

# Moving to Work FY2020 Annual Plan

Vancouver Housing Authority

Re-Submitted for HUD Approval – February 24, 2020



# Moving to Work FY2020 Annual Plan

VANCOUVER HOUSING AUTHORITY

## Board of Commissioners

Art Miles, Chair

Joan Caley, Vice Chair

Lloyd Halverson, Commissioner

Roy Heikkala, Commissioner

Greg Kimsey, Commissioner

Evelyn Hallett, Resident Commissioner

## Senior Staff

Roy Johnson, Executive Director

Saeed Hajarizadeh, Deputy Executive Director

Leah Greenwood, Director of Property and Asset Management

Angie Sytsma, Executive Director of Bridgeview Housing

Sasha Nichelson, Director of Voucher Programs

Mila Fabyanchuk, Director of Finance

Terry Harder, Construction Department Manager

David Overbay, Federal Program Policy Manager

Natasha Douglas, Director of Human Resources

## Prepared By:

David Overbay, Federal Program Policy Manager

## Table of Contents

<b>SECTION I: INTRODUCTION .....</b>	<b>4</b>
The Vancouver Housing Authority .....	4
Short and Long-Term MTW Goals and Objectives.....	5
<b>SECTION II: GENERAL OPERATING INFORMATION.....</b>	<b>6</b>
A. Housing Stock Information.....	6
B. Leasing Information .....	7
C. Waiting List Information .....	8
<b>SECTION III: PROPOSED MTW ACTIVITIES .....</b>	<b>9</b>
Activity 2016-02: Local Blended Subsidy.....	9
<b>SECTION IV: APPROVED MTW ACTIVITIES.....</b>	<b>11</b>
A. Implemented Activities .....	11
B. Not Yet Implemented Activities .....	18
C. Activities on Hold .....	18
D. Closed Out Activities.....	19
<b>SECTION V: SOURCES AND USES OF FUNDS.....</b>	<b>20</b>
A. Sources and Uses of MTW Funds.....	20
B. Local Asset Management Plan .....	21
C. Rental Assistance Demonstration (RAD) Participation .....	21
<b>SECTION VI: ADMINISTRATIVE .....</b>	<b>22</b>
A. Board Resolution and Certifications of Compliance.....	22
B. Documentation of Public Process .....	22
C. Planned and Ongoing Evaluations.....	22
D. Lobbying Disclosures .....	22
<b>APPENDIX A. BOARD RESOLUTION AND CERTIFICATION.....</b>	<b>23</b>
<b>APPENDIX B. LOBBYING DISCLOSURES .....</b>	<b>26</b>

## SECTION I: INTRODUCTION

### The Vancouver Housing Authority

The Vancouver Housing Authority (VHA) was established in 1942 for the purpose of housing an influx of employees to the aluminum and shipyard industries during World War II. During that time, the VHA built 1,000 permanent homes and 11,396 temporary units capable of housing 50,000 people. In the 1960s the VHA assumed the primary role we still hold today, providing subsidized housing for low-income families, elderly, and disabled people. In the early 1990s the VHA began to diversify by purchasing and developing affordable non-subsidized housing known as Workforce Housing. In 1999 the VHA was selected by HUD to participant in Moving to Work (MTW) demonstration. Today the VHA provides subsidized housing to more than 3400 households and provides more than 1600 apartment units that are not subsidized, but are built to be affordable.

The MTW program provides the VHA the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. As a MTW Agency, the VHA receives exemptions from many program rules and more flexibility regarding the use of Federal funds.

Initiatives developed and approved under the MTW demonstration that utilize the flexibility offered under the terms of the MTW Agreement require approval from HUD and are known as MTW Activities. Each year the

#### The Moving to Work Statutory Objectives:

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

VHA writes and provides for public comment an annual plan that describes ongoing and new activities that use MTW flexibility. After consideration of public comments the plan is approved by the VHA Board of Commissioners and is submitted to HUD for final approval. The content and format of this plan is mandated by HUD and is described in an attachment to the Moving to Work Agreement. The attachment is periodically updated and this 2020 Annual MTW Plan conforms to the latest requirements.

## Short and Long-Term MTW Goals and Objectives

The mission of the VHA is to provide opportunities to people who experience barriers to housing because of income, disability, or special needs in an environment which preserves personal dignity, and in a manner which maintains the public trust. Each year the VHA Board and agency staff review and restate the strategy the agency will follow to meet its mission.

The current strategic plan identifies five key areas within which our specific goals and strategies fall. These areas are Housing Access, Resident Services, Portfolio Management, Fiscal Stability, and Operations:

- VHA goals for increasing housing access include developing new affordable housing, increasing housing options through partnerships and innovative programming, and providing housing for underserved populations and those with special needs.
- Long-term goals around resident services include expanding work readiness and employment support program availability, expanding linkages with community social and educational partners to encourage school success, and investigating programming that supports independence of seniors and other vulnerable adults.
- Portfolio Management goals include increasing VHA's capital funding flexibility to allow for fiscally sound property improvements and enhancing our ability to secure private funding.
- Long-term goals for fiscal stability include exploring ways to increase revenue, reducing development cost and managing revenue and expenses to ensure the agency maintains long term fiscal stability.
- Operations goals are to encourage an innovative and effective workforce and ensure that employment law and Human Resources best practice compliances are being met.

