



# **Housing Authority of Washington County Public Housing Agency (PHA) Plan**

**2022 Annual Update**

**April 8, 2022**

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<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																				
A.1	<p> <b>PHA Name:</b> <u>Housing Authority of Washington County</u>      <b>PHA Code:</b> <u>OR022</u>  <b>PHA Type:</b> <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2022</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>244</u>      <b>Number of Housing Choice Vouchers (HCVs)</b> <u>2,960</u>  <b>Total Combined</b> <u>3,204</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> Will Seals, Asset Manager:                      (503) 846-4784 or <a href="mailto:will_seals@co.washington.or.us">will_seals@co.washington.or.us</a>  111 NE Lincoln Street, Suite 200L, Hillsboro, Oregon 97124 </p> <p> A copy of the proposed plan can be viewed by visiting our offices at the above address or online at:  <a href="https://www.co.washington.or.us/Housing/PoliciesPlans/plans-policies-reports.cfm">https://www.co.washington.or.us/Housing/PoliciesPlans/plans-policies-reports.cfm</a> </p> <p> A copy of the draft PHA Plan was provided to members of the Resident Advisory Board for review and comment. The handout included the proposed changes to the Housing Choice Voucher (HCV) Administrative Plan and the Admissions and Continued Occupancy Plan (ACOP). </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program													
		PH	HCV																		
Lead PHA:																					

<b>B. Plan Elements</b>						
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p><b>See Attachment 2.0</b></p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p><b>See Attachment 2.5.</b></p>					
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><b>See Attachment 3.0</b></p>					
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p><b>See Attachment 4.0.</b></p>					

<b>B.4.</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See HUD Form 50075.2 approved by HUD on 11/04/2021 via EPIC.</p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<p><b>Other Document and/or Certification Requirements.</b></p>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> Information to follow after RAB meeting, scheduled for March 29, 2022.</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><b>See Attachment 5.0.</b></p> <p>The Public Hearing is scheduled for the April 5, 2022 Housing Authority Board of Directors meeting.</p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><b>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,</b> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><b>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</b> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/> Information to follow after public comment period</p> <p>If yes, include Challenged Elements.</p>
<b>D.</b>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing.</b></p>

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

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*Describe fair housing strategies and actions to achieve the goal*

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*Describe fair housing strategies and actions to achieve the goal*

## Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

**A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

**B. Plan Elements.**

**B.1 Revision of Existing PHA Plan Elements.** PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k)) and 24 CFR §903.12(b).

**Safety and Crime Prevention (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

**Pet Policy.** Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

**Substantial Deviation.** PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

**HOPE VI.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). (Notice PIH 2011-47)

**Mixed Finance Modernization or Development.** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and 2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

## C. Other Document and/or Certification Requirements

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works

with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### **D. Affirmatively Furthering Fair Housing.**

##### **D.1 Affirmatively Furthering Fair Housing.**

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...". Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works 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. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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# Housing Authority of Washington County

## 50075-MTW Supplement

April 8, 2022

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# PHA Name : Housing Authority Of Washington County

PHA Code : OR022

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2022

PHA Program Type: Combined

MTW Cohort Number: 2

MTW Supplement Submission Type: Annual Submission

## **B. MTW Supplement Narrative.**

### **LONG-TERM MTW GOALS**

The Housing Authority of Washington County (HAWC) is framing our MTW strategies to align with the goals stated in our Agency Plan: 1) Increase the availability of decent safe, and affordable housing; 2) improve community quality of life and economic vitality; 3) promote self-sufficiency and asset development of families and individuals; and 4) ensure equal opportunity in housing for all Americans. The flexibility offered by the MTW program enables HAWC to implement and test strategies that move the agency closer to these goals.

Throughout our participation as an MTW agency, HAWC will explore strategies for cost reduction and effectiveness. We will shift focus from paperwork and verifications to improving household outcomes. With the innovation and flexibility offered by MTW participation, we will encourage our staff and community partners to think outside the box and find ways to improve and streamline processes.

HAWC will also build on our efforts to partner and create leverage points for both services and housing development. We will think creatively on how to increase the number of units available to our low-income households, while also entering into partnerships that will help our residents improve their opportunities in education, increasing their earnings and meeting goals for their families.

HAWC is committed to centering equity and inclusion in the work we do, to include policies or processes that are considered or changed within the scope of MTW. We will examine practices with a lens toward equity, and engage our households and community partners, with specific outreach to communities of color and tribal communities that have often been excluded from the decision-making process.

### **SHORT-TERM MTW GOALS**

In our first year as an MTW agency, HAWC is focusing on strategies for cost reduction and administrative effectiveness. Our community has experienced significant instability and change in the last two years, and our focus on simplifying processes for the agency and for households will bring better understanding and transparency to our work.

For example, in Year 1 we are proposing to move seniors and people with disabilities to a triennial review schedule, and to vastly simplify aspects of the rent calculation. These changes will save significant staff time by reducing the number of reexaminations and verifications that need to be performed, allowing HAWC to redirect its staff and resources into activities that hold a higher value for its participants. In a time when many of our households need even more supports than usual, we can take advantage of the administrative savings to connect low-income families to services and to collaborate with public and private partners on local initiatives.

We will also implement the Tiered Rent Program demonstration this year. We are hopeful that families who are selected for this program will see an opportunity to increase earnings and decrease paperwork burdens, through the tiered rent schedule and triennial reviews. We look forward to learning from this six-year demonstration and building a future rent calculation that works well for all of our families.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Plan to Implement in the Submission Year
b. Tiered Rent (HCV)	Plan to Implement in the Submission Year
r. Elimination of Deduction(s) (PH)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
<b>2. Payment Standards and Rent Reasonableness</b>	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Plan to Implement in the Submission Year
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	

**C. MTW Activities Plan that Housing Authority Of Washington County Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.a. - Tiered Rent (PH)</b>
<p>As part of our MTW designation, HAWC will implement a tiered rent program to simplify the way rents are calculated for households. This is part of a rent study with three other MTW agencies and will only apply to a small portion of our households. The initial program is for six years and will begin enrolling households in FY 2022-2023. The program will enroll current households and newly admitted for 12 months. After six years, any participating households will transition back to the traditional rent calculation or to a revised calculation that would be introduced to the community in the future.</p> <p>Only households who are work-able are considered eligible for the Tiered Rent Program. Households where the head, co-head or spouse is age 56 or older or a person with disabilities are not eligible. Households participating in FSS, mixed-eligibility households, and households using special purpose vouchers are not eligible.</p> <p>Households will be selected randomly for participation by the research firm’s website. Of the households that are eligible, approximately half will be selected for the Tiered Rent Program and half will be selected as comparison households. Comparison households will continue to have their rents calculated using the standard calculation.</p>

Under the Tiered Rent Program, households will pay rent based on a rent schedule with tiers of \$2,500 corresponding to the household's gross income (as described in Waivers 1.r. and 1.s.) Rents are set at 28% of the midpoint of each tier. Although the Tiered Rent Program uses gross income, hardship policies have been established to protect families that will lose significant deductions. See the attached Hardship Policy information for more detail.

As described in Waivers 3.a. and 3.b., households that are selected for the Tiered Rent Program will move to a triennial recertification schedule. This means that these households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. (Safe Harbor Waiver requested. See below)
- ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income.

This MTW activity serves the following statutory objectives:

Cost effectiveness  
Self-sufficiency

This MTW activity serves the following statutory objectives:

Decreased revenue  
Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Income bands are in increments of \$2,500 in gross annual income. Rents are set at 28% of the midpoint of the tier, divided by 12 (to represent monthly income/rent). Households with income below \$2,500 will pay a minimum rent of \$50.

