

Vancouver Housing Authority

MOVING TO WORK ANNUAL PLAN 2023

Submitted to HUD 10/31/2022

Moving to Work FY2023 Annual Plan

VANCOUVER HOUSING AUTHORITY

Board of Commissioners

Joan Caley, Chair

Carol Collier, Vice Chair

Evelyn Hallett, Resident Commissioner

Lloyd Halverson, Commissioner

Greg Kimsey, Commissioner

Dominique Merriweather, Commissioner

Senior Staff

Roy Johnson, Executive Director

Saeed Hajarizadeh, Deputy Director

Victor Caesar, Director of Development

Natasha Douglas, Director of Human Resources

Mila Fabyanchuk, Finance Director

Sasha Nichelson, MTW and Policy Manager

Andy Silver, Chief Operating Officer

Angie Sytsma, Executive Director of Bridgeview Housing

Prepared By:

Sasha Nichelson, MTW & Policy Manager

Table of Contents

SECTION I: INTRODUCTION	4
A. The Vancouver Housing Authority.....	4
B. Short and Long-Term MTW Goals and Objectives	5
SECTION II: GENERAL OPERATING INFORMATION	6
A. HOUSING STOCK INFORMATION.....	6
B. LEASING INFORMATION	9
C. WAITING LIST INFORMATION	10
SECTION III: PROPOSED MTW ACTIVITIES	11
SECTION IV: APPROVED MTW ACTIVITIES.....	21
A. Implemented Activities.....	21
B. Not Yet Implemented Activities.....	28
C. Activities on Hold	28
D. Closed Out Activities.....	29
SECTION V: PLANNED APPLICATION OF MTW FUNDS.....	31
A. PLANNED APPLICATION OF MTW FUNDS.....	31
SECTION VI: ADMINISTRATIVE.....	33
A. Board Resolution and Certifications of Compliance.....	33
B. Documentation of Public Process.....	33
C. Planned and Ongoing Evaluations.....	34
D. Lobbying Disclosures.....	34
APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS	35
APPENDIX B: LOBBYING DISCLOSURES	38
APPENDIX C: HARDSHIP POLICY	40

SECTION I: INTRODUCTION

A. 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 3800 households and has developed more than 1900 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 program rules and more flexibility regarding the use of Federal funds.

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

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 2023 Annual MTW Plan conforms to the latest requirements.

B. 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.

The importance of VHA's MTW status cannot be overstated, it has allowed VHA to be responsive to community needs through development of local initiatives. VHA has secured a position in the County as the go-to agency for responsiveness and collaboration. Many times, addressing affordable housing needs of targeted populations was possible due to VHA taking a lead role in provision of homeless and supportive housing options for the County.

VHA is considering projects in 2023 that include Faircloth to RAD, mixed finance, and, ultimately, a Streamlined Voluntary Conversion application to close-out Public Housing. 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 BR	2 BR	3 BR	4 BR	5 BR	6+BR	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A										

Total Public Housing Units to be Added in the Plan Year:	N/A
---	------------

* 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](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:

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
Mill Creek AMP TBD	60	Voluntary Conversion to close-out Public Housing
Tenny Creek WA008000517	40	Voluntary Conversion to close-out Public Housing

TOTAL: Public Housing Units to be Removed in the Plan Year	249
--	-----

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 in 2023. Project is planned as 80 multi-family units, 20% set aside for homeless.
N/A			
TOTAL: PLANNED NEW PROJECT BASED UNITS IN PLAN YEAR	N/A		

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	58	Leased	Yes (30)	60 unit assisted living, partial RAD transfer
Aurora Place	13	Leased	Yes	Owned by 2 nd Step
Camas Ridge	8	Leased	No	A 58-unit market rate project
Cascadia Village	6	Leased	No	51-unit LIHTC owned by Reach CDC
Central Park Place	30	Leased	No	30 VASH PBV in 124-unit SRO
Freedom's Path	40	Leased	No	40 VASH PBV in 50-unit building
Fruit Valley	18	Leased	No	Previously public housing