This plan introduces VHA's short-term goals for 2020 that are specific to MTW. For 2020 VHA is planning two additional mixed finance public housing developments that utilize public housing units retained under the Faircloth limit. The first will be a new 46 unit property for formally homeless persons with behavioral health issues. The second is to utilize public housing subsidy for some of the units at Central Park Place, the existing Single Room Occupancy (SRO) project on the VA campus. VHA is also resubmitting for HUD approval the MTW activity for blended subsidy so that the new behavioral health project, The Meridian, can utilize housing subsidy from both public housing and Section 8. Last year VHA proposed five new mixed finance public housing developments. Four of those projects are still moving forward. By the end of the 2020 plan year VHA expects to have almost 250 new public housing units in place.

VHA is also expanding the existing MTW Activity 2014-04 Second Step Transitional Housing Program to include two additional small programs totaling 26 units operating by other local agencies. The name of the activity will be shortened to the Transitional Housing Program to reflect this change.

VHA continues to recognize and appreciate the MTW demonstration as a valuable tool for meeting the housing needs of Vancouver and Clark County and looks forward to another year of providing housing assistance and services in keeping with the program's and VHA's objectives and goals.

## SECTION II: GENERAL OPERATING INFORMATION

## A. Housing Stock Information

## i. Planned New Public Housing Units

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Meridian/TBD	46	0	0	0	0	0	46	Other	14	0
Central Park Place/TBD	94	0	0	0	0	0	94	Other	8	0

Total Public Housing Units to Added in the Plan Year

140

\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

Meridian is planned for homeless individuals with behavioral health issues. Central Park Place is an existing SRO.

## ii. Planned Public Housing Units to be Removed

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
WA008000512	0	VHA is planning the disposition of 2.22 acres of underlying land that was developed by VHA with funds under the U.S. Housing Act of 1937. The site consists of 30 units that had subsidy transferred off the site as part of a RAD conversion. The units were removed from the public housing program after the RAD closing and so this approval covers only the underlying land. VHA plans to convey 1.30 acres and its associated 18 units (Northside) for use as Section 8 Homeownership units, and .92 acres and its associated 12 units (Southside) for use in a transitional housing program for the homeless.

0

Total Public Housing Units to be Removed in the Plan Year

## iii. Planned New Project Based Vouchers

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT

0

Planned Total Vouchers to be Project-Based

## iv. Planned Existing Project Based Vouchers

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Camas Ridge	8	Leased/Issued	No	A 58 unit market rate project
Van Vista	96	Leased/Issued	No	96 units, previously public housing
Vista Court	76	Leased/Issued	No	76 unit senior building
Cascadia Village	6	Leased/Issued	No	51 unit LIHTC owned by Reach CDC
The Mews	3	Leased/Issued	No	24 unit LIHTC owned by Reach CDC
Central Park Place	30	Leased/Issued	No	30 VASH PBV in 124 unit SRO
VHA Apartment Homes	122	Leased/Issued	Yes	Scattered small complexes
Skyline Crest	90	Leased/Issued	No	Previously public housing
Skyline Crest	48	Leased/Issued	Yes	RAD portion of previous public housing

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Mill Creek	12	Leased/Issued	Yes	50 unit LIHTC, RAD transfer
Fruit Valley	30	Leased/Issued	No	Previously public housing
Arbor Ridge	30	Leased/Issued	Yes	60 unit assisted living, RAD transfer
Lincoln Place	30	Leased/Issued	No	30 unit Housing First project
Smith Tower	3	Leased Issued	No	170 units, owned by Mid-Columbia
Freedom's Path	40	Leased/Issued	No	40 VASH PBV in 50 unit building
Isabella Court	10	Leased/Issued	No	49 unit LIHTC, Reach CDC
Meriwether Place	23	Leased/Issued	No	30 unit LIHTC, CNPH
The Meadows	23	Leased/Issued	No	30 unit LIHTC, 2 <sup>nd</sup> Step Housing
Rhododendron Place	23	Leased/Issued	No	30 unit LIHTC, CNPH
Isabella II	30	Leased/Issued	No	49 unit LIHTC, Reach CDC

733

Planned Total Existing Project-Based Vouchers

## v. Planned Other Changes to MTW Housing Stock during the Plan Year

## PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

Subject to HUD approval, VHA is planning to transfer RAD assistance from some of the sites within the 122 units known as VHA Apartment Homes. The RAD PBV subsidy will be utilized at another VHA site to be determined. This is being proposed because some of properties currently under RAD require substantial rehabilitation that cannot be supported with the current RAD rents.

## vi. General Description of All Planned Capital Expenditures during the Plan Year

## PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

VHA is planning to use Demolition or Disposition Transitional Funding (DDTF) for construction of Tenny Creek, a 40 unit public housing project described in the 2019 MTW Annual Plan.

## B. Leasing Information

## i. Planned Number of Households Served

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
MTW Public Housing Units Leased	738	62
MTW Housing Choice Vouchers (HCV) Utilized	25452	2121
Local, Non-Traditional: Tenant Based	300	25
Local, Non-Traditional: Property-Based	348	29
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	26838	2237

LOCAL NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
Tenant-Based	School Stability Subsidy / 2013-02	300	25
Property Based	Transitional Housing / 2014-04	348	29
Homeownership	None	0	0



## ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	VHA does not foresee any leasing issues in public housing.
MTW Housing Choice Voucher	VHA expects that voucher holders will continue to have a difficult time locating affordable units in Vancouver. VHA will continue to provide additional help for new voucher holders through our funding of local navigation, referral, and deposit assistance programs.
Local, Non-Traditional	VHA does not foresee any leasing issues in our local non-traditional activities.