Please see attached tiered rent policy table that shows the income bands.

The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

This activity uses different definition of income because we are using the following MTW waivers:

1.r. and/or 1.s. "elimination of deductions"

### 1.b. - Tiered Rent (HCV)

As part of our MTW designation, HAWC will implement a tiered rent program to simplify the way rents are calculated for households. This is part of a rent study with three other MTW agencies and will only apply to a small portion of our households. The initial program is for six years and will begin enrolling households in FY 2022-2023. The program will enroll current households and newly admitted for 12 months. After six years, any participating households will transition back to the traditional rent calculation or to a revised calculation that would be introduced to the community in the future.

Only households who are work-able are considered eligible for the Tiered Rent Program. Households where the head, co-head or spouse is age 56 or older or a person with disabilities are not eligible. Households participating in FSS,

mixed-eligibility households, and households using special purpose vouchers are not eligible.

Households will be selected randomly for participation by the research firm's website. Of the households that are eligible, approximately half will be selected for the Tiered Rent Program and half will be selected as comparison households. Comparison households will continue to have their rents calculated using the standard calculation.

Under the Tiered Rent Program, households will pay rent based on a rent schedule with tiers of \$2,500 corresponding to the household's gross income (as described in Waivers 1.r. and 1.s.) Rents are set at 28% of the midpoint of each tier. Although the Tiered Rent Program uses gross income, hardship policies have been established to protect families that will lose significant deductions. See the attached Hardship Policy information for more detail.

As described in Waivers 3.a. and 3.b., households that are selected for the Tiered Rent Program will move to a triennial recertification schedule. This means that these households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. (Safe Harbor Waiver requested. See below)
- ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income.

This MTW activity serves the following statutory objectives:

Cost effectiveness  
Self-sufficiency

This MTW activity serves the following statutory objectives:

Decreased revenue  
Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

This MTW activity applies to the following housing choice voucher unit types: This activity applies to all tenant-based units and properties with project-based vouchers.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Income bands are in increments of \$2,500 in gross annual income. Rents are set at 28% of the midpoint of the tier, divided by 12 (to represent monthly income/rent). Households with income below \$2,500 will pay a minimum rent of \$50.

Please see attached tiered rent policy table that shows the income bands.

The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

This activity uses different definition of income because we are using the following MTW waivers:

1.r. and/or 1.s. "elimination of deductions"

#### **1.r. - Elimination of Deduction(s) (PH)**

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the

household's gross income. Households who are selected for this program will have their rent calculated using gross income from the prior twelve months (except for new admissions, who will have their rent calculated using current gross income). As a part of the policy, deductions and allowances will not be included in the calculation of gross income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Agency must conduct an impact analysis.
- ii. Agency must exempt elderly and disabled families from rent policy.
- iii. Agency must implement a hardship policy.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Decreased revenue  
Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH)  
1.s. - Elimination of Deduction(s) (HCV)  
3.a. - Alternative Reexamination Schedule for Households (PH)  
3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:  
1.r. - Elimination of Deduction(s) (PH)  
1.s. - Elimination of Deduction(s) (HCV)  
3.a. - Alternative Reexamination Schedule for Households (PH)  
3.b. - Alternative Reexamination Schedule for Households (HCV)

Following deduction(s) will be eliminated, modified, or added.

Dependent allowance  
Unreimbursed childcare costs  
Other

All deductions, including dependent allowances and deductions for childcare costs, will be eliminated for households participating in the Tiered Rent Program. Families who experience a significant rent increase due to the loss of these deductions may be eligible for hardship and adjustment to their rent calculation.

### **1.s. - Elimination of Deduction(s) (HCV)**

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will have their rent calculated using gross income from the prior twelve months (except for new admissions, who will have their rent calculated using current gross income). As a part of the policy, deductions and allowances will not be included in the calculation of gross income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Agency must conduct an impact analysis.
- ii. Agency must exempt elderly and disabled families from rent policy.
- iii. Agency must implement a hardship policy.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

<p>This MTW activity serves the following statutory objectives:  Decreased revenue  Increased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:  New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  The MTW activity applies only to selected family types</p>
<p>This MTW activity applies to the following housing choice voucher unit types: This activity applies to all tenant-based units and properties with project-based vouchers.</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH)  1.s. - Elimination of Deduction(s) (HCV)  3.a. - Alternative Reexamination Schedule for Households (PH)  3.b. - Alternative Reexamination Schedule for Households (HCV)}</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Housing Authority Of Washington County MTW agency  Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>
<p>The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:  1.r. - Elimination of Deduction(s) (PH)  1.s. - Elimination of Deduction(s) (HCV)  3.a. - Alternative Reexamination Schedule for Households (PH)  3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>Following deduction(s) will be eliminated, modified, or added.  Dependent allowance  Unreimbursed childcare costs  Other (please explain)  All deductions, including dependent allowances and deductions for childcare costs, will be eliminated for households participating in the Tiered Rent Program. Families who experience a significant rent increase due to the loss of these deductions may be eligible for hardship and adjustment to their rent calculation.</p>

<p><b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b></p>
<p>HAWC is proposing to eliminate the requirement for a third party to conduct rent reasonableness on units our agency owns or controls, assisted with project-based vouchers. HAWC currently engages a third-party contractor to conduct rent reasonableness in these cases, and it is time consuming and costly. Conducting rent reasonableness calculations internally will streamline processes and create cost effectiveness. HAWC will utilize GoSection8 Rent Reasonableness software for all rent reasonableness processes to ensure quality control and transparency. The program allows Quality Control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent reasonableness documentation with comparable will still be transmitted to HUD for Subsidy Layering Reviews.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:  i. The agency shall establish and make available a quality assurance method to ensure impartiality.  ii. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.  iii. At the Department’s request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.</p>
<p>This MTW activity serves the following statutory objectives:  Cost effectiveness</p>
<p>This MTW activity serves the following statutory objectives:  Decreased expenditures</p>



An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain quality assurance method:

Quality assurance method: The GoSection8 Rent Reasonableness software program allows for quality control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent reasonableness documentation with comparable will still be transmitted to HUD for Subsidy Layering Reviews. and attached for quality assurance method

Following will explain rent reasonableness determination method:

Rent reasonableness determination method: HAWC will utilize GoSection8 Rent Reasonableness software for all rent reasonableness processes. The process includes comparable based on up-to-date market units and costs. The software's processes and certification of each review adheres to HUD's rent reasonableness standards. and attached for rent reasonableness determination method

### **3.a. - Alternative Reexamination Schedule for Households (PH)**

HAWC is utilizing 3.a. and 3.b. in two activities: Tiered Rent Program and Triennial Reviews for Seniors and People with Disabilities. Utilization of the waiver in each activity is described below.

#### **TIERED RENT PROGRAM**

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will move to a triennial recertification schedule. These households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

The triennial review schedule will benefit families who increase their earnings. Families will not need to report increased income between triennial reviews, and will keep their full additional earnings to build stability.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

#### **TRIENNIAL REVIEWS FOR SENIORS AND PEOPLE WITH DISABILITIES**

HAWC is implementing a triennial review schedule for seniors and people with disabilities. The triennial review schedule will be applied to households with at least one fixed income source, and where all adults in the households are seniors or people with disabilities. (At this time, both factors must apply for households to qualify for triennial reviews.)

