80%-120%.

MTW authorization:

- Attachment C, Section D(2)(a) – Rent Policies and Term Limits

Statutory objective:

Increase housing choice for low-income families

Home Forward participants are on biennial and triennial recertification schedules, per Activity 01 Rent Reform. Because of this, there is sometimes a delay of several months or even years before the increased payment standard is applied to a participant’s rent calculation. In the meantime, those participants may be experiencing a larger shelter burden as their landlords increase rent without the accompanying increase in payment standards. To address this delay, we also modified this activity in FY 2017 to allow us to apply updated payment standards at a participant’s interim review.

In order to ensure that payment standards are sufficient to allow Housing Choice Voucher participants reasonable choice in neighborhoods, Home Forward has used MTW authority to broaden its “base range” for payment standards to between 80% and 160% of the Fair Market Rents without prior HUD approval. (In FY2015, Home Forward received authorization to set payment standards between 80% and 120% of Fair Market Rents. In FY2017, Home Forward received authorization to broaden that range between 80% and 160% of Fair Market Rents.)

Home Forward uses the following parameters to establish payment standards:

- Payment standards are broken down by nine separate neighborhoods as defined by ZIP codes. Each of these neighborhood payment standards is broken down by bedroom size.
- Payment standards are set at the market rate.
- Because data shows that market rents are significantly different for three-bedroom apartments and three-bedroom single-family homes and duplexes, Home Forward has established separate payment standards for the two housing types with three bedrooms.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Increase in resident mobility (Standard Metric: HC#5)				

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Number of households living in better neighborhoods (defined as low poverty census tracts where poverty is below 17%) ⁵	FY2013: 1,896 (30%) households lived in better neighborhoods	FY2023: 2,100 (31%) households	3,762 households	Outcome Achieved
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request				
Total cost of task	FY2014: \$48,597,556	FY2023: \$71,765,252	\$74,340,000	Outcome Achieved

Additional Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Average Housing Assistance Payment Expense (AM#1)				
Average annual HAP expense by household	FY2014: \$6,690	FY2023: \$10,850	\$12,936	Outcome Not Achieved

MTW Flexibility

Home Forward used our MTW authority to expand the range for which Home Forward may set payment standards across the various submarkets of Multnomah County to between 80% and 160% of HUD-established Fair Market Rents, and to establish exception payment standards up to 160% of Fair Market Rents, without HUD approval. This ensures that payment standards are sufficient to allow all families, including those that need a reasonable accommodation, to choose to rent units in all nine of the defined areas in Multnomah County (so long as Housing Choice Voucher funding is sufficient to permit this).

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

The metric of total cost was not met due to payment standard increases in April 2023, which is reflected in the metric of total Housing Assistance Payments spent. Increasing the payments standards has been necessary to allow participants flexibility in the current rental market in Multnomah County. At this time, we are not considering a change of strategy, but will continue to maintain our payment standard structure to reflect the market as much as possible. The number of zero income households sharply increased in 2023 to 1,886 (14.2% of MTW HCV households), which also contributed to the increase in average subsidy per household.

⁵ Data will be collected from Yardi Voyager, Home Forward's database, which tracks the census tract and Payment Standard used for each household.

14 Program Based Assistance Approved FY2015, Implemented FY2015

The need for rental assistance in Multnomah County far outstrips the supply. When Home Forward opened the Housing Choice Voucher waiting list in fall 2023, over 19,000 households applied for 2,000 waiting list slots.

To increase the number of households served over a given period, Home Forward has designed Program Based Assistance. This local, non-traditional rent assistance program merges two past single-fund MTW activities: Short Term Rent Assistance and Agency Based Assistance. This program offers time-limited rent assistance, paired with services, to help families access and/or retain stable housing. While the Housing Choice Voucher and public housing programs provide permanent subsidies to ensure long-term affordability for low-income families, the focus of Program Based Assistance is helping families achieve stability. These households will likely remain rent-burdened, but with services available to help address other challenges in their lives, many will be able to avoid homelessness and remain permanently housed.

To administer Program Based Assistance, Home Forward sets aside a pool of flexible rent assistance funds, that are administered by the Rent Assistance Department but do not operate like traditional vouchers. The funds serve targeted populations, in partnership with one or more local service providers who ensure that the families have access to the supportive services or resources they need to be stable and successful. Funds may be contracted to partner agencies to administer or may be administered by Home Forward on behalf of partner agencies. In both cases, partner agencies are responsible for identifying participating families and determining the amount and duration of the rental assistance, with some guidance from Home Forward.

Target populations for Program Based Assistance are families for whom: 1) success on the Section 8 Housing Choice Voucher program would be unlikely; 2) the delay in accessing rent assistance due to the Section 8 waitlist would most likely have devastating results (recidivism, relapse, death, homelessness, etc.); or 3) the need for rental subsidy is short term while the client is receiving the support needed to stabilize in permanent housing. Examples of target populations include families who are homeless or at risk of homelessness, families with children attending Alder Elementary School (which has one of the highest mobility rates in the County and was adopted by the I Have a Dream Foundation in order to improve outcomes), former foster youth as part of the New Doors program, survivors of domestic violence, and families with an adult who has recently been released from prison.

Program Based Assistance partners work with Home Forward to set program policies that are specific to the target population they are serving. Home Forward ensures that policies are clear, equitably managed, and in compliance with Fair Housing laws. All programs have common elements which include:
Uses of Funds: Rental Assistance funds may be used for rental assistance, rent arrears with a current landlord, move-in fees and deposits, utility assistance and arrears, motel vouchers if housing is identified but not immediately available, and documented debt to a past landlord (other than a public housing authority).

Eligibility: Eligibility for Program Based Assistance is as low barrier as possible to provide housing access for hard-to-serve households. The only limitations on eligibility are: 1) the household must include at least one person who is a U.S. citizen, U.S. national, or noncitizen with eligible immigration status; 2) the household may not include any member who is subject to lifetime registration as a sex offender or has been convicted of production/manufacture of methamphetamine on premises of federally assisted housing; 3) no one in the household may owe Home Forward money; and 4) annual gross income cannot exceed 50% of AMI.

MTW authorization:

- Attachment C, Section B(1) – Single Fund Budget with Full Flexibility
- Attachment D – Use of MTW Funds

Statutory objective:

Increase housing choice for low-income families

Subsidy Determination Method: Each partner is required to write clear policies and procedures for how subsidy amount and duration will be determined. These policies must be applied to all participants in that partner's program.

Service Requirements: Home Forward makes these funds available to target populations in partnership with one or more partners who are experts in providing the supports families may need to remain stably housed and move towards a stable, permanent housing situation. Therefore, partner agencies are required to make services available to all families accessing Program Based Assistance. Partner agencies will also have the discretion to discontinue rental assistance to households who violate their program policies or fail to engage in services after repeated attempts at engagement.

Program Based Assistance is a local, non-traditional rental subsidy program. Home Forward will comply with PIH Notice 2011-45 when administering this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY 2020: \$198,000	FY2023: \$75,000	\$75,000	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2020: 25 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3)				
Average error rate in completing task	FY2019: 0%	FY2023: 0%	0%	Outcome Achieved
Increase in resources leveraged (Standard Metric: CE#4)				
Amount of funds leveraged	FY2019: \$198,000	FY2023: \$75,000	\$75,000	Outcome Acheived
Additional Units of Housing Made Available (Standard Metric: HC#1)				
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units	FY2023: 5 units	5 units	Outcome Achieved
Increase in Resident Mobility (Standard Metric: HC #5)				
Number of households able to move to a better unit and/or neighborhood of opportunity	Before implementation, 0 households	FY2023: 47 unduplicated households	71 households	Outcome Achieved
Households Assisted by Services that Increase Housing Choice (Standard Metric: HC #7)				
Number of households receiving services aimed to increase housing choice	Before implementation, 0 households	FY2023: 76 unduplicated households	82 households	Outcome Achieved

MTW Flexibility

Home Forward uses MTW flexibility to blend program funds into a single budget used to fund Program Based Assistance. This allows Home Forward to administer a form of non-traditional rent assistance that can target households in crisis and help them reach or maintain housing stability.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

15 Tenant-Based Voucher Set Aside Policies Approved FY2017, Implemented FY2017

Home Forward operates or participates in several programs that have been designed to align housing with supportive services to ensure success for participating families. These include local non-traditional rent assistance programs, our local project-based voucher programs, and the Veterans Affairs Supportive Housing (VASH) program. In all cases, jurisdictional or community partners provide supports for families who access the housing, with target populations including families exiting homelessness, former foster youth, seniors, and people with disabilities.