## C. Waiting List Information

### i. Waiting List Information Anticipated

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Housing Choice Voucher	Tenant-Based Voucher	654	Partially Open	No
Camas Ridge	PBV Site	3987	Open	NA
Vista Court	PBV Site	830	Partially Open	No
VHA Apartment Homes	PBV Site	4348	Open	NA
Skyline Crest	PBV Site	4961	Open	NA
Mill Creek	PBV Site	5636	Open	NA
Fruit Valley	PBV Site	4851	Open	NA
Lincoln Place	PBV Site	1	Partially Open	No
Isabella Court	PBV Site	1313	Open	NA
The Meadows	PBV Site	1911	Partially Open	No
Meriwether Place	PBV Site	67	Partially Open	No
Caples Terrace	Public Housing Site	0	Closed	Yes
Rhododendron Place	PBV Site	17	Partially Open	No
Englund Manor	Public Housing Site	0	Closed	Yes
The Elwood	Public Housing Site	0	Closed	Yes
Central Park Place	Public Housing Site	0	Closed	Yes

Please describe any duplication of applicants across waiting lists

Applicants may apply for multiple lists so there is a great deal of duplication across lists.

### ii. Planned Changes to the Waiting List in the Plan Year

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO THE WAITING LIST
Housing Choice Voucher	VHA recently made changes to the local preference for homelessness and uses the local Continuum of Care consolidated entry system for referrals and verification of the preference.
Van Vista	VHA has permanently closed the waiting for the non-assisted living units at Van Vista. The property is undergoing a renovation and upon completion the entire property will be assisted living which does not utilize a conventional waiting list (MTW Activity 2009-19). Current residents will be permitted to stay, but any new vacancies will be filled by those requiring assisted living.
Public Housing	VHA will open several new site-based public housing wait lists in 2020 in order to select residents for new public housing projects that are completed in 2020. The new waiting lists are for the Englund Manor, Elwood, and Central Park Place sites.

## SECTION III: PROPOSED MTW ACTIVITIES

VHA is re-proposing one previously approved activity.

### Activity 2016-02: Local Blended Subsidy

#### A. Activity Description

This activity uses a blend of funding from both the Public Housing and Section 8 Voucher Programs in order to develop mixed-finance public housing projects. Projects utilizing blended subsidy will be developed under the regulations found at 24 CFR § 905 and must be specifically approved by HUD separate from any approval of the Annual MTW Plan. For the purpose of regulatory compliance these units will be considered public housing. The length of time the blended subsidy would be available is dependent upon VHA remaining under an MTW Agreement (currently extended to 2028). If VHA no longer has MTW authority, any units under the blended subsidy will revert to public housing. VHA will obtain specific approval from any financial partner or investor in a property utilizing this blended subsidy in writing.

In 2016 VHA was approved to use this activity for Caples Terrace. Local Blended Subsidy was not used for that project as it was able to be developed as public housing but without the need for a blended subsidy. VHA proposed and was approved for adding four projects under the blended subsidy activity in the 2019 Plan, Tenny Creek, and three existing properties; Englund Manor, Arbor Ridge and Wisteria Manor. It now looks like Wisteria Manor will not be going forward under blended subsidy, but the other projects are on track.

For 2020 VHA is requesting approval to add the Meridian as another project that will be developed as public housing but also will utilize blended subsidy to bring the rents up to the level required to make the project sustainable. The Meridian will be a new constructed 46 unit project with services for individuals with behavioral health issues and a history of homelessness.

The length of time the blended subsidy would be available is dependent upon VHA remaining under an MTW Agreement (currently though 2028). In the event that VHA is no longer under the MTW Agreement any units under the blended subsidy will revert to Public Housing. VHA will obtain specific approval from any financial partner or investor in a property utilizing this blended subsidy in writing.

Projects utilizing blended subsidy will be developed under Public Housing development regulations found at 24 CFR 941 905 regulations (Public Housing Development) and must be specifically approved by HUD separate from any approval of the Annual MTW Plan. For the purpose of regulatory compliance these units will be considered Public Housing.

#### B. Activity Metrics Information

<b>HC #1: Additional Units of Housing Made Available</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 50% AMI as a result of the activity.	Housing units of this type prior to implementation of the activity (zero).	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<b>HC #2: Units of Housing Preserved</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation of the activity (zero).	Expected housing units preserved after implementation of the activity (number).	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (zero).	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<b>CE #4: Increase in Resources Leveraged</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (zero).	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

#### C. Cost Implications

Although this activity will redirect some Section 8 funding away from vouchers, it will do so at a much lower per-unit cost than the average HAP for a voucher. At the same time the S8 expense will leverage public housing funding lost through the disposition process and that would not be available without additional subsidy funding from another source.

#### D. Need/Justification for MTW Flexibility

This activity is authorized under Section B.1. of Attachment C of the Amended and Restated Agreement.

## SECTION IV: APPROVED MTW ACTIVITIES

### A. Implemented Activities

#### Activity 2019-01: Mandatory Participation in Services at Caples Terrace

- i. This activity was approved in the FY2019 MTW Annual Plan and was implemented August 1, 2019. It has not been amended since initial approval.
- ii. This activity is to require residents of Caples Terrace to participate in the services to be provided there. Caples Terrace is a mixed finance development with a preference for youth transitioning out of foster care and also for homeless unaccompanied youth. Services will be provided for residents to assist them to transition to self-sufficiency. If a resident fails to participate in these services, VHA proposes to cancel their income-based rent and require the participant to begin paying the flat rent for the unit if they wish to continue living there. The resident may continue to rent the unit as long as they are in compliance with the requirements of the lease.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### Activity 2018-02: Local Payment Standards

- vi. This activity was approved in an amendment to the FY2018 MTW Annual Plan and was implemented January 1, 2018. It has not been amended since initial approval.
- vii. This activity allows the VHA to set payment standards outside of the normal range allowed under regulation. VHA monitors rent burdens and other factors such as voucher success rates, lease-up time, market rents, vacancy rates and funding availability and set payment standards within a range between 80 and 120 percent of the HUD published FMR. This activity will be ongoing during the Plan year.
- viii. There are no non-significant changes planned for this activity during the Plan year.
- ix. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- x. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### Activity 2016-01: Family Self-Sufficiency Lite

