

Moving to Work FY2022 Annual Plan

Vancouver Housing Authority

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Amended April 2022

Moving to Work FY2022 Annual Plan

VANCOUVER HOUSING AUTHORITY

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SECTION I: INTRODUCTION

The Vancouver Housing Authority

The Vancouver Housing Authority (VHA) was established in 1942 to house 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, HUD selected the VHA to participate in the Moving to Work (MTW) demonstration. Today the VHA provides subsidized housing to more than 3400 households and has developed more than 1600 affordable apartment units.

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 an MTW Agency, the VHA receives exemptions from many

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

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 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 2022 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 that preserves personal dignity, and in a manner that 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 under-served 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.

VHA has three (3) mixed finance projects that will be completed during 2022; these include Tenny Creek, The Meridian and Mill Creek. VHA will then submit a Streamlined Voluntary Conversion application to close-out public housing. In addition to the 3 developments in construction, the application will include Caples Terrace, The Elwood and Englund Manor.

VHA will consider coupling onto Home Forward's Faircloth to RAD application for a number of RAD vouchers to be determined when a suitable property is identified. VHA will also provide additional funding to local non-traditional programs with funds still available from the terminated PBV agreement.

In the long range, VHA will continue to flexibly respond to changing community housing needs, arising opportunities, and ongoing funding challenges.

SECTION II: GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
Mill Creek TBD	31	23	6	0	0	0	60	Other, mixed Elderly and General	4	2
The Meridian WA008000521	46	0	0	0	0	0	46	Other	14	6
Tenny Creek WA008000517	38	2	0	0	0	0	40	Disabled	8	8
Total Public Housing Units to be Added in the Plan Year:							86			

* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

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

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

The Meridian: Homeless with Behavioral Health Issues

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Caples Terrace WA008519	28	Voluntary Conversion to close-out Public Housing
The Elwood WA008520	46	Voluntary Conversion to close-out Public Housing
Englund Manor WA008000516	29	Voluntary Conversion to close-out Public Housing
The Meridian WA008000521	46	Voluntary Conversion to close-out Public Housing
Tenny Creek WA008000517	40	Voluntary Conversion to close-out Public Housing

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
TOTAL: Public Housing Units to be Removed in the Plan Year	189	

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Battle Ground Project in Development	16	No	This development is in very early stages: Housing Trust Fund and LIHTC applications to be submitted. Project is planned as 80 multi-family units, 20% set aside for homeless.
TOTAL: Planned new Project Based Units in Plan Year	16		

iv. Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Select one of the following to indicate the Planned Status by the end of the Plan Year: "Committed," "Leased," or "Issued." In column three, indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Arbor Ridge	30	Leased/Issued	Yes	60 unit assisted living, RAD transfer
Arbor Ridge	30	Leased/Issued	No	60 unit Assisted Living, PBV
Aurora Place	13	Leased/Issued	No	13-unit project owned by 2 nd Step
Camas Ridge	8	Leased/Issued	No	A 58-unit market rate project
Cascadia Village	6	Leased/Issued	No	51-unit LIHTC owned by Reach CDC
Central Park Place	30	Leased/Issued	No	30 VASH PBV in 124-unit SRO
Freedom's Path	40	Leased/Issued	No	40 VASH PBV in 50-unit building
Fruit Valley	17	Leased/Issued	No	Previously public housing
Ft. Vancouver Terrace	13	Leased	No	HUD Conversion of Multifamily Property
Isabella Court	10	Leased/Issued	No	49-unit LIHTC, Reach CDC
Isabella II	30	Leased/Issued	No	49-unit LIHTC, Reach CDC
Kauffman Townhomes	10	Leased/Issued	No	10-unit project owned by 2 nd Step
Lincoln Place	30	Leased/Issued	No	30 unit site for chronic homeless
The Meadows	23	Leased/Issued	No	30-unit LIHTC, 2 nd Step Housing

