

PHA Name : Ha City Of Spokane

PHA Code : WA055

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2024

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 continue its Moving To Work (MTW) demonstration program in 2024. 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 second year 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.

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.

This Supplement outlines the existing MTW waivers approved and implemented in 2023 and proposes two new waivers to be implemented during 2024.

Strategic Planning & MTW

In 2022, SHA completed a comprehensive strategic planning effort to revisit the agency's guiding values and chart a path for the next five years. We incorporated extensive staff, participant, and community partners' feedback to help guide the agency for the next several years. SHA's resulting strategic plan includes five priorities that closely align with MTW goals, and reflect a commitment to making meaningful change in our area:

- Affordable Impact
- Customer Service
- Housing Stability and Client Success
- Housing Supply
- Relationships

In 2023, SHA initiated five MTW activities, which began a path to reduce administrative barriers and expand landlord participation. SHA's two new activities for 2024 are centered on cost effectiveness and expanding housing opportunities for low-income households.

Move to Work Statutory Objectives

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

1. Cost Reduction and Effectiveness

SHA has adopted 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 is focused 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.

We are focused on testing 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).

1. Tenant Rent Policies	
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
2. Payment Standards and Rent Reasonableness	
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)	Plan to Implement in the Submission Year
3. Reexaminations	
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)	Currently Implementing
4. Landlord Leasing Incentives	
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)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Currently Implementing
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
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
10. Family Self-Sufficiency Program with MTW Flexibility	
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
11. MTW Self-Sufficiency Program	
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
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
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
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
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

2.d. - Rent Reasonableness – Third-Party Requirement (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 use its own trained employees in the Housing Choice Voucher (HCV) Program to perform rent reasonableness determinations for project based voucher units that are PHA owned, managed, or controlled, using AffordableHousing.com or another similar independent third-party online comparability site to gather appropriate data. At HUD's request, SHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.

Quality Assurance Method: For quality assurance purposes, we will utilize an online rent comparability service (currently AffordableHousing.com) to pull at least three comparable rental units and ensure that rent reasonableness is based on objective third-party data regarding comparable rents in our market. Unit description data will be entered and results determined by our trained inspection staff. Rent reasonableness will not be determined by staff on the property management team. At least 10% of the resulting rent reasonableness determinations will be reviewed for accuracy and reasonableness by a senior HCV staff member. We will make available the method used to determine that rents charged

by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.

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.

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

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

No

Please explain or upload a description of the quality assurance method.

Quality Control Policy

A SHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS. The unit sample must include only units that have been inspected within the preceding three months. The selected sample

should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

SHA Rent Reasonableness Policy

The SHA will continue to use an internet-based rent reasonability database provided by a third party vendor to establish and document the rent reasonableness determination and to maintain data on market rents in the SHA's jurisdiction. The database uses an automated valuation model to identify and compare the program unit to the most similar private market rental property units within a specific geographic radius, drawing on a database of non-subsidized comparables and current property listings.

The database uses eight comparability factors: location, size, type, quality, and any amenities, housing services, maintenance, and utilities provided by the owner. The rent reasonableness system will make automatic adjustments to comparable units based on variations between the subject unit and the comparable unit. In instances where sufficient

comparable unit data is not available through SHA's third party vendor, SHA will collect sufficient information on rents from nearby unsubsidized rental units AND from unassisted units at the subject property (similar in type, size, quality, amenities and services) to determine rent reasonability.

Generally, a rent reasonableness comparability should have at least 80% similarity to be a valid sample. All relevant data used to make the rent reasonableness determination must be documented in the file.

No document is attached.

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 was implemented 1/1/23.

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 and will be made once the HAP contract is executed. 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 all tenant-based 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.

- Landlord Incentive internal procedure, forms and marketing materials were developed.
- Implementation of Landlord incentives initially rolled out as a "soft opening" in November, 2023. Incentives

Announcement and emphasis to occur in January 2024.