Ft. Vancouver Terrace	13	Leased	No	HUD Conversion of Multifamily Property
Isabella Court	10	Leased	No	49-unit LIHTC, Reach CDC
Isabella II	30	Leased	No	49-unit LIHTC, Reach CDC
Kauffman Townhomes	10	Leased	No	10-unit project owned by 2 nd Step
Lainie's Crossing	39	Leased	Yes	39 Units, RAD Transfer
Lincoln Place	30	Leased	No	30 unit site for chronic homeless
The Meadows	23	Leased	No	30-unit LIHTC, 2 nd Step Housing
Columbia Heights/Mercy Peace Health	17	Leased	No	69 units. Partnership between Mercy Housing Northwest and Peace Health Hospitals
Meriwether Place	23	Leased	No	30-unit LIHTC, CNPH
The Mews	3	Leased	No	24-unit LIHTC owned by Reach CDC
Mill Creek	12	Leased	Yes	50-unit LIHTC, RAD transfer
Nam'u Qas	30	Leased	Yes	RAD transfer
Neals Lane	8	Leased	No	8 units. Homeless families.
The Pacific	8	Leased	No	18-unit behavioral health, Housing Initiative
Rhododendron Place	23	Leased	No	30-unit LIHTC, CNPH
Skyline Crest	90	Leased	No	Previously public housing
Skyline Crest	48	Leased	Yes	RAD portion of previous public housing
Smith Tower	3	Leased	No	170 units, owned by Mid-Columbia
Van Vista	95	Leased	No	96 units, previously public housing
VHA Apartment Homes	53	Leased	Yes	Scattered small complexes
Vista Court	76	Leased	No	76-unit senior building
TOTAL: PLANNED EXISTING PROJECT-BASED VOUCHERS	817			

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 will transfer the remaining 53 RAD units at VHA Apartment Homes to properties to be determined in 2023.

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

\$1,750,000 Arbor Ridge renovations.

B. LEASING INFORMATION

i 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	2988	249
MTW Housing Choice Vouchers (HCV) Utilized	24336	2028
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	3012	251
Local, Non-Traditional: Homeownership^	0	0
PLANNED TOTAL HOUSEHOLDS SERVED:	30,336	2528

* "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*
Property-Based	Shelter Beds/2021 Proposed 2021-01	2364	197
Property –Based	LIHTC Rent Buy Down/2021 Proposed 2021-02	288	24
Property-Based	Market Unit Rent Buy Down/2015-01	360	30
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.

ii 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.
Local, Non-Traditional	No leasing issues anticipated.

C. 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	2696	Partially Open	NA
Aurora Place	PBV Site	4733	Closed	No
Camas Ridge	PBV Site	9068	Closed	No
Caples Terrace	Public Housing Site	58	Partially Open	NA
Columbia Heights	PBV Site	1170	Open	NA
Englund Manor	Public Housing Site	1049	Open	NA
Fort Vancouver Terrace	PBV Site	2381	Open	NA
Fruit Valley	PBV Site	4802	Closed	No
Isabella Court	PBV Site	5219	Closed	No
Kauffman Townhomes	PBV Site	2703	Closed	No
The Meadows	PBV Site	8271	Partially Open	No
Meriwether Place	PBV Site	2	Partially Open	No
Mill Creek	PBV Site	9611	Closed	No
Neals Lane	PBV Site	1302	Open	NA
The Pacific	PBV Site	2	Partially Open	No
Rhododendron Place	PBV Site	18	Partially Open	No
Skyline Crest	PBV Site	9704	Closed	No
VHA Apartment Homes	PBV Site	8643	Closed	No
Vista Court	PBV Site	1804	Open	NA

Please describe any duplication of applicants across waiting lists:

ii Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting

Applicants can apply to multiple waiting lists. 67% of applicants applied to more than one waiting list.

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
Lainie's Crossing	Possible Opening of list
Nam'u Qas	Possible Opening of List

SECTION III: PROPOSED MTW ACTIVITIES

ACTIVITY 2023-01 USE OF MTW FUNDS FOR DEVELOPMENT – LOCAL NON-TRADITIONAL

A. ACTIVITY DESCRIPTION

Through this activity, VHA intends to commit MTW funds to acquire, renovate, or build local, non-traditional affordable units. Funds may be used directly by VHA or may be granted or loaned to another entity that will acquire, renovate or develop and own the local, non-traditional affordable units. Such units are made available in the project, by regulatory and operating agreement, master contract, individual lease, or equity interest.

This activity will follow the general parameters of PIH Notice 2011-45, as well as those specific to Housing Development Programs. Funds will be used only to develop affordable units (for families with income below 80% AMI). Developments will remain affordable for 30 years unless MTW funds are used only as a loan. In the case of a loan, the units must remain affordable at least until the loan is repaid but maybe longer by agreement. VHA will record a use agreement or covenant on any property developed using MTW funds. Development of local non-traditional housing under this activity will also comply with requirements for Environmental Review, Site and Neighborhood Standards, Subsidy Layering Review, and any applicable Section 18 disposition requirements.

While VHA may identify other projects in the future, in 2023 VHA plans to utilize \$1,000,000 to support Development of Laurel Manor a HUD Multi-family 202 project by providing a loan to Columbia Nonprofit Housing (CNPH) is a nonprofit formed by VHA. The project consist of 82 one-bedroom units in the heart of Vancouver's International District along Fourth Plain Boulevard. The building is designed with best practices for senior living with the ultimate goals of allowing seniors to age in place and promote social interaction.

