

# PHA Name : Ha City Of Spokane

**PHA Code :** WA055

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

The Spokane Housing Authority (SHA) is pleased to start its Moving To Work (MTW) demonstration program in 2023. Creating vibrant communities where people thrive is SHA's vision for MTW. With the flexibility and new tools provided by MTW, SHA will be able to assist our participants in reaching for what is possible and improve their quality of life.

This marks the beginning of a five-year project on Landlord Incentives for an overall MTW term of 20 years. All MTW initiatives will be combined with a commitment to seek and end racial and other demographic characteristics as determinates of success. SHA will continue to develop additional local strategies during our participation in MTW, learning from our experiences and other MTW agencies.

This Supplement outlines the MTW waivers SHA will implement and the proposed benefits to the Authority or participants for the period from January 1, 2023 through December 31, 2023.

SHA creates and adopts a Public Housing Authority Annual Plan (PHA Annual Plan) to describe new and ongoing activities with our awarded federal resources. The Annual Plan is subject to public review and comment and board approval before submission to HUD. This supplement is submitted with the SHA Annual PHA Plan. Then, HUD approves the Annual Plan and supplement so SHA can move forward with those new activities.

In this inaugural year, SHA plans to implement five MTW activities, which will reduce administrative barriers and expand landlord participation. Of SHA's five total MTW activities for 2023, one of the MTW activities is centered on efficiency of program staff and cost effectiveness. The other four will focus on improving our relationships, participation, and coordination with landlords to increase housing choice for low-income program participants in the Housing Choice Voucher (HCV) program.

### **Move to Work Statutory Objectives**

SHA will braid the identified priorities with the three statutory objectives of MTW:

#### **1. Cost Reduction and Effectiveness**

SHA will adopt policies to streamline annual reviews, adopt relevant waivers, and assist in building new or existing programs to reduce both tenant rent and SHA costs, and creatively increase units in a resource-scarce housing market. Participant, resident, and community partnerships will be vital in this process and SHA will ensure full engagement of various stakeholders. These policy and procedural changes will also assist SHA in furthering our Affordable Impact and Housing Supply strategic priority. All cost savings efforts will allow us to reallocate additional funds to increase housing supply and affordability for participants.

#### **2. Incentivizing Educational and Job Opportunities**

Spokane boasts a large number of local Universities and Continuing Education Learning Centers. SHA will work with these partners to incorporate pathways for families seeking educational opportunities, thereby increasing their overall income potential and housing stability.

The landlord and inspection waivers through MTW will allow families to move to High Opportunity Areas, where increased educational and job opportunities exist.

As the housing market begins to cool down, we will also look at ways to better enhance our Homebuyer Program for existing voucher holders. We will leverage existing partnerships with organizations assisting first-time homebuyers (Habitat for Humanity, Spokane Neighborhood Action Partners, Spokane Low Income Housing Consortium, etc.). While home buying may not be desirable for all families, it is a critical one for long-term stability.

#### **3. Housing Choice and Mobility Initiatives**

SHA will focus on increasing voucher participation in High Opportunity Areas by way of new landlord incentives offered through MTW. In addition, our Landlord Liaison will assist our voucher holders in identifying areas that have historically been unattainable to households on a fixed-income, underemployed, or unemployed. SHA will incorporate our Housing Supply objectives outlined in our Strategic Plan as a foundation to identify sites located in opportunity areas for future buildouts.

The first MTW year will focus on implementing practical short-term initiatives like first-time landlord bonuses, additional updates to SHA technology, and new data systems. We will establish more robust reporting and client relationship management systems that will enable future MTW initiatives like client portal and electronic lease-up processes. SHA will continue to work collaboratively with participants and community stakeholders to achieve MTW goals and our vision.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

### C. MTW Activities Plan that Ha City Of Spokane Plans to Implement in the Submission Year or Is Currently Implementing

#### 3.d. - Self-Certification of Assets (HCV)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

At reexamination, SHA will allow participants to self-certify their assets in an amount up to \$50,000. This activity reflects an administrative streamlining objective to save staff time and resources, speed the process of reexaminations, and reduce the time and personal cost to participants on retrieving asset documentation.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This is the first year of implementing this program.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

#### 4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

SHA will provide qualifying landlords a "bonus" payment of up to one month's contract rent as an incentive to participating in SHA's Housing Choice Voucher Program (HCV). SHA plans to implement a range of bonus payment types to increase the number of participating landlords, increase the number of units in high opportunity areas, and increase the longevity of landlord participation with SHA.