Because this subset of our community is frequently on fixed incomes, they do not see significant rent changes from year to year. Annual reviews can be burdensome for these households. Instead, HAWC will only do a full review for these households once every three years. In 2022, households will be assigned their next review in either 2022, 2023 or 2024, and will not have another regular review for three years after. Households do not need to report changes in income between triennial reviews, unless they have a loss of income and are seeking rent reduction.

HAWC will still update COLA, payment standards, utility allowances and run EIV every year, send rent notice and informational letters to the household reminding them that they're on a triennial review, as well as a reminder to update medical expenses within 30 days if applicable.

If a household where all adults in the household are seniors or people with disabilities is zero income, they will be on a six-month review cycle. The goal of these six-month reviews will be to connect households with services or organizations who can help the household through the process of confirming SSI or SSDI income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

This MTW activity serves the following statutory objectives:

Cost effectiveness  
Self-sufficiency

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)  
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH)

1.s. - Elimination of Deduction(s) (HCV)

3.a. - Alternative Reexamination Schedule for Households (PH)

3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is Once every three years

Household may request 2 or more interim recertifications per year.

Tiered Rent Program - If a family experiences a decrease in income that falls into a lower tier, the family can request a hardship (as opposed to an interim recertification). Please see the hardship policy for additional details.

Triennial Reviews for Seniors and People with Disabilities - Households will have access to our hardship policy if they feel their current rent calculation is putting their housing stability at risk. HAWC will track and annually review the hardship requests received by these household to ensure the policy is not having a negative or bias impact on these households. Families can also request interims as needed, if the change in household circumstances warrants.

### **3.b. - Alternative Reexamination Schedule for Households (HCV)**

HAWC is utilizing 3.a. and 3.b. in two activities: Tiered Rent Program and Triennial Reviews for Seniors and People with Disabilities. Utilization of the waiver in each activity is described below.

#### **TIERED RENT PROGRAM**

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will move to a triennial recertification schedule. These households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

The triennial review schedule will benefit families who increase their earnings. Families will not need to report increased income between triennial reviews, and will keep their full additional earnings to build stability.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

#### TRIENNIAL REVIEWS FOR SENIORS AND PEOPLE WITH DISABILITIES

HAWC is implementing a triennial review schedule for seniors and people with disabilities. The triennial review schedule will be applied to households with at least one fixed income source, and where all adults in the households are seniors or people with disabilities. (At this time, both factors must apply for households to qualify for triennial reviews.)

Because this subset of our community is frequently on fixed incomes, they do not see significant rent changes from year to year. Annual reviews can be burdensome for these households. Instead, HAWC will only do a full review for these households once every three years. In 2022, households will be assigned their next review in either 2022, 2023 or 2024, and will not have another regular review for three years after. Households do not need to report changes in income between triennial reviews, unless they have a loss of income and are seeking rent reduction.

HAWC will still update COLA, payment standards, utility allowances and run EIV every year, send rent notice and informational letters to the household reminding them that they're on a triennial review, as well as a reminder to update medical expenses within 30 days if applicable.

If a household where all adults in the household are seniors or people with disabilities is zero income, they will be on a six-month review cycle. The goal of these six-month reviews will be to connect households with services or organizations who can help the household through the process of confirming SSI or SSDI income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

This MTW activity serves the following statutory objectives:

Cost effectiveness  
Self-sufficiency

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)  
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

This MTW activity applies to the following housing choice voucher unit types: This activity applies to all tenant-based units and properties with project-based vouchers.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH)

1.s. - Elimination of Deduction(s) (HCV)

3.a. - Alternative Reexamination Schedule for Households (PH)

3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 2 or more interim recertifications per year.
Tiered Rent Program - If a family experiences a decrease in income that falls into a lower tier, the family can request a hardship (as opposed to an interim recertification). Please see the hardship policy for additional details. Triennial Reviews for Seniors and People with Disabilities - Households will have access to our hardship policy if they feel their current rent calculation is putting their housing stability at risk. HAWC will track and annually review the hardship requests received by these household to ensure the policy is not having a negative or bias impact on these households. Families can also request interims as needed, if the change in household circumstances warrants.

<b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b>
HAWC is proposing the option to allow pre-qualifying unit inspections, within 90 days of the participant occupying the unit. Allowing pre-qualifying inspections will streamline the process and allow households to move through occupancy more quickly.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. The pre-inspection must have been conducted within 90 days of the participant occupying the unit. ii. The participant must be able to request an interim inspection. iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of Washington County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The pre-inspection is valid for 90 days.

<b>5.c. - Third-Party Requirement (HCV)</b>
HAWC is proposing to eliminate the requirement for a third party to conduct HQS inspections on units our agency owns or controls, when assisted with tenant-based or project-based vouchers. HAWC currently engages a third-party contractor to conduct HQS inspections in these cases, and it is time consuming and costly. Using HAWC staff to conduct these HQS inspections will streamline processes and create cost effectiveness. HAWC will continue to have a sampling of inspections done by our auditor to ensure quality control and transparency in the process.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. The agency shall establish and make available a quality assurance method to ensure an objective analysis. ii. The participant must be able to request an interim inspection. iii. HQS inspection standards must not be altered as found at 24 CFR 982.401. iv. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

The quality assurance method:

Following will explain the quality assurance method – HAWC will continue to utilize our internal quality control process of HQS audits, ensuring that a minimum amount of inspections are reviewed by a secondary staff member. The agency will conduct quality control inspections utilizing 24 CFR 985.2(b) that determines the quality control sample size, whereas the PHA will perform quality control inspections to ensure housing quality. The sample selection will be drawn in an unbiased manner and reviewed by an agency supervisor or another qualified person other than the person who performed the original work. Sample pulls may occur monthly or quarterly and notices will be sent to the participants and landlords. If [Upload file] options- Display 'Attached for quality assurance method"

#### 5.d. - Alternative Inspection Schedule (HCV)

HAWC is proposing that in lieu of initial staff inspections of PBV units before occupancy or at turnover (per 24 CFR 983.103(b)-(c)), properties in good standing will self-certify adherence to HQS inspection standards. This policy will allow for the landlord and tenant to complete and sign a self-certification of inspection at the time of lease up, with documentation submitted at the same time as the other leasing paperwork. Once received, staff will review and if approved, place the PBV unit on an annual inspection cycle.

This policy will only apply to properties in good standing, and HAWC may require initial inspections at any PBV unit if there are concerns with failed inspections in the property. Additionally, the participant can request an interim inspection at any time. All initial inspections on a contract will be conducted by an HQS inspection, including but not limited to new construction, rehabilitation and unit transfers. The unit must pass at least one full HQS inspection before it will be eligible for an initial self-certification.

HAWC will employ a quality control process of HQS internal audits, randomly selecting a percentage of self-certified inspections to receive a secondary inspection by internal staff. HAWC will also track interim inspection requests and results from annual inspections, to monitor if the policy is having any negative or bias impact on housing quality or residents.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Units must be inspected at least once every three years.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards as found at 24 CFR 982.401 must not be altered.
- iv. The Department must be able to conduct or direct the agency to perform an inspection at any time for health and safety, as well as accessibility, purposes.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

#### 9.a. - Increase PBV Program Cap (HCV)

HAWC is proposing to increase the number of authorized units that we may project-base up to 50%. Project-based vouchers (PBVs) are an important resource in our community, allowing the agency to coordinate with local property owners, developers, service coordinators and jurisdictional partners to provide targeted housing for different populations.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

i. The agency must not project-base more than 50% of the lower of either the total authorized units or annual budget authority.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of Washington County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
50.00% of total authorized HCV units will be authorized for project-basing.