Relation to Statutory Objectives

This activity will achieve the statutory objective of increasing housing choice by leveraging private and/or public funding to develop low-income housing.

Implementation

Development of this project is set to begin in the spring of 2023 and is expected to open the summer of 2024. The building should be fully leased by fall 2024.

B. ACTIVITY METRICS INFORMATION

<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	82	0	0.
--	---	----	---	----

Baseline is zero as this is a new activity. Baseline is the number of units expected to be developed in 2023.

C. COST IMPLICATIONS

VHA plans to lend \$1,000,000 in 2023.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

This activity is authorized by Housing Development, PIH Notice 2011-45 Parameters for Local, Non-Traditional Activities under the Moving to Work

ACTIVITY 2021-02 LOCAL NON-TRADITIONAL: RENT BUY DOWN IN LIHTC UNITS - AMENDED

A. ACTIVITY DESCRIPTION

This activity was approved in an amendment to the 2021 MTW Annual Plan and was implemented in 2021. This amendment adds flexibility to the amount of the rent buy-down and sets the original buy-down calculation as a maximum. This local non-traditional program buys down rents in Low Income Housing Tax Credit Units (LIHTC). The target population for this activity is households with income under 50% AMI for whom even Tax Credit rents are unaffordable. VHA will buy down rents by paying to the LIHTC property a monthly amount determined by agreement between the PHA and the LIHTC property. The agreed amount will be dependent on available funds and the needs of the property in serving low-income households. The buy-down amount will not exceed the difference between 35% of household income and the rent for the unit (rents in Tax Credit units are not necessarily set at the Tax Credit Rent Limit. Some are lower).

This activity meets the statutory goal of increasing housing choice.

Relation to Statutory Objectives

This activity will achieve the statutory objective of increasing housing choice by ensuring that tenants with incomes as low as zero dollars would be able to sustain housing in LIHTC units. This also provides housing subsidy at a lesser cost than HCV, allowing VHA to serve more households.

Implementation

VHA anticipates implementing this activity as soon as it is approved.

B. ACTIVITY METRICS INFORMATION

CE #6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	\$764	\$500		

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	14		

HC #2: UNITS OF HOUSING PRESERVED				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	14		

Metric data will be sourced from records provided by the LIHTC property on number of units assisted and from VHA records of HAP costs.

C. COST IMPLICATIONS

VHA anticipates a continued positive cost implication with this activity by keeping the contribution per bed/room below average HAP. Surplus funds will be utilized to support other MTW subsidies and programs.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

This activity is authorized by Rental Subsidy, PIH Notice 2011-45 Parameters for Local, Non-Traditional Activities under the Moving to Work

AMEND ACTIVITY 2013-01: MINIMUM EARNED INCOME RENT REFORM**A. ACTIVITY DESCRIPTION**

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.

In this amendment, VHA proposes to establish categories of exemption, and refine the definition of earned income. This activity utilizes a minimum earned income when calculating rent for any HCV or Public Housing household that includes one or more workable family members.

Workable Definition: A family member who is

- 18 or more years of age and under 62 years of age.
- Not a dependent of the head of household. A dependent is a child under 18, or a person of any age (except the Head of Household, Spouse, or Co-Head) who is disabled or a full time student.
- Not disabled.
- Not the caretaker for a household member who is disabled.
- See also, Temporary Exemptions to Workable.

Earned Income Definition. For the purposes of this policy, the following will be counted as earned income to determine if the Minimum Earned Income requirement has been met. This definition does not alter the definition of included/excluded income used to determine a family's subsidy amount:

- Income from employment.
- Benefits resulting from previous employment: i.e. Unemployment compensation, Labor & Industries insurance benefits.

Calculation of Minimum Earned Income: The household Minimum Earned Income responsibility will equal the number of workable family members multiplied by the Minimum Wage in Clark County multiplied by 20 hours per week. All earned income in the household will offset the family's Minimum Earned Income responsibility. If the household's total earned income is greater than the Minimum Earned Income responsibility, the household is not affected by this policy. Any Minimum Earned Income will be added to the household's other countable income when calculating rental subsidy.

Temporary Exemptions to Workable: The following exemptions require the family to provide documentation.

- Tenant Choice. Each family will have 6 months of exemption to use by choice when they make a written request. This exemption can be used in two month periods during which all family members will be exempt from Minimum Earned Income. Once all six months are used, no further Tenant Choice exemption can be used.
- Student Exemption for Head of Household, Spouse, or Co-head. Individuals who are not dependents and are pursuing an education can be individually exempted from the Minimum Earned Income policy. To qualify, the family member must provide

documentation that the family member is enrolled full time (as defined by the school) at an accredited educational institution.