The following landlord incentive payments are proposed for this plan year, subject to availability of SHA funding, program reserves and Board approved annual budget authority:

- New Landlord Bonus:

A one-time bonus of one-month contract rent for a landlord or property owner who has never participated as a landlord in HCV.

- Welcome Back Bonus:

A one-time bonus of one-month contract rent to a landlord or property owner who left the HCV program for at least 24 months and is now returning.

- Opportunity Area Bonus:

A one-time bonus of one-month of contract rent for owners who submit a RFTA and lease a new unit to an HCV participant in an opportunity area (must have poverty rate of <20%).

- Security Deposit Assistance:

Voucher holders may request up to one month's contract rent or the requested security deposit (whichever is less) if they meet the McKinney-Vento definition of homeless and they are unable to access other community resources.

• **Application Fee Assistance:**

Voucher holders may request one-time assistance with application fees of up to \$50.

SHA will continue to work with its MTW Advisory Committee, staff, and other community stakeholders to finalize incentive payment eligibility criteria and guidelines, and to ensure responsible stewardship of funds.

This MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. SHA will provide the landlord bonus incentives for all HCV tenant-based units with the exception of SHA owned properties that accept HCV's. It does not apply to Project Based Voucher units.

Incentive payments are limited to a one-time payment that cannot exceed the cost of one month's rent per the established HAP contract. Recipients of one bonus incentive type may not receive an additional payment under another category of incentive. All landlord incentive payments provided under this activity are subject to the availability of SHA funding, program reserves and Board approved annual budget authority and are subject to change. SHA will communicate any such changes in the availability of landlord incentive payments or impact to this program through its website, social media, and any other method necessary to notify the public.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

This MTW activity applies to specific tenant-based units but NOT properties with project-based vouchers. SHA will provide the landlord bonus incentives for all HCV tenant-based units with the exception of SHA owned properties. To reiterate - It does not apply to Project Based Voucher units.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This is the first year implementing this program.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

Certain types of units only

**What is the maximum payment that can be made to a landlord under this policy?**

One month's contract rent, the requested security deposit, or application fees up to \$50.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

#### **5.a. - Pre-Qualifying Unit Inspections (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The PHA may allow units to be pre-inspected for Housing Quality Standard (HQS) approval, to accelerate the lease-up process and minimize the landlord's lost revenue during a period of vacancy. The pre-inspection must happen within 90 days before the HCV participant begins occupancy of the unit, and HQS Standards will not be altered. The participant may request an interim inspection.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This is the first year implementing this program.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

#### **5.d. - Alternative Inspection Schedule (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

SHA will implement an alternative HQS inspection schedule. Typically, HCV units must be inspected bi-annually. Under this MTW activity, units can be inspected less frequently but must be inspected at least once every three years. Per current regulations, HQS Standards will not be altered, a third-party will continue to perform HQS inspections of SHA-owned units, and the participant may request an interim inspection.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue; Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This is our first year implementing this program.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	<b>Total Local, Non-Traditional Households</b>	<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<p><b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No</p> <p><b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> No plans at this time.</p>	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if Population Type is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	<b>0</b>

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	No known evaluations.

**MTW CERTIFICATIONS OF COMPLIANCE*****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning ( 01/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Spokane Housing Authority

WA055

***MTW PHA NAME***

***MTW PHA NUMBER/HA CODE***

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Pamela Parr

Executive Director/Secretary of Board

***NAME OF AUTHORIZED OFFICIAL***

***TITLE***



Mar 1, 2023

***SIGNATURE***

***DATE***

***\* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

## **Summary of Public Comments Received on Proposed Annual Plan & MTW Supplement**

The Spokane Housing Authority (SHA) held a series of public meetings to receive comments and recommendations to help develop the FY 2023 Annual PHA Plan and MTW Supplement. The public meetings (also referred to as “listening sessions”) occurred on the following dates:

- Monday, August 1, 2022
- Wednesday, August 3, 2022
- Thursday, August 4, 2022
- Thursday, August 18, 2022

Each of these meetings took place at 3:30 p.m. in a hybrid format, both in-person at the SHA Board Room (25 W. Nora Ave., Spokane, WA 99205) and online via Microsoft Teams. Attendees included SHA staff, members of the SHA Board, program participants and tenants, landlords, partner organization representatives, and members of the general public.