<b>9.b. - Increase PBV Project Cap (HCV)</b>
HAWC is proposing to increase the PBV cap within a project to 100%. Project-based vouchers (PBVs) are an important resource in our community, allowing the agency to coordinate with local property owners, developers, service coordinators and jurisdictional partners to provide targeted housing for different populations.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. The agency is subject to Notice PIH 2013-27 where applicable, or successor.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of Washington County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)</b>
HAWC is proposing to eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. HAWC will continue to abide by the additional HUD selection requirements and will maintain transparency with our community.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. A subsidy layering review must be conducted. ii. The agency must complete site selection requirements. iii. (The agency is also implementing Activity 5.c. and will be waiving the third-party inspection requirements for all PBV properties. The agency has confirmed that Activity 5.c. overrides the Safe Harbor in Activity 9.c. with the MTW Office.) iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor. v. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and

currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of Washington County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>9.h. - Limit Portability for PBV Units (HCV)</b>
HAWC is proposing to waive the current requirement to provide a tenant-based voucher at 12 months when requested by a PBV household. Because of the limited availability of tenant-based vouchers in our community, we currently have a list of approximately 1,800 households waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist.
HAWC will limit the preference for a tenant-based voucher at 12 months to PBV households who are requesting transfer because of VAWA transfer or another reasonable accommodation. Requests must be submitted in writing and will be reviewed by the Program Manager. If a request is denied, the household would have the right to an informal review through the hearing process.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. (Safe Harbor Waiver requested. See below.) ii. The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households. iii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of Washington County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>14.a. - Waive Initial HQS Inspection Requirement (HCV)</b>
Moving On enables individuals and families who are able and want to move from permanent supportive housing (PSH) to do so by providing mainstream housing options, like public housing units or rent assistance vouchers. HAWC is utilizing our MTW authority to waive the requirement for an additional HQS inspection if the household is going to use mainstream housing options (such as a voucher) to continue to lease the same unit.
HAWC anticipates this activity will be relatively cost neutral, with some staff time savings through the policy, but significant improvements in administrative efficiency.
Per the MTW Operations Notice, this activity will operate within the following Safe Harbors: i. Initial income eligibility must be determined in accordance with 24 CFR 5.609 of the 1937 Act. ii. Agencies must continue to allow participants to request an interim HQS inspection. iii. Any income calculations that are accepted from partner agencies must have been calculated within the last year. iv. Screenings for lifetime sex offender status and convictions of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing must continue and are not waivable.
This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice

This MTW activity serves the following statutory objectives:  
Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of Washington County MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.



<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> Please see attached for Safe Harbor Waivers requested this year.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.  Please see attached for Agency-Specific Waiver(s) requested this year.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2021	\$1,004,472	\$1,004,472		2029-09-30
2022	\$337,490	\$168,745	\$168,745	2030-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months	

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	Yes - This table lists evaluations of Housing Authority Of Washington County's MTW activities, including the names of evaluators and available reports

**Table I.1 - Evaluations of MTW Policies**

Title and short description	Evaluator name and contact information	Time period	Reports available
Tiered Rent Program - HAWC's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. HAWC will be studying a tiered rent model. An independent research team led by MDRC will work with HUD, HAWC, and the other selected agencies to assist in implementation and evaluate the effects of the alternative rent policy.	MDRC Contact: Nina Castells; Nina.Castells@mdrc.org	HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.	

**MTW CERTIFICATIONS OF COMPLIANCE*****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning ( 07/01/2022 ), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of Washington County

OR (022)

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Kathryn Harrington

Chair

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
**SIGNATURE**

4/8/22

**DATE**

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

## Safe Harbor Waivers

### Tiered Rent Program

#### 1.a., 1.b. – Tiered Rent

Activity: The agency may implement changes to the tenant rent/TTP calculation to create a system based upon income bands.

Safe Harbor to be Waived: “i. Rents and/or TTP (as applicable) established under this system must set be set up using the lowest income in each band. For example, if an income band is \$2,500-\$5,000 then the rent for that band must be set using \$2,500.”

Regulation: Certain provisions of sections 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.628

Proposed activity: The standard MTW waiver provides that when a tiered rent is adopted, TTP/rent is based on the income at the bottom of the tier. For the Tiered Rent Program, the study design has established TTP/rent at 28% of the midpoint of the tier.

Impact analysis: Please see attached Tiered Rent Program impact analysis.

Hardship policy: Please see attached Tiered Rent Program hardship policy.

Public comments: Please see attached description of all public comments received and consideration/responses to comments. No comments were made in specific reference to the waiver of this Safe Harbor.

### Tiered Rent Program

#### 3.a., 3.b. – Alternative Reexamination Schedule for Households

Activity: The agency may establish an alternative reexamination schedule for households.

Safe Harbor to be Waived: “ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.”

Regulation: Certain provisions of sections 8(o)(5) of the 1937 Act and 24 CFR 982.516(a)(1) and 982.516(c)(2).

Proposed activity: The standard MTW waiver calls for at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. However, the Tiered Rent Program study design does not provide for interim adjustments, but instead calls for hardship rent application when a household’s income decreases and falls into a lower rent tier. (Please note this Safe Harbor Waiver only applies to triennial reviews established by the Tiered Rent Program, and not to the triennial review activity for seniors and people with disabilities.)

Impact analysis: Please see attached Tiered Rent Program impact analysis.

Hardship policy: Please see attached Tiered Rent Program hardship policy.

Public comments: Please see attached description of all public comments received and consideration/responses to comments. No comments were made in specific reference to the waiver of this Safe Harbor.

**Local Project-Based Voucher Program**  
**9.h. Limit Portability for PBV Units (HCV)**

Activity: The agency is authorized to waive the requirement to provide a tenant-based voucher at 12 months when requested by a PBV household.

Safe Harbor to be Waived: “i. Portability under this activity must not be restricted for more than 24 months.”

Regulation: Certain provisions of section 8(o)(13)(E) of 1937 Act and 24 CFR 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461 (see implementation guidance in Notice PIH 2017-21).

Proposed activity: HAWC is proposing to restrict portability based on need of the PBV household (for example, VAWA transfer, reasonable accommodation), rather than on a timeframe.

Because of the limited availability of tenant-based vouchers in our community, we currently have a list of approximately 1,800 households waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist. HAWC will limit the preference for a tenant-based voucher at 12 months to PBV households who are requesting transfer because of VAWA transfer or another reasonable accommodation.

Impact analysis:

1. Agency finances – No projected impact.
2. Affordability of housing costs – No projected impact.
3. Agency waitlist – Although significant waitlist time reductions are not anticipated, this activity will allow the agency to that ensure households on our tenant-based waitlist continue to be served.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity will reduce cost and achieve greater cost effectiveness in federal expenditures through administrative efficiencies. It will also increase housing choices for eligible low-income families as the agency continues to serve households on our tenant-based waitlist.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

Hardship policy: This activity will primarily result in administrative efficiency, will not affect tenant rent amounts and will not require a specific hardship policy. However, households will retain the right to request reasonable accommodations.

Public comments: Please see attached description of all public comments received and consideration/responses to comments. One person asked for clarification about how this priority was changing:

**Q: How is the priority changing for Project-Based Voucher transfers?**

Under current rules, after a household has lived in a Project-Based Voucher unit for 12 months, they can request a tenant-based voucher and be given priority above those on the waitlist. Because of our extensive waitlist for tenant-based vouchers and the known need in the community, we want to ensure we’re able to continue to serve households who are not yet receiving rent assistance. For this reason,

we are proposing that a Project-Based Voucher household will only receive priority for a tenant-based voucher upon completion of a reasonable accommodation request, such as a VAWA transfer.



