Moving to Work 2017 Annual Plan



Vancouver Housing Authority

Draft for HUD Approval - January 17, 2016

Moving to Work 2017 Annual Plan

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SECTION I: INTRODUCTION

The Vancouver Housing Authority

The mission of the Vancouver Housing Authority (VHA) is to provide opportunities to people who experience barriers to housing because of income, disability, or special needs in an environment which preserves personal dignity, and in a manner which maintains the public trust. In order to fulfill that mission the VHA owns and manages numerous low-income housing projects and operates several subsidized housing programs. Foremost among these is the Section 8 Housing Choice Voucher program. The VHA contracts with the Department of Housing and Urban Development (HUD) to operate this program throughout Clark County in the state of Washington.

Starting in 1999 the VHA was selected by HUD to participant in a demonstration program named Moving to Work. This program provides the VHA the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. As a Moving to Work 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
- 3. 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 2017 Annual MTW Plan conforms to the latest requirements.

Short and Long-Term MTW Goals and Objectives

Each year the VHA Board and agency staff review and restate the strategic plan for the agency. 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.

This Plan introduces VHA's short-term goals for 2017 that are specific to MTW. This year VHA is seeking approval for significant changes to two existing MTW Activities; our Alternative Project-Based Voucher Program and our Minimum Income Rent Reform. These proposed changes are described in Section III of this Plan. We are also to close out some existing activities and make a few modifications to the Rent Buy-Down Activity that we introduced in 2015 that we hope will result in us being able to implement this activity. We plan to continue to use the single fund flexibility to support additional services for the families we serve including our work opportunity program and new services to assist voucher holders struggling to find units in our tight rental market.

In addition to MTW Activities VHA has a number of new housing projects in development, some of which utilize Project-Based Vouchers and one (Caples Terrace) that will use Local Blended Subsidy (LBS). The Meadows, Meriwether Place, Rhododendron Place, and Caples Terrace will also utilize Disposition Funds. VHA is also planning to submit a Disposition application for the Fruit Valley site, a former Public Housing project where the Public Housing units were converted and transferred to another site under RAD.

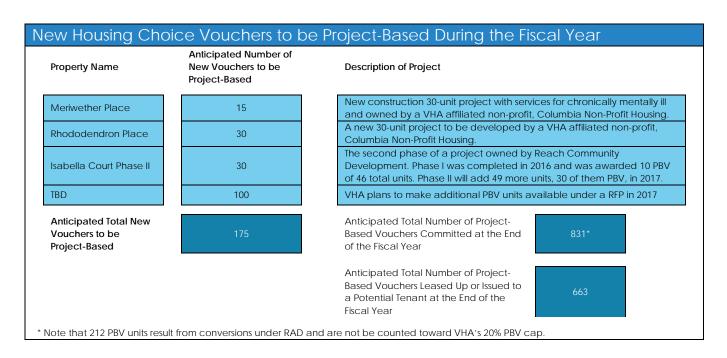
VHA recognizes and appreciates that the MTW demonstration is a valuable tool for meeting the housing needs of Vancouver and Clark County and that the statutory objectives of the demonstration align with VHA's goals of promoting resident empowerment and self-sufficiency, maximizing the use of federally subsidized housing and rent assistance, and providing opportunities to people who experience barriers to housing because of income, disability or special needs.

SECTION II: GENERAL HOUSING AUTHORITY OPERATING INFORMATION

A. Housing Stock Information

| | | | | | | | | | | # of UF | AS Units |
|--|----------|------|------|-------|------|---|-----|--------------|------------|------------|----------|
| AMP Name and | | | Bec | lroom | Size | | | Total Units | Population | | Adaptab |
| Number | 0 | 1 | 2 | 3 | 4 | 5 | 6+ | iotai oriits | Type * | Accessible | Adaptab |
| Caples Terrace | 12 | 12 | 4 | 0 | 0 | 0 | 0 | 28 | General | 6 | 22 |
| AMP Number TBD | 12 | 12 | 7 | J | Ü | J | O . | 20 | General | J | 22 |
| otal Public Housing | Units to | be A | dded | | | | | 28 | | | |
| * Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other | | | | | | | | | | | |
| | cribe: | | | | | | | | | | |

| Planned Public Housing Units to be Removed During the Fiscal Year | | | | | | |
|---|----------------------------------|-------------------------|--|--|--|--|
| PIC Dev.#/AMP and PIC Dev. Name | Number of Units to be Removed | Explanation for Removal | | | | |
| NA NA | None | NA | | | | |
| Total Number of Units to be Removed | None | | | | | |



Other Changes to Housing Stock During the Fiscal Year

VHA does not anticipate any changes to housing stock other than those described in the previous tables.

General Description of All Planned Capital Fund Expenditures During the Plan Year

VHA received an unanticipated award of \$257,161 in Capital funds in 2016 that we plan to use toward construction costs of the planned Bridgeview Resource Center at Skyline Crest.

B. Leasing Information

Planned Number of Households Served at the End of the Fiscal the Fiscal Year

MTW Households to be Served Through:

Federal MTW Public Housing Units to be Leased

Federal MTW Voucher (HCV) Units to be Leased

Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs ** Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **

| Total Households Proj | ected to be Served |
|------------------------------|--------------------|
|------------------------------|--------------------|

| Households to be Served* | Unit Months Occupied/ Leased*** |
|--------------------------|------------------------------------|
| 0 | 0 |
| 2150 | 25800 |
| 30 | 360 |
| 30 | 360 |
| 2210 | 26520 |

^{*} Calculated by dividing the planned number of unit months occupied/leased by 12.

Reporting Compliance with Statutory MTW Requirements

VHA is currently in compliance with required statutory MTW requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program

Description of Anticipated Leasing Issues and Possible Solutions

Housing Choice Vouchers

Public Housing Program

Local Non-Traditional Units

VHA anticipates that the current tight rental market will continue into 2017 making finding an available rental unit challenging for voucher holders. The situation should begin improving as newly constructed properties come online. VHA has increased payment standards, requested and received an increase to the local FMRs and implemented a landlord incentive program in order to assist voucher holders with their housing search.

Caples Terrace is now not expected to be completed until Spring 2018.

VHA anticipates that the 2nd Step program will not have any leasing issues. The School Stability Subsidy Program has also met it's leasing goals in 2016 and plans to be fully utilized in 2017.

VHA does not anticipate any Public Housing units available to lease in FY 2017.

^{**} 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 PHA should estimate the number of households to be served.

^{***}Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

C. Waiting List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s)*

Federal MTW HCV Program Federal MTW HCV Program Federal MTW HCV Program (PBV) Federal MTW HCV Program (PBV)

Wait List Type**

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

| Community-Wide |
|----------------------------|
| Community-Wide (Shared) |
| Site-Based (Camas Ridge) |
| Site-Based (Van Vista) |
| Site-Based (Vista Court) |
| Site-Based (RAD-VHA Apt) |
| Site-Based (RAD-Skyline) |
| Site-Based (RAD-Millcreek) |
| Site-Based (Fruit Valley) |
| |

Number of Households on Wait List

| on Wait List |
|--------------|
| 191 |
| 239 |
| 1134 |
| 777 |
| 301 |
| 529 |
| 817 |
| 1349 |
| 1128 |

| Wait List Open, | Are There Plans to | |
|-----------------|------------------------|--|
| Partially Open | Open the Wait List | |
| or Closed*** | During the Fiscal Year | |
| Partially Open | No | |

| During the Fiscal Year |
|------------------------|
| No |
| NA |
| NA |
| NA |
| No |
| No |
| NA |
| NA |
| NA |
| |

^{*} Select Housing Program: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** Select Wait List Types: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

The community- wide HCV program list is partially open for applicants who qualify for two local preferences: 1) VHA and PBV residents displaced due to being under-housed/overcrowded, need for accessible unit, or disposition/condemnation actions. 2) Homeless applicants referred by school districts or Health Home agencies under the terms of their memorandum of understanding (MOU) with the VHA.

The Site-Based PBV list for Vista Court is only open to applicants qualifying for a two-bedroom unit.

If Local, Non-Traditional Program, please describe:

NA

If Other Wait List Type, please describe:

NA

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

NA

SECTION III: PROPOSED MTW ACTIVITIES

VHA is not proposing any new MTW activities for the 2017 plan year, but is proposing changes to two previously approved activities that are significant enough that a new approval is required.

Activity 2014-06: Alternative Project-Based Voucher Program

Description

In 2014 VHA consolidated a number of MTW activities and flexibilities that affected Project-Based Vouchers (PBV) into this single activity. This year VHA wishes to add to those features of our alternative PBV program the ability to increase the maximum amount of PBV assistance from 20 percent of the budget authority allocated to VHA from HUD to 30 percent. VHA is approaching the 20 percent cap and local housing market conditions are such that VHA needs to continue to offer new PBV units in order to assure full utilization of the Section 8 funding.