MTW authorization:

- Attachment C, Section D(4) – Waiting List Policies

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Home Forward has found that leveraging our housing resources with services from partners often results in better housing stability and success for families with barriers to succeeding with a voucher alone. In addition to the above programs, we have also established a series of limited preferences for tenant-based vouchers. Through these limited preferences, specific community partners refer target populations to Home Forward for housing as they provide services. We currently have two set aside programs under this umbrella:

- Home Forward sets aside up to 200 vouchers for families currently served by Multnomah County's Homeless Family System of Care.
- We also set aside up to 50 vouchers for families that include a veteran experiencing homelessness, who are ineligible for HUD-VASH vouchers. These families are referred by and received services from Transition Projects, Inc.

HUD regulations for tenant-based vouchers require a housing authority to select all participants from a waiting list. In order to adhere to regulations, current families served by the two set aside programs are chosen and referred to Home Forward by the community partner, added to the tenant-based voucher waiting list, then immediately pulled from the waiting list to be served with the vouchers that are dedicated to the program. This process is inefficient, time-consuming, and cumbersome.

Home Forward will model the referral and selection procedures after the existing VASH program. As with VASH, Home Forward will accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral will be maintained in the tenant file by Home Forward, but Home Forward will not add these households to the waiting list to be immediately selected. This flexibility will increase efficiency and may reduce the number of days a family has to wait between referral and issuance of the voucher.

For each limited preference program, Home Forward will execute a Memorandum of Understanding with the partner specifying:

- Number of vouchers set aside for the preference,
- Eligibility criteria for the preference,
- Criteria for determining how families will be selected and referred to Home Forward by the partner(s),
- Type and duration of services the partner(s) will make available to the household, and
- Understanding that all referrals must be in writing and include a certification from the partner(s) that the family was selected and referred to Home Forward in accordance with the criteria outlined in the Memorandum of Understanding.

Home Forward will audit partner agencies to ensure that they adhere to selection criteria specified in the Memorandum of Understanding.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2016: \$875	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2016: 29.5 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in wait list time (Standard Metric: HC#3) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Because households are immediately pulled from the waiting list, this will have no impact on this metric; but we have included it at HUD's request				
Average applicant time on wait list in months	FY2016: 0 months	FY2023: 0 months	0 months	Outcome Achieved

MTW Flexibility

Home Forward uses MTW flexibility to waive requirements that families served through set aside tenant-based vouchers be selected from a waitlist, only to be immediately pulled from the list. Instead, families will be referred to Home Forward by the specified community partners, who will have selected households based on limited preferences and criteria of the Memorandum of Understanding.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**16 Affordable Housing General Obligation Bond Project Based Voucher Allocation
Approved FY2018, Implemented FY2018**

Home Forward received approval to allocate up to 400 project-based vouchers to support the goals of a \$258.4 million Portland Housing General Obligation Bond that was approved by voters in November of 2016. From time to time, local jurisdictions may issue general obligation bonds to acquire, develop and rehabilitate properties for affordable housing. Home Forward, as a Moving to Work agency, is granted the ability to support such local housing programs. This includes collaborating with local jurisdictions to provide affordable housing and services for low income and/or disabled households in our community.

MTW authorization:

- Attachment C, Section D(7)(b) – Local Competitive Process

Statutory objective:
Increase housing choice for low-income families

Prior to the constitutional amendment voted on by voters in 2018, local jurisdictions had to be the only owner of such housing when using general obligation bonds. For this specific financing situation, Home Forward is defining the ballot initiative and future competitive processes run by the Portland Housing Bureau as a competitive process. Ultimately, the local jurisdiction is competing for the use of vouchers and is seeking authorization from voters. If the voters elect to pass such a ballot measure, it is done so with the public’s knowledge that housing will be developed and vouchers will be utilized to make homes further affordable. Home Forward will have permission to allocate project-based vouchers to such general obligation bond funded properties to ensure housing opportunities for very-low and extremely low-income families. Home Forward will measure the number of units made available to members of the community through utilization of this designation.

The Portland Housing Bond was designed to increase the affordable housing stock in a community with rapidly rising rents that limit choice for families living with low incomes. One of the location priorities of the Portland Housing Bond’s framework is to prioritize acquiring land for new housing in high opportunity areas with access to education and economic opportunities, among other amenities. The Portland Housing Bond’s framework includes recommendations for services related to “workforce skill development/employment resources and parenting resources, youth engagement and academic assistance” among other resident services’ priorities.

The Portland Housing Bond will create approximately 1,300 permanently affordable units throughout the City of Portland, with 600 designated for households earning 0-30% of the area median incomes. According to the City of Portland, the allocation of up to 400 vouchers to the affordable housing general obligation bond will leverage an additional 200 units of housing for families earning between 0-30% of the area median income, netting a total of 600 units of deeply affordable, permanent affordable housing added to the City of Portland. These permanent units will increase choice across the city for families living with low and extremely low incomes. The vouchers will be allocated over five to seven years as properties are acquired and built.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Additional units of housing made available (Standard Metric: HC#1)				
The Portland Housing Bond anticipates adding 1,300 units of affordable housing over a seven year period. The 400 vouchers will be used to leverage an additional 200 units being available for households earning between 0 and 30% median family income.	FY2018: 0	FY2023: 400 units	399 units	Outcome Not Achieved

MTW Flexibility

Home Forward designates voter-approved affordable housing general obligation bond ballot measures as a competitive process. This is an additional waiver of 24 CFR 983.51. In Oregon, local jurisdictions may issue general obligation bonds. These bonds are secured by tax levies and provide communities with access to debt at favorable interest rates.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

As of October 2023, Portland Housing Bonds were fully committed in 15 projects. As of October 2023, three projects remain in construction, and one is in predevelopment. Home Forward continues to work with the City of Portland to determine appropriate allocation of project-based vouchers in these remaining projects.

17 Mod Rehab and Mod Rehab SRO Rent Assistance Demonstration Rent Reform Approved FY2019, Implemented FY2019

Home Forward implemented its comprehensive Rent Reform activity in FY2012. The Rent Reform activity eliminates deductions from the subsidy calculation, utilizes an alternative percentage calculation for total tenant payment, and implements a tiered subsidy structure for non-elderly, non-disabled (“work-focused”) households.

Home Forward administers project-based rent assistance for 517 units of housing assisted through HUD’s Section 8 Moderate Rehabilitation (Mod Rehab) and McKinney Moderate Rehabilitation Single Room Occupancy (SRO) programs. This housing is a critical component of our community’s housing stock available to people leaving homelessness. Owners of these properties can participate in HUD’s Rent Assistance Demonstration (RAD) in order to preserve and improve their properties. Participation in RAD can involve the conversion of a properties existing subsidy contract into a Project Based Voucher contract that may operate under the program requirements of Home Forward’s Local Project Based Voucher MTW activity (see Activity 10). Participants in Home Forward’s Local Project Based Voucher program are subject to Home Forward’s Rent Reform activity.

MTW authorization:

- Attachment C, Section D(3)(b) – Eligibility of Participants
- Attachment D, Section B(2) – Rent Structure and Rent Reform

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choice for low-income families

While the Rent Reform activity has been successful in meeting its cost savings and self-sufficiency objectives, Home Forward recognizes that the tiered rent structure for work-focused households does not adequately meet the needs of certain households or programs. Specifically, analysis shows that implementing the full Rent Reform activity at our Section 8 Mod Rehab and Mod Rehab SRO properties, which serve significant numbers of households moving out of homelessness, may result in household displacement over time and have a significant effect on these properties’ ability to continue to serve these households. Home Forward instead proposes implementing an alternative rent reform initiative for these properties post-RAD to allow owners to take advantage of the Rent Assistance Demonstration while continuing to serve the same tenant population profile.

The SRO Mod Rehab Rent Reform initiative mirrors our existing previously approved Rent Reform activity but eliminates certain aspects of that activity, such as the tiered rent structure for work-focused households. Specifically, the SRO Mod Rehab Rent Reform Activity implements the following policies:

- Eliminates all deductions in rent calculations. To offset the loss in deduction, rent will instead be calculated based on 28.5% of gross income. There is no minimum rent and utility reimbursements are allowed.
- Implements a triennial income re-certification schedule. For our existing Rent Reform activity, Home Forward created a separate “release of information” form to supplement the HUD Form 9886, to obtain a release of information that covers the appropriate biennial or triennial review cycle which will be utilized in this activity.
- Simplifies the proration of subsidy for mixed families to a flat \$1 monthly reduction in assistance, regardless of the number of ineligible members.
- Requires an interim review for a household that reports a change in family size and has resided in their unit for at least 12 months. Any changes to voucher size, payment standard, and subsidy calculation will be effective 120 days after the interim review.
- Eliminates the earned income disallowance.
- Makes use of actual past income to determine annual income for participant families.