## Agency Specific Waivers

- A. Income Verification
- B. Calculation of Asset Income
- C. Calculation of Medical/Disability Expense Deduction
- D. Discontinue Earned Income Disallowance (EID)
- E. Proration of Assistance for Mixed-Eligibility Households
- F. Voucher Set-Aside Program
- G. Strategic Waitlists

Attachment: MTW Activities Hardship Policy

### A. Income Verification

Full description: HAWC is proposing a waiver to the verification hierarchy found in PIH Notice 2018-18, "Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System". HAWC is proposing this waiver for all current households (excludes income verification at new admission).

HAWC will continue to use EIV and other Upfront Income Verification (UIV) tools as the first, preferred verification technique. Use of EIV is mandatory. The next level will be tenant-provided documents (including pay stubs) and tenant self-certification. The lowest ranking verification techniques will be third-party verification (written or oral).

This waiver will help reduce cost and streamline processes in verifying income during the reexamination process. In HAWC's experience, tenant-provided documents and tenant self-certification has been an efficient method of verifying income, when partnered with EIV and UIV.

Statute, Regulation or Operations Notice to be waived: Notice PIH 2018-18

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: All

Cost Implications: HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.

Implementation timeline: HAWC will implement this new process for all households, beginning on July 1, 2022 (pending HUD approval).

#### Impact Analysis:

1. Agency finances - HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.
2. Affordability of housing costs – No projected impact.
3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals - This activity is projected to increase staff efficiency by reducing reliance on third-party oral or written income verifications.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.

9. Protected classes / Disparate impact – No project impact.

Hardship Policy: This activity will primarily result in administrative efficiency and will not require a specific hardship policy. However, households will retain the existing rights to contest income findings. If the family disputes the accuracy of the data, the PHA will independently verify and give the family an opportunity to contest findings through the informal review/hearing process of the PHA. These policies are established in Chapters 7 of the HCV Program Administrative Plan and the Public Housing ACOP.

Comments received + Agency response: No comments received.

**B. Calculation of Asset Income**

Full description: The calculation of asset income and how it affects a household’s rent is often arduous and confusing. Across 2,256 households currently reporting assets, the average annual impact on household rent is \$3.56 per household, per year. The staff time required to collect, verify and calculate asset information is of significant more cost than this.

HAWC is requesting an Agency Specific Waiver to change the way assets are used to calculate rent. Asset information will still be collected and verified at initial eligibility. However, HAWC will disregard all assets when total assets for the household are less than \$100,000. HAWC will not include asset or asset income in the rent calculation, or enter the information into Yardi, if total assets are less than \$100,000 as indicated in the personal declaration packet. If assets are \$100,000 or more, HAWC will continue to process assets and calculate the impact on rent as usual.

Out of 2,256 households currently reporting assets, only 21 households (or 1%) have assets of \$100,000 or more. The total impact of those assets represents 65% of the difference in final rent calculations across the agency. Continuing to include assets of \$100,000 or more will ensure that households with significant asset income use a portion of that income toward their rent.

This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households.

Statute, Regulation or Operations Notice to be waived: Certain provisions of section 24 CFR 5.609 (b), 982.516, and sections 3(a)(1) and 3(b)(4)-(5) of the 1937 Act

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households.

Cost Implications: Loss of rental income or increase in HAP expenditures will cost HAWC approximately \$2,836 annually. However, this small cost will be offset by increased staff efficiency and the opportunity for staff to focus on additional supports for households.

Implementation timeline: HAWC will implement this new process and calculation for all new and existing households, beginning on July 1, 2022 (pending HUD approval). Updated calculations will be included at the household’s next reexamination.

**Impact Analysis:**

1. Agency finances – This activity is projected to cost the agency approximately \$2,836 annually in loss of rental income or increase in HAP expenditures.
2. Affordability of housing costs – This activity has no impact or a very small impact for the majority of households with assets of less than \$100,000. (Current process remains in place for households with assets totaling \$100,000 or more.)

2,235 Households with assets \$1 - \$99,999

		Rent Decrease	
Rent Increase	No change	\$1-\$10	More than \$10
0 households	2,073 households	158 households	4 households

3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity is projected to increase staff efficiency by reducing the processes around asset information collection, verification and calculation by more than 90%.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No projected impact.

Hardship Policy: This policy does not result in any additional hardships or rent increases for our household. All households have access to our MTW Hardship policy.

Comments received + Agency response: No comments received.

**C. Calculation of Medical/Disability Expense Deduction**

Full description: HAWC is requesting MTW flexibility to simplify the calculation of the medical or disability expense deduction, the process of verifying expenses, and how those expenses will impact a household’s rent.

HAWC will use a simplified table (below) to calculate allowances related to a household’s medical or disability expenses. We will no longer use a varying medical or disability expense threshold for households. In essence, we will take the full amount of the household’s expense and round down to the nearest \$1,000 to calculate their deduction. Only medical or disability expenses totaling \$1,500 or more per year are eligible.

Medical / Disability expense	Deduction	Medical / Disability expense	Deduction
\$0 - \$1,500	\$0	\$5,000 - \$5,999	\$5,000
\$1,500 - \$1,999	\$1,000	\$6,000 - \$6,999	\$6,000
\$2,000 - \$2,999	\$2,000	\$7,000 - \$7,999	\$7,000
\$3,000 - \$3,999	\$3,000	\$8,000 - \$8,999	\$8,000
\$4,000 - \$4,999	\$4,000	\$9,000 - \$9,999	\$9,000

Medical /disability expense information can only be submitted once every 12 months. Interim reviews will not recalculate medical expenses. Households will submit medical expense information via a form. For expenses totaling less than \$5,000, HAWC will use tenant self-certification. Receipts will be required for expenses totaling \$5,000 or more.

This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households. Please note that households participating in the Tiered Rent Program will no longer have deductions included in their rent calculation, and will therefore not be subject to this change.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 5.611(a)(3) and section 3(a)(1) and 3(b)(5) of 1937 Act

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: All

Cost Implications: HAWC anticipates savings of approximately \$11,000 annually in reduced HAP costs or increased public housing rent. Additionally, HAWC anticipates a savings in staff time with this activity, but we do not anticipate staffing reductions.

Implementation timeline: HAWC will implement this new process and calculation for all new and existing households, beginning on July 1, 2022 (pending HUD approval). Updated calculations will be included at the household’s next reexamination.

Impact Analysis

1. Agency finances – HAWC anticipates savings of approximately \$11,000 annually in reduced HAP costs or increased public housing rent. Additionally, HAWC anticipates a savings in staff time with this activity, but we do not anticipate staffing reductions.
2. Affordability of housing costs – Of the 492 households who currently report medical/disability expenses, the majority will see no change or very little change in their monthly rent due to this activity.

492 Households with reported medical/disability expenses

Rent Increase			No change	Rent Decrease		
\$21+	\$11-\$20	\$1-\$10		\$1-\$10	\$11-\$20	\$21+
6	51	172	177	52	29	5

The largest increase in monthly rent is \$28. The largest decrease in monthly rent is \$44.

3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity is projected to increase staff efficiency by reducing the processes around gathering information for medical and disability expenses, calculating the deduction, and reducing medical and disability expense reporting to once every 12 months.
7. Statutory Requirements – No projected impact.
8. Hardship requests – See hardship policy information below. We do not project an impact in the number of hardship requests.