VHA's Alternative Project-Based Voucher 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 requirement to offer a move voucher after one year of tenancy if requested and one is available is waived and 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. (Note that HUD continues to require move vouchers in PBV projects converted under RAD)
- 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. Instead selection
 will be based on referral from the service providing agency. Services may include, but
 are not limited to, case management, self-sufficiency, mental health and alcohol and
 drug dependency programs.
- 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.
- MTW Activity 2011-05, which allows VHA to perform HQS inspections and to make determinations of ongoing rent reasonableness in both project-based and tenantbased vouchers remains a stand-alone activity, but is also referenced in the description of this activity.
- VHA may utilize up to 30% of the amount of budget authority allocated to the VHA by HUD under the voucher program.

Relation to Statutory Objectives

This activity will result in increased housing choice.

Impact on Statutory Objectives

VHA anticipates that these flexibilities with PBV will result in new housing opportunities for very-low income families.

Metrics and Data Collection

This activity will use the following Standard HUD Metrics:

| CE #1: Agency Cost Savings | | | | | | | | |
|---|-----------------------|-------------------------|---------------------------|----------------------|--|--|--|--|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? | | | | |
| Total cost of task in dollars (decrease). | Cost of task prior to | Expected cost of task | Actual cost of task after | Whether the outcome | | | | |
| | implementation of the | after implementation of | implementation of the | meets or exceeds the | | | | |
| | activity (TBD). | the activity (TBD). | activity (in dollars). | benchmark. | | | | |

| CE #2: Staff Time Savings | | | | | | | | |
|--|---|---|--|---|--|--|--|--|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? | | | | |
| Total time to complete the task in staff hours (decrease). | Total amount of staff time dedicated to the task prior to implementation of the activity (TBD). | Expected amount of total staff time dedicated to the task after implementation of the activity (TBD). | Actual amount of total staff time dedicated to the task after implementation of the activity (in hours). | Whether the outcome meets or exceeds the benchmark. | | | | |

| 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 percentage (decrease). | Average error rate of task prior to implementation of the activity (TBD). | Expected average error rate of task after implementation of the activity (TBD). | Actual average error rate of task after implementation of the activity (percentage). | Whether the outcome meets or exceeds the benchmark. | | | |

| HC #3: Decrease in Wait List Time | | | | |
|---|--|--|--|---|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average applicant time on wait list in months (decrease). | Average applicant time on wait list prior to implementation of the activity = 46 months (PBV). | Expected average applicant time on wait list after implementation of the activity (TBD). | Actual average applicant time on wait list after implementation of the activity (in months). | Whether the outcome meets or exceeds the benchmark. |

| HC #4: Displacement Prevention | | | | |
|---|--|--|---|---|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Number of households at or below 80% AMI that would lose assistance or need to move (decrease). | Households losing assistance/moving prior to implementation of the activity (TBD). | Expected households losing assistance/moving after implementation of the activity (TBD). | Actual households losing assistance/moving after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |

Authorizations

This activity is authorized under Attachment C, Sections D.1.b, D.1.e, D.2.d., D.4., and D.7.a. of the Amended and Restated Agreement.

Activity 2013-01: Minimum Income Rent Reform

Description

This activity utilizes a minimum income when calculating rent for any HCV or Public Housing household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The initial minimum income was set at \$9000 annually for each work-able family member. For 2017 VHA is proposing to increase the minimum income to \$10,000 for each workable family member. For example, a household with one work-able member has a minimum income of \$10,000; a household with two workable members has a minimum income of \$20,000, and so on. If the household's actual annual income as determined under the program regulations falls below the minimum, tenant rent and housing assistance is calculated using the minimum. If the household's actual income is greater than the minimum, the actual income is used and the minimum income will not be a factor. A household subject to the minimum still has any deductions they might be eligible for under HUD regulations (as modified by VHA MTW policy) deducted from the minimum income as part of the rent calculation.

The increase in the minimum income amount is being made because the Washington State minimum wage has increased since this activity began. In addition, the local unemployment rate is down and employment opportunities for work-able families have increased since this activity began.

Relation to Statutory Objectives

This proposed activity will provide incentives to families with children to obtain employment and become economically self-sufficient. In addition, the activity will also reduce costs through lower HAP expense due to the minimum income and through higher household incomes.

Impact on Statutory Objectives

VHA anticipates an increase in the number of work-able households with earned income and an increase in the average amount of earned income. This increase in household income, along with the direct effect of the minimum income on the calculation of assistance, will result in cost savings through a reduction in HAP expense.

Metrics and Data Collection

| CE #1: Agency Cost Savings | | | | |
|--|--|---|--|---|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| HAP savings imputed from income amounts added to actual household incomes to reach minimum income. | HAP savings from minimum income prior to implementation = \$0. | Expected HAP savings after implementation of activity = \$500,000 annually. | Actual imputed HAP savings after implementation of the activity. | Whether the outcome meets or exceeds the benchmark. |

| 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). | Average earned income of households affected by this policy prior to implementation of the activity = \$15,653. | Expected average earned income of households affected by this policy prior to implementation of the activity = \$16,000. | Actual average earned income of households affected by this policy prior to implementation (in dollars). | Whether the outcome meets or exceeds the benchmark. |

| | SS #3: Increase in | Positive Outcomes in E | mployment Status | |
|----------------------------|--|--|--|---|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| (1) England Full | Head(s) of households employed full-time prior to implementation of the activity (TBD). | Expected head(s) of households employed full-time after implementation of the activity (TBD). | Actual head(s) of households employed full-time after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |
| (1) Employed Full- Time | Percentage of total work-able households employed full-time prior to implementation of activity (TBD). | Expected percentage of total work-able households employed full-time after implementation of the activity (TBD). | Actual percentage of total work-able households employed full-time after implementation of the activity (percent). | Whether the outcome meets or exceeds the benchmark. |
| (2) Employed Part- | Head(s) of households employed part-time prior to implementation of the activity (TBD). | Expected head(s) of households employed part-time after implementation of the activity (TBD). | Actual head(s) of households employed part-time after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |
| Time | Percentage of total work-able households employed part-time prior to implementation of activity (TBD). | Expected percentage of total work-able households employed part-time after implementation of the activity (TBD). | Actual percentage of total work-able households employed part-time after implementation of the activity (percent). | Whether the outcome meets or exceeds the benchmark. |
| (3) Enrolled in an | Head(s) of households in program prior to implementation of the activity (number). | Expected head(s) of households in program after implementation of the activity (number). | Actual head(s) of households in program after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |
| Educational Program | Percentage of total work-able households in program prior to implementation of activity (TBD). | Expected percentage of total work-able households in program after implementation of the activity (TBD). | Actual percentage of total work-able households in program after implementation of the activity (percent). | Whether the outcome meets or exceeds the benchmark. |
| (4) Enrolled in Job | Head(s) of households in program prior to implementation of the activity (number). | Expected head(s) of households in program after implementation of the activity (TBD). | Actual head(s) of households in program after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |
| Training Program | Percentage of total work-able households in program prior to implementation of activity (TBD). | Expected percentage of total work-able households in program after implementation of the activity (TBD). | Actual percentage of total work-able households in program after implementation of the activity (percent). | Whether the outcome meets or exceeds the benchmark. |
| 5) Unemployed | Head(s) of households unemployed prior to implementation of the activity (TBD). | Expected head(s) of households unemployed after implementation of the activity (TBD). | Actual head(s) of households unemployed after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |

| Percentage of total work-able households unemployed prior to implementation of activity (TBD). | Expected percentage of total work-able households unemployed after implementation of the activity (TBD). | Actual percentage of total work-able households unemployed after implementation of the activity (percent). | Whether the outcome meets or exceeds the benchmark. |
|--|--|--|---|
|--|--|--|---|

| SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) | | | | |
|---|--|--|---|---|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Number of households receiving TANF assistance (decrease). | Households receiving TANF prior to implementation of the activity = 306. | Expected number of households receiving TANF after implementation of the activity = 275. | Actual households receiving TANF after implementation of the activity (number). | Whether the outcome meets or exceeds the benchmark. |

| SS #6: Reducing Per Unit Subsidy Costs for Participating Households | | | | |
|---|-----------------------|-------------------------|------------------------|----------------------|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average amount of | Average subsidy per | Expected average | Actual average subsidy | |
| Section 8 and/or 9 | household affected by | subsidy per household | per household affected | Whether the outcome |
| subsidy per household | this policy prior to | affected by this policy | by this policy after | meets or exceeds the |
| affected by this policy in | implementation of the | after implementation of | implementation of the | benchmark. |
| dollars (decrease). | activity = \$665. | the activity = \$650. | activity (in dollars). | |

| SS #7: Increase in Tenant Rent Share | | | | |
|--------------------------------------|-----------------------|-----------------------|----------------------------|----------------------|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average Tenant Rent | Average Tenant Rent | Average Tenant Rent | Average Tenant Rent | Whether the outcome |
| Share for work-able | Share prior to | Share after | after implementation of | meets or exceeds the |
| households (increase). | implementation of the | implementation of the | the activity (in dollars). | benchmark. |
| | activity = \$274. | activity \$342. | | |

| | SS #8: Households Transitioned to Self Sufficiency | | | | |
|---------------------------|--|---|--|----------------------|--|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? | |
| Number of households | Households transitioned | Expected households | Actual households | | |
| transitioned to self- | to self-sufficiency | transitioned to self- | transitioned to self- | | |
| sufficiency (increase). | (< <pha definition="" of="" self-<="" td=""><td>sufficiency (<<pha< td=""><td>sufficiency (<<pha< td=""><td>Whether the outcome</td></pha<></td></pha<></td></pha> | sufficiency (< <pha< td=""><td>sufficiency (<<pha< td=""><td>Whether the outcome</td></pha<></td></pha<> | sufficiency (< <pha< td=""><td>Whether the outcome</td></pha<> | Whether the outcome | |
| The PHA may create | sufficiency>>) prior to | definition of self- | definition of self- | meets or exceeds the | |
| one or more definitions | implementation of the | sufficiency>>) after | sufficiency>>) after | benchmark. | |
| for "self-sufficiency" to | activity (TBD). This | implementation of the | implementation of the | | |
| use for this metric. | number may be zero. | activity (TBD). | activity (number). | | |