- Uses all income sources as currently defined by HUD to determine a household’s assistance, with the following exceptions:
 - The value of any asset or the value of any income derived from that asset is not used in the rent calculation, except when the asset makes regular payments (quarterly or more often) to the resident or participant. However, the value of assets or the value of any income derived from assets is used to determine initial eligibility. Home Forward allows households to self-certify assets with a net value of \$5,000 or less.
 - All earned income of full-time students age 18 and over is excluded from the rent calculation, unless they are the head, co-head or spouse of the household.
 - Student financial assistance is considered only for the purpose of determining eligibility. Student financial assistance is not used to determine annual income for rent and subsidy calculation.
 - All adoption assistance payments are excluded from the rent calculation.
 - Households have the option to not report income that is not used in the rent calculation, such as foster care payments. However, Home Forward will accept income reporting of such sources for use in determining affordability of a unit. Home Forward permits families to rent units where the family share is up to 50% of their gross income.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2018: \$1,660	FY2023: Less than \$5,325	\$3,099	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2018: 80 hours	FY2023: Less than 256 hours	149 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3)				
Average error rate in completing task	FY2018: 7.5%	FY2023: 7.5% or less	Less than 1%	Outcome Achieved
Increase in tenant share of rent (Standard Metric: CE#5)				
Total annual tenant share of rent	FY2018: \$17,344	FY2023: \$59,000	\$50,589	Outcome Not Achieved
Increase in household income (Standard Metric: SS#1)				
Average earned income of households	FY2018: \$1,228	FY2023: \$ 2,397	\$1,573	Outcome Not Achieved
Increase in positive outcomes in employment status (Standard Metric: SS#3) Note: Home Forward does not collect detailed employment data from SRO participants. The number provided reflects the total number of work-focused households.				
Number of heads of households who: (6) Other (increase in earned income)	FY2018: 32 households	FY2023: 115 households	53 households	Outcome Not Achieved
Percent of work-focused households who: (6) Other (increased in earned income)	FY2018: 16% of households	FY2023: 19% of households	13% of households	Outcome Not Achieved

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)				
Number of households receiving TANF assistance	FY2018: 1 households	FY2023: 0 households	0 households	Outcome Achieved
Households transitioned to self-sufficiency (Standard Metric: SS#8) Note: Home Forward's SRO properties assist households transitioning from homelessness to permanent, stable housing. Rather than moving to self-sufficiency, Home Forward anticipates participant households will move from an SRO property into a long-term Home Forward subsidy program.				
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2018: 0 households	FY2023: 0 households	27 households	Outcome Achieved

MTW Flexibility

Home Forward is using our rent reform authorizations to eliminate deductions, simplify the rent calculation, change review schedules, and implement other policy adjustments that, as a whole, make up our rent reform activity, as described above. The requested waiver authority will result in cost and time savings for the agency while ensuring the effected properties can continue to their mission of assisting households moving out of homelessness.

Hardship Policy

As with our standard Rent Reform activity, households may apply for a hardship review if their total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy. Section 8 participants who choose to rent housing where the total shelter costs exceed 50% of total monthly income at the time of initial lease-up in that unit will not generally qualify for hardship review; however, all households have the right to request a hardship and exceptions may be made. There were no hardship requests for this activity during FY2023.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Number of households with earned income did not meet benchmarks. Home Forward does not collect detailed employment data from SRO participants. The number provided reflects the total number of work-focused households, which can show a lower number of households than those that increased earned income.

18 Transfer of Project-Based Voucher Contract to Support Local Preservation or Development of Affordable Housing

Approved FY2019, Implemented FY2019

Home Forward works closely with local affordable housing owners and developers to preserve and increase the affordable housing stock in the community. For many property owners participating in our Project-Based Voucher (PBV) program, the ability to transfer an existing PBV contract to a new location before its expiration would greatly increase the owner's ability to expand the number of affordable units in the region. Currently, only a project owner that has completed a RAD conversion may request a contract transfer. Non-RAD PBV Project Owners have no such recourse.

Home Forward believes this situation discourages some property owners from entering a HAP Contract as it limits the property owner's ability to engage in short- and long-term development and planning. In addition, Home Forward is concerned that with the extreme pressures on Portland's housing stock, property owners may opt to not renew a HAP Contract, as witnessed in similar tight housing markets. Such a situation would create a significant increase in the number of existing households switching to tenant-based assistance. This increase would tie up valuable staff resources and reduce our ability to help new households off the waiting list. Fiscally, an unanticipated increase in tenant-based vouchers reduces our ability to predict costs and may require us to redirect resources currently allocated to opportunity neighborhoods.

Home Forward proposes to create a local Project-Based Contract Transfer activity for all non-RAD PBV property owners. This activity balances the needs to provide a streamlined process for PBV Project Owners with the need to ensure existing households retain their subsidy without impacting our ability to serve new households.

With Home Forward approval, a Project Owner may request a transfer of assistance after 5 years from the effective date of the initial HAP Contract. Home Forward may waive the 5-year requirement for properties for the following reasons:

- The agency or an affiliate holds ownership interest or manages the property;
- A transfer is needed sooner because of events such as eminent domain proceedings, natural disasters or unforeseen events; or
- HUD provides approval of a transfer for any other reason.

Home Forward may consider a partial or complete transfer of assistance to a new location if the new location complies with applicable site selection standards. If applicable, any lender and/or investor of the Covered Project must approve the transfer of the assistance. In the event of such transfer, the Project Owner may request, subject to Home Forward consent, that the original PBV Contract be modified or released to reflect such transfer of assistance.

Home Forward will only approve such a request where the following policy goals and technical requirements are met:

- The proposed new development must add or preserve affordable housing in the community;

MTW authorization:

- Attachment C, Section B(2) – Partnerships with For Profit and Non-Profit Entities
- Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project Based Program
- Attachment D, Section B(3) – Local Unit Based Subsidy Program

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choice for low-income families

- The proposed new development must otherwise comply with environmental review and subsidy layering review;
- Home Forward does not require a competitive process for the proposed new development as the initial PBV allocation removes the need for a subsequent competition. However, the proposed new development must meet all Home Forward’s Site Selection Standards as well as any appropriate laws and regulations.
- Tenants residing in subsidized units within the assisted development must be offered the option of retaining a project-based voucher subsidy pursuant to the following guidelines:
 - Tenants within the assisted development must be offered the option of moving to a comparable subsidized unit in the new or preserved development upon completion of purchase, rehabilitation, or construction, or to another comparable subsidized unit offered by the Project Owner;
 - Comparable units must adhere to all required rules and regulations regarding relocations and tenant moves. Home Forward will prioritize preventing moves to distant geographic areas and/or lower opportunity neighborhoods but believes this ultimate choice should be left to the tenant, as we recognize that they may have circumstances that make some areas more desirable.
 - If tenants decline to move, they may remain in the assisted development and the subsidy will remain in place until the subsidized tenant vacates the assisted unit, at which point the project-based voucher subsidy will be converted to the new development and added to the new PBV Contract;
 - Because the above requirements protect the ability of tenants to remain in their choice of PBV subsidized units, Choice-Mobility vouchers will not be available for tenants under this proposal as a result of the contract transfer.
- Rents and bedroom sizes must remain comparable between the assisted development and the new development to maintain stability in Housing Assistance Payment costs.