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Mercy Peace Health	17	Committed	No	69 units. Partnership between Mercy Housing Northwest and Peace Health Hospitals
Meriwether Place	23	Leased/Issued	No	30-unit LIHTC, CNPH
The Mews	3	Leased/Issued	No	24-unit LIHTC owned by Reach CDC
Mill Creek	12	Leased/Issued	Yes	50-unit LIHTC, RAD transfer
Mill Creek	42	Leased/Issued	No	78 unit Senior and Family units, PBV
Neals Lane	8	Leased	No	8 units. Homeless families.
North Crest Manor	17	Leased	No	26 unit. Existing units general population
The Pacific	8	Leased/Issued	No	18-unit behavior health, Housing Initiatives
Rhododendron Place	23	Leased/Issued	No	30-unit LIHTC, CNPH
Skyline Crest	90	Leased/Issued	Yes	Previously public housing
Skyline Crest	48	Leased/Issued	Yes	RAD portion of previous public housing
Smith Tower	3	Leased Issued	No	170 units, owned by Mid-Columbia
Van Vista	95	Leased/Issued	No	96 units, previously public housing
VHA Apartment Homes	122	Leased/Issued	Yes	Scattered small complexes
Vista Court	76	Leased/Issued	No	76-unit senior building
Total: Planned Existing Project-Based Vouchers	877			

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
VHA is still pursuing approval 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.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
\$1,300,000 for Sewer Improvements at three (3) RAD properties that are comprised of a total of 27 units: Z Street, NE 54 th St, and Stapleton Road.
\$692,000 for improvements at Mill Creek. .

A. LEASING INFORMATION

Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	2534	211
MTW Housing Choice Vouchers (HCV) Utilized	27,379	2281
Local, Non-Traditional: Tenant-Based^	73	6
Local, Non-Traditional: Property-Based^	2292	191
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served:	32,278	2689

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

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

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Transitional Housing/2014-04	60	5
Tenant-Based	School Stability/2013-02	13	1
Property-Based	Shelter Beds/2021 Proposed 2021-01	1980	165
Property –Based	LIHTC Rent Buy Down/2021 Proposed 2021-02	168	14
Property-Based	Market Unit Rent Buy Down/2015-01	144	12
Homeownership	N/A	0	0

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

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

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	No leasing issues anticipated.
MTW Housing Choice Voucher	Rents remain high and vacancy rate is 1%. New construction is underway/planned in the market. Payment standards will increase in 2022.
Local, Non-Traditional	No leasing issues anticipated.

B. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Housing Choice Voucher	Tenant-Based Voucher	1205	Partially Open	No
Aurora Place	PBV Site	354	Partially Open	No
Camas Ridge	PBV Site	5118	Open	NA
Caples Terrace	Public Housing Site	16	Partially Open	No
Englund Manor	Public Housing Site	115	Open	NA
Fort Vancouver Terrace	PBV Site	169	Open	NA
Fruit Valley	PBV Site	4527	Open	NA
Isabella Court	PBV Site	2845	Open	NA
Kauffman Townhomes	PBV Site	272	Partially Open	No
Lincoln Place	PBV Site	0	Partially Open	No
The Meadows	PBV Site	3434	Partially Open	No
Meriwether Place	PBV Site	0	Partially Open	No
Mill Creek	PBV Site	7862	Open	NA
Neals Lane	PBV Site	0	Open	NA
Northcrest Manor	PBV Site	0	Open	NA
Rhododendron Place	PBV Site	23	Partially Open	No
Skyline Crest	PBV Site	6981	Open	NA
VHA Apartment Homes	PBV Site	6824	Open	NA
Vista Court	PBV Site	1197	Partially Open	No

Please describe any duplication of applicants across waiting lists:

Applicants can apply to any or all waiting lists. 37% of applicants apply to more than one waitlist.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
The Meridian	New Public Housing waitlist
Mercy Peace Health PBV	New PBV property expected to be complete in 2022

SECTION III: PROPOSED MTW ACTIVITIES

VHA plans no new activities.

SECTION IV: APPROVED MTW ACTIVITIES

A. Implemented Activities

. Activity 2021-01 Local Non-Traditional: Financial Support of Shelter Beds

- i. This activity was approved in an amendment to the 2021 MTW Annual Plan and was implemented in 2021.
- ii. This activity provides operational support for homeless shelters, through payment directly to the operator of the shelter. Tenants served are homeless individuals or families under 80% AMI. The amount of subsidy per shelter is determined by agreement with the shelter and dependent on other resources and whether the shelter is serving families or single individuals.
- iii. There are no non-significant changes planned 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 2021-02 Local Non-Traditional: Rent Buy Down in LIHTC Units

- i. This activity was approved in an amendment to the 2021 MTW Annual Plan and will be implemented in 2021.
- ii. VHA pays to the LIHTC property the difference between 35% of household income and the rent for the unit. The target population for this activity is households with income under 50% AMI for whom even Tax Credit rents are unaffordable. LIHTC properties may apply to VHA for inclusion in the program.
- iii. There are no non-significant changes planned 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 2020-01 Exclusion of Childcare Wages