- Must provide VHA documentation of having satisfactorily completed courses to maintain the exemption. Documentation must be received within 30 days of the end of the school term (quarter or semester).
- Not providing documentation and/or not making satisfactory progress during one or more school terms will disqualify the family member from the exemption for the same number of terms.
- This exemption will not be given for longer than four years total to each family member. No more than two years will be given for students at a Community College or Vocational School. Students enrolled in Graduate programs who have already used four years of exemption may apply for a separate Financial Hardship Exemption.
- Exemption for Pregnancy: A birthing parent in their last trimester of pregnancy may request to be exempt by providing documentation of their due date from a health care professional.
- Exemption for the Caregiver of a Child from birth to 3 years old: One adult family member may request to be exempt to care for one or more children under 3 years old living in the household. Only one family member at a time may be exempt to care for a child/children. The household cannot be receiving a childcare expense deduction for the child/children.
- Exemption to care for a Disabled family member in the household.
 - The workable family member must provide a letter from the disabled person's healthcare professional stating that the disabled person needs enough care that their caregiver cannot work 20 hours per week outside the home.
 - Only one family member may receive an exemption to be an individual disabled person's caregiver.
 - The disabled person may not also have a live-in aide.

Financial Hardship Exemptions: VHA recognizes that additional circumstances may make the policy a hardship for workable family members. These families may request a Financial Hardship under the VHA Hardship policy. See Appendix C

Statutory Objectives

This activity provides incentives to households to obtain employment and become economically self-sufficient. In addition, the activity reduces costs through lower HAP expense due to the minimum income and through higher household incomes.

Implementation

If approved in 2023, VHA intends to implement the changes to the activity at

- the next interim reexamination of income, or
- the family's next regular re-examination, or
- the family's request for hardship.

B. Metrics and Data Collection

The baselines and benchmarks are not changing as part of this amendment. This will allow us to measure impact by comparing future outcomes to current.

CE #5: INCREASE IN AGENCY RENTAL REVENUE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase).	\$0	\$33,680		

SS #1: INCREASE IN HOUSEHOLD INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$14,787	\$14,787		

SS #3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full-Time	5	5		
	26%	26%		
(2) Employed Part-Time	3	3		
	16%	16%		
(3) Enrolled in an Educational Program	0	0		
	0%	0%		
(4) Enrolled in Job Training Program	7	7		
	37%	37%		
5) Unemployed	4	4		
	21%	21%		

SS #8: HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency.	0	0		

C. COST IMPLICATIONS

This activity has increased the number of work-able households with earned income and the average amount of earned income. Along with the direct effect of the minimum income on the calculation of assistance, VHA has experienced cost savings through a reduction in HAP expense. The changes in this amendment will likely reduce cost savings. See impact analysis for additional information.

D. JUSTIFICATION FOR MTW FLEXIBILITY

This activity is authorized under Sections C. 11. and D. 2.a. of Attachment C of the Amended and Restated Agreement.

E. ADDITIONAL INFORMATION FOR RENT REFORM ACTIVITIES

i IMPACT ANALYSIS

After utilizing the Minimum Earned Income policy for nearly 10 years VHA sees opportunities to retain the work incentive while modifying the policy to be more responsive to real life circumstances. Most of the proposed changes are prompted by repeat Hardship Requests received and approved. The proposed changes to the Minimum Earned Income activity will reduce the HAP savings we have seen under the activity. Although not all of the changes can be modeled, we believe the cost increase will be relatively modest and is called for in the interest of a fair policy. VHA also has a Request for Proposals published that we hope will result in a research project that will assess how much impact the Minimum Earned Income has had on household earnings. The research project hopes to assess the impact of other influences on changes in VHA participants' earnings.

The total number of MTW households that have at least one workable family member is 703. Of the 703 workable households, 426 have income imputed to them because actual earned income is less than the Minimum Earned Income. Below are the specific changes to this activity and an effort to estimate their impact.

- a. Counting work-based benefits: 25 households with Imputed Income receive Unemployment or L&I (Worker's Compensation) benefits. VHA feels that since this income can only be obtained by having previously worked and returning to work as soon as possible is a requirement to receive the benefits, counting these benefits as earned income is fair. Allowing these payments to offset the Minimum Earned Income will result in a monthly increase in VHA's total HAP expense of \$7769.

- b. Exempting non-dependent students: We feel that the pursuit of an education for a reasonable period should exempt a family member from the requirement to earn a minimum income. This change will only impact a Head-of-Household, co-head, or spouse who is a full time student. Unfortunately, we do not track whether individual non-dependent family members are pursuing an education. Based on hardship exemptions we have received, we anticipate fewer than 10 households will likely be exempted. VHA will add a tracking method to our software in order to be able to report on the outcomes.
- c. Exemption for 3rd Trimester Pregnancy: Again, we do not specifically track pregnancy. However, we can see that 16 children under one reside in work-able households. Using these 16 households as an example, the removal of imputed income for three months would increase HAP by a total of \$8071 (\$2690 per month).
- d. Exemption to care for children under 3: VHA is aware that adequate daycare is not always available for children under 3 years old. When it is available, it may be so expensive as to exceed any earnings. This exemption allows one adult in a household with children under 3 years old to be exempt from Minimum Earned Income until the child/children turn three. 87 work-able households have children under three living in them. The increased cost in HAP for this change is \$19,525 for the families with children under 3.