- i. This activity was approved in the FY2016 MTW Annual Plan and was implemented on April 1, 2016. It has not been amended since initial approval.
- ii. VHA offers a shorter version of the Family Self-Sufficiency (FSS) program in addition to the traditional five-year FSS program. This shorter version of the FSS program is not meant to replace the traditional program nor is it intended to siphon any potential applicants from that program. Rather it is aimed at those households that have an interest in increasing self-sufficiency but are reluctant to commit to the full five-year FSS program. This version has a much shorter commitment of two years, limits escrow to a maximum of \$2000 and does not offer contract extensions, but does allow conversion to the full FFS program if requested during the term of the FSS Lite contract. This activity will be ongoing during the Plan year.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

**Activity 2015-02: Alternative TTP Calculation (35%)**

- i. This activity was approved in the FY2015 MTW Annual Plan and was implemented on November 1, 2015. It was changed in an amendment to the FY2017 Annual Plan.
- ii. This MTW activity changes the way in which the Total Tenant Payment (TTP) is calculated when determining tenant rent and housing assistance in the HCV and Public Housing programs. The TTP is normally determined by taking the highest of: 1) 30% of the household's monthly adjusted income; 2) 10% of the household's monthly income; or 3) The minimum rent of \$50. Under this activity VHA has changed the percentage of adjusted monthly income. When first implemented 33% of adjusted income was used instead of 30%; effective January 1, 2018, the percentage was changed to 35%. Also under this activity, households with a tenant-based voucher are allowed to have a maximum family share of up to 50% of the family's adjusted monthly income at initial occupancy, an increase over the 40% maximum family share allowed under regulation. This activity will be ongoing during the Plan year.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

**Activity 2014-06 Alternative Project-Based Voucher Program**

- i. This activity was approved in amendment to the FY2014 MTW Annual Plan and was implemented on August 6, 2014. It has been resubmitted for approval in the FY2017 Annual Plan to allow VHA to change the limit on project-basing from 20% to 30% of the HCV program.
- ii. This activity consolidated some previous MTW activities and added some new policies with regard to Project-Based Vouchers (PBV). VHA's Alternative PBV program utilizes the existing regulations under 24 CFR § 983 with the following exemptions:
  - The required competitive bidding process is waived when VHA is placing PBV in a project owned by the VHA or a closely affiliated organization.
  - The VHA will not generally provide move vouchers except in cases of overcrowded or under-occupied units where VHA does not anticipate an appropriately sized PBV becoming available, VHA does provide move vouchers at PBV projects converted under RAD and at PBV projects that include services and when the tenant has resided there for at least two years, no longer has a need for the provided services, and has a recommendation from the service provider.
  - The requirement that tenants be selected from a waiting list may be waived for projects where participation in specific services is a requirement of residency.
  - VHA may allow up to 100% of the units in a project to be PBV even when the project is not exclusively for elderly or disabled households or when no services are required.
  - For VHA owned units, VHA will not use an independent entity, for inspections, determination of rent to owner and rent reasonableness, and the initial and renewal HAP contract term.
  - VHA may project-base up to 30% of its HCV program.

This activity will be ongoing during the Plan year.

- iii. VHA has included the new requirement for an independent entity to determine HAP contract terms to the list of waivers utilized for VHA owned PBV projects.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

**Activity 2014-05: Interim Verification Policy**

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on September 1, 2014. It has not been amended since the initial approval.

- ii. This activity changes the way interim reexaminations for changes in family income and composition are verified and their effective dates. Households may still request an interim reexamination at any time but the responsibility to obtain verification is changed from VHA to the participant. Verification of the income or family change that they are reporting must be provided prior to any resulting change in tenant rent becoming effective. If the request *and* the verification is received before the 15<sup>th</sup> of the month, any resulting change in tenant rent will be effective the first of the following month. The VHA still obtains verification for initial eligibility reexaminations and for regular/annual reexaminations.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2014-04: Local Non-Traditional Transitional Housing Program**

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on July 1, 2014. It has not been amended since the initial approval.
- ii. The Transitional Housing Program is a program for homeless individuals and families with income below 30% of the Area Median Income (AMI). In 2019 VHA expanded the program to include a second agency's program after their previous funding ended. Second Step Housing utilizes 12 large group homes for this program. They have a capacity of about 35 individuals and families at one time. Share's program is for up to 13 individual or families in scattered rental units. Tenants must be homeless at admission, income eligible and willing to participate in case management. Utilities are provided and tenants pay 30% of their adjusted income for rent. Calculation of income for eligibility and rent is done in compliance with the regulations found at 24 CFR § 5.609. Second Steps housing units are alcohol and drug free, while share uses the Housing First model.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2014-01: Modified FSS Escrow Calculation**

- i. This activity was approved in the FY2014 MTW Annual Plan and was implemented on January 1, 2014. It has not been amended since the initial approval.
- ii. This activity modifies the way escrow is calculated in the full, five-year, Family Self-Sufficiency Program (FSS). VHA's method under MTW has two parts. The first part is a monthly deposit to a participants escrow account when they have increased earned income that results in a Total Tenant Payment (TTP) over the baseline set when they join FSS. The baseline is a fixed amount set at \$450 for all new participants regardless of their income. The second part is that VHA pays a specific amount to a participant's escrow account based on specific achievements. Some of these "pay points" result in an immediate deposit to the escrow account while others are not calculated and paid until a successful program graduation. Examples of achievements that result in escrow deposits include:
  - a. Completion of core GOALS classes or entire curriculum
  - b. Completion of other educational goals
  - c. Obtaining and maintaining employment
  - d. Increase in credit score
  - e. Establishing and maintaining a saving account
  - f. Completion of other ITSP goals

The maximum allowable that a participant may earn under pay points is \$6,000. There is no limit set on the amount a participant may earn under the increased earned income part of the escrow calculation. Under this new system FSS participants are only eligible for one interim withdrawal from



their escrow account during their program participation. This activity will be ongoing during the Plan year.