Authorizations

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

Additional Information for Rent Reform Activities

The VHA Board approval of this policy and the documentation of the public hearing is the same as for the Annual Plan and may be found in Section VIII. A revised Impact Analysis of this proposal is included as an appendix to this Plan.

SECTION VI: APPROVED MTW ACTIVITIES

A. Implemented Activities

The table below lists all approved, implemented, and ongoing activities from prior Plan years. Following the table is a description and update of each activity.

| Activity Number | Activity Name | Plan Year Approved |
|-----------------|--|-----------------------|
| 2016-01 | Family Self-Sufficiency Lite | FY 2016 Annual Plan |
| 2015-02 | 33% Household Share Rent Reform | FY 2015 Annual Plan |
| 2014-06 | Alternative Project-Based Voucher Program | FY 2014 Plan Amendmen |
| 2014-05 | Interim Verification Policy | FY 2014 Plan Amendmen |
| 2014-04 | Second Step Transitional Housing Program | FY 2014 Plan Amendmen |
| 2014-01 | Modified FSS Escrow Calculation | FY 2014 Annual Plan |
| 2013-02 | School Stability Subsidy Program | FY 2013 Plan Amendmen |
| 2013-01 | Minimum Income Rent Reform | FY 2013 Annual Plan |
| 2012-04 | Short Term Rental Assistance | FY 2012 Plan Amendmen |
| 2012-03 | Home Sharing in Housing Choice Voucher Program | FY 2012 Annual Plan |
| 2012-01 | Community Supported Self Reliance | FY 2012 Annual Plan |
| 2011-04 | VHA staff to perform HQS and rent reasonable on VHA owned properties | FY 2011 Annual Plan |
| 2010-02 | Skyline Crest Campus of Learners | FY 2010 Annual Plan |
| 2009-19 | Special admission procedure for assisted living program | FY 2009 Plan Amendmen |
| 2009-16 | Renter Education Required for Applicants | FY 2009 Plan Amendmen |
| 2009-15 | Limit contract rent increases in the HCV program to one per year | FY 2009 Plan Amendmen |
| 2009-13 | Reset of next required reexamination after interim reexamination | FY 2009 Plan Amendmen |
| 2009-10 | Replacement of medical expense deduction | FY 2009 Plan Amendmen |
| 2009-08 | Simplified utility allowance schedule in HCV program | FY 2009 Plan Amendmen |
| 2009-03 | Verification of assets limited to those declared greater than \$50,000 | FY 2009 Annual Plan |
| 2008-01 | Time-Limited Vouchers tied to services | FY 2008 Annual Plan |
| 2007-02 | Alternate required reexamination schedule | FY 2007 Annual Plan |

Activity 2016-01: Family Self-Sufficiency Lite Description

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 intended to replace the traditional program nor is it intended to siphon any potential applicants from that program. Rather it is intended for 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 and will allow for more modest self-sufficiency goals, but is convertible to the full program should any participant find they wish to do so during their participation.

Program rules are as follows:

- The Contract of Participation (COP) is for two years rather than five
- There is required classroom participation to address employment, education, financial management, and family dynamics goals.
- Escrow calculation is traditional. TTP at time of contract signing will determine escrow calculation during the two years. No requirement of eligibility review within 180 days of contract signing
- Maximum escrow earned is capped at \$2,000
- Participant's goals in their ITSP must be met in order to graduate from the program
- Pay points that are allowed under VHA's full FSS program are not allowed in FSS Lite
- Residents may choose to participate in FSS Lite only once. Participants who have graduated from FSS Lite will not be permitted to participate in the Mainstream FSS program after graduation. However, FSS Lite participants will be permitted to convert to the Mainstream FSS program prior to completing their FSS Lite COP (see Contract Extensions, below).
- Current Mainstream FSS participants will be permitted to terminate their Mainstream FSS
 Contract of Participation and enroll in FSS Lite only once. Any accumulated escrow
 while in FSS Mainstream will be forfeited.
- Contract extensions in FSS Lite are not allowed, however participants may choose to "upgrade" to the Mainstream FSS program using their original COP date in FSS Lite, thereby extending their participation in the program. Adjustment of the COP will not only extend the dates, but also set the TTP for any further escrow accumulation at \$450, the current amount in the MTW Activity 2013 under the Mainstream FSS program.

Participants who choose this option must also agree to set a goal in their ITSP to be free from all forms of public assistance, including VHA subsidized housing at the time of graduation. The reason for offering conversion rather than full participation in Mainstream FSS after graduation from FSS Lite is to prevent any participant the opportunity to earn more escrow than one who chose the full version of FSS at entry.

Status Update

This activity was implemented in 2016 with the first participants signing their contract in March. There are currently (August 2016) eight participants. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2015-02: 33% Household Share Rent Reform Description

This policy change increases the percentage of adjusted income used to calculate tenant rent and housing assistance from 30% to 33%. In the HCV tenant-based program 33% of the household's monthly adjusted income is deducted from the lesser of the gross rent or the payment standard to determine the Housing Assistance Payment (HAP). Also under this activity, households with a tenant-based voucher are allowed to have a family share of up to 50% of the family's adjusted monthly income at initial occupancy. This change offsets the

reduction in dollars in the 40% maximum family share that occurs with the decrease in HAP resulting from the change to using 33% of monthly adjusted income.

For households in Project-Based Voucher (PBV) units the Utility Allowance (UA) is subtracted from 33% of the household's monthly adjusted income to determine tenant rent.

Status Update

After an initial delay, implementation began in October 2015 as staff complete required reexaminations for participating households. As this Plan is being written over 2100 households have been changed over to a rent based on 33% with VHA only receiving 11 Hardship Requests due to this policy. Three of those requests were approved for a short-term hardship exemption.

2014-06 Alternative Project-Based Voucher Program Description

The VHA first proposed an alternative Project-Based Voucher program in the FY 2008 MTW Annual Plan. Subsequently a number of MTW policies relating to the PBV program were incorporated into specific MTW Activities or as standalone MTW activities. This activity consolidated those policies in order to clarify that they apply to all PBV projects funded under MTW. VHA's Alternative Project-Based Voucher 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 requirement to offer a move voucher after one year of tenancy if requested and
 one is available is waived and 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. (Note that HUD continues to require move
 vouchers in PBV projects converted under RAD)
- 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. Instead selection
 will be based on referral from the service providing agency. Services may include, but
 are not limited to, case management, self-sufficiency, mental health and alcohol and
 drug dependency programs.
- 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.
- MTW Activity 2011-05, which allows VHA to perform HQS inspections and to make determinations of ongoing rent reasonableness in both project-based and tenantbased vouchers remains a stand-alone activity, but is also referenced in the description of this activity.

Status Update

This activity was approved by HUD on August 6, 2014 and will be ongoing in 2017. This activity is also being re-proposed in Section II as is seeking approval to waive the maximum number of

vouchers that may be project-based from 20% of voucher budget authority and allow this program to expand up to 30% of budget authority.

Activity 2014-05: Interim Verification Policy Description

This activity changes the way reductions of income and family changes are verified and the effective dates for interim reexaminations. Households may still request an interim reexamination at any time but will also have to provide appropriate verification of the change that they are reporting 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. Current program regulations [24 CFR § 982. 516 (a)(2)] require the VHA to obtain verification so this change requires MTW authority in order to shift the responsibility for obtaining verification to the participant. The VHA will still obtain verification for initial eligibility reexaminations and for regular/annual reexaminations.

Status Update

This activity was approved by HUD on August 6, 2014 and will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2014-04: Second Step Transitional Housing Program Description

The Second Step Transitional Housing Program is a program for homeless individuals and families with income below 30% of the Area Median Income (AMI). This is a local non-traditional housing subsidy program where VHA provided funding of up to \$90,000 annually in housing assistance to a local non-profit; Second Step Housing.