In addition to the criteria above, Home Forward retains full discretion to deny a transfer of project-based voucher assistance. The activity applies to all current and future properties under a PBV HAP Contract.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1) Note: Home Forward is unable to calculate anticipated costs absent the activity.				
Total cost of task	FY2018: \$0	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2) Note: Home Forward is unable to calculate anticipated costs absent the activity.				
Total time to complete the task	FY2018: 0 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Displacement prevention (Standard Metric: HC#4) Note: Number of households in a unit that has completed, or will complete, RAD conversion by December 31, 2018 used as a proxy for potential displacement absent the proposed activity.				
Number of households at or below 80% AMI that would lose assistance or need to move	FY2018: 903 households	FY2023: 0 households	0 households	Outcome Achieved

MTW Flexibility

Home Forward is utilizing our MTW flexibilities to give the agency authority to provide a contract transfer option to non-RAD property owners under a PBV contract and require Project Owners requesting a contract transfer to provide the same or better unit upon completion, as described above. The requested waiver authority will increase or preserve the number of affordable housing units in the community and decrease the number of households forced to move due to the contract transfer.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

19 Program Transfer Flexibility Bridge Approved FY2020, Implemented FY2020

Under current regulations, whenever an active household transfers from one Home Forward program to another (e.g., from Public Housing to a Housing Choice Voucher), agency staff is required to administer complicated waitlist preferences, assess eligibility, and perform a full certification of eligibility for that household. Depending on when the household's regular recertification is due, this means staff could be recertifying the household's continuing program eligibility shortly before or after the certification of eligibility for the new program, resulting in an expensive and unnecessary duplication of efforts. This issue has increased significantly with the agency's Rental Assistance Demonstration (RAD) efforts and has impacts on both staff and residents alike.

MTW authorization:

- Attachment C, Section C(5) – Ability to Certify Housing Quality Standards
- Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project Based Program

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures

The new Program Transfer Flexibility Bridge removes the requirement that staff run a full eligibility certification for households transferring between Home Forward MTW programs. Instead, staff will use information from the household's most recent recertification to determine eligibility. The household will retain their existing anniversary date, but otherwise be subject to all policies regarding income eligibility and recertifications in the new program. This initiative would also align waitlist preferences differently to ensure that program transfers occur more seamlessly without additional administrative burden.

In a sense, this is a temporary activity designed to bridge the period until Home Forward has converted all public housing to a voucher-based model, at which time all potential transfers will occur within the voucher program. By waiving the need for a full eligibility certification and utilizing existing data, and by aligning waitlists between programs, Home Forward will reduce the staff time and costs of running the same data multiple times within a short period and streamline the transfer process.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2020: \$6,007	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2020: 229 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3)				
Average error rate in completing task	FY2020: 7.5%	FY2023: 0	0%	Outcome Achieved

MTW Flexibility

Home Forward is utilizing our MTW flexibility to streamline the transfer process for households transferring from one Home Forward program to another by allowing staff to use information from the most recent recertification rather than duplicating efforts. This additional flexibility reduces staff time, resulting in greater cost effectiveness and increased housing choice for households.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

20 Local Inspection Policies
Approved FY2020, Implemented FY2021

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of Home Forward participants, residents, staff, and/or the general public, Home Forward may implement certain temporary changes to inspection protocols to ensure continuity of safe operations to the extent possible and practical. This modification is proposed in response to the current COVID-19 pandemic, which has created a need for physical and social distancing to protect against the spread of the disease. In compliance with the recommendations of the Centers for Disease Control (CDC), the “Stay Home Stay Safe” Executive Order issued by Oregon Governor Brown, and other guidance from local, state, and federal agencies, Home Forward is reducing contact between individuals, including closing offices to the public and reducing the number of employees in the office. As a result, Home Forward foresees that some operations may need to be modified and/or deferred to a later time. This activity will support the statutory objective: “Reduce cost and achieve greater cost effectiveness in federal expenditure” as demonstrated in the Activity Metrics section below.

MTW authorization:

- Attachment C, Section C(5) – Ability to Certify Housing Quality Standards
- Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project Based Program

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures

The proposed inspection protocols which Home Forward may implement are:

- Home Forward may extend the validity of a family’s most recently completed biennial HQS inspection by one year.
- The due date of the family’s next biennial HQS inspection would be one year from the original due date, and subsequent inspections would occur on a regular biennial schedule based on the new adjusted biennial due date.
- Home Forward will continue to perform emergency inspections and initial HQS inspections in un-occupied units.

In response to the COVID-19 pandemic, Home Forward has implemented HUD waiver HQS-5, which allows a delay of biennial inspections, and is authorized in HUD Notice PIH 2020-33 (HA) Rev-2, which was preceded by HUD Notice PIH 2020-05, HUD Notice PIH 2020-13, and HUD Notice PIH 2020-33(HA). HUD approved this activity on January 21, 2021, and Home Forward is using the authority granted in this activity to delay biennial inspections as outlined above. These temporary changes will be ended or adjusted as soon as it is safe, feasible, and practical to do so in the context of the COVID-19 public health emergency.

Home Forward may temporarily enact these protocols in the future in response to another local disaster, emergency, or other crisis to protect the health and/or safety of Home Forward participants, residents, staff and/or the general public.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2020: \$744,190	FY2023: \$0	\$0	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Total time to complete the task	FY2020: 7,730 hours	FY2023: 0 hours	0 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3)				
Average error rate in completing task	FY2020: 3.5%	FY2023: 3.5%	Less than 1%	Outcome Achieved

MTW Flexibility

Home Forward is utilizing our MTW flexibility to waive the requirement that public housing authorities inspect units not less often than biennially during the term of the Housing Authority Payment (HAP) contract. This additional flexibility results in greater cost effectiveness.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

21 Self-Certification of Income Approved FY2021, Implemented FY2021

As evidenced by the COVID-19 public health emergency, there are circumstances during which temporarily accepting self-certification of income is necessary to maintain efficient operations and promote housing stability. Home Forward implemented HUD waivers allowing self-certification of income in responses to the COVID-19 public health emergency provided in the current HUD Notice PIH 2020-33(HA) Rev-2 which was preceded by HUD Notices PIH 2020-05, PIH 2020-13, and PIH 2020-33 (HA). In the case that these waivers expire during the COVID-19 pandemic, Home Forward may continue to accept self-certification as the highest form of income verification to process annual and interim reexaminations. Home Forward may also accept self-certification of income as the highest form of income verification to process annual and interim reexaminations in response to future local, State, or National emergencies or disasters that result in significant barriers to households being able to access information from their employer to verify their income. This proposed activity will support the statutory objective: “Reduce cost and achieve greater cost effectiveness in federal expenditures” as demonstrated in the Activity Metric section below. The proposed protocols which Home Forward may temporarily implement in response to the COVID-19 and other local, state, or national emergencies or disasters are:

MTW authorization:

- Attachment C, Section D(3)(b) – Eligibility of Participants
- Attachment C, Section C(2) – Local Preferences and Admission and Continued Occupancy Policies and Procedures

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures

- *Annual Re-examination Income Verification (PH and HCV-3):* Home Forward may forgo third-party income verification requirements for annual reexaminations. Home Forward may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur over the telephone (with a contemporaneous written record by a Home Forward staff person), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. After a period of temporarily using this alternative flexibility, Home Forward will be responsible for addressing any material discrepancies that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool (IVT) shows that the tenant’s employment continued, Home Forward will take enforcement action in accordance with our policies and procedures. While HUD waives the use of EIV (e.g., HUD Notice PIH 2020-33 (HA) Rev-2, Home Forward may also forgo the use of EIV when doing annual re-examination income verification but must resume use of EIV when HUD waivers are no longer in effect.

The due date of the family’s next biennial HQS inspection would be one year from the original due date, and subsequent inspections would occur on a regular biennial schedule based on the new adjusted biennial due date.

- *Interim Re-examinations (PH and HCV-4):* Home Forward may forgo third-party income verification requirements for interim reexaminations. Home Forward may consider self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone (with a contemporaneous written record by a Home Forward staff person), through an email with a self-certification form by the family, or through other electronic communications. After a period of temporarily using this alternative flexibility, Home Forward will be responsible for addressing any material discrepancies that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool (IVT) shows that the tenant’s employment continued, Home Forward will take enforcement action in

accordance with our policies and procedures. While HUD waives the use of EIV (e.g., HUD Notice PIH 2020-33 (HA) Rev-2, Home Forward may also forgo the use of EIV when doing annual re-examination income verification but must resume use of EIV when HUD waivers are no longer in effect.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2021: \$127,195	FY2023: \$95,396	\$93,801	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2021: 3,027 hours	FY2023: 2,270 hours	2,208 hours	Outcome Achieved
Decrease in error rate of task execution (Standard Metric: CE#3)				
Average error rate in completing task	FY2021: 5.5%	FY2023: 3.5%	Less than 1%	Outcome Achieved
Increase in tenant share of rent (Standard Metric: CE#5)				
Note: Home Forward does not intend to have an agency cost savings from this activity.				
Total annual tenant share of rent	FY2021: \$37,942,344	FY2023: \$37,972,344	\$56,363,808	Outcome Achieved

MTW Flexibility

This proposed activity is authorized by MTW flexibility, specifically:

- Attachment C, Section D(3)(b): “The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations”; and
- Attachment C, Section C(2): “...the Agency is expressly authorized to adopt a local system of income verification in lieu of the current HUD system. For example, the Agency may implement alternate time frames for validity of verification or adopt policies for verification of income and assets through sources other than those currently allowed under the 1937 Act.”