9. Protected classes / Disparate impact – No projected impact.
Hardship Policy – Households will be able to access our MTW Hardship policy. Because of the current medical / disability expense calculation, many of these households are accustomed to annual changes in their rent, due to changes in their actual annual medical / disability expenses.
Comments received + Agency response: No comments received.

#### **D. Discontinue Earned Income Disallowance (EID)**

<p>Full description: HUD has published proposed rules indicating that the Earned Income Disregard (EID) program will be discontinued. In anticipation, HAWC is proposing an end to our program and to stop enrolling new households into EID as of August 1, 2022. In accordance with the proposed HUD rules, HAWC will allow current EID participants to continue to receive the benefit until the end of their benefit timeframe, or on July 31, 2023 (whichever is sooner).</p> <p>The current EID program allows some households to disregard income when calculating rent. However, the program is complicated to administer, with a number of different rules related to the calculation and the timeline. Because HUD has indicated the intention to end the program, HAWC is seeking a waiver to discontinue enrollment at this time, providing more time for phasing out the program and exploring other options for supporting households that are increasing their income.</p>
Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 5.611(a)(3) and section 3(a)(1) and 3(b)(5) of 1937 Act
MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures
Population groups and household types impacted by this activity: All
Cost Implications: Cost neutral
Implementation timeline: HAWC will stop enrolling new households into EID as of August 1, 2022, and will allow current EID participants to continue to receive the benefit until the end of their benefit timeline or July 31, 2023 (pending HUD approval).
<p>Impact Analysis</p> <ol style="list-style-type: none"> <li>1. Agency finances – Because current households will be allowed to finish out the majority of their planned benefit, HAWC expects minimal impact to agency finances.</li> <li>2. Affordability of housing costs – No projected impact.</li> <li>3. Agency waitlist – No projected impact.</li> <li>4. Termination rate – No projected impact.</li> <li>5. Occupancy / Utilization – No projected impact.</li> <li>6. MTW Statutory Goals – This activity is projected to increase staff efficiency by reducing the processes around administering the EID program.</li> <li>7. Statutory Requirements – No projected impact.</li> <li>8. Hardship requests – No projected impact.</li> <li>9. Protected classes / Disparate impact – No projected impact.</li> </ol>
Hardship Policy: Because current households will have until their benefit ends or July 31, 2023, HAWC does not anticipate any need for additional hardship policies.
Comments received + Agency response: No comments received.

**E. Proration of Assistance for Mixed-Eligibility Households**

Full description: HAWC is proposing a simplified calculation for rent reduction for households that include a member who does not have eligible citizenship status, called “mixed-eligibility households”. The current proration method for reducing assistance to mixed-eligibility households is very complicated, and impacts smaller households and lower income households on a greater scope. The current impact on households varies between \$0 and more than \$500 in increased monthly rent.

HAWC is proposing a standard subsidy reduction of \$100 to any mixed-eligibility household, regardless of the number of non-eligible citizens in the household. There are currently 46 mixed-eligibility households in our programs – of those, 42 have one non-eligible member and 2 have two non-eligible members. Applying a standard subsidy reduction of \$100 to all households is a more equitable method and will be easier for staff to calculate and for households to understand.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 5.611(a)(3) and section 3(a)(1) and 3(b)(5) of 1937 Act

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: All

Cost Implications: Increase in expenditures

Implementation timeline: HAWC will implement this new process and calculation for all new and existing households in fiscal year 2022-2023, pending HUD approval and software modifications. Updated calculations will be included at the household’s next reexamination.

**Impact Analysis**

1. Agency finances – HAWC anticipates approximately \$110,000 in decreased public housing rent and/or increased voucher HAP costs per year. After careful consideration, HAWC feels that this cost is worth the value of reduced staff time spent on the calculation, reduced errors, an increase in client understanding, and equitable impact across mixed-eligibility households.
2. Affordability of housing costs – Of the 46 mixed-eligibility households, the majority will see a reduction in rent costs due to this activity. Only 5 households will see a rent increase.

Rent Increase		Rent Decrease				
\$1-\$100	No Change	\$1-\$100	\$101-\$200	\$201-\$300	\$301-400	\$401+
5	2	9	7	10	10	3

The largest increase in monthly rent is \$100. The largest decrease in monthly rent is \$887.

3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity is projected to increase staff efficiency by reducing the processes around calculating the assistance reduction for mixed-eligibility households.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No projected impact.

Hardship Policy: Households have access to our MTW Hardship policy.

Comments received + Agency response: No comments received.

**F. Voucher Set-Aside Program**

Full description: HAWC regularly partners with local service providers to create housing programs that provide supports to ensure stability and success for participating families. The partnerships frequently center around Project-Based Vouchers (PBVs). HAWC is proposing an activity that allows the agency to set aside an agreed-upon number of tenant-based vouchers, when partnering with a service provider to serve a vulnerable target population.

At this time, HAWC is working with a local school district to create a program aimed to house homeless students and their families. Washington County includes several school districts with notably high populations of homeless students, including Beaverton School District with the highest number of homeless students in the State of Oregon. The program will partner services provided by the school district’s McKinney Vento program with a tenant-based voucher for the family, and possibly additional supports provided by local services providers through our coordinated entry system. In FY2022-2023, HAWC is planning to set aside 50 tenant-based vouchers to serve these homeless families and provide housing stability to families with children enrolled in the school district.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 5.611(a)(3) and section 3(a)(1) and 3(b)(5) of 1937 Act

MTW Statutory Objective: Housing choice

Population groups and household types impacted by this activity: Families with children

Cost Implications: Cost neutral

Impact Analysis

1. Agency finances – No projected impact.
2. Affordability of housing costs – This activity will provide affordable housing for up to 50 homeless families with students in the partnering school system.
3. Agency waitlist – No projected impact. The agency will continue to pull from the waitlist to increase utilization and maintain leasing numbers.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – Because these vouchers are part of the regular ACC and may be paired with additional supports to find and maintain stable housing, this program may increase utilization in the voucher program.
6. MTW Statutory Goals - This activity is projected to increase access to affordable housing for homeless families in our community.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

Hardship Policy: HAWC does not anticipate a negative impact on households through this activity. Therefore, no specific hardship policy is needed.

Comments received + Agency response: Please see attached description of all public comments received and consideration/response to comments. One person asked a question specific to this activity:

**Question: Has HAWC considered partnering with other service providers for the voucher set-aside program? For example, Portland Community College has a large number of homeless students.**

We are hopeful that the first voucher set-aside program with Beaverton School District will be successful, and will create a template for expanding the program to other service providers (such as Portland Community College). At this time we are only working with Beaverton School District.

## **G. Strategic Waitlists**

Full description: HAWC's Project-Based Voucher (PBV) program serves a variety of household types, often in specific settings or with linked services that increase the likelihood of success and stability for the voucher holder. Similarly, the proposed Voucher Set-Aside program will provide assistance to targeted households, coupled with services and supports for those families.

To maximize efficiency for our PBV and Voucher Set-Aside programs, HAWC is proposing use of strategic waitlist options. This activity will allow HAWC to utilize deliberate waitlist strategies for each PBV or Voucher Set-Aside program, to create a waitlist process that is the best fit for the individual scenarios. Strategic waitlist options include:

1) Referral-based placement: In situations where HAWC is working with a specific provider or a very targeted household type, HAWC may forego use of a waitlist and instead use a referral and selection process. HAWC will accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral will be maintained by HAWC, but HAWC will not add the household to a waiting list, just to be immediately selected. This process will be modeled after the same procedure currently used for the existing VASH program.