Second Step Housing utilizes 11 large group homes for this program. They have a capacity of about 35 individuals and families at one time. Tenants must be homeless at admission, income eligible and willing to participate in case management, classes, and shared living. Utilities are provided and tenants pay 30% of their adjusted income for rent. Calculation of income for eligibility and rent is done in compliance with the regulations found at 24 CFR § 5.609. All housing units are alcohol and drug free. The maximum length of stay in the program is two years.

Status Update

This activity was approved by HUD on August 6, 2014. The activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2014-01: Modified FSS Escrow Calculation Description

This activity modifies the way escrow is calculated in the full, five-year, Family Self-Sufficiency Program (FSS). VHA's method under MTW has two parts. The first part is a monthly deposit to a participants escrow account when they have increased earned income that results in a Total Tenant Payment (TTP) over the baseline set when they join FSS. However the baseline is a fixed amount set at \$450 for all new participants regardless of their income rather than the conventional practice of setting it at the TTP of their most recent eligibility reexamination prior to their admission to FSS. 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. The current pay points and deposit amounts are listed below:

- 1. Complete 50% of required core GOALS* classes in first 12 months (24 months if working/school full time) = \$500
- 2. Complete entire GOALS curriculum = \$500
- 3. Employment obtained at a minimum of 20 hours per week in industry specified in ITSP = \$500
- 4. Maintain employment (calculated at end of contract)
 - a. At least 32 hours per week for 6 consecutive months =\$500; or
 - b. At least 32 hours per week for 12 months or more =\$1,000
- 5. Increased credit score (one only, calculated at end of contract)
 - a. To 550 = \$300
 - b. To 600 = \$350
 - c. To 650 = \$400
 - d. To 700 + = \$500
- 6. Complete educational goal (one only, calculated at end of contract)
 - a. GED = \$150
 - b. Post-Secondary Certification (minimum 6 months) =\$250
 - c. AA degree = \$500
 - d. BA degree or higher \$750
- 7. Established savings account with \$500 minimum for 12 months = \$500
- 8. Complete all ITSP goals and graduate prior to contract end date = \$750
- 9. Purchase a home= \$1,000 (available at closing of home loan)

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.

Update on Status

This activity was implemented for all FSS participants admitted after January 1, 2014 and will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2013-02: School Stability Subsidy Program Description

This is a local non-traditional rental subsidy activity that uses MTW funds for a pilot subsidy program in partnership with Family Resource Centers (FRC) at selected local schools and a local agency serving the homeless. Families with a student enrolled in the partnering school, and who are either homeless or at risk of homelessness, are selected for participation in the program in order to prevent them from having to relocate outside of the school district. The subsidy allows the family to remain in the same school district providing needed stability for the student.

This activity has been modified slightly from the initial description from 2013. The income limit for eligibility is now 30% of the Area Median Income. The housing subsidy has been changed from a flat amount with a 36 month time limit to a tiered subsidy over a four-year period. The first year the family pays 20% of the rent and the housing subsidy is the remaining 80%; the second year the family share increases to 40%; in year three the family share is 60% and the fourth year the family's rent increases again to 80%. At the end of the fourth year the subsidy ends. The family must participate in ongoing economic self-sufficiency meeting provided by the VHA and educational planning meetings provided by the partnering agencies.

Update on Status

This activity will be ongoing in 2017. VHA does not anticipate changes or modification to this activity significant enough to change the metrics and authorization/s employed.

Activity 2013-01: Minimum Income Rent Reform Description

This activity utilizes a minimum income when calculating rent for any HCV or Public Housing household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum income is \$9000 annually for each work-able family member. For example a household with one work-able member has a minimum income of \$9000; a household with two workable members has a minimum income of \$18,000, and so on. If the household's actual annual income as determined under the program regulations falls below the minimum, tenant rent and housing assistance is calculated using the minimum. If the household's actual income is greater than the minimum, the actual income is used and the minimum income will not be a factor. A household subject to the minimum still has any deductions they might be eligible for under HUD regulations (as modified by VHA MTW policy) deducted from the minimum income as part of the rent calculation.

Update on Status

This activity will be ongoing in 2017. VHA is planning to increase the minimum income amount to \$10,000 for each work-able member in 2017, so this activity is being re-proposed in Section III.

Activity 2012-01: Community Supported Self Reliance Description

Community Supported Self Reliance (CSSR) is a pilot project where housing assistance along with intensive wrap around services are made available through partnering agencies to very-low income clients with multiple barriers to self-reliance. Up to 16 participants are provided a Housing Choice Voucher with a time-limit of five and a half years (66 months). In addition to the regular HCV program obligations, participants are required to actively participate in their approved self-reliance plans developed with their assigned case manager from a partnering agency; failure to do so results in expulsion from the program. Participants facing expulsion may file a grievance with the project's Review Board. If the expulsion is upheld by the Review Board, the participant will be considered to be in violation of their HCV family obligations and will be terminated from the HCV program. Participants facing termination of housing assistance will have an opportunity for an HCV informal hearing.

In addition to access to a housing voucher participants in this program, and their case managers, will have access to the expertise and resources provided by members of the Project Team and the Review Board. Participants will also participate in a VHA sponsored Self-Sufficiency program such as Family Self-Sufficiency (FSS).

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

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

Description

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.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2010-02: Skyline Crest Campus of Learners Description

The Skyline Crest Campus of Learners is a partnership between VHA and the residents of Skyline Crest; which was VHA's largest Public Housing Property and has recently been converted to PBV under a combination of RAD and Section 18. VHA provides children and young adults' resources and activities through the community center and families develop

and commit to success plans centered on their child's school attendance and community involvement.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2009-19: No Waiting List for Assisted Living Facility Description

This MTW activity allows for tenant selection to be made by the assisted living administration 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.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2009-16: Renter Education Required for Applicants Description

Under this activity new applicants for Public Housing and the Housing Choice Voucher program must complete a rent education course prior to being offered a unit or voucher when they reach the top of the waiting list. Exemptions can be made for disability related or other issues. The course covers topics including money management and credit, landlord/tenant rights and responsibilities, how to be a good renter, and how to find landlords that will rent to you. Applicants who complete the course receive a certificate of completion that is recognized by many landlords in the community and can substitute for good credit and references in tenant screening policies.

Update on Status

VHA is planning to end this activity prior to 2017. We will continue to offer the class through our partnership with the class provider, but completion of the class will no longer be a requirement for program admission.

Activity 2009-15: Owners Restricted to Annual Rent Increases Description

Under this MTW policy owners in the Housing Choice Voucher program are restricted to a single rent increase each year.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2009-13: Next Required Reexamination 12 Months after Interim Description

This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled to at least 12 months after the effective date of an interim reexamination. This policy reduces the overall number of reexaminations required each year.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2009-10: Replacement of Medical Expense Deduction Description

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 Elderly/Disabled deduction increased to \$700.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2009-08: Simplified Utility Allowance Schedule Description

VHA utilizes a simplified utility allowance schedule for vouchers funded under MTW in the Housing Choice Voucher program that simplifies rent calculations, particularly for participants prior to leasing, and encourages reduced energy consumption. The schedule is based on the conventional HCV utilities schedules for newer energy efficient all electric units by bedroom size.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

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

VHA does not obtain a verification of a reported asset if the reported value is less than \$50,000. This MTW activity saves VHA significant administrative funds by eliminating verifications on the vast majority of assets and any income from those assets that has little or no effect on housing subsidy and/or tenant rent.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2008-01: Time-Limited Vouchers Tied to Services Description

This activity partners with other community organizations in order to provide housing assistance tied to case management and other services. VHA has set aside 50 vouchers for this activity. Tenant selection may be done by the partner so that appropriate clients they have already identified can be readily served. The partnering agency may also place time limits on assistance.

Update on Status

This activity will be ongoing in 2017. VHA is not planning any significant changes or modification to this activity or to the metrics and authorization/s employed.

Activity 2007-02: Alternate Required Reexamination Schedule Description

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.

Update on Status

This activity will be ongoing in 2017 and no changes are planned to the activity, the metrics used to determine outcome, or the authorizations required for implementation.

B. Not Yet Implemented Activities

The table below lists all proposed but not yet implemented activities from prior Plan years. Following the table is an update of implementation plans for each activity.

| ctivities Not | : Yet Implemented | |
|-----------------|--|---------------------|
| Activity Number | Activity Name | Plan Year Approved |
| 2016-02 | Local Blended Subsidy | FY 2016 Annual Plan |
| 2015-01 | Rent Buy-Down Local Subsidy Program | FY 2015 Annual Plan |
| 2012-02 | Use of MTW Funds for Leveraging New Affordable Housing | FY 2012 Annual Plan |

Activity 2016-02: Local Blended Subsidy Description

This activity uses a blend of funding from both Public Housing and the Section 8 Voucher Program in order to develop replacement units for VHA Public Housing units disposed of under recent approved disposition plans. VHA was approved to use this activity for the 28 unit Caples Terrace project planned for the old site of the VHA administrative offices at Skyline Crest.