This activity allows Home Forward to provide efficient service to people earning low incomes as needed, including during local, state, or national disasters that pose a risk to the health and safety of residents, participants, staff, and the community.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**22 Modernizing HCV/PBV Oral Briefings
Approved FY2021, Implemented FY2021**

Under 24 Code of Federal Regulations (CFR) 982.301, Public Housing Authorities are required to provide families eligible to participate in the voucher program with an “oral briefing”. During the COVID-19 public health emergency, Home Forward implemented HUD waiver HCV-2 provided in HUD Notice PIH 2020-05, which was extended and superseded by HUD Notice PIH 2020-13 and the current notice, HUD PIH Notice 2020-33(HA) Rev-2, allowing flexibility in how the required oral briefing for HCV and PBV households are conducted. Home Forward may conduct required oral briefings for new HCV and PBV households by other means including but not limited to situations when necessary to protect the health and safety of participants and staff due to local, state, or national state of emergencies or disasters. Home Forward also proposed to use this flexibility on a case-by-case basis if an individual or household faces extenuating circumstances that prevent them from coming to an in person oral briefing. In these individual cases, Home Forward will note the extenuating circumstances in the tenant file.

MTW authorization:

- Attachment C, Section B(1)(b) – Single Fund Budget with Full Flexibility
- Attachment C, Section B(1)(b)(iii) – Single Fund Budget with Full Flexibility

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures

These other means may include webcast, video call, or expanded information packet. Home Forward will ensure that the method of communication for the briefing effectively communicates with, and allows for equal participation of, each family member, including those with vision, hearing, and other communication-related disabilities, and ensures meaningful access for persons with limited English proficiency.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	FY2021: \$14,177	FY2023: Less than \$8,861	\$7,757	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	FY2021: 312 hours	FY2023: 195 hours	158 hours	Outcome Achieved

MTW Flexibility

This proposed activity is authorized by MTW flexibility, specifically:

- Attachment C, Section B(1)(b): “...the Agency can carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve greater cost effectiveness in Federal expenditures...” and
- Attachment C, Section B(1)(b)(iii): “The provision of housing or employment-related services or other case management activities, such as housing counseling in connection with rental or homeownership assistance, energy auditing, activities related to the provision of self-sufficiency and other services, employment counseling, education, training and other services related to assisting tenants, owners, contractors, and other persons or entities participating or seeking to participate in other housing or training and educational activities assisted pursuant to this section.”

This allows Home Forward to provide efficient service to people earning low incomes as needed, including during local, state, or national disasters that pose a risk to the health and safety of residents, participants, staff, and the community.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**23 Independent Entities: Use of Staff Instead of Third Parties for Home Forward Owned Properties
Approved FY2023, Implemented FY2023**

This activity consolidates and clarifies the scope of Home Forward’s use of staff rather than independent entities to perform various functions with respect to HCV or PBV units owned by Home Forward. The activity covers all such functions otherwise required to be performed by independent entities by applicable law, regulations, or notices. For PBVs, this includes all the functions listed in “Table 1: Overview of Independent Entity Functions” in Attachment B of Notice PIH 2017-21 (pp. 14-15), except for functions related to the voucher homeownership option.

MTW authorization:

- Attachment C, Section D(1)(f) – Property Eligibility Criteria
- Attachment C, Section D(2)(c) – Rent Policies and Term Limits
- Attachment C, Section (D)(5) - Ability to Certify Housing Quality Standards
- Attachment C, Section D(7) - Establishment of an Agency MTW Section 8 Project-Based Program

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures

Activity 08, Alternative Inspection Requirements for Partner-Based Programs, and Activity 10, Local Project-Based Voucher Program references use of staff for rather than independent entities in connection with. Both of those activities state that where Home Forward both owns and manages a unit, it hires a third party to conduct quality control testing of inspections and rent reasonableness determinations for a sample of these units. Home Forward continues that practice.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Prior to implementation: \$0	FY2024: \$88,466	\$61,402	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 1,697 hours	972 hours	Outcome Achieved

MTW Flexibility

This activity utilizes MTW flexibility to further streamline Home Forward’s use of staff rather than third parties for Home Forward-owned properties. This additional flexibility achieves greater cost effectiveness.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

24 Rent Assistance Termination Reform Approved FY2023, To Be Implemented FY2024

This activity authorizes Home Forward to adopt and implement policies that limit the circumstances in which Home Forward will terminate HCV assistance to recipients. This activity was the result of extensive resident, participant, and Home Forward staff collaboration through a work group that met for over a year and reviewed data on demographic disparities in program terminations. The work group members engaged the broader rent assistance department and key decision makers at Home Forward. This group's work resulted in a report entitled "Policy Recommendations—Rent Assistance Termination Policy" that included a summary of how the work group reviewed the rent assistance termination policies and HUD regulatory requirements with a racial equity framework and a goal of increasing housing stability for households who have a HCV.

MTW authorization:

- Attachment C, Section D(1)(h) added by the Ninth Amendment to Moving to Work Agreement – Policies for terminating program assistance

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choices for low-income families

As a result of this activity, Home Forward does not terminate HCV assistance to a recipient:

- If the owner evicts the household. Eviction and lease enforcement is a landlord/tenant issue. Home Forward's mission is to shelter people.
- If the household's income reaches the level where Home Forward will pay no subsidy (Housing Assistance Payments) on behalf of the family for 180 days. Home Forward allows an assisted household to go without assistance for 365 days prior to termination. . This gives households more time to complete an income recertification and regain assistance if they have a loss of income, thus promoting housing stability.
- Who are absent for 180 days from the assisted unit. Home Forward allows a recipient to be absent from the assisted unit for up to 270 days when the absence is due to attendance at specific institutional settings, as detailed in Home Forward's administrative plan, rather than at the overall regulatory limit of 180 days.

Activity Metrics

While no HUD Standard metrics would apply to this activity, Home Forward will track the number of households who retain housing assistance because of this activity.

MTW Flexibility

This activity relies on our MTW flexibility to provide greater housing choice for low-income households while also achieving cost effectiveness. This application of our MTW flexibility increases housing stability for households with rent assistance to advance Home Forward's mission.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**25 Preservation and Expansion of Affordable Housing
Approved FY2023, To Be Implemented FY2024**

This activity authorizes Home Forward to use MTW funding to preserve and expand affordable housing units in any manner that Home Forward judges most effective. Alternatives include direct grants, hard or soft loans, loan guarantees, property purchases, purchases of investor interests and others. This activity authorizes Home Forward to provide critical flexible assistance to affordable housing units serving households with incomes not exceeding 80% of the Area Median Income, which Home Forward is not subsidizing under the PBV or public housing program.

MTW authorization:

- Attachment D - Use of MTW Funds
- Attachment D, Section (B)(3) - Local Unit-Based Subsidy Program

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choices for low-income families

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Additional Units of Housing Made Available (Standard Metric: HC#1)				
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2024: 84 units	84 units	Outcome Achieved
Units of Housing Preserved (Standard Metric: HC#2)				
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	FY2024: 0 units	0 units	Outcome Achieved

MTW Flexibility

This activity utilizes our MTW flexibility to more flexibly respond to the need to preserve and expand affordable housing units. Especially for units serving households that are not already receiving subsidy, this additional MTW flexibility is critical to increase housing choice.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**26 Initial HQS Inspection and HAP Contract Execution
Approved FY2023, Implemented FY2023**

This activity authorizes Home Forward to use flexibilities granted by HUD during the COVID-19 pandemic to support households in leasing up with their voucher in perpetuity. Specifically, Home Forward:

- Executes the Housing Assistance Payment (HAP) contract within 120 days of the lease term. HUD initially granted PHAs this authority in waiver HCV-4, Notice PIH 2021-14(HA);
- Executes the HAP contract despite minor discrepancies between the lease and contract;
- Makes Housing Assistance Payments (HAP) to the owner before the Housing Quality (HQS) Inspection is complete as needed. Home Forward requires the owner’s self-certification that “the owner has no reasonable basis to have

knowledge that life threatening conditions exist in the unit or units in question instead of conducting an initial inspection.” For any unit for which Home Forward accepted an owner’s self-certification, Home Forward completes the initial inspection as soon as is reasonably possible, but no later than 60 days of the owner’s self-certification. While the HQS inspection is pending, a tenant may request an expedited inspection as a Reasonable Accommodation request or if the tenant makes a report of a life-threatening condition. If, upon inspection, a unit is found to not meet the HQS standards, Home Forward follows the process to enforce an owner’s obligation to comply with HQS standards outlined in Home Forward’s Administrative Plan including owner notification, reinspection, HAP abatement, and, in limited cases, termination of the HAPC. HUD initially granted PHAs the authority to do this in waiver HQS-1, Notice PIH 2021-14(HA);