At each of these listening sessions, SHA staff members delivered a presentation on SHA’s participation in the MTW Expansion demonstration program as well as planned activities for the following year. Attendees provided comments throughout these sessions with additional comments received through an online form posted on the SHA website. A summary of these comments is included in the following section. Presentation slides are also available on the SHA website at [spokanehousing.org/mtw](http://spokanehousing.org/mtw). Additional public meeting materials, including session recordings and detailed polling data are available upon request.

These comments helped inform the development of the FY 2023 Annual PHA Plan and MTW Supplement, which was publicly posted on August 28, 2022. In response to the comments referenced below, SHA staff have updated certain aspects of the proposed MTW activities, and developed additional proposed activities not initially included within the August 28 draft plan.

Additional activities proposed in response to public comments include new types of assistance provided under the “Other Landlord Activities” MTW Activity, such as one-time payments to prospective landlords for application fees or deposit assistance.

### **Public Meetings**

Following is a summary of major themes and comments provided during the course of each public listening session. Sessions were promoted through SHA’s social media channels, via email through SHA’s contact listings, and through additional contacts with HCV participants in-office or through staff communications with partners.

While each session was open to the public, SHA conducted targeted outreach for each session to especially encourage a broad range of attendees and help spur discussion with different groups of stakeholders in our community.

#### **1. August 1, 2022: Project Based Voucher (PBV) Partners**

Attendees for this meeting included SHA staff, SHA Commissioners Keith James, Jo Straight, and Randy Bustamante, a private apartment manager, and a representative from Catholic Charities of Eastern Washington.

Attendees took part in an online poll and expressed that major challenges to accessing affordable housing in the area were primarily due to the high cost of rent in Spokane. Additional comments and recommendations included improvements in timely communication with landlords and additional outreach to private landlords not currently participating in the Housing Choice Voucher (HCV) program.

A majority of attendees indicated the greatest need for change within SHA centered on the typical time required for SHA processes throughout the lease-up process. Specific areas of concern included the length of time taken to process Request for Tenancy Approvals (RFTAs) and Housing Assistance Payments Contracts. Attendees expressed that these delays contributed to the difficulty participants had in finding available units and moving in, which also negatively affected landlords' ability to receive Housing Assistance Payments (HAP) quickly enough to satisfy their financial obligations each month. Attendees noted that improvements had been observed in SHA's outreach in recent years and that efforts had been made to address issues surrounding delayed or incorrect HAP payments.

On the topic of potential landlord incentives for SHA's first year as an MTW agency, attendees recommended incentive payments similar to both the Emergency Housing Voucher (EHV) program, the Washington State Mitigation Fund.

## **2. August 3, 2022: Referral Partners**

This session focused on organizations currently partnered with SHA to provide referrals for HCV assistance, primarily local service providers and their clients. Attendees included SHA staff, representatives from Goodwill Industries of the Inland Northwest, YWCA Spokane, and other housing program staff from similar groups.

Attendees took part in an online poll and as in the previous session, identified rising rent costs as one of the most significant barriers to housing locally. Additional comments were expressed on SHA's eligibility requirements, a lack of understanding on all available SHA assistance and programming, and some specific questions on SHA internal processes. Attendees also noted the difficulty some low-income families, particularly clients of the organizations represented in the session, face in meeting eligibility requirements for the HCV program and the selection criteria used by local landlords. Common issues identified included lack of documents, poor credit, poor rental history, and insufficient funds for application fees, deposits, and other nonrefundable moving costs.

Recommendations for SHA included process and program changes designed to increase the number of applicants eligible for SHA assistance, as well as suggestions for incentives to reduce cost burdens on incoming renters and attract more private and corporate landlords accepting vouchers. One additional recommendation included a request that SHA provide appropriate compensation to those volunteers serving on the MTW Advisory Committee with lived experience (SHA voucher participants or tenants). This recommendation noted that SHA participants face additional hardships taking time off work, making child care arrangements, and would otherwise be uncompensated for their time and work with the committee, unlike representatives employed by partner organizations within the committee.

## **3. August 4, 2022: Landlords**

This session included targeted outreach to landlords participating in the HCV program, as well as local trade organizations representing property owners and landlords in the region. Attendees included representatives from the Landlord Association of the Inland Northwest, Goodwill Industries of the Inland Northwest, Urban Settlements, and private property owners not yet participating in SHA's programs.