Projects utilizing blended subsidy will be developed under Public Housing development regulations found at 24 CFR § 905 and must be specifically approved by HUD separate from any approval of the Annual MTW Plan. For the purpose of regulatory compliance these units will be considered Public Housing. The length of time the blended subsidy would be available is dependent upon VHA remaining under an MTW Agreement (currently extended to 2028). Should VHA no longer have MTW authority any units under the blended subsidy would revert to Public Housing. VHA will obtain specific approval from any financial partner or investor in a property utilizing this blended subsidy in writing.

Status Update

Construction of Caples Terrace is now anticipated to start in 2017 with completion occurring in 2018.

Timeline for Implementation

VHA anticipates that this activity will be implemented when construction of Caples Terrace is completed.

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

This proposed activity is for the VHA to create a local program that will "buy-down" rents at a market rate apartment property (not subsidized or receiving tax credits) so that the units become affordable for, and only available to, households at or below 50% of the Area Median Income (AMI). If selected an owner would receive funds from the VHA to offset the amount the project would require to reduce apartment rents to reach the affordable level. To be considered affordable the bought-down gross rents will be calculated by taking 33% of an

income equal to 45% of AMI assuming 1.5 persons per bedroom. The current VHA S8 MTW Utility Allowance(UA) will deducted from the gross rent to determine the final bought-down rent for any units where the tenant is responsible for at least the utility providing the heat for the unit.

Status Update

To date VHA has not had any response to our ongoing Request for Proposals (RFP) that was initially posted in May 2015. It is believed the current local rental market, with vacancy rates as low as 1.8%, is discouraging interested landlords from submitting a proposal at this time. VHA plans to modify the program and allow an option where the owner can master lease the property to the VHA and VHA will manage the property utilizing the buy-down rents. We will also offer an option to have the rents bought down to a level affordable for households at 30% of the AMI provided the project serves the homeless or other special needs group. In addition, this activity may be utilized in a project owned by the VHA or an affiliated entity.

Timeline for Implementation

VHA is currently discussing a potential project utilizing this activity with the master lease option. If this project goes forward the activity will be implemented in 2017.

Activity 2012-02: Use of MTW Funds for Leveraging New Affordable Housing Description

VHA is committing up to \$2,000,000 in MTW funds for the development of additional affordable housing in Clark County Washington. The re-programmed funds will be used to leverage additional investment funds in amounts far greater that the MTW funds. Development activities may include site acquisition, substantial rehabilitation of existing housing, and the development of new units.

Status Update

The first project that VHA anticipated using this activity to help fund was able to be developed absent the additional MTW funds. VHA continues to seek development opportunities where this flexibility can be utilized.

Timeline for Implementation

VHA anticipates that this activity will only be implemented when an appropriate development opportunity is found.

C. Activities on Hold

At this time VHA has no approved MTW activities that have been placed on hold.

D. Closed Out Activities

The following table lists all of VHA's closed out activities since becoming a MTW agency in 1999, the year the activity was approved and the year and reason the activity was closed out.

| Activity Number | Activity Name | Plan Year Approved | Year Closed | Reason |
|--------------------|--|------------------------|----------------|-----------------------|
| 2014-03 | Local Non-Traditional Rent Subsidy Program | FY 2014 Annual Plan | FY 2014 | Never Implemented |
| 2014-02 | UA in HCV Program lesser of Unit Size or Voucher Size | FY 2014 Annual Plan | FY 2015 | Policy adopted by HUD |
| 2013-05 | Health Advocate Training Program | FY 2013 Plan Amendment | FY 2013 | Concluded |
| 2013-04 | Admin Fee for Owners in HCV Program | FY 2013 Annual Plan | FY 2013 | Withdrawn |
| 2013-03 | Shelter and Transitional Housing Facilities Support | FY 2013 Plan Amendment | FY 2014 | Never Implemented |
| 2012-04 | Short-Term Rental Assistance | FY 2012 Plan Amendment | FY 2016 | Concluded |
| 2012-03 | Home-Sharing in the HCV Program | FY 2012 Plan Amendment | FY 2016 | Concluded |
| 2011-03 | Up to 50% of units in a Project may be PBV | FY 2011 Annual Plan | FY 2014 | Merged with 2014-06 |
| 2011-02 | "Floating Units" in Project-Based Voucher program | FY 2011 Annual Plan | FY 2013 | Concluded |
| 2011-01 | Minimum Rent / Income Limits for New Public Housing | FY 2011 Annual Plan | FY 2015 | Never Implemented |
| 2010-04 | Waiting List Preference for Applicants without Subsidy | FY 2010 Annual Plan | FY 2015 | Concluded |
| 2010-01 | Community Involvement and Educational Opportunity | FY 2010 Annual Plan | FY 2013 | Concluded |
| 2009-18 | Local Preference for FSS Participation | FY 2009 Plan Amendment | FY 2009 | NOFA Requirement |
| 2009-17 | Mandatory Self-Sufficiency Program (Yes We Can) | FY 2009 Plan Amendment | FY 2009 | Never Implemented |
| 2009-14 | Simplified Recertification Process | FY 2009 Plan Amendment | FY 2009 | Never Implemented |
| 2009-09 | Limited Utility Allowance Payments | FY 2009 Plan Amendment | FY 2013 | Concluded |
| 2009-06 | Alternate inspection schedule in HCV program | FY 2009 Plan Amendment | FY 2015 | Policy adopted by HUD |
| 2009-04 | Asset Based Initiative (IDA) | FY 2009 Annual Plan | FY2010 | Never Implemented |
| 2009-02 | Imputed TANF Income for Voluntary Grant Closures | FY 2009 Annual Plan | FY 2013 | Concluded |
| 2009-01 | Pilot Rental Subsidy Project | FY 2009 Annual Plan | FY 2009 | Never Implemented |
| 2008-02 | Alternate HCV Homeownership Program | FY 2008 Annual Plan | FY 2011 | Concluded |
| 2007-01 | Flat rent and Flat HCV Subsidy | FY 2007 Annual Plan | FY 2008 | Never Implemented |
| 2004-01 | Alternative Rent Reasonable Procedure | FY 2004 Annual Plan | FY 2009 | Concluded |
| 2003-01 | Escrow Accounts Capped at \$6000 | FY 2003 Annual Plan | FY 2005 | Concluded |
| 2002-01 | "Request Line" Single Waiting List | FY 2002 Annual Plan | FY 2003 | Concluded |
| 2001-02 | \$480 Deduction for Child Support Payments | FY 2001 Annual Plan | FY 2004 | Concluded |
| 2001-01 | Eight Percent Earned Income Deduction | FY 2001 Annual Plan | FY 2004 | Concluded |
| 1999-09 | No Earned Income Disallowance in Public Housing | 1999 MTW Agreement | FY 2015 | Concluded |
| 1999-08 | No Flat Rent Option in Public Housing | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-07 | Maximum Family Share 45% of Gross Income | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-06 | Restrictions on HCV Port-Outs | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-05 | All Households Eligible for Escrow Accounts | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-04 | FSS Absorbed into MTW Self-Sufficiency Program | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-03 | Five-Year Time Limit for Non Eld/Dis Households | 1999 MTW Agreement | FY 2005 | Concluded |
| 1999-02 | Mandatory Participation in Self-Sufficiency Program | 1999 MTW Agreement | FY 2005 | Concluded |

SECTION V: SOURCES AND USES OF FUNDS

A. Sources and Uses of MTW Funds

| Sources | | |
|---------------------------------------|--|---------------|
| FDS Line Item | FDS Line Item Name | Dollar Amount |
| 70500 (70300+70400) | Total Tenant Revenue | |
| 70600 | HUD PHA Operating Grants | 16,842,206.00 |
| 70610 | Capital Grants | |
| 70700 (70710+70720+70730+70740+70750) | Total Fee Revenue | 1,372,923.00 |
| 71100+72000 | Interest Income | |
| 71600 | Gain or Loss on Sale of Capital Assets | |
| 71200+71300+71310+71400+71500 | Other Income | 3,317,900.00 |
| 70000 | Total Revenue | 21,533,029.00 |

| timated Uses of MTW Funding for t | | |
|--|--|---------------|
| Uses | | |
| FDS Line Item | FDS Line Item Name | Dollar Amount |
| 91000 (91100+91200+91400+91500+91600+91700+91800+91900) | Total Operating - Administrative | 2,201,965.00 |
| 91300+91310+92000 | Management Fee Expense | 187,758.00 |
| 91810 | Allocated Overhead | |
| 92500 (92100+92200+92300+92400) | Total Tenant Services | 238,809.00 |
| 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 | 3,312.00 |
| 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 | Housing Assistance Payments + HAP Portability-In | 18,749,250.00 |
| 97400 | Depreciation Expense | |
| 97500+97600+97700+97800 | All Other Expenses | 26,000.00 |
| 90000 | Total Expenses | 21,407,094.00 |