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?)
To all units
What is the maximum payment that can be made to a landlord under this policy?
Up to one month's contract rent.
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?
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.
Our current plan is: January 1, 2024: Begin roll out of PBV Units for Prequalifying Inspections. July 1, 2024: Begin roll out of HCV Units for Prequalifying units.
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)
<p>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</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>January 1, 2024: Begin this incentive for all NEW ADMISSIONS beginning January 2024.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

17.c. - Housing Development Programs
<p>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</p> <p>SHA Housing will use MTW funds to acquire renovate and/or build units for low-income families that are not public housing units or Housing Choice Voucher Units. Activities will include gap financing for development of affordable housing and tax credit partnerships. Initial development projects include:</p> <ul style="list-style-type: none"> • Reimagining Cornerstone Courtyard, Agnes Kehoe Place, and the Pearl on Adams, a tax-credit partnership portfolio recapitalization. • Acquisition, recapitalization and preservation of a 288 unit project serving households at or below 60% of AMI. <p>SHA will not spend more than 10% of its annual HAP budget on this program, alone or in combination with other local, non-traditional activities. Families receiving housing through this local, non-traditional activity shall meet the HUD definition of low-income (income at or below 80% of AMI). Activities will be subject to PIH Notice 2011-45 or any successor notice/guidance from the HUD MTW Office. SHA will comply with any applicable provisions of Section 30 of the 1937 Housing Act. Any MTW funds awarded to a third-party provider will be through a competitive procurement process. These activities will be funded initially from unused HAP funds currently in HUD-Held Reserves to minimize any impact on voucher utilization. Applies to: All family types, with priority for current residents of existing properties to be redeveloped.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>

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.

Proposed Activities:

- Reimagining Cornerstone Courtyard, Agnes Kehoe Place, and the Pearl on Adams, a tax-credit partnership portfolio recapitalization.
- Acquisition, recapitalization and preservation of a 288 unit project serving households at or below 60% of AMI.

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

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).				
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? Yes</p> <table border="1" data-bbox="214 1243 1523 1287"> <thead> <tr> <th data-bbox="214 1243 760 1287">Title</th> <th data-bbox="760 1243 1523 1287">Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td data-bbox="214 1287 760 2018"> </td> <td data-bbox="760 1287 1523 2018"> </td> </tr> </tbody> </table>	Title	Supporting Documents Attached		
Title	Supporting Documents Attached				

E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	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.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. 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.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		0
49%-30% Area Median Income		0
Below 30% Area Median Income		0
Total Local, Non-Traditional Households		0

*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.

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. We do not currently have plans.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
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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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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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	0

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.	

I.	Evaluations.
No known evaluations.	

Cohort Specific Waivers

COHORT 4.1 -

Waiver of Mandatory Initial Inspection (HCV)

A unit must pass HQS inspection before an HCV participant can move into the unit. This MTW waiver and associated activity eliminates that requirement for an initial inspection under certain circumstances.

Under this activity, SHA will not require initial HQS inspections for units meeting at least one of the following criteria: a) the unit is less than five years old (as demonstrated by a certificate of occupancy, provided by the landlord); b) the unit passed an HQS inspection (or equivalent inspection) within the previous three years; or c) the unit is located in a census tract with a poverty rate below 10 percent. Additionally, participants may request an interim inspection and inspections standards will not be altered.

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 (01/01/2024), 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 identity, 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).

Besse Bailey

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

Besse Bailey

Besse Bailey (Oct 2, 2023 10:17 PDT)

Oct 2, 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.***

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

Public notice for the MTW supplement was posted on August 10, 2023 for the required 45 day public review period.

A public hearing occurred on September 25, 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 September 25th. 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
- Ben Rascoff, Counsel
- Pam Parr, Executive Director
- Arielle Anderson, Director of Housing Assistance Program
- John Chatburn, Director of Asset Management
- Kathy Clark, Controller
- Amanda Rollins, Executive Assistant