- iii. Non-significant changes planned for this activity during the Plan year may include revision of some specific pay points used in the calculation of escrow. Any changes will be approved in a revision of the FSS Action Plan.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### Activity 2013-02: School Stability Subsidy Program

- i. This activity was approved as part of an amendment to the FY2013 MTW Annual Plan. It was implemented April 1, 2015.
- ii. This is a local non-traditional rental subsidy program in partnership with Family Resource Centers (FRC) at selected local schools and a local agency serving the homeless. Families with a student enrolled in the partnering school, and who are either homeless or at risk of homelessness, are selected for participation in the program in order to prevent them from having to relocate outside of the school district. The subsidy allows the family to remain in the same school district providing needed stability for the student. The housing subsidy starts at 80 percent of the contract rent and is reduced each year until the end of the fourth year of participation, when it ends. During their time on the program the family must participate in ongoing economic self-sufficiency meetings provided by the VHA and educational planning meetings provided by the partnering agencies.

In 2018 VHA began leasing families under a revised version of this activities funded by local funds rather than MTW funding. This second cohort uses a shorter term of a half years (30 months) and a subsidy of 70% of the payment standard for the first six months, 60% for one year, and goes to 30% of the payment standard for the final year of participation.

- iii. VHA may consider expanding the number of families participating in this program during the during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### Activity 2013-01: Minimum Earned Income Rent Reform

- i. This activity was initially approved in the FY2013 MTW Annual Plan. It was re-proposed in the FY2017 MTW Annual Plan for an increase in the amount of the annual minimum income from \$9,000 to \$10,000. Later, it was re-proposed in amendment to the FY2017 Plan and changed to link the amount of the minimum income directly to the Washington State minimum wage. It was again re-proposed in the FY2018 MTW Annual Plan to change from a minimum income to a minimum *earned* income.
- ii. This activity utilizes a minimum earned income when calculating rent for any HCV or Public Housing household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum earned income amount is based on the Washington State minimum wage at 20 hours per week. This amount is applied for each work-able member. For example, a household with one work-able member has a minimum earned income based 20 hours per week at the current minimum wage; a household with two workable members has a minimum earned income twice that, and so on. If the household's actual annual earned income, as determined under the program regulations, falls below the minimum, tenant rent and housing assistance is calculated using the minimum in addition to any other included income type in the

household. If the household's actual earned income is greater than the minimum, the actual earned income is used and the minimum earned income is not a factor. A household subject to the minimum still has any deductions they might be eligible for under HUD regulations or VHA policy. The change to a minimum earned income was completed in 2018 and the activity will be ongoing during the Plan year.

- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2012-01: Community Supported Self Reliance**

- i. This activity was approved in the FY2012 MTW Annual Plan and was implemented on April 1, 2012. It has not been amended since the initial approval.
- ii. Community Supported Self Reliance (CSSR) is a pilot project where housing assistance along with intensive wrap around services are made available through partnering agencies to very-low income clients with multiple barriers to self-reliance. 16 participants were provided a Housing Choice Voucher with a time-limit of five and a half years (66 months). In addition to the regular HCV program obligations, participants were required to actively participate in their approved self-reliance plans developed with their assigned case manager from a partnering agency; failure to do so results in expulsion from the program. Participants facing expulsion may file a grievance with the project's Review Board. In addition to access to a housing voucher participants in this program, and their case managers, will have access to the expertise and resources provided by members of the Project Team and the Review Board. Participants also participate in a VHA sponsored Self-Sufficiency program.
- iii. As this plan is being drafted, it has not yet been decided to continue this program into the new Plan year. Most of the clients have graduated, and the remaining two will have done so by the end of 2018. VHA may elect to continue this activity into the Plan year with a new cohort of clients.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2011-05: VHA Staff to Perform HQS and Rent Reasonableness on VHA Owned Properties.**

- i. This activity was approved in the FY2011 MTW Annual Plan and was implemented on January 1, 2011. It has not been amended since the initial approval.
- ii. This MTW activity allows the VHA to have Section 8 HCV department staff perform HQS inspections and determine rent reasonableness for units owned by the VHA or owned by an entity substantially controlled by the VHA such as a tax credit property. This authority creates substantial savings compared to what the VHA was being charged by contracted inspectors.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2010-02: Skyline Crest Campus of Learners**

- i. This activity was approved in the FY2010 MTW Annual Plan and was implemented on January 1, 2010. It has not been amended since the initial approval.
- ii. The Skyline Crest Campus of Learners is a partnership between VHA and the residents of Skyline Crest; which was VHA's largest Public Housing Property and has recently been converted to PBV under a combination of RAD and Section 18. VHA provides children and young adults' resources and



activities through the community center and families develop and commit to success plans centered on their child's school attendance and community involvement.

- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA plans to assess the activity in the Plan year and may elect to close it out at the end of 2020.