The predicted annual cost to make these changes is \$335,599 or 1.6% of MTW Budget Authority. VHA anticipates that this cost can be absorbed into our financial plans.

HARDSHIP CRITERIA

As a rent reform activity, affected families may access the Hardship Policy. Our Hardship Policy, including information on requesting a hardship is attached as Appendix C.

ANNUAL REEVALUATION

VHA believes these amendments to the Minimum Earned Income will create a fair policy for the families we serve. We will evaluate the changes' impact on education and employment over time.

TRANSITION PERIOD

VHA will implement the changes to the activity at the next interim reexamination of income, or the family's next regular re-examination. Families for whom this is a hardship can request the changes be implemented sooner under the Hardship Policy.

ACTIVITY 2009-08 ~ SIMPLIFIED UTILITY ALLOWANCE SCHEDULE - AMENDED

A. ACTIVITY DESCRIPTION

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. The Simplified Utility Allowance adopts a schedule calculated from the standard estimated costs for a unit where the tenant is responsible for only the cost of electricity. For studio through 3 bedroom units, the standard schedule for a new or weatherized multi-family unit is used. For larger units

the standard schedule for a single family home is used. The Simplified Utility Allowance allows participants to know whether a prospective unit falls within their maximum rent range. This reduces the number of Request for Tenancy Approvals that have to be denied because they are too expensive, and reduces the frustration for participants and property owners when searching for units to lease. The Simplified Utility Allowance is only used in Tenant Based Vouchers.

In this amendment, VHA is making two changes:

VHA adopted HUD’s definitions of Standard and Energy Efficient units in setting our 2022 Utility Allowance Schedule. The majority of units under lease do not meet HUD’s definition of Energy Efficient. The simplified Utility Allowance will utilize the Standard unit calculations in the future

Over the years, it has become more common in Clark County for tenants to pay for water, sewer, and garbage service (WSG), either directly or through costs allocated across the property. However, participants are able to locate units with WSG paid by the property. VHA wishes to keep the convenience for participant families and retain the shopping incentive of the Simplified Utility Allowance while addressing the changing practices related to utility costs.

The Simplified Utility Allowance will be used for maximum rent estimates, and at leasing for new units. After the first year of tenancy, subsidy will be recalculated utilizing the standard Utility Allowance Schedule for the actual tenant utility responsibilities when families pay directly to the utility or a third party biller. When families are charged an unchanging monthly fee that is paid to the property, that fee will be used in the utility calculation.

Statutory Objectives

This amended activity meets the statutory objectives of cost effectiveness through a reduction in the number of denied Request for Tenancy Approvals. The schedule is based on the conventional HCV utilities schedules for newer energy efficient all electric units by bedroom size.

Implementation

For families moving or newly leasing, this amendment will not change anything. For Families in units longer than 12 months the amendment will be implemented at the next interim or annual re-examination (including rent increase only actions) or earlier if a hardship review is requested.

B. METRICS AND DATA COLLECTION

The baselines and benchmarks are not changing as part of this amendment

CE #1: AGENCY COST SAVINGS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$7,603	\$0		

CE #2: STAFF TIME SAVINGS

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	194	0		

CE #3: DECREASE IN ERROR RATE OF TASK EXECUTION				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percent (decrease).	11.63%	0%		

Metrics for this activity are based on estimated staff time that would be spent on Requests for Tenancy Approval forms that were denied for exceeding maximum rent and estimates on additional instruction provided to property owners and tenants on calculating utility allowances that is no longer necessary under this activity.

C. COST IMPLICATIONS

This amendment will continue to provide cost savings related to simplifying the Maximum Rent and Request for Tenancy Approval processes. The changes in this amendment may increase HAP for some families who are living in their units more than 12 months. See impact analysis for additional information.

D. JUSTIFICATION FOR MTW FLEXIBILITY

This activity is authorized under Section D.2.a. of Attachment C of the Amended and Restated Agreement.

E. ADDITIONAL INFORMATION FOR RENT REFORM ACTIVITIES

IMPACT ANALYSIS

This activity will not impact families in the first year of tenancy. For families who remain in a unit beyond the first year, the activity may result in a higher Utility Allowance (assuming the family has responsibility for more than electricity). The higher Utility Allowance will reduce the family share of rent if the gross rent of the unit is not already higher than the Payment Standard. If gross rent is higher, the family will see no change in their share of rent from the increased UA.