For example, HAWC has dedicated PBV units for chronically homeless individuals, with supportive services linked to the assistance to ensure the household has the highest likelihood of housing stability. Our community has successfully established a Coordinated Entry System, through which people experiencing homelessness or at imminent risk of homelessness can find housing resources and be connected with qualified service providers. When HAWC has available PBV units dedicated to this specific population, it makes the most sense to accept referrals directly from the coordinated entry system using a network of referrals, instead of establishing a wait list with information that will quickly become obsolete.

When using a referral-based placement option, HAWC will establish an MOU with the referring partner, and will institute quality control metrics to ensure that households are being referred in an equitable manner.

2) Site-based waitlists: HAWC may allow individual PBV or Voucher Set-Aside programs to maintain their own site-based waiting lists with individual preferences. Site-based waitlists are often more practical to manage than the alternative of HAWC individually managing multiple different lists. In addition, it sometimes creates a better connection between the applicant and the property or program they've applied to.

HAWC is likely to use site-based waitlists when the project has the capacity to administer the waitlist for all units identified in the PBV HAP contract. The community provider and leasing agents must demonstrate the ability to adhere to the site-based waitlist policies and would be subject to contract monitoring to ensure the waitlist is being managed correctly by each contract. HAWC may still choose to administer select waitlists internally, per the current standard PBV waitlist processes.



When using a site-based waitlist option, HAWC will establish an MOU with the waitlist manager and will institute quality control metrics to ensure that households are being selected in an equitable manner.

3) Centralized PBV waitlist: For PBV units that are not dedicated to specific populations or services, HAWC may create a centralized waitlist similar to our centralized public housing waitlist. Households placed on this centralized waitlist will be eligible for the multiple PBV units and properties included in the waitlist. This will maximize efficiencies in administering the waitlist and remove the necessity for households to register on each PBV waitlist that comes online.

As households are selected from the centralized waitlist, they will be given the option to refuse up to three available PBV units before they are removed from the list. The centralized waitlist will be administered internally, with the same quality control processes as our current public housing and tenant-based voucher waitlists.

For PBV units that are dedicated to specific populations or services, HAWC will continue to administer individualized waitlists or one of the other strategic waitlist options specified here.

4) Local waitlist preferences: HAWC may choose to implement specific preferences for individual PBV or Voucher Set-Aside waitlists, when there is not an appropriate partner to refer applicants or to administer a site- or program-based waitlist. Creating local preferences allows HAWC to ensure that the waitlist process is selecting applicants who are best served by the associated services and supports.

HAWC will ensure the preference is clear in the waitlist information at the time of application. Applicants will self-certify the preference and will be pulled based on preference time and date, then general time and date.

When any of these strategic waitlist processes are applied, the housing authority and/or the partner managing the process must comply with all applicable federal, state or local Fair Housing and civil rights laws and requirements. These laws and requirements are in place to promote equal housing choice for all prospective tenants regardless of race, color, religion, sex, sexual orientation, disability, familial status, or national origin. In cases where specific preferences are established, the housing authority and/or partner must apply criteria uniformly to all applicants in compliance with all Fair Housing and civil rights laws and requirements.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 5.611(a)(3) and section 3(a)(1) and 3(b)(5) of 1937 Act

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: Vouchers

Cost Implications: Cost neutral

Implementation timeline: HAWC will begin to consider and implement new waitlist processes after July 1, 2022 (pending HUD approval).

Impact Analysis

1. Agency finances - HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.
2. Affordability of housing costs – No projected impact.
3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – HAWC anticipates a faster lease-up time for our Project-Based Voucher units and our Voucher Set-Aside program, when strategic waitlist options are used.
6. MTW Statutory Goals - This activity is projected to increase staff efficiency by reducing time spent managing multiple individualized waitlists.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

Hardship Policy – HAWC does not anticipate a negative impact on households through this activity. Therefore, no specific hardship policy is needed.

Comments received + Agency response: No comments received.

## MTW Activities: Hardship Policy

HAWC offers a hardship policy when households have mitigating circumstances and believe an MTW activity constitutes a financial or other hardship for the family. To qualify for a hardship, you must be following all program rules and regulations, and not owe HAWC money, or if you do owe money, be current in your repayment agreement. HAWC staff will remind households of the hardship policy during intake and regular reexamination meetings, and consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.

Households must submit the request for the MTW Hardship Policy in writing. The process will be similar to the current process for requesting an interim review. If approved, the MTW activity will be suspended the next month following change reported by the 20<sup>th</sup> of the month. If the request is made after the 20<sup>th</sup>, the change will be effective the first of the following month.

### **Households must identify which MTW Activity they are requesting to be suspended:**

- Medical / Disability Expense Calculation
- Mixed-Eligibility Family Subsidy Reduction
- Triennial Reviews for Seniors/People with Disabilities
- Other: \_\_\_\_\_

*(Please note that the Tiered Rent Program includes a separate hardship policy.)*

### **Households must identify the situation that qualifies them for hardship.**

- Family has experienced a decrease in income of more than \$2,500 because of loss or reduction of income, death in the family, or loss or reduction of earnings or other assistance;
- Family has experienced an increase in expenses of more than \$2,500, such as a large medical expense

### **Households must provide verification**

- Attach any written documentation, such as pay stubs or receipts
- Additional explanation: \_\_\_\_\_

If your hardship request is approved, the MTW activity will be suspended and your rent calculation and process will be based on non-MTW regulations. **Please note that calculating rent based on non-MTW regulations may not always result in a rent reduction.** The hardship will be effective until the next annual update or review, up to 12 months.

If your hardship request is not approved, you will be able to appeal the decision for further review. If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by HAWC's Hearing Officer.

## Tiered Rent Program – Bands

Tier	Income Minimum	Income Maximum	Monthly Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896

\*Please note: this is only a snapshot of the tiers, through Area Median Income. Tiers continue in increments of \$2,500 of income, with the rent calculated at 28% of the midpoint of each tier. Visual tables with higher tiers are available upon request.

## Tiered Rent Program: Impact Analysis

This impact analysis applies to the following waivers:

- a. 1.a., 1.b. + Safe Harbor – Tiered Rents
- b. 1.r., 1.s. – Elimination of Deductions
- c. 3.a., 3.b. + Safe Harbor – Reexamination Schedule

### 1. Impact on agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)

HAWC anticipates approximately \$39,000 in decreased public housing rent and/or increased voucher HAP costs per year under the Tiered Rent Program.

Annual Agency Impact

Public Housing Rents (decreased income)	Housing Assistance Payments (increased expense)	Total Agency Impact
-\$5,000	\$34,000	\$39,000

### 2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay toward their housing costs)

The following analysis uses the current information of households that would be considered eligible for the program. We have approximately 600 households that would likely be eligible – half will be randomly selected and half will be assigned to the control group. 70% of eligible households will see a rent decrease or no change if they are selected for the Tiered Rent Program.

This impact analysis takes into account established hardship policies to mitigate the impact of the policy for families who have childcare expenses of \$2,500 and/or families who have five or more dependents. Because of the policies removal of deductions, these households saw significant rent increases when moving to the Tiered Rent Program. HAWC has established hardship policies to moderate these rent increases.

The average rent change across all eligible households is a **decrease** in rent of \$10.81. For those households that see a rent increase, the average increase is \$24. The largest projected increase is \$61 in monthly rent.