Attendees indicated through discussion and partially through an online poll that the most significant local challenges for accessing quality, affordable housing included rising costs, insufficient HAP payment standards and/or wages, and local market conditions that do not support lengthy paperwork or processing times. Attendees noted that times required from initial interest with a potential tenant and actual time of move-in varied greatly for SHA voucher-holders, and that delays in receiving rental income discouraged owners from participating. The Landlord Association and Housing Navigators highlighted that smaller property owners were especially disadvantaged in relying on less volume of units than larger property management companies.

Recommendations for landlord incentives included support for bonus payments provided for incoming landlords who had not previously participated in SHA's voucher program. Additional input recommended that SHA collaborate with local trade groups and other housing stakeholders to issue a survey of renters and landlords in the area. Survey data could be used to further develop different types of incentives and assess the relative value of each proposed incentive. Attendee recommendations also included partnering with the City of Spokane to align and enhance MTW activities with the new incentives available under the City's Housing Action Plan. Additional outreach and education on all available housing assistance, for low-income renters and potential new HCV landlords was suggested as a meaningful step toward addressing local challenges in understanding and accessing resources (City, Department of Commerce, homelessness services providers, and SHA programs).

#### **4. August 18, 2022: MTW Advisory Committee**

This listening session was targeted to potential members of the MTW Advisory Committee, and attendees included SHA staff, SHA Commissioners, the Landlord Association of the Inland Northwest, Goodwill, Housing Navigator, HCV participants, and representatives from the Department of Commerce, the VA's VASH Program, the Spokane County United Way, and communication action centers staff from surrounding rural counties.

Attendees discussed and provided verbal input on the course and direction that SHA could take with its new MTW Advisory Committee. Suggestions ranged from utilizing the committee to centralize stakeholders in the region and collaborating with other local coalitions involved broadly in addressing the housing crisis. Attendee recommendations also included additional outreach to SHA residents to provide invaluable perspectives and actionable advice on future changes to SHA processes and interactions with landlords.

Attendees also discussed recent trends in local rental practices that may be contributing to housing inequality, such as only providing month-to-month leases and Voucher Payment Standards that have not kept pace with record increases for rentals across the region.

Options for how MTW flexibility may be utilized to increase SHA's HAP payments, making sure incentives provided to landlords under MTW come with ethical and equitable eligibility criteria, measures for assessing effectiveness, and provisions for addressing potential "bad actors" who violate program requirements were all discussion topics. Attendees also recommended that SHA staff continue to work with MTW Advisory Committee members to develop safeguards for tenants of units owned by landlords receiving any bonus payments.

### **Online Form Responses**

As of this date, SHA has received one public comment via the "SHA Speaks Feedback Form," which is an online form posted on the SHA website ([www.spokanehousing.org](http://www.spokanehousing.org)). The commenter requested assistance on a personal case issue relating to missed lobby hours at the SHA office.

The comment was provided to the Customer Service Manager for additional follow-up on the commenter's request.

### **Mailed Comments**

SHA received one written public comment sheet by mail on August 24, 2022. The anonymous comment recommended that communication with landlords should be improved to ensure timely, predictable follow-up. The comment stated that previous experiences included long delays in hearing back on paperwork submitted for RFTA and sometimes receiving no update on their unit inspections. The comment recommended that customer service standards be elevated across the agency to better support local landlords in helping SHA voucher-holders move into units and maintain their housing assistance.

***NOTE:*** *This summary will be updated to include any additional public comments received up to the closing of the public review period at 5:00 p.m. on Wednesday, October 12, 2022.*

Spokane Housing Authority  
Moving to Work Supplement  
Public Notice and Hearing Documentation

Public notice for the MTW supplement was posted on January 11, 2023 for the required 45 day public review period.

A public hearing occurred on February 27, 2023 at 3:30 P.M. during a regular board meeting. No comments were submitted and no members of the public attended the public hearing on February 27<sup>th</sup>. Those in attendance were Spokane Housing Authority staff and Board Members, as follows:

- Besse Bailey, Chair
- Joycelynn Straight, Vice Chair
- Kai Nevala, Commissioner
- Randy Bustamante, Commissioner
- Jenny McClenathen, Commissioner
- Marcus Kelsey, Commissioner
- Kammi Smith, Counsel
- Pam Parr, Executive Director
- Arielle Anderson, Director of Housing Assistance Program
- Brian Jennings, Housing Development Director
- Kathy Clark, Controller
- Reid Wells, Human Resources Manager
- Amanda Carpentier, Executive Assistant