MTW authorization:

- Attachment C, Section (D)(1)(a) - HCV Program Operational Policies and procedures
- Attachment C, Section (D)(5) - Ability to Certify Housing Quality Standards

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choices for low-income families

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Prior to implementation: \$0	FY2024: \$2,960	\$1,900	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 285 hours	59 hours	Outcome Achieved

MTW Flexibility

This activity applies our MTW flexibility to continue certain flexibilities granted during the Covid-19 pandemic to continue serving low-income households. This activity gives households more flexibility to access stable housing or stay assisted in current housing sooner.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

**27 Income Verification at Admission to Housing Choice Voucher Program
Approved FY2023, To Be Implemented FY2024**

This activity allows Home Forward to accept self-certifications and allows for the delay of receipt of documentation and/or third-party verification past the regulatory 60-day required time from all applicants to the HCV program. HUD provided a similar waiver with respect to the Emergency Voucher Program in Notice PIH 2021-15, Section 9.h. (pp. 32-33); Home Forward will consider that waiver language as general advisory guidance in connection with this activity.

MTW authorization:

- Attachment C, Section (D)(3)(b) - Eligibility of Participants

Statutory objective:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Increase housing choices for low-income families

The program regulations under § 982.201(e) require that the PHA must receive information verifying that an applicant is eligible within the 60-day period before the PHA issues a voucher to the applicant. For verification purposes, Notice PIH 2018-18 states that third-party generated documents be dated within 60 days of the PHA’s request.

For homeless families and other vulnerable HCV applicant families, documentation may not be readily on-hand and may be difficult to obtain quickly. Accepting self-certifications and allowing for the delay of receipt of documentation and/or third-party verification allows the family to obtain necessary documentation without unduly delaying the family’s housing assistance. This activity enables Home Forward to move more rapidly through intake and voucher issuance, allowing vulnerable families to lease up and increase their housing stability as they are collecting necessary documentation.

With self-certification, applicants submit an affidavit attesting to reported income, assets, expenses and known pending income that would affect an income eligibility determination. Self-certification serves as the highest form of income verification at admission and no additional third-party document is needed. After admission, when Income Validation Tool reports are available through EIV, Home Forward compares the reports to the participant’s self-certification. Any inconsistencies or discrepancies are addressed in accordance with Home Forward’s Administrative Plan, which may entail entering a repayment plan or termination, if found ineligible.

Additionally, applicants may provide third-party documentation that represents the applicant’s income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA’s request.

Activity Metrics

Metric	Baseline	Benchmark	Final Outcome	Outcome Achieved?
Agency cost savings (Standard Metric: CE#1)				
Total cost of task	Prior to implementation: \$0	FY2024: \$3,358	\$3,204	Outcome Achieved
Staff time savings (Standard Metric: CE#2)				
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 122 hours	80 hours	Outcome Achieved

MTW Flexibility

The additional flexibility enabled by this activity provides greater housing choice to low-income families by allowing Home Forward to accept self-certifications and delayed receipt of certain documentation, including from third parties. Applying our MTW flexibility in this way results in cost savings as well as greater housing choice.

Actual Non-Significant Changes

Home Forward made no planned or unplanned non-significant changes to this activity in FY2023.

Actual Changes to Metrics/Data Collection

No changes have been made to benchmarks, metrics, or data collection methodology.

Actual Significant Changes

Home Forward made no planned or unplanned significant changes to this activity in FY2023.

Challenges in Achieving Benchmarks and Possible Strategies

Home Forward had no challenges in achieving our benchmarks for this activity in FY2023.

Not Yet Implemented Activities

Activity 24 – Rent Assistance Termination Reform, Activity 25 – Preservation and Expansion of Affordable Housing and Activity 27 – Income Verification at Admission to Housing Choice Voucher Program will be implemented in FY2024.

Closed Out Activities

No Home Forward MTW activities were closed out in FY2023.

Activities Closed in Previous Years

Activity	Approved	Implemented	Closed Out	Reason for Close Out
Alternate Rent Calculation for Public Housing Units at Rockwood Station, Martha Washington, and Jeffrey	FY2011	FY2011	FY2012	This activity was discontinued on April 1, 2012 when our current Rent Reform activity was implemented and the units at those buildings shifted to the Rent Reform calculation.
Limits for Zero-Subsidy Participants	FY2010	FY2010	FY2012	This activity was discontinued on April 1, 2012 with the implementation of Rent Reform.
Limiting Portability in Higher Cost Areas	FY2013	Never implemented	--	Home Forward determined that the administrative costs to manage this activity would offset the proposed savings.
04 Bud Clark Commons	FY2010	FY2010	FY2014	Home Forward has determined that operations at Bud Clark Commons do not utilize MTW flexibility.
05 Biennial Inspections	FY2008	FY2008	FY2015	The FY2014 Appropriations Act allows all housing authorities to conduct inspections on a biennial basis. This activity no longer requires MTW flexibility.
12 Alternative Initial Housing Assistance Payment Policy	FY2015	--	FY2017	Home Forward determined that the policy may be an administrative burden and may cause unintentional delays in household lease-ups.

Section V. Sources and Uses of Funding

Sources and Uses of MTW Funds

Actual Sources and Uses of MTW Funding for the Fiscal Year

Home Forward submits its unaudited and audited information in the prescribed FDS format through the Financial Assessment System – PHA (FASPHA), or its successor system.

Activities that Used Only MTW Single Fund Flexibility

Replacement Housing Factor Funds /Demolition or Disposition Transitional Funding

Home Forward’s efforts to reposition its public housing portfolio can result in a formal disposition approval from HUD and then the sale of the asset. In these instances, Replacement Housing Factor (RHF) or Demolition or Disposition Transitional Funding (DDTF) funds are received by Home Forward as part of the Capital Fund Formula and used to create a new public housing unit. Home Forward utilized MTW authority to use these RHF or DDTF funds within its single fund flexibility to create new public housing units in a mixed-finance project. These funds provide a portion of the total development capital needed for a project. Given the development cash flow needs of any mixed-finance project, Home Forward may also

use the RHF or DDTF funds to repay construction financing. This would be done without formally pledging the future RHF or DDTF funds to the lender as collateral.

In September 2013, Home Forward proceeded with the disposition of four high-rise properties as part of our High-Rise Preservation Initiative. The properties are Hollywood East, Sellwood Center, Northwest Tower, and Gallagher Plaza, consisting of 654 public housing units. Home Forward anticipated receiving RHF or DDTF funds for these units and may utilize its MTW authority to determine the future use of these funds based upon the amount of the award and timing in which funds are received. As of FY 2019, Home Forward received two years of DDTF funds in the Capital Fund Program Grant and anticipates receiving three more years of DDTF funds for these public housing units. Home Forward may utilize its MTW authority to determine the future use of these funds based upon the amount of the award and timing in which funds are received. To date, none of the DDTF funds have been expended.

MTW Initiative Funds

Home Forward has created MTW Initiative Funds, comprised of MTW reserve funds in their entirety. This is a funding source to support initiatives that will advance the goals and objectives of MTW and Home Forward's Strategic Plan, as well as provide sufficient operating reserves for prudent financial management. Some of these initiatives are aspects of our MTW Activities, described earlier in this Plan.