A review of recent new leases showed about 50% of property owners were requiring the family to pay for water, sewer, and gas. To determine the financial impact on HAP, we used current residents who have been in their units more than 12 months. We assumed 50% would be responsible for water, sewer, and gas. We estimated the change in HAP with a new UA, and calculated the difference. We estimate that the use of the standard UA after the first year will increase HAP by \$20,885 per month.

However, there are so many variable in this estimate that cannot be controlled. More or fewer families could stay in their units for longer than 12 months; payment standards could change; rents could change; property owners could change which utility charge responsibilities.

HARDSHIP CRITERIA

As a rent reform activity, affected families may access the Hardship Policy. Our Hardship Policy, including information on requesting a hardship is attached as Appendix C.

ANNUAL REEVALUATION

VHA will internally monitor the increased HAP costs. However, as more properties require tenants be responsible for full utilities, VHA will need to absorb these costs or develop additional MTW activities to offset the costs.

TRANSITION PERIOD

For families moving or newly leasing, this amendment will not change anything. For Families in units longer than 12 months the amendment will be implemented at the next interim or annual re-examination (including rent increase only actions) or earlier if a hardship review is requested.

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 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 to provide operating subsidy 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 no longer receive the operating subsidy. 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. No insignificant changes are planned to this activity.
- 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 may be 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 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 at least 12 months after the effective date of an interim reexamination. An interim review for income or household composition change may reset the next required reexamination only once. This policy reduces the overall number of reexaminations required each year.
- iii. VHA has clarified that an interim review may only change the required reexamination date once. It was not VHA's intent or practice that a regular reexamination could be reset by interim reviews multiple times.
- 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 2009-03: 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 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 be closed out in the 2022 Annual MTW Report.

D. Closed Out Activities

The following chart lists all closed out MTW activities

MTW ACTIVITY NAME/NUMBER	PLAN YEAR APPROVED	PLAN YEAR IMPLE- MENTED	PLAN YEAR CLOSED OUT	REASON CLOSED OUT
--------------------------	-----------------------	-------------------------------	----------------------------	----------------------

Mandatory Participation in Services/2019-01	FY2019	2019	2021	Not Successful
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
All HCV Port-Ins to be Absorbed by VHA/1999-01	FY1999	FY2009	FY 2001	Concluded

SECTION V: PLANNED APPLICATION OF MTW FUNDS

* Due to timing of the Annual Plan preparation, these are preliminary 2023 numbers. Budget has not been finalized.

A. PLANNED APPLICATION 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	21,686,961
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,721,760
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	5,736,000
70000	TOTAL REVENUE	\$29,144,721

ii Estimated Application of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
9000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	2,667,813
91300+91310+92000	Management Fee Expense	174,512
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	97,000
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	6,120
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	26,196,060
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	3,216
90000	TOTAL EXPENSES	\$29,144,721

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

No significant variance

iii Description of Planned Application of MTW Funding Flexibility

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

VHA will utilize MTW funding flexibility (including Section 8, Public Housing operating reserves, Capital Fund Grants, Replacement Housing Factor Funds, and Demolition and Disposition Transitional Funds) for activities authorized in the MTW Agreement. Uses include capital needs rehabilitation, operating expenses, and construction and redevelopment costs at properties where VHA has an ownership interest, as well as rental subsidies in Public Housing, Section 8 Voucher, and Local Non-Traditional programs.

VHA will use the funding flexibility allowed under MTW to provide additional services for the people we house. Many of our resident services are under the umbrella of Bridgeview Housing. In addition to the grant-funded services of Family Self Sufficiency (FSS), MTW funds support the Community Employment and Education program. These services support VHA's rent reform activities.

VHA will use the funding flexibility to fund resident services at specific properties serving high needs populations such as Lincoln Place, Englund Manor, Elwood, and Caples Terrace.

VHA also funds a local agency's moving cost assistance program for households that have been issued vouchers.

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.

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 at the transferred site.

iv PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

ORIGINAL FUNDING SOURCE	BEGINNING OF FY - UNSPENT BALANCES	PLANNED APPLICATION OF PHA UNSPENT FUNDS DURING FY
HCV HAP*	\$0	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$764,944	\$500,000
TOTAL:	\$	\$

DESCRIPTION OF PLANNED EXPENDITURE OF UNSPENT OPERATING FUND AND HCV FUNDING

PH unspent Operating Subsidy (Disposition Proceeds) to be spent on excess Public Housing Operating costs.

v 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

vi Rental Assistance Demonstration (RAD) Participation

i Description of RAD Participation.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

The VHA is considering a Faircloth to RAD conversion. Specific plans and properties are not confirmed at this time. .

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

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 as Appendix A.