Describe the Activities that Will Use Only MTW Single Fund Flexibility

VHA will continue to use single-fund flexibility to support the following activities:

- Additional administrative costs associated with MTW such as planning and data collection.
- VHA's Resident Services Department which includes the Work Opportunity Program, the Rise and Stars Community Center, and other MTW related programs for residents and participants.
- Supportive services at Lincoln Place, a housing first project for chronically homeless expected to be completed by 2016.
- VHA is also using single-fund flexibility to set initial contract rents for the 12 RAD PBV units at Mill Creek as allowed under PIH 2012-32 Section 1.6.A.5.a.
- Funding for a landlord incentive program that will provide a \$100 lease up fee to landlords (not including the VHA or its affiliates) upon an initial lease up of a HCV participant.
- Funding for a deposit assistance program for New Voucher Admissions.
- Funding for tuition and incentive for HCV Participants taking Rent Well classes.
- Funding for Bridgeview Resource Center (see Section II. A. Planned Capital Fund)

B. Local Asset Management Plan

| Local Asset Management Plan | | | | |
|--|-----|----|----|--|
| | | | | |
| Is the PHA allocating costs within Statute? | Yes | or | | |
| Is the PHA implementing a local asset management plan (LAMP)? | | or | No | |
| If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP. | | | | |
| Has the PHA provided a LAMP in the appendix? | | or | No | |
| | | | | |

SECTION VI: ADMINISTRATIVE

A. Resolution Adopting the Annual Plan

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

B. Public Process

Documentation of the Public Process is included in Appendix B.

C. Agency Directed Evaluations

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

D. Annual Statement/Performance and Evaluation Report

The Annual Statement/Performance Evaluation Reports (HUD Form 50075.1) for the Capital Fund Program is attached under Appendix D.

E. Impact Analysis of Rent Reform

The minimum income rent reform is being re-proposed in Section III of the plan and an updated impact analysis is attached under Appendix F.

APPENDIX A. BOARD RESOLUTION AND CERTIFICATION

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 3144

RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2017

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

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

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

WHEREAS, the Annual Plan for Fiscal Year 2017 has been prepared and made available for public comment for thirty days and a public hearing was held on September 1, 2016. No public comments were received.

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

- The Board of Commissioners approves the 2017 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 22nd day of September 2016.

ATTEST:

Johnson, Secretary-Treasurer

OMB Control Number: 2577-0216 Expiration Date: 5/31/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan 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 Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1, 2017, 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:

- The 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 PHA conducted a public hearing to discuss the Plan and invited public comment.
- The 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 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.
- 4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- 5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- 6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- 7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
- 8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- The 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.
- 10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- 12. The 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.

Attachment B

OMB Control Number: 2577-0216 Expiration Date: 5/31/2016

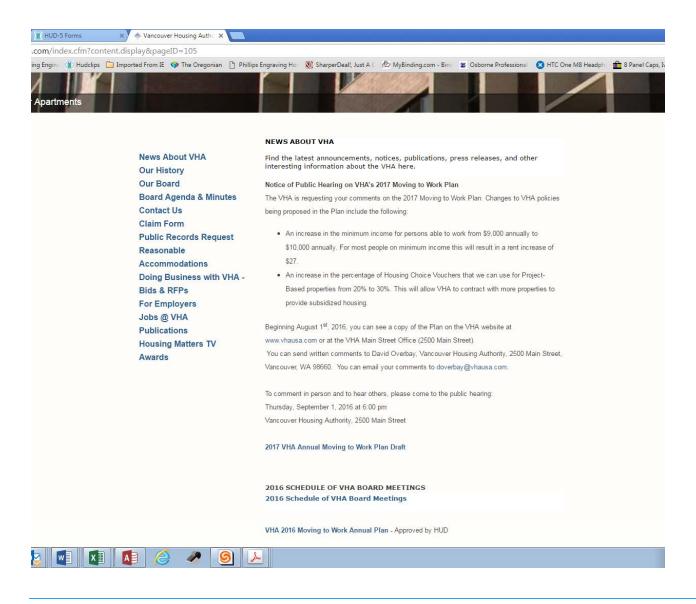
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National 15. Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the 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.
- 16. With respect to public housing the 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.
- 17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
- The 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.
- 21. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

| Vancouver Housing Authority | WA008 |
|-----------------------------|--|
| PHA Name | PHA Number/HA Code |
| | n, as well as any information provided in the accompaniment herewith, is true and and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. |
| Art Miles | <u>Chairman</u> |
| Name of Authorized Official | Title |
| CAT D. Male | 9/22/2016 |
| Signature | Date |

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

APPENDIX B. PUBLIC PROCESS

The 2017 Plan was developed in consultation with VHA's Moving to Work Advisory Committee and our Resident Advisory Board (RAB). VHA staff met with the RAB on March 15, 2016 and again on August 9, 2016 to discuss the 2017 Plan. Staff also met with the MTW Advisory Committee on July 20, 2016. A draft of the plan was made available for public comment for 30 days beginning on August 1, 2016. A public hearing was held on September 1, 2016. Notification of the comment period and the hearing was made on the VHA website and the local newspaper. Two people attended the public hearing and while there were comments regarding an issue with children throwing rocks and pulling up plants at one of VHA's sites, no comments regarding the plan were received.



Affidavit of Publication STATE OF WASHINGTON)

County of Clark

Columbian

ACCTS PAYABLE/KRIS VANC HOUSING AUTH/DEV DEPT-L 2500 MAIN ST VANCOUVER WA 98660

REFERENCE: 71171 MTW PLAN 3384281 Notice of Public Hea

I, the undersigned say,

That I am over the age of eighteen and not interested in the above entitled matter; that I am! now, and at all time embraced in the publication herein mentioned, was, the principal clerk of the printer of The Columbian, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of the County of! Clark, State of Washington, under Proceeding No. ! 802006715; that the advertisement, of which the annexed is a true printed copy, was published in the above-named newspaper on the following dates, to wit:

PUBLISHED ON: 08/01

TOTAL COST: 68.17 FILED ON: 08/01/16

I Certify (or declare) under penalty of perjury that the foregoing is true and correct

Signature _



Please Sign In

Vancouver Housing Authority

| VANCOUVER | Public Hearing on the 2017 MTW Annual Plan | |
|-----------|--|----------------------|
| AUTHORITY | Thursday, September 1, 2016 | |
| | 2500 Main Street Vancouver, WA 98660 | |
| Name | Organization or Housing Program | Planning to Comment? |
| D31 | | Yes No |
| Cueran | | Yes No |
| , | | Yes No |
| | | Yes No |
|). | | Yes No |
| | | Yes No |
| 2. | | Yes No |

APPENDIX C. ADVISORY COMMITTEES

RESIDENT ADVISORY BOARD

Joy Howard, Chair Housing Choice Voucher Participant

John Glenn, Vice Chair Public Housing Resident

Evelyn Hallett Project-Based Voucher Participant
Stacey Paggett Housing Choice Voucher Participant
Michael Ralston Project-Based Voucher Participant
Billie Reed Housing Choice Voucher Participant
Michael Yancy Housing Choice Voucher Participant

MOVING TO WORK ADVISORY COMMITTEE

Jennifer Blechschmidt Vancouver School District

Armetta Burney Clark College

Debby Dover Second Step Housing

Kevin Gillette Community Housing Resource Center

Nicole Loran-Graham Vancouver School District

Amy McCullough Northwest Justice Project

Amy Reynolds Share

Peggy Sheehan City of Vancouver

Andy Silver Council for the Homeless
Tamara Shoup Vancouver School District

Michael Torres Clark County

APPENDIX D. HUD 50075.1

To be completed for the Performance and Evaluation Report.

To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

PHAs with under 250 units in management may use 100% of CEP Grants for operations.

REF funds shall be included here.

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| 12 | 1470 Non-dwelling Structures | | | | |
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| 51 | 1492 Moving to Work Demonstration | \$257.161.00 | | | |
| 16 | 1495.1 Relocation Costs | | | | |
| 17 | 1499 Development Activities 4 | | | | |

form HUD-50075.1 (07/2014)

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PHAs with under 250 units in management may use 100% of CEP Grants for operations.

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⁴ RHF funds shall be included here.

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Annual Statement Ferformance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Finencing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

| Part II: Supporting Pages | Y A. A. A. |) | | | | | | | |
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² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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Annual Statement/Performance and Évaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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¹To be completed for the Performance and Evaluation Report.

²To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

²PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴RHF funds shall be included here.

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¹To be completed for the Performance and Evaluation Report.