#### **Activity 2009-19: Special Admission Procedure for Assisted Living Facility**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.
- ii. This MTW activity allows for tenant selection to be made by the administrator of the assisted living facility rather than utilizing a waiting list. VHA's Assisted Living programs at Van Vista and Arbor Ridge regularly receive inquiries regarding the availability of a unit. If a unit is not immediately available the agency or person making the inquiry continues their search elsewhere as waiting on a list for a unit with assisted living services is not a desirable option. Once a vacancy is anticipated then the next inquiry will be notified and the vacancy filled. The waiver of the waiting list requirement allows for the unique needs of the assisted living population and their need for services.
- iii. Non-significant changes planned for this activity during the Plan year include additional assisted living units both Van Vista and Arbor Ridge and a new public housing development, Tenny Creek. These new assisted living units will also utilize this activity for tenant selection rather than a traditional waiting list.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2009-15: Owners Restricted to Annual Rent Increases**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.
- ii. Under this MTW policy owners in the Housing Choice Voucher program are restricted to a single rent increase each year.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2009-13: Reset of Required Reexamination Date after Interim**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on October 1, 2009. It has not been amended since the initial approval.
- ii. This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled to at least 12 months after the effective date of an interim reexamination. This policy reduces the overall number of reexaminations required each year.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2009-10: Replacement of Medical Expense Deduction**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on November 5, 2009. It has not been amended since the initial approval.

- ii. Under this activity the VHA has eliminated individual calculation and verification of medical expenses for Elderly and Disabled designated families, replacing the deduction with an increase in the Elderly/Disabled deduction from \$400 to \$700.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2009-08: Simplified Utility Allowance Schedule**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 24, 2009. It has not been amended since the initial approval.
- ii. VHA utilizes a simplified utility allowance schedule for tenant-based Housing Choice Vouchers. This provides households searching for a unit foreknowledge of their maximum rent and saves cost through a reduction in the number of denied Request for Lease Approvals. The schedule is based on the conventional HCV utilities schedules for newer energy efficient all electric units by bedroom size.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2009-03: No Verification of Assets Less Than \$50,000**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. The dollar threshold was changed from \$5,000 to \$50,000 in an amendment to the FY2014 Annual Plan.
- ii. VHA does not obtain a verification of a reported asset if the reported value is less than \$50,000. This MTW activity saves VHA significant administrative funds by eliminating verifications on the vast majority of assets and any income from those assets that has little or no effect on housing subsidy and/or tenant rent.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

#### **Activity 2007-02: Alternate Required Reexamination Schedule**

- i. This activity was approved in the FY2007 MTW Annual Plan and was implemented on September 1, 2008. In an amendment to the FY2009 the policy was changed to the current schedule of triennial reexaminations for those on fixed income.
- ii. VHA identifies households with a fixed income and places them on a schedule to have a full reexamination every three years rather than annually. Fixed income means the household has no work-able members and the only household income is from sources such as Social Security, Supplemental Security Income (SSI), and/or pensions. Households that are not determined to have a fixed income are scheduled to have a reexamination 12 months after their last reexamination.
- iii. There are no non-significant changes planned for this activity during the Plan year.
- iv. There are no planned changes or modifications to the metrics for this activity during the Plan year.
- v. VHA does not plan to pursue any significant changes to this activity in the Plan year.

## B. Not Yet Implemented Activities

### Activity 2015-01: Rent Buy-Down Local Subsidy Program

- i. This activity was first approved in the FY2015 Plan Year. It allows VHA to create a local program that will “buy-down” rents at a market rate apartment property (not subsidized or receiving tax credits) so that the units become affordable for, and only available to, households at or below 50% of the Area Median Income (AMI). If selected, an owner would receive funds from the VHA to offset the amount the project would require to reduce apartment rents to reach the affordable level. To be considered affordable the bought-down gross rents will be calculated by taking 33% of an income equal to 45% of AMI assuming 1.5 persons per bedroom. The current VHA S8 MTW utility allowance will be deducted from the gross rent to determine the final bought-down rent for any units where the tenant is responsible for at least the utility providing the heat for the unit. This activity has not been implemented because VHA has not yet received a project proposal where this type of subsidy could be utilized. The original project where this activity was expected to be utilized did not end up being developed for reasons unrelated to this activity. Since then we have had interest from two other developers but their projects ended up receiving tax credits, or were targeted toward a population (homeless) that needs a deeper subsidy.
- ii. The Request for Proposals (RFP) for this activity remains open and VHA continues to expect that, for the right project, this subsidy create new housing choice for local tenants.
- iii. There have been no non-significant changes to this activity since it was approved by HUD.

## C. Activities on Hold

VHA has no activities on hold at this time.