B. Documentation of Public Process

VHA met with our Resident Advisory Board (RAB) on August 10 and 31, 2022 to review the proposed Annual MTW Plan for 2023. A legal notice that the Plan was available for review was published in The Columbian on August 5 and September 6. VHA's website had a banner soliciting input to the Plan from August 5 through October 11.

A public hearing was held on October 11, 2022. VHA staff Roy Johnson, Sasha Nichelson, and Angie Sytsma attended along with seven RAB members. There were not attendees from the

general public. RAB members had general questions about the difference between Housing Choice Vouchers and Public Housing, policy questions not related to Moving to Work activities, property costs, and questions specific to the circumstances of the person asking the question.

Only one comment was offered on the Annual Plan: VHA should make everyone work or volunteer in order to receive housing assistance. The commenter stated that having purpose was beneficial to residents even if they are elderly or disabled. VHA staff responded that her suggestion will be considered when making future plans.

No other comments were offered in the Public Meeting. No comments were received via email, US mail, or phone.

C. Planned and Ongoing Evaluations

VHA has solicited proposals for a quantitative and qualitative review of VHA's Minimum Earned Income policy (Activity 2013-01). Proposals are currently under review and we anticipate the review will be complete in 2023.

D. Lobbying Disclosures

Signed copies of lobbying disclosures are attached as Appendix B.

APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS

DocuSign Envelope ID: C78748F2-0B76-41F6-8BA3-E42384FA2751

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 3442

RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2023

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 an Annual MTW Plan; and


WHEREAS, the Amendment to the Annual Plan for Fiscal Year 2023 has been prepared and made available for public comment for thirty days and a public hearing was held on October 11, 2022.

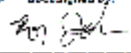
NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Vancouver Housing Authority that:

1. The Board of Commissioners approves the 2023 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 27th day of October 2022.

ATTEST:

DocuSigned by:

Joan Caley, Chair

DocuSigned by:

Roy A. Johnson, Secretary-Treasurer

DocuSign Envelope ID: 6F6A0526-1B4D-4AA8-98FB-19DAB0ADD9BD

OMB Approval No. 2577-0216 (exp. 3/31/2024)

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 Chair 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 01/01/2023, 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents 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 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (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 75.

form HUD 50900: Certifications of Compliance (3/2021)

DocuSign Envelope ID: 6F6A0526-1B4D-4AA8-98FB-19DAB0ADD9BD

OMB Approval No. 2577-0216 (exp. 3/31/2024)

- (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.
- (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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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

WA008

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.
WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Joan Caley

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

DocuSigned by

 SIGNATURE

10/27/2022

DATE

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

form HUD 50900: Certifications of Compliance (3/2021)

APPENDIX B: LOBBYING DISCLOSURES

DocuSign Envelope ID: 594ADD86-9032-465B-AD9E-7DF5DBCDD927

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

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

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)

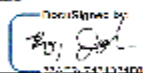
Name of Authorized Official

Roy A. Johnson

Title

Executive Director

Signature



Date (mm/dd/yyyy)

10/31/2022

Previous edition is obsolete

form HUD 50071 (01/14)

APPENDIX C: HARDSHIP POLICY

FINANCIAL HARDSHIP EXEMPTION FROM MTW RENT REFORM POLICIES

For a PHA in the Moving to Work demonstration, HUD requires the agency to adopt a policy for addressing hardship cases caused by agency established rent reform initiatives. [MTW Amended and Restated Agreement]

MTW Rent Reform Policies

VHA Policy

VHA has implemented the following MTW rent reform initiatives:

1. Simplified Utility Allowance Schedule (Activity 2009-08)
2. Replacement of Medical Expense Deduction (Activity 2009-10)
3. Minimum Earned Income Rent Reform (Activity 2013-01)
4. Alternative TTP Calculation – 35% (Activity 2015-02)

Tenant Choice Exemptions – Minimum Earned Income

Families affected by the Minimum Income Rent Reform are eligible for a six-month exemption period that the family may choose to use at any time without prior VHA approval. To use this exemption the family must request it, using the VHA form for that purpose, at least two weeks prior to the first of the month they want to be exempt from the minimum income. The minimum length of time the family may request is two months and each family is only eligible for a total of six months of exemption that they may use without VHA approval. The Tenant Choice Exemption must be utilized before requesting a Financial Hardship Exemption.

VHA Defined Financial Hardships

For the purpose of an exemption from a MTW rent reform policy, VHA defines a financial hardship as one that is directly and primarily due to one or more MTW rent reform policies and is significant enough that the family is facing the loss of their housing through eviction or utility shutoff due to their inability to pay. VHA may consider exceptional circumstances other than those listed below. In all cases VHA will expect work-able family members will be working or actively seeking work and that families will be living in as economical a unit as practical to meet their needs when considering whether a Moving to Work policy is causing a hardship. VHA is only able to approve exemptions from MTW rent reform policies and is not able to waive policies based on program regulations.