- i. This activity was approved in an amendment to the 2020 MTW Annual Plan and will be implemented in 2021.
- ii. This activity will exclude income from new employment in the childcare industry (either as an employee or as a state licensed childcare provider). Such income will be considered earned income but will be excluded as countable income. The exclusion will be 100% in the first twelve months. In the second twelve months, the exclusion will be 50%. The maximum exclusion will be 24 months. Breaks in employment will not extend the length of the exclusion. Although income is excluded from calculation of TTP, participants are still subject to Activity 2013-01: Minimum Earned Income Rent Reform. Earnings excluded under this Activity (2020-01) will be counted as earnings under 2013-01.
- iii. There are no non-significant changes planned 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

- i. 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.
- ii. 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.
- iii. There are no non-significant changes planned 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 2016-02: Local Blended Subsidy

- i. This activity was approved in the FY2016 MTW Annual Plan and was implemented in 2020. It was last amended in the FY2020 MTW Plan Amendment to add The Meridian as a project to receive blended subsidy.
- ii. 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 are considered public housing. The length of time the project receives blended subsidy 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. VHA is developing, and has been approved for, five projects under this activity: Tenny Creek, Englund Manor, Arbor Ridge, and the Meridian.
- iii. VHA will seek HUD approval of a Mixed Finance project for 60 units of Public Housing at Mill Creek. .
- 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 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%. Some properties (currently the Public Housing sites Englund Manor and Tenny Creek) may be exempt from this activity due to a conflict with a State of Washington requirement. In addition, under this activity, households with a tenant-based voucher can 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 2015-01: Rent Buy-Down Local Subsidy Program

- i. This activity was first approved in the FY2015 Plan Year. The original project where this activity was going to be utilized did not happen and this activity was not implemented until FY2020.
- ii. This activity is a local housing subsidy program that “buys-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). Approved projects receive funds from the VHA to bring unit rents down from the market rent to a level affordable for a household with income at 50% of the AMI. VHA signed an agreement in FY2020 with a local developer for up to 35 units in three properties.
- 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. There have been no non-significant changes to this activity since approved by HUD.

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 was 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. The activity was amended in the 2020 MTW Annual Plan Amendment to waive the requirement of an independent entity to approve initial and renewal HAP contract terms. In 2022 VHA will add Quality Control Inspections to this activity. 5% of all completed inspections completed each year will be re-inspected by an independent third party as a Quality Control measure.
- ii. This activity consolidated some previous MTW activities and added some new policies regarding 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 provide move vouchers except in cases of overcrowded or under-occupied units where VHA does not anticipate an appropriate sized PBV becoming available. This rule does not apply to PBV project converted under RAD. (Note that VHA is making a non-significant change to this policy below)
 - 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.
 - VHA may perform HQS inspections and to make determinations of ongoing rent reasonableness in VHA owned units. (see also Activity 2011-05)
 - VHA will approve initial and renewal HAP contract terms without approval by an independent entity.
 - VHA may project-base up to 30% of its HCV program.

This activity will be ongoing during the Plan year.

- iii. There are two non-significant changes to this activity in 2022

- a. Addition of Quality Control Inspections.
- b. VHA plans to relax the restriction on move vouchers and allow a move voucher when requested in non-RAD 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.
- 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 15th 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

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on July 1, 2014. It was amended in 2021.
- ii. The Transitional Housing Program supports transitional housing for homeless individuals and families with income below 30% of the Area Median Income (AMI). Transitional Housing providers receive financial assistance to support the cost of rent when they have funds to leverage that are not adequate to provide housing assistance. Assistance maybe provided in scattered sites, or property owned by the transitional housing provider. Transitional housing providers will provide services to support self-sufficiency. Participation of individual households will be limited by the sponsoring agency's rules. Income eligibility will be determined following the VHA's HCV eligibility with a 30% limit. VHA has presently committed \$50,000 annually to this activity. VHA may commit additional funding in the future if a sponsoring agency seeks support and the cost per household can be held under VHA's average HAP cost in the HCV program.
- 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 participant's 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. 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 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 either are 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 activity. 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. 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 stopped leasing new families under this program and is not planning to lease any in 2021. The activity will likely be closed out once current families complete their terms of participation.

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 to increase 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 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. In 2022 VHA will add Quality Control Inspections to this activity. 5% of all completed inspections completed each year will be re-inspected by an independent third party as a Quality Control measure.
- 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. Addition of Quality Control Inspections.
- 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 2009-19: 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 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. 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 2009-15: 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 most 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

VHA has no activities not yet implemented at this time.

C. Activities on Hold

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

This activity will be closed in the 2021 Annual Report.