## D. Closed Out Activities

The following chart lists all closed out MTW activities

MTW ACTIVITY NAME/NUMBER	PLAN YEAR APPROVED	PLAN YEAR IMPLEMENTED	PLAN YEAR CLOSED OUT	REASON CLOSED OUT
Local Rent Subsidy Program/2014-03	FY2014	NA	FY2014	Never Implemented
Utility Allowance Lesser of Unit/Voucher/2014-02	FY2014	FY2014	FY2015	Adopted by HUD
Health Advocate Training Program/2013-05	FY2013	FY2013	FY2013	Concluded
Admin Fee for Owners in HCV Program/2013-04	FY2013	NA	FY2013	Withdrawn
Shelter Facilities Support/2013-03	FY2013	NA	FY2014	Never Implemented
Short Term Rental Assistance/2012-04	FY2012	FY2013	FY2016	Concluded
Home Sharing in HCV Program/2012-03	FY2012	FY2015	FY2016	Concluded
MTW Fund for Leveraging Housing/2012-02	FY2012	NA	FY2017	Never Implemented
"Floating Units" in PBV program/2011-02	FY2011	FY2002	FY2013	Concluded
Income Limits for New Public Housing/2011-01	FY2011	NA	FY2011	Never Implemented
Local Preference for Unsubsidized/2010-04	FY2010	FY2010	FY2015	Concluded
Community Involvement/2010-01	FY2010	FY2010	FY2013	Concluded
Local Preference for FSS Participation/2009-18	FY2009	FY2009	FY 2009	NOFA Requirement
Mandatory Self-Sufficiency Program/2009-17	FY2009	NA	FY 2009	Never Implemented
Renter Education Required for Applicants/2009-16	FY2009	FY2009	FY 2017	Concluded
Simplified Recertification Process/2009-14	FY2009	NA	FY 2009	Never Implemented
Limited Utility Allowance Payments/2009-09	FY2009	FY2009	FY 2013	Concluded
Alternate Inspection Schedule in HCV/2009-06	FY2009	FY2010	FY 2015	Adopted by HUD
Asset Based Initiative (IDA)/2009-04	FY2009	NA	FY2010	Never Implemented
Imputed TANF for Voluntary Closures/2009-02	FY2009	FY2009	FY 2013	Concluded
Pilot Rental Subsidy Project/2009-01	FY2009	NA	FY 2009	Never Implemented
Alternate HCV Homeownership Program/2008-02	FY2008	FY2010	FY 2011	Concluded
Time-Limited Vouchers Tied to Services/2008-01	FY2008	FY2008	FY2018	Concluded
Flat rent and Flat HCV Subsidy/2007-01	FY2007	NA	FY 2008	Never Implemented
Alternative Rent Reasonable Procedure/2004-01	FY2004	FY2004	FY 2009	Concluded
Escrow Accounts Capped at \$6000/2003-01	FY2003	FY2003	FY 2005	Concluded
"Request Line" Single Waiting List/2002-01	FY2002	FY2002	FY 2003	Concluded
\$480 Deduction for Child Support /2001-02	FY2001	FY2001	FY 2004	Concluded
Eight Percent Earned Income Deduction/2001-01	FY2001	FY2001	FY 2004	Concluded
No Earned Income Disallowance/1999-09	FY1999	FY2009	FY 2015	Concluded
No Flat Rent Option in Public Housing/1999-08	FY1999	FY2009	FY 2015	Concluded
Maximum Family Share 45% of Gross/1999-07	FY1999	FY2009	FY 2005	Concluded
Restrictions on HCV Port-Outs/1999-06	FY1999	FY2009	FY 2005	Concluded
All Households Eligible for Escrow /1999-05	FY1999	FY2009	FY 2005	Concluded
FSS Absorbed into MTW Self-Sufficiency/1999-04	FY1999	FY2009	FY 2005	Concluded
Five-Year Time Limit for Non Eld/Dis/1999-03	FY1999	FY2009	FY 2005	Concluded
Mandatory Self-Sufficiency Program/1999-02	FY1999	FY2009	FY 2005	Concluded
All HCV Port-Ins to be Absorbed by VHA/1999-01	FY1999	FY2009	FY 2001	Concluded

## SECTION V: SOURCES AND USES OF FUNDS

### A. Sources and Uses of MTW Funds

#### i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	-
70600	HUD PHA Operating Grants	18,930,152
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,516,849
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	3,744,867
70000	Total Revenue	24,191,868

#### ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	2,623,397
91300+91310+92000	Management Fee Expense	208,620
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	371,500
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	-
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	-
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	4,565
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	-
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	-
97300+97350	HAP + HAP Portability-In	21,014,584
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	3,000
90000	Total Expenses	24,225,666

Description of any variance between Estimated Total Revenue and Estimate Total Expenses

There is a relatively small variance between estimated revenue and expenses in the MTW portion of VHA's overall budget. If actual MTW expenses exceed available MTW revenue it will be covered by other VHA local revenue.

#### iii. Description of Planned Use of MTW Single Fund Flexibility

PLANNED USE OF SINGLE FUND FLEXIBILITY
VHA uses the funding flexibility allowed under MTW to provide additional services for the people we house. We have consolidated all of our housing services under the umbrella of Bridgeview Housing. In addition to the grant funded services of Family Self Sufficiency (FSS) and Elderly Service Coordinators, MTW funds support the Community Employment and Education program. Being able to offer employment referrals supports VHA's rent reform activities.

#### PLANNED USE OF SINGLE FUND FLEXIBILITY

The single fund is also used to fund services at specific properties serving high needs populations such as Lincoln Place, which serves chronically homeless individuals, and the soon to open Caples Terrace which will serve youth transitioning out of foster care.

VHA also funds a local agency's deposit assistance program for persons on our waiting list and also a fund for navigation and referral services for the same population. We also pay the tuition costs for HCV applicants and participants who wish to take the Rent Well class offered by a local agency.

VHA is also using single fund flexibility to pay MTW administrative costs and HCV program administrative costs that are not covered by the administrative fee (currently prorated at 77%).

VHA plans to utilize single fund flexibility if we are approved to transfer existing RAD PBV units from their current location to a new site. The funds will be used to bring the contract rents up to a sustainable level.

### B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

Yes

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

No

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

NA

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

NA

### C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation.

#### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

The VHA complete its last RAD conversion in Plan Year FY2016. A total of 212 former public housing units were converted to PBV under RAD. VHA does not currently have any proposed or planned number of units to be converted under RAD.

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment.

NA

## SECTION VI: ADMINISTRATIVE

### **A. Board Resolution and Certifications of Compliance**

Copies of the VHA Board of Commissioners Resolution adopting the Plan and the MTW Certifications of Compliance are included in Appendix A.