Listed below are initiatives that only use single-fund flexibility:

- **Wealth Creation:** Wealth Creation initiatives help youth and adults improve their quality of life.
 - For adults: Wealth creation will include the following strategies: collecting information about families through an Employment and Training Interest Inventory; aligning existing self-sufficiency programs into a single program (GOALS) with site-based and non-site-based component; facilitating the hiring of low-income (Section 3) residents and participants by Home Forward and contractors; integrating Action for Prosperity into Economic Opportunity work. Ultimately, the goals for this initiative include increases in resident/participant earned income, increases in residents'/participants' contribution to rent, and residents/participants reaching a living wage if they exit housing subsidy.
 - For youth: Programming to attain education success and develop leadership skills.
- **Aging at Home Strategies:** Home Forward is developing and implementing initiatives to increase independence and a sense of community at properties that serve seniors and people with disabilities. We plan to continue administering the Congregate Housing Services Program at five properties and are evaluating expansion of this program at other properties.
- **Staff Training:** Home Forward's current strategic plan recognizes that how our work is done matters to our community and staff. To strengthen our relationship with the people we serve and with each other, Home Forward continues to re-evaluate best practices and approaches to offer relevant training for staff. Training includes trauma-informed practice, a recognized model that recognizes the impact trauma can have on people and commits to not repeating traumatic experiences. The goal is to provide staff with knowledge and tools suitable for their position to recognize symptoms of trauma and apply trauma-informed awareness in engaging in the work.
- **Security Deposit Assistance:** Home Forward uses single-fund flexibility to offer security deposit assistance to participants leasing up with Veterans Affairs Supportive Housing (VASH) vouchers. For homeless veterans, a lack of funds for security deposits is a serious barrier to successful use of VASH vouchers. Home Forward's funds are to be used only when the service agencies working with these populations are not able to otherwise arrange for deposit assistance.
- **Tenant Education Class and Deposit Assistance:** During FY2016, Home Forward entered a contract with a community-based tenant advocate organization, the Community Alliance of Tenants (CAT), to teach new and transferring HCV holders about their rights and responsibilities as tenants. Upon completing the class, voucher holders are given one-time access to \$200 in deposit assistance for their housing search. This partnership grew out of concern that in the rental market, and with the changes in Oregon landlord/tenant law, voucher holders need more education about how to be successful applicants and tenants.
- **Inter-jurisdictional Transfer Program for Survivors of Domestic Violence:** In collaboration with other MTW-authorized housing authorities and the local domestic violence service system, Home Forward has implemented an inter-jurisdictional transfer program to assist participants who are

survivors of domestic violence. The program ensures continued access to stable and safe housing when it is deemed necessary that the household move to another jurisdiction to avoid violence that is likely to become lethal or near lethal. A local domestic violence service provider has assigned two full-time advocates to work on-site with Home Forward participants and residents. The advocates can recommend voucher participants to this transfer program and provide assistance with relocation. Clients are connected with a local domestic violence agency in the new jurisdiction for support after their transfer. Home Forward allocates up to \$2,000 per household for relocation costs, for up to five households each year. In addition, Home Forward intends to absorb the vouchers of up to five families referred by partnering MTW agencies.

- **Expungement Partnership:** Home Forward is collaborating with Metropolitan Public Defender, a non-profit legal firm, to provide legal services to assist Home Forward residents, participants, and waitlist households with criminal record expungements along with consultation on any outstanding obligations to the court system. By reducing a barrier to housing and employment that is associated with a criminal background, Home Forward will help residents gain greater housing choice options in our community and ability for increased opportunity for work focused households to obtain employment. Home Forward also plans to see a decrease in administrative costs related to screening denials as an outcome of this project. Home Forward is using MTW Initiative Funds to support this program.
- **Affordable Housing Opportunities:** With incredibly low vacancy rates and a lack of affordable housing, Home Forward is dedicated to preserving and increasing the number of housing units in our community. Home Forward will use MTW Initiative Funds to leverage additional funding for the preservation of existing affordable housing and development of new affordable housing. By using methods such as site acquisition, predevelopment loans, and gap financing, Home Forward can invest in projects to expand the availability of housing that is affordable to families at different income levels in our community.
- **Grant Shortfalls:** A large share of tenant/resident services are funded from grants and foundations. These funds augment local funds to provide supportive services and self-sufficiency services to residents. To optimize available services, any costs not eligible for state and local grants will be funded by single-fund flexibility.
- **Emergency Fund:** In the event of an emergency that affects a family living in public housing's ability to live safely in their unit, funds exist to temporarily find safe housing in a hotel.
- **Landlord Portal:** Home Forward developed a portal to allow landlords to schedule inspections, view payment information, and communicate with Home Forward. Home Forward is still building out the ability to electronically process a Request for Tenancy Approval. It is our objective to streamline the process and reduce the time required to lease a home to a voucher holder.
- **MTW Operating Reserve:** Home Forward will set aside funds each year, as determined by the Board of Commissioners, towards building an Operating Reserve sufficient for Operating Expenses and Housing Assistance Payments.

LOCAL ASSET MANAGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

No

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

Yes

iii. Has the MTW PHA provide a LAMP in the appendix?

Yes

- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

Home Forward does not plan to make any changes in the Plan Year.

Section VI. Administrative

A. Reviews, Audits, and Inspections

Public Housing – The chart below lists the Public Housing properties that had REAC inspections in FY2023.

Peaceful Villa	84c
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Annual Program/Financial A-133 Audit – Home Forward’s Board of Commissioners accepted and approved the independent audit findings for FY2021 (covering the period of January 1, 2021 to December 31, 2021) in August 2022. There were no financial statement findings, questioned costs, or compliance findings.

B. Evaluation Results

There are no evaluation results to report on for FY2023.

C. MTW Statutory Requirement Certification



MEMORANDUM

To: Board of Commissioners Date: March 19, 2024

From: Terren Wing Director, Strategy & Federal Policy 503.802.8458 Subject: Authorization to Submit Moving to Work Twenty Fourth-Year Annual Report Resolution 24-03-04

The Board of Commissioners is requested to authorize Home Forward to submit the Moving to Work (MTW) Twenty Fourth-Year Annual Report to the Department of Housing and Urban Development (HUD).

OVERVIEW

As a housing authority with MTW designation, Home Forward is obligated to submit an annual report detailing its progress toward objectives proposed in its prior year's annual MTW plan. This year's report corresponds to Home Forward's fiscal year 2023 (January 1, 2023 – December 31, 2023). The report demonstrates that Home Forward continues to utilize its MTW flexibilities to reduce costs, increase housing choices for low-income families, and help move households toward self-sufficiency.

As prescribed by HUD Form 50900, the report includes certifications that Home Forward serves substantially the same population as it would absent the MTW flexibility. These certifications are included in the report and are incorporated into the resolution.

ATTACHMENT

FY2023 Annual Moving to Work Report



RESOLUTION 24-03-04

RESOLUTION 24-03-04 AUTHORIZES HOME FORWARD STAFF TO SUBMIT THE MOVING TO WORK TWENTY FOURTH-YEAR ANNUAL REPORT, WITH CERTIFICATIONS, TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

WHEREAS, Home Forward is obligated by its Moving to Work (MTW) agreement with HUD to submit an annual report detailing its progress toward objectives proposed in its prior year's annual MTW plan; and

WHEREAS, as part of its MTW reporting obligation, Home Forward certifies that more than 75% of families assisted by the Agency are very low-income families; that it continues to assist substantially the same total number of eligible low-income households as would have been served without MTW authority; and that it maintains a comparable mix of households as would have been served had the agency not participated in the MTW demonstration.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of Home Forward that staff is directed to submit this approved Moving to Work Twenty Fourth-Year Annual Report to the Department of Housing and Urban Development.

ADOPTED: MARCH 19, 2024

Attest:

Ivory N. Mathews, Secretary

Home Forward:

Matthew Gebhardt, Chair

D. MTW Energy Performance (EPC) Flexibility Data
Not applicable.

Appendix

Local Asset Management Plan

Home Forward Asset Management Program

The First Amendment to the Amended and Restated Moving to Work (MTW) Agreement allows Home Forward to develop a local asset management program for its Public Housing Program. The following describes Home Forward's asset management program and identifies where differences exist from HUD's asset management guidance.

Home Forward's Local Asset Management Program

Home Forward has operated a property/project-based management, budgeting, accounting, and reporting system for the past five years. Our project-based management systems include:

- Annual budgets are developed by on-site property managers. These budgets are reviewed and further consolidated into portfolio level budgets managed by housing program managers.
- Budgets at the property level are provided an allocation of public housing operating subsidy based on factors which differentiate subsidy based on building age, type, size, and relative poverty of the population of the various public housing properties.
- Weekly monitoring of occupancy by property, including notices, vacancies, and applicants, is published to the Public Housing management and Executive management.
- Monthly property-based financial reports comparing month-to date and year-to-date actual to budget performance for the current year are provided to site managers, portfolio managers, and the Director of Property Management. These reports are available to other management staff as needed to monitor specific properties.
 - Monthly reviews are held at the property level with Site Managers and their portfolio management.
 - Quarterly reviews of the Public Housing portfolio in its entirety are held at the division level with Property Management Director and Assistant Directors, as well as the Deputy Director and Chief Financial Officer. This review covers each property Net Operating Income and Cash Flow.
 - Home Forward applies the same project/program-based budgeting system and financial performance review to its Housing Choice Voucher program, local MTW programs, and non-federal programs and properties.