Simplified Utility Allowance Hardship.

A hardship exemption to this policy will cause the family's rent to be determined using a calculated utility allowance instead of the Simplified Utility Allowance. To demonstrate a hardship:

1. The family cannot be living in a unit that is larger than their voucher size, unless the unit rent is less than the Payment Standard for their voucher size or a change in household composition has occurred within the last 90 days.
2. The family's share of rent plus actual monthly utility costs must exceed 50% of their income, including any Minimum Earned Income.
3. The family's non-essential expenses cannot be more than 20% of their income.
4. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered essential when determining a hardship.

Replacement of Medical Expense Deduction Hardship

A hardship exemption to this policy will cause the Voucher Program to consider actual out-of-pocket medical expenses when determining the family's share of rent. To demonstrate a hardship:

1. The family must have an elderly (62 or older) or disabled Head of Household, Spouse, or Co-head.
2. The family must have eligible, ongoing, out-of-pocket medical expenses.
3. The family's non-essential expenses cannot be more than 20% of their income.
4. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered essential when determining a hardship.

A hardship exemption does not determine the amount of the medical deduction. A review of medical expenses will be completed by the Voucher Department if a hardship is granted.

Minimum Earned Income Hardship

A hardship exemption to this policy will cause the Voucher Program to consider actual household income, without imputed income, when determining the family's share of rent. To demonstrate a hardship, the family must provide documentation that one of the following applies:

1. They are currently working with Bridgeview Resources, Partners in Careers, or other work opportunity programs to find employment, or
2. A qualified professional can confirm they are unable to work because of a short term physical or mental health condition.

The exemptions above are in addition to standard definitions of Workable. See MTW Annual Plan, activity 2013-01 for the definition of work-able.

Alternative TTP Calculation Hardship

A hardship exemption to this policy will cause the Voucher Program to calculate 30% of household income when determining the family's Total Tenant Payment (TTP). To demonstrate a hardship, the following must apply:

1. The family must not have any Minimum Earned Income imputed to them.
2. The family cannot be living in a unit that is larger than their voucher size, unless the unit rent is less than the Payment Standard for their voucher size, or a change in household composition has occurred within the last 90 days.
3. The family's rent plus actual monthly utility costs must exceed 50% of their calculated income, including any Minimum Earned Income.
4. The family's combined non-essential expenses cannot be more than 20% of their calculated income. .
5. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered when determining a hardship.

Hardship Exemption Requests

VHA Policy

Families must utilize their 6 month Tenant Choice exemption to seek a Hardship Exemption to a MTW policy. A request for a hardship exemption must be made using the appropriate VHA form. The form contains questions about the family's finances, employment situation, and plans for resolving their financial hardship. If documentation is required, the family must submit it with their request. Incomplete requests will not be considered. Persons with disabilities, limited English proficiency, or who do not possess basic literacy skills may request assistance from VHA staff with preparing their request.

Determination of Hardship

VHA Policy

All requests will be evaluated by a reviewer, designated by the VHA Executive Director. The family may request to speak with the reviewer by phone or virtual meeting when they submit their request.

Requests will initially be reviewed to see if the family is affected by a MTW rent reform policy and if required documentation has been provided. If not, the request will not be accepted. The family will be notified in writing within ten business days that their request cannot be accepted and why. The family may submit another request with additional information.

Accepted requests will be evaluated and a determination will be made within 30 days of receipt of the completed request. The reviewer may require the family to provide additional information or documentation of any factors used in making a determination, such as the family's loss of income, unpaid expenses, notices, etc.

The decision may set conditions the family must meet in order to have the hardship request approved. Conditions may include requiring the family to apply for benefits they may be eligible for, and/or participate in a self-sufficiency program or educational classes offered by the VHA or a partnering agency.

The decision will determine if a financial hardship exists, and the appropriate length of any approved hardship exemption.

Implementation of Hardship Exemption Determinations

VHA Policy

No Financial Hardship – If the reviewer determines that no VHA defined financial hardship exists the family will be notified of the decision and of their right to make another request if their situation changes and of their right to request an informal hearing.

Temporary Hardship – If the reviewer determines that a temporary hardship exists on an exemption request regarding a MTW initiative, the reviewer may determine that no exemption be granted or that a temporary exemption be granted depending on the severity of the hardship and the expected recovery from the hardship.

A temporary exemption may include a decision to reduce the family's rent by eliminating the effect of the rent reform policy or policies for a specific period of time, usually at least two months but not more than six months.

Long-Term Hardship – If the reviewer determines that the financial hardship is long-term, the reviewer may decide to exempt the family from the effect of the MTW rent reform policy or policies until their next regularly scheduled reexamination or on a permanent basis.