### **B. Documentation of Public Process**

VHA met with Resident Advisory Board (RAD) on July 17, 2019 to present the first draft of the Plan and seek feedback. The final draft was made available for public comment on August 5, 2019. Notice was made on the VHA website and was advertised in the Columbian, the local newspaper. No written comments were received. On September 5, 2019 a public hearing was held at the VHA Community Room. Notice of the public hearing was made on the VHA website and in the Columbian. Other than VHA staff, no one attended the hearing. The Plan was approved at the September 26, 2019 public VHA Board meeting. No public comments were received by the Board.

### **C. Planned and Ongoing Evaluations**

VHA does not currently have any ongoing agency directed evaluations of the MTW program or activities and is not planning any for the plan year.

### **D. Lobbying Disclosures**

Signed copies of HUD Form 50071 the Disclosure of Lobbying Activities (SF-LLL) are included in Appendix B.



## APPENDIX A. BOARD RESOLUTION AND CERTIFICATION

### HOUSING AUTHORITY OF THE CITY OF VANCOUVER

#### CLARK COUNTY WASHINGTON

#### RESOLUTION NO. 3273

#### RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2020

**WHEREAS**, the Housing Authority of the City of Vancouver has entered into various contracts with the United States of America pertaining to the Housing Act of 1937, as amended; and

**WHEREAS**, the Department of Housing and Urban Development and the Housing Authority of the City of Vancouver have entered into a Moving to Work Demonstration Agreement as amended and restated on March 26, 2008; and

**WHEREAS**, the Moving to Work Agreement with the Department of Housing and Urban Development requires the submission of a Annual MTW Plan; and


**WHEREAS**, the Annual Plan for Fiscal Year 2020 has been prepared and made available for public comment for thirty days and a public hearing was held on September 5, 2019.

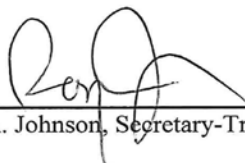
**NOW, THEREFORE, BE IT RESOLVED**, by the Board of Commissioners of the Vancouver Housing Authority that:

1. The Board of Commissioners approves the FY 2020 Moving to Work Annual Plan and authorizes the Executive Director to complete the Plan documents and submit the Plan to the Department of Housing and Urban Development, and to revise VHA policy to reflect the proposals in the Plan once HUD approval is obtained.
2. The Board of Commissioners certifies that the Public Hearing Requirement has been met and authorized the Chair to execute the attached Certifications of Compliance.

ADOPTED by the majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 26th day of September, 2019.

ATTEST:

  
Art Miles, Chair

  
Roy A. Johnson, Secretary-Treasurer



OMB Control Number: 2557-0216  
Expiration Date: 01/31/2021

## 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 Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2020), hereinafter referred to as "the Plan", 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 Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (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 Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan 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 Plan 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 Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (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 and implementing regulations at 49 CFR Part 24.

OMB Control Number: 2557-0216  
Expiration Date: 01/31/2021

- (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 24 CFR 85.20 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 OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan 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 Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Vancouver Housing Authority  
MTW PHA NAME

WA008  
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).*

Art Miles  
NAME OF AUTHORIZED OFFICIAL

Chairperson – Board of Commissioners  
TITLE

Art D. Miles  
SIGNATURE

9-26-2019  
DATE

\* *Must be signed by either the Chairman 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 Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

## APPENDIX B. LOBBYING DISCLOSURES

**Certification of Payments  
to Influence Federal Transactions**U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

The Vancouver Housing Authority

Program/Activity Receiving Federal Grant Funding

Housing Choice Voucher and Public Housing Programs

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

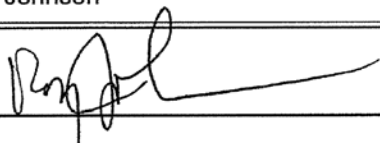
Name of Authorized Official

Roy Johnson

Title

Executive Director

Signature



Date (mm/dd/yyyy)

10/7/19

Previous edition is obsolete

form HUD 50071 (01/14)  
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3



**Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352**

Authorized for Local Reproduction  
Standard Form - LLL (Rev. 7-97)

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
--	--	--

**4. Name and Address of Reporting Entity:**  
☒ Prime    ☐ SubAwardee  
 \* Name: Vancouver Housing Authority  
 \* Street 1: 2500 Main Street    Street 2:   
 \* City: Vancouver    State: AS: American Samoa    Zip: 98660  
 Congressional District, if known: 3rd

**5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:**

<b>6. * Federal Department/Agency:</b> <span style="border: 1px solid black; padding: 2px;">US Dept of Housing and Urban Development</span>	<b>7. * Federal Program Name/Description:</b> <div style="border: 1px solid black; height: 20px; margin-bottom: 5px;"></div> CFDA Number, if applicable: <span style="border: 1px solid black; padding: 2px;"></span>
--	--

<b>8. Federal Action Number, if known:</b> <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>	<b>9. Award Amount, if known:</b> \$ <span style="border: 1px solid black; padding: 2px; width: 100px;"></span>
---	--

**10. a. Name and Address of Lobbying Registrant:**  
 Prefix  \* First Name [REDACTED] Middle Name   
 \* Last Name None Suffix   
 \* Street 1  Street 2   
 \* City  State  Zip

**b. Individual Performing Services** (including address if different from No. 10a)  
 Prefix  \* First Name [REDACTED] Middle Name   
 \* Last Name None Suffix   
 \* Street 1  Street 2   
 \* City  State  Zip

**11.** Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**\* Signature:** [REDACTED]  
**\* Name:** Prefix Mr. \* First Name Roy Middle Name   
 \* Last Name Johnson Suffix

**Title:** Executive Director    **Telephone No.:** (360) 993-9500    **Date:** 10/07/2019

**Federal Use Only:**

Authorized for Local Reproduction  
 Standard Form - LLL (Rev. 7-97)