Home Forward's Cost Objectives

OMB Circular A-87 defines cost objective as follows: Cost objective means a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred. The Cost Objectives for Home Forward's asset management program are the organizational subdivisions:

- Public Housing properties - includes resident services and management staff directly supporting this program;
- Rent Assistance programs - includes management staff directly supporting this program and Family Self Sufficiency staff (including those supporting Public Housing residents)
- Moving to Work - includes activities related to our MTW agreement and local programs
- Integrated Facilities Services – includes maintenance staff for specialized maintenance services including those supporting maintenance for Public Housing units
- Resident Services – Family Self Sufficiency staff including those supporting Public Housing residents
- Affordable Housing
- Development

Home Forward's Treatment of Certain Costs

Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, Home Forward has identified all its direct costs and segregated all its costs into pools, as either a direct, direct allocated, or indirect allocated. We have further divided the indirect allocated pool to assign costs based on a relevant metric, as described in Attachment 1.

- **Integrated Facilities Services:** Integrated Facilities Services is the operating group for Home Forward's specialized maintenance services. IFS Maintenance performs services covering plumbing and electrical repairs, painting, and pest control, as well as garbage and recycling. Although these maintenance functions are performed centrally, the decisions and control remain at the property level as it is the property manager and/or housing program manager who determines the level of service required from the CORE maintenance group. All services are provided on a fee for service basis.
- **Procurement:** Home Forward has adopted procurement policies that balance the need for expedient and on-site response through delegated authorization to site staff for purchases under \$5,000. Purchases greater than this limit requires engaging central procurement. The Procurement staff is well trained in the special requirements of procuring goods and services for a federal program and provides necessary contract reporting requirements as well. Central procurement services are part of Home Forward's indirect overhead allocation.
- **Human Resources:** Along with the public housing program and its Section 8 voucher program, Home Forward has non-federal affordable properties, a development group, and locally funded rent assistance programs. Home Forward's Human Resources department serves the entire agency and certain human resource activities that HUD would consider a direct cost, such as recruitment and pre-employment drug testing and screening, are centralized and are part of Home Forward's indirect overhead allocation. Home Forward has determined that the cost of keeping extremely detailed records of HR activity for direct cost assignment exceeds the value received from such effort.
- **Information Technology:** Hardware and software costs will be directly charged to the appropriate cost objective when such costs are available and specific to that cost objective. When a reasonable measurement of such IT costs can be obtained, an allocation based on the number of users (computers, software applications, etc.) will be utilized to directly charge the cost objective.
- **Resident Services:** A large share of tenant/resident services are funded from grants and foundations and these funds augment local funds to provide supportive services and self-sufficiency services to residents. To optimize available services, any costs not eligible for state and local grants will be funded by Home Forward's public housing properties and housing choice voucher program.
- **Rent:** Home Forward charges rent to each cost objective based on the space they occupy in our central office building. Rent is based on estimated costs and adjusted for actual costs at year-end.

Home Forward's Treatment of Public Housing Operating Subsidy

Home Forward's flexibility to use MTW funding resources to support its low-income housing programs is central to our Asset Management Program. Home Forward will exercise our contractual authority to move our MTW funds and project cash flow among projects and programs as the Authority deems necessary to further our mission and preserve our low-income housing assets and local programs.

Home Forward's Indirect Cost Allocations

Costs that can specifically and efficiently be identified to a cost objective are counted as direct costs to that objective. Costs that cannot be readily or efficiently identified as specifically benefiting a cost objective will be considered indirect and allocated. The Home Forward Allocation Process – Process Flow Diagram shown at the end of this policy is a graphic representation of Home Forward's allocation methodology. Home Forward has determined that some costs, defined as "direct costs" by HUD for asset

management, require effort disproportionate to the results achieved and have included those costs as part of the indirect cost pool allocated to cost objectives as overhead.

Home Forward Indirect Costs

OMB Circular A-87 defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Home Forward's indirect costs include, but are not limited to:

- Executive
- Policy & Planning
- Accounting & Finance
- Purchasing
- Human Resources, including job applicant screening, payroll, labor negotiations & organization wide training
- Information Technology: costs not specifically identified and charged as a direct expense to a cost objective

Differences – HUD Asset Management vs. Home Forward Local Asset Management Program

Home Forward is required to describe in the MTW Annual Plan differences between our asset management program and HUD's asset management program as described in HUD's Financial Management Guidebook. Below are several key differences:

- HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Public Housing (PH) property level and voucher program. Home Forward has implemented an indirect allocation methodology that is much more comprehensive than HUD's asset management system which includes all of Home Forward's cost objectives listed above.
- Home Forward has defined the treatment of direct and indirect costs differently than HUD's asset management program. From the agency perspective, we view the program operations management as direct costs of the program.
- These differences include, but are not limited to:
 - HUD Indirect/Home Forward Direct:
 - Portfolio and program ("regional") management, including hiring, supervision and termination of frontline staff is considered a direct cost. These costs are pooled and then allocated to each property based on units, vouchers, or other relevant metrics. Work with auditors and audit preparation by HCV and PH staff is considered a direct expense. Executive management is considered an indirect cost.
 - Storage of HCV and PH records and adherence to federal and/or state records retention requirements will be considered a direct cost of the program.
 - Development and oversight of office furniture, equipment and vehicle replacement plans will be considered a direct cost of the program.
 - Advertising (notification) costs specific to HCV, including applicants and landlords, will be considered a direct expense.
 - HUD Direct/Home Forward Indirect:
 - Advertising for new hires will be considered indirect and allocated to the program and properties.
 - Staff recruiting and background checks, etc. will be considered indirect and allocated to the program and properties.
 - Other:
 - Using MTW authority to improve efficiencies across programs, all staff associated with the Family Self Sufficiency program, regardless of serving public housing or housing choice voucher residents, will be considered a direct cost of the housing choice voucher program.
 - Preparation and submission of HCV and public housing program budgets, financial reports, etc. to HUD and others will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by

program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.

- Investment and reporting on HCV proceeds will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.
- HUD's rules limit the transfer of cash flow between projects, programs, and business activities. Home Forward intends to fully use its MTW resources and flexibility to move project cash flow among projects as locally determined and use MTW funding flexibility to provide additional funding to public housing properties when appropriate and necessary to provide for and preserve our public housing assets.
- HUD's rules provide that maintenance staff be maintained at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, and asset preservation work.
- HUD's rules provide that purchasing is performed at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central purchasing, depending on the total cost of procurement and complexity of applicable procurement laws and reporting requirements.
- HUD intends certain property management activities to be at the property level. Home Forward has centralized selected property management functions, including but not limited to denial hearings, occupancy management, transfers, reasonable accommodations, auditing, training, compliance, and some waitlist management, and will allocate these costs as a direct expense to the properties based on a relevant metric such as units.
- Home Forward employs its own development staff. Any work on Public Housing Capital projects will be subject to a cost recovery fee paid from the capital fund to cover costs of development staff engaged in such capital projects.

Balance sheet accounts

Most balance sheet accounts will be reported in compliance with HUD's Asset Management Requirements, and some will deviate from HUD's requirements, as discussed below:

- Cash
- Restricted Cash
- Petty Cash
- Investments
- Selected Prepaid Expenses and Deferred Charges
- Selected Accrued Liabilities
- Payroll Liabilities
- Compensated Absences
- Other Post-Employment Benefits (OPEB) Liability
- Pension Liability (GASB 68)
- Deferred Inflows of Resources – Pension (GASB 68)
- Deferred Outflows of Resources – Pension (GASB 68)
- Unrestricted and Restricted Net Assets

Home Forward's asset management program will maintain the above balance sheet accounts centrally. Maintaining these accounts centrally has proven to be the most cost effective and least labor-intensive method ensuring efficient accounting operations and ultimately reducing costs charged to the programs. This deviates from HUD's asset management requirements as these accounts will not be reported at the AMP or program. Additionally, the centralization of cash and investments is in keeping with the single fund precept of our MTW authority. For those balance sheet accounts that are originated from expense entries, the related expenses will continue to be reported as an expense to the appropriate program, department and AMP-based income and expense statement through direct charges or allocations.

The agency is continually reviewing our asset management practices and will likely revise our approach over the coming years.