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²PHAs with under 250 units in management may use 100% of CEP Grants for operations.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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form HUD-50075.1 (07/2014)

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 PHAs with under 250 units in management may use 100% of CFP Grants for operations.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226

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| 7 | 1430 Fees and Costs | | | | | | | _ |
| 60 | 1440 Site Acquisition | | - | | | | | |
| 9 | 1450 Site Improvement | | | | | | | |

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1485 Demotition 1475 Non-dwelling Equipment 1470 Non-dwelling Structures

208,064.00

1499 Development Activities 1495.1 Relocation Costs 1492 Moving to Work Demonstration 12

1460 Dwelling Structures

1465.1 Dwelling Equipment—Nenexpendable

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⁴To be completed for the Performance and Evaluation Report.

²To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³PHAs with under 250 units in management may use 100% of CFP Grants for operations.

RJHF funds shall be included here.

24 B 12 12 20 5 Vancouver Housing Part I: Summary Capital Fund Financing Program Capital Fund Program, Capital Fund Program Replacement Housing Factor and Annual Statement/Performance and Evaluation Report 18ba 18a Type of Grant

Original Annual Statement Performance and Evaluation Report for Period Ending:

Summary by Development Account 9000 Collateralization or Debt Service paid Via System of Direct Amount of Annual Grant:: (sum of lines 2 - 19) Amount of line 20 Related to Security - Hard Costs Amount of line 20 Related to Security - Soft Costs Amount of line 20 Related to Section 504 Activities Amount of line 20 Related to LBP Activities 1502 Contingency (may not exceed 8% of line 20) 1501 Collateralization or Debt Service paid by the PHA Grant Type and Number
Capital Fund Frogram Grant No:
Replacement Housing Factor Grant No: WA16R00850114 Date of CFFP: Payment Reserve for Disasters/Emergencies 208,064.00 Original Total Estimated Cost Revised 2 Final Performance and Evaluation Report ☐ Revised Annual Statement (revision no: FFY of Grant:2014 FFY of Grant Approval: 2014 Obligated Office of Public and Indian Housing OMB No. 2577-0226 Expires 08/31/2011 Total Actual Cust Expended

Amount of line 20 Related to Energy Conservation Measures

Signature of Executive Director

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Signature of Public Housing Director Jaras

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7/3/14

³ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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RHF funds shall be included here.

U.S. Department of Housing and Urban Development

Page3

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

| Part I: Summary | ummary | | | | | | |
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| 7 | 1430 Fees and Costs | | | | | | |
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| 9 | 1450 Site Improvement | | | | | | |
| 10 | 1460 Dwelling Structures | | | | | | |
| 11 | 1465.1 Dwelling Equipment—Nonexpendable | Nonexpendable | | | | | |
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| 13 | 1475 Non-dwelling Equipment | DI . | | | | | |
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¹To be completed for the Performance and Evaluation Report.

²To be completed for the Performance and Evaluation Report or a Revised Annual Statemert.

³PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴RHF funds shall be included here.

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APPENDIX F. RENT REFORM IMPACT ANALYSIS

Minimum Income Rent Reform

Annual Reevaluation of Impact on Households Served

David Overbay ► Vancouver Housing Authority ► 6/30/2016

Introduction

In 2012 the Vancouver Housing Authority (VHA) proposed a change to the way housing assistance and tenant rent is calculated in our Housing Choice Voucher (HCV) and Public Housing programs. This proposal utilized the authority under the terms of the Moving to Work (MTW) agreement between VHA and the Department of Housing and Urban Development (HUD) and was approved by HUD as part of the VHA FY 2013 MTW Annual Plan. The approved proposal, Minimum Income Rent Reform, was implemented on June 1, 2013 for all applicable households after a six-month period of outreach.

The proposal requires a minimum income for any household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum income is currently \$9000 annually for each work-able family member. For example, a household with one work-able member would have a minimum income of \$9000; a household with two workable members would have minimum income of \$18,000, and so on. If the household's actual annual income as determined under the program regulations falls below the minimum income, tenant rent and housing assistance is calculated using the minimum. If the household's actual income is greater than the minimum, the actual income is used and the minimum income is not a factor. A household subject to the minimum is still able to have any income deductions they might be eligible for under HUD regulations (or as modified by other VHA MTW policy) deducted from the minimum income as part of the rent calculation.

This policy is intended to meet the objectives of the MTW program by providing an incentive for participants to obtain earned income and move toward self-sufficiency. It also is intended to diminish any disincentive that may exist when a participant loses income (whether intentionally or not) and is able to get their rent reduced or eliminated altogether. Additionally, there are cost savings both from the reduction in assistance resulting from increased tenant rent, but also as a result of participants obtaining new employment.

Impact Analysis

VHA completed an Impact Analysis of the proposed minimum income in 2012. At that time, it was anticipated that there were 1270 households that met the definition of Work-able and who would potentially be impacted by the proposed rent reform. The following table shows a comparison between

the 2012 estimated impact on tenant rents for work-able households versus the actual current impact of the minimum income on tenant rent for work-able households:

| Comparison of Projected and Ac | tual Impact o | on Tenant Re | nt of Minimu | m Income |
|-------------------------------------|---------------|--------------|--------------|------------|
| In average in Taxant Bant Due to | Projected I | mpact from | Actual Im | pact from |
| Increase in Tenant Rent Due to | June 2012 | 2 Analysis | June 2016 | 5 Analysis |
| Minimum Income | Number | Percent | Number | Percent |
| No Change in Tenant Rent | 643 | 50.63% | 687 | 70.25% |
| \$1 to \$50 Tenant Rent Increase | 129 | 10.16% | 82 | 8.38% |
| \$51 to \$100 Tenant Rent Increase | 133 | 10.47% | 43 | 4.40% |
| \$101 to \$150 Tenant Rent Increase | 133 | 10.47% | 51 | 5.21% |
| \$151 to \$200 Tenant Rent Increase | 108 | 8.50% | 75 | 7.67% |
| \$201 to \$250 Tenant Rent Increase | 36 | 2.83% | 17 | 1.74% |
| \$251 to \$300 Tenant Rent Increase | 27 | 2.13% | 4 | 0.41% |
| \$301 to \$350 Tenant Rent Increase | 11 | 0.87% | 6 | 0.61% |
| \$351 to \$400 Tenant Rent Increase | 34 | 2.68% | 8 | 0.82% |
| Over \$400 Tenant Rent Increase | 16 | 1.26% | 5 | 0.51% |
| Totals | 1270 | 100.00% | 978 | 100.00% |

The anticipated total number of work-able households in 2012 was quite a bit higher than the current number. When the original impact analysis was completed VHA's vouchers were leased at close to 100% of the contracted number. A short time later VHA experienced a funding shortfall under sequestration. That, along with rising rents, contributing to lower utilization and a lower number of workable households on the program. In fact, the number of work-able households was down to 1039 just prior to implementation on June 1, 2013.

However, the more significant change since 2012 is the percentage of work-able household unaffected by the minimum income; from 50% to 70% in four years. As shown by additional data to follow, this is due to an increase in the number of households with earned income and an increase in the average amount of that income.

The next table from the 2012 analysis shows work-able households potentially impacted by the minimum income compared to those not expected to be impacted by different characteristics. Presenting the data in this way was intended to reveal if there were unintended discriminatory effects resulting from the policy. The columns labeled "Impacted" show the distribution of work-able households that we anticipated would have a rent increase due to the minimum income in numbers and by what percentage households with that characteristic represent of all impacted workable households. The columns labeled "Not Impacted" show the distribution for those work-able households that we expected to not have any rent change due to the policy. In comparing the percentages for impacted, not impacted and the total we would expect the percentages shown for each characteristic to be relatively the same unless households with that characteristic were disproportionately impacted by the policy. The only two characteristics with significant discrepancies were those where the head of household was elderly or disabled. Those two categories are disproportionally not impacted by the policy. However, this is expected because these households are only considered workable because they contain other members who are work-able and the elderly or disabled members typically receive income from Social Security that reduces the chances they would be impacted by the minimum income.