- 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 another 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 complying with the requirements of the lease.
 - iii. There are no non-significant changes planned 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.
- .

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
Skyline Crest Campus of Learners/2010-02	FY2010	FY2010	FY2019	Concluded
Community Supported Self Reliance/2012-01	FY2012	FY2012	FY2018	Concluded
Time Limited Vouchers with Services/2008-01	FY2008	FY2008	FY2018	Concluded
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
Community Supported Self-Reliance/2012-01	FY2012	FY2012	FY2020	Concluded
"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

MTW ACTIVITY NAME/NUMBER	PLAN YEAR APPROVED	PLAN YEAR IMPLEMENTED	PLAN YEAR CLOSED OUT	REASON CLOSED OUT
All HCV Port-Ins to be Absorbed by VHA/1999-01	FY1999	FY2009	FY 2001	Concluded

Section V: Sources and Uses of Funds

* Due to timing of the Annual Plan preparation, available information is from 2021 budget. *

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	19,310,329
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,621,497
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	5,240,091
70000	Total Revenue	\$26,171,917

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	2,655,118
91300+91310+92000	Management Fee Expense	166,860
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	123,184
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	5,356
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	23,209,899
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	1,500
90000	Total Expenses	\$26,171,917

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

No significant variance

iii. Description of Planned Use of MTW Single Fund Flexibility

PLANNED USE OF SINGLE FUND FLEXIBILITY
<p>VHA uses the funding flexibility allowed under MTW to provide additional services for the people we house. We have consolidated all 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.</p> <p>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 Caples Terrace, which serves youth transitioning out of foster care.</p> <p>VHA also funds a local agency's deposit assistance program for persons on our waiting list and a fund for navigation and referral services for the same population.</p> <p>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.</p> <p>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.</p> <p>VHA plans to utilize Capital Funds within our Single Fund Flexibility for construction or renovation costs at VHA owned properties.</p>

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
<p>The VHA completed its last RAD conversion in Plan Year FY2016. A total of 212 former public housing units were converted to PBV under RAD. VHA plans to seek a Faircloth to RAD conversion at Skyline Crest as described in the introduction.</p>

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 attached.

B. Documentation of Public Process

The VHA made the proposed Annual Plan available for public comment on August 6, 2021. A public hearing was held September 7, 2021. No public comments were received and no one attended the public hearing.

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 lobbying disclosures are attached as *WA008 2022 MTW Annual Plan Resolution and Appendix Documents*.

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HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 3374

**RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN
FOR FISCAL YEAR 2022**

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

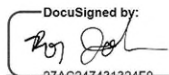
WHEREAS, the Amendment to the Annual Plan for Fiscal Year 2022 has been prepared and made available for public comment for thirty days and a public hearing was held on September 7, 2021.

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

1. The Board of Commissioners approves the 2022 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 of the Board 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 23rd day of September 2021.

ATTEST:

DocuSigned by:

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Roy A. Johnson, Secretary-Treasurer

DocuSigned by:

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Joan Caley, Chair

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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.

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- (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.

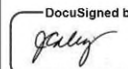
VANCOUVER HOUSING AUTHORITY
MTW PHA NAME

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).

JOAN CALEY
NAME OF AUTHORIZED OFFICIAL

BOARD CHAIRMAN
TITLE

DocuSigned by:

 72A9089724E1460...
SIGNATURE

9/24/2021
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.**

DocuSign Envelope ID: DDF0A68C-1FF2-4E91-9B85-22D28E8C62B3

Department of Housing
and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

**Certification of Payments
to Influence Federal Transactions**

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Vancouver Housing Authority WA008

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)

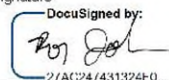
Name of Authorized Official

Roy A. Johnson

Title

Executive Director

Signature

DocuSigned by:


2/AC24/431324-0

Date (mm/dd/yyyy)

9/16/2021

Previous edition is obsolete

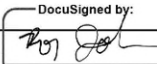
form HUD 50071 (01/14)

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DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input 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		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Vancouver Housing Authority 2500 Main St Vancouver, WA 98660 Congressional District, if known: 4c 3rd			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency: US Dept. of Housing and Urban Development			7. Federal Program Name/Description: CFDA Number, if applicable: _____		
8. Federal Action Number, if known:			9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):		
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 this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information 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.			DocuSigned by:  Signature: _____ Print Name: <u>Roy A. Johnson</u> Title: <u>Executive Director</u> Telephone No.: <u>360-993-9500</u> Date: <u>9/27/2021</u>		
Federal Use Only:				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	