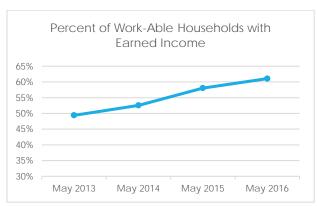
| Work-Able Households Impacted | d by Minin | num Rent | by Chara | cteristic i | n 2012 | |
|---|------------|----------|----------|-------------|---------|---------|
| | Impacte | ed - 630 | Not Impa | cted - 643 | Total - | 1273 |
| | Number | Percent | Number | Percent | Number | Percent |
| HOH is Elderly | 14 | 2.22% | 39 | 6.07% | 53 | 4.16% |
| HOH is under age 62 and Disabled | 66 | 10.48% | 114 | 17.73% | 180 | 14.14% |
| HOH is female | 520 | 82.54% | 523 | 81.34% | 1043 | 81.93% |
| HOH is only adult in household | 364 | 57.78% | 357 | 55.52% | 721 | 56.64% |
| Households with children | 506 | 80.32% | 542 | 84.29% | 1048 | 82.33% |
| HOH is White | 481 | 76.35% | 480 | 74.65% | 961 | 75.49% |
| HOH is Black | 93 | 14.76% | 106 | 16.49% | 199 | 15.63% |
| HOH is American Indian/Alaska Native | 12 | 1.90% | 8 | 1.24% | 20 | 1.57% |
| HOH is Asian | 10 | 1.59% | 23 | 3.58% | 33 | 2.59% |
| HOH is Native Hawaiian/Pacific Islander | 34 | 5.40% | 26 | 4.04% | 60 | 4.71% |
| HOH is Hispanic or Latino | 49 | 7.78% | 45 | 7.00% | 94 | 7.38% |

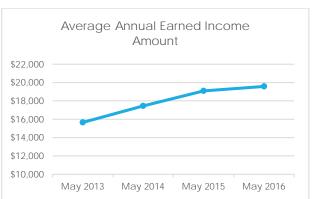
Recreating the same chart with data from June 2016 shows relatively the same distribution of households with each characteristic as was projected in the original impact analysis. There is no indication that the minimum income policy results in any significant discriminatory effect by disproportionally impacting households with a particular characteristic. The only significant difference after four years is that instead of about 50% of work-able households impacted by a rent increase, today only about 30% are.

| Work-Able Households Impacted by Minimum Rent by Characteristic in 2016 | | | | | | | | | |
|---|----------------|---------|--------------------|---------|-------------|---------|--|--|--|
| | Impacted - 291 | | Not Impacted - 687 | | Total - 978 | | | | |
| | Number | Percent | Number | Percent | Number | Percent | | | |
| HOH is Elderly | 2 | 0.69% | 33 | 4.80% | 35 | 3.58% | | | |
| HOH is under age 62 and Disabled | 23 | 7.90% | 131 | 19.07% | 154 | 15.75% | | | |
| HOH is female | 246 | 84.54% | 537 | 78.17% | 783 | 80.06% | | | |
| HOH is only adult in household | 182 | 62.54% | 368 | 53.57% | 550 | 56.24% | | | |
| Households with children | 236 | 81.10% | 526 | 76.56% | 762 | 77.91% | | | |
| HOH is White | 208 | 71.48% | 514 | 74.82% | 722 | 73.82% | | | |
| HOH is Black | 47 | 16.15% | 102 | 14.85% | 149 | 15.24% | | | |
| HOH is American Indian/Alaska Native | 7 | 2.41% | 13 | 1.89% | 20 | 2.04% | | | |
| HOH is Asian | 7 | 2.41% | 16 | 2.33% | 23 | 2.35% | | | |
| HOH is Native Hawaiian/Pacific Islander | 23 | 7.90% | 41 | 5.97% | 64 | 6.54% | | | |
| HOH is Hispanic or Latino | 21 | 7.22% | 64 | 9.32% | 85 | 8.69% | | | |

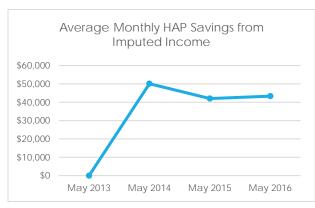
Metrics

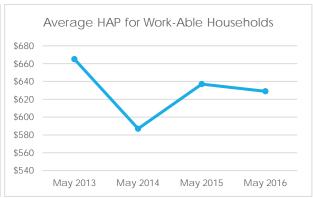
The primary metrics used to measure the impact of this activity on the MTW objective of increasing economic self-sufficiency are the number of work-able households reporting earned income at their eligibility reexaminations and the average amount of that income. Since the minimum income policy was implemented in June 2013, the percentage of work-able households with earned income has increased from 49% to 61%. The average amount of earned income went from \$15,653 to \$19,576. This is a 25% increase in just three years for both metrics. And while there are certainly other factors in addition to the minimum income that may have contributed to the increase (for example, the Clark County unemployment rate went down 3 points during the same period and VHA's own efforts at employment assistance), this is still a significant achievement.





Increased tenant income also results in reduced costs for the VHA; households with higher income require less housing assistance. However, it is difficult to estimate the actual savings from higher wages since new earned income often replaces other household income, such as TANF and even the imputed minimum income. But, savings resulting from the additional imputed income added to actual household income to bring them up to the minimum can be estimated. The chart below shows that monthly savings in Housing Assistance Payments (HAP) resulting directly attributable to imputed income averages between \$40,000 and \$50,000 per month. In addition, the average HAP for all work-able households went down significantly the first year and despite rapidly rising rents (and corresponding increases in payment standards) are still well below what they were prior to the policy change.





Another metric we are tracking is the reason that households leave the program. These reasons are divided into three broad categories of positive, negative and neutral. Of particular concern to many prior to implementation of the minimum income was the number of households evicted or terminated because of nonpayment of rent. VHA received a number of critical comments speculating that more

households would be unable to pay the new rents resulting from the minimum income and program exits due to eviction or termination for non-payment would increase. This has not been the case. Not only has the number of exits for non-payment gone down, a closer examination shows that 80% of households terminated for non-payment did not have a minimum income at all.

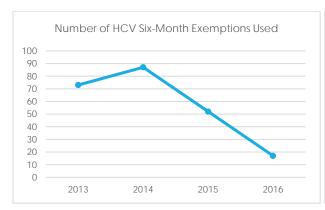
| VHA Housing Choice Voucher and Public Housing Program Exits | | | | | | | | |
|---|------|------|------|------|--|--|--|--|
| Reason for Exit | 2012 | 2013 | 2014 | 2015 | | | | |
| Criminal/Drug Activity | 3 | 0 | 1 | 1 | | | | |
| Eviction Other Reason | 3 | 1 | 8 | 4 | | | | |
| Fraud | 7 | 3 | 1 | 0 | | | | |
| Tenant Failure to Comply | 48 | 53 | 44 | 20 | | | | |
| Eviction Non payment | 11 | 14 | 7 | 5 | | | | |
| Skipped | 14 | 11 | 12 | 4 | | | | |
| Expired Move Voucher | 19 | 40 | 44 | 32 | | | | |
| Total Negative Program Exits | 105 | 122 | 117 | 66 | | | | |
| | | | | | | | | |
| Time limit reached (Case Managed TBTL) | 0 | 15 | 19 | 18 | | | | |
| Deceased | 35 | 44 | 35 | 35 | | | | |
| Health Reasons | 16 | 12 | 18 | 16 | | | | |
| Port-In Returned to Initial HA | 7 | 12 | 4 | 0 | | | | |
| Total Neutral Program Exits | 58 | 83 | 76 | 69 | | | | |
| | | | | | | | | |
| Voluntary | 71 | 69 | 66 | 62 | | | | |
| Bought Home | 0 | 2 | 3 | 1 | | | | |
| Zero HAP/Over Income | 18 | 22 | 26 | 26 | | | | |
| Total Positive Program Exits | 89 | 93 | 95 | 89 | | | | |
| | | | | | | | | |
| Total Program Exits | 252 | 298 | 288 | 224 | | | | |

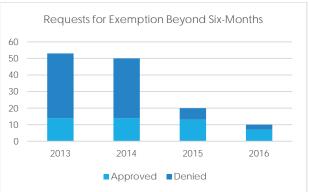
Hardship Policy

With the implementation of minimum income, VHA created a new two-part hardship policy for those having difficulty with any rent increase resulting from the minimum income. Each household impacted by this activity is given a one-time six-month period of exemption from the policy. To use all or part of this exemption the household just has to complete a form requesting the exemption. No approval from VHA is required. Once the six months is exhausted, households are still eligible to request an additional hardship exemption from the VHA. These requests are reviewed and approved by a panel that includes both a VHA resident and the Executive Director.

To date about 250 households have used all or part of their six-month exemption. Many households used their exemption as soon as they could, but even more opted to save their six-month exemption period for a later date and just paid their increase in rent resulting from the minimum income. Today, only a small number of households are utilizing their six-month exemption and these are mostly new households from the waiting list.

Regarding the second type of hardship exemption, 101 households have made 133 requests for an additional hardship exemption from the minimum rent in the three years since the policy started. Of the 133 requests, 10 households were approved for a long-term exemption, 38 were approved for a short-term exemption and 83 were denied. However, it should be noted that during the first year or so of the policy most of those denials were for requests from households who had not even utilized their six-month exemption.





Conclusion

Four years ago, when VHA proposed adopting the minimum income policy, there was a great deal of concern, even alarm, expressed from residents and other members of the community. It was said that there were few jobs available and our residents would be unable to find work, landlords would opt-out due to concerns that tenants couldn't pay their share of rent and that many households would end up evicted and homeless. One commenter went so far as to predict that hundreds of families would evicted as a result of the minimum income.

Fortunately, none of these predictions have occurred. Instead, more households are employed and those employed are making more money. Evictions for non-payment have actually gone down with only five occurring in 2015. Although changes in the local rental market have made finding a unit much more difficult, there is no indication that landlords are opting out due to the minimum income policy. And finally, VHA's costs for providing housing assistance for work-able households are far less than they would have been absent the policy.