	Households	Percentage
Rent Decrease	311	52%
No change*	108	18%
Rent Increase	181	30%
<b>Rent Increase Increments</b>		
\$5-\$10	29	5%
\$11-\$25	65	11%
\$26-\$50	79	13%
\$51 or more	8	1%

	Amer Ind/ Alaska Nat	Asian	Black/ African Amer	Hispanic	Native HI/ Pac Island	White
No. of Households	6	15	136	135	14	429
Avg Rent Change	\$18.00	(\$27.33)	(\$9.32)	(\$6.40)	(\$27.21)	(\$10.57)
Rent Decrease	-	10	67	62	9	225
No change	-	2	20	25	2	84
Rent Increase	6	3	49	48	3	120
<b>Rent Increase Increments</b>						
\$5-\$10	2	2	5	11	1	19
\$11-\$25	3	1	18	13	1	42
\$26-\$50	1	-	26	20	-	52
\$51 or more	-	-	-	4	1	7

Table Notes:

- Due to rounding calculations, “No Change” is defined as a projected rent increase or decrease of less than \$5.
- Race and ethnicity terms are per the HUD required reporting fields.
- Households counted in the “Hispanic” column may also be counted in other race/ethnicity columns.
- Because of statistically small counts of American Indian/Alaskan Native, Asian, and Native Hawaiian/Pacific Islander households, the average rent impact numbers are easily skewed by outlying households.

**3. Impact on agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

No anticipated impact

**4. Impact on agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

No anticipated impact

**5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program**

No anticipated impact

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

HAWC anticipates a positive impact on the statutory goals of cost effectiveness and self-sufficiency. Triennial reviews and the elimination of deductions are expected to result in administrative efficiencies and reduction in staff time for annual reviews.

Because households do not have to report income increases between triennial recertifications, HAWC anticipates increased incentive (or decreased disincentive) for families to increase earnings and move

toward self-sufficiency. Households will be able to use increase income in the time between triennial reviews to build financial and housing stability.

#### **7. Impact on the agency's ability to meet the MTW statutory requirements**

No anticipated impact

#### **8. Impact on rate of hardship requests and the number granted/denied as a result of this activity**

HAWC anticipates that a higher number of households in the Tiered Rent Program will request a hardship than under the current policy. Families who have unreimbursed childcare expenses and those that have a significant number of dependents will see a higher impact through the Tiered Rent Program, due to the loss of deductions.

HAWC has established a hardship policy for households with annual childcare expenses of \$2,500 or more, and for those with 5 or more dependents to mitigate the impacts of the change to the Tiered Rent Program. Of the 600 anticipated households eligible for the Tiered Rent Program, approximately 40 households (about 7%) would qualify for these hardships.

HAWC has also established a hardship policy for households whose current income is lower than their retrospective income and for those who have an unexpected loss in income or significant unexpected expense. HAWC will track hardship requests, approvals or denials, and the impact on staff time.

#### **9. Impact on protected classes (and any associated disparate impact)**

As previously stated, this program has the largest impact for families with unreimbursed childcare expenses and/or a significant number of dependents. Among eligible families, our households with five or more dependents more often have heads of household who are Black/African American or Hispanic. HAWC recognized disparate impact by race/ethnicity in the Tiered Rent Program and has taken significant steps to mitigate that impact.

The original Tiered Rent Program as described in the Final MTW Operations Notice designed a tiered rent structure based on 30% of income at the middle of each tier. Because the calculation no longer included deductions for dependents or unreimbursed childcare expenses, we saw significant rent increases for many of our families. After reviewing the analysis, HUD agreed to change the rent structure to tiers based on 28% of income.

The change to 28% improved impacts for our households and decreased the number of families who would see a rent increase, but HAWC still saw disparate rent increases for families with 5 or more children, who were more often led by heads of household who are Black/African American or Hispanic. Although it is not a part of the policy as defined by HUD, HAWC is implementing an agency-specific hardship policy for families with 5 or more dependents. This hardship policy will lower rent increases for large families and significantly reduce the disparate impact between households by race/ethnicity.

The table on the next page shows the different impacts as HAWC has developed policy. Hardship policies have reduced the disparate impact between households by race/ethnicity, but on average our Black/African American and Hispanic households see a smaller rent reduction than the total population.

**Original Policy**

Rents based on 30% of income

Rent Increases	72%
No change (\$4 to -\$4)	16%
Rent Decreases	12%

Highest Increase: \$415

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	\$29.75	\$48.67	\$16.60	\$36.63	\$32.45	\$23.07	\$26.11
Average Impact for Households with 5+ dependents: \$70.47							

**Revised Policy**

Rents based on 28% of income

Rent Increases	30%
No change (\$4 to -\$4)	18%
Rent Decreases	52%

Highest Increase: \$98

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	(\$9.56)	\$18.00	(\$27.33)	(\$5.87)	(\$6.57)	(\$27.21)	(\$11.33)
Avg Impact for Households with 5+ dependents: \$29.47							

**HAWC Hardship Policy**

Rents based on 28% of income  
 \$30 rent increase cap for large households

Rent Increases	30%
No change (\$4 to -\$4)	18%
Rent Decreases	52%

Highest Increase: \$61

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	(\$10.81)	\$18.00	(\$27.33)	(\$9.32)	(\$6.40)	(\$27.21)	(\$10.57)
Avg Impact for Households with 5+ dependents: \$12.53							

## Table Notes:

- Less than 20 eligible households in the American Indian/Alaskan Native, Asian, and Native Hawaiian/Pacific Islander categories. Outliers may skew averages.
- Numbers in parentheses represent decreases in anticipated monthly rent.



## Tiered Rent Program: Hardship Policy

Participating in the Tiered Rent Program should not threaten an individual or family’s housing stability. HAWC offers an affordability hardship to address childcare expenses, unexpected decreases in income, or exceptional household expenses, such as a large medical bill. HAWC also offers a Transition Discount for Large Families, for families with 5 or more dependents who would see a significant increase in rent when moving to the Tiered Rent Program.

### Affordability Hardship

This hardship application may be initiated by staff at enrollment or recertification, or may be requested by any household at any time. An approved rent adjustment may be enacted for 3 months, 6 months, or 12 months dependent on the circumstance. Renewal of hardship will require request from the household and approval from the agency.

If a household has...	Rent will be adjusted by...	Additional details...
Childcare expenses above \$2,500 per year	The household’s childcare expenses will be deducted from <b>current</b> annual income. This adjusted annual income will be used to determine tiered rent.	This hardship can be approved at the OS level. This hardship has 12-month duration, or until the household’s next regularly scheduled review, whichever is sooner.
A decrease in household income that drops the rent determination into a lower tier	The household’s annual income will be calculated using their <b>current</b> income, instead of their past income. Current income will be used to determine tiered rent.	This hardship can be approved at the OS level. This hardship has 12-month duration, or until the household’s next regularly scheduled review, whichever is sooner.
A significant unexpected event, such as a large medical expense, requiring temporary rent relief to avoid eviction	The expense will be deducted from annual income. This adjusted annual income will be used to determine tiered rent.  OR  To ensure housing stability, the household’s rent may be reduced as appropriate for a shorter amount of time.	<ul style="list-style-type: none"> <li>• This hardship will be reviewed by and require approval from a supervisor.</li> <li>• The household will be asked to provide documentation demonstrating the expense.</li> <li>• The hardship may last for 3 months, 6 months, or 12 months depending on remedy.</li> <li>• The household may request that the hardship be renewed.</li> </ul>

### How do I request a hardship?

To qualify for a hardship, you must be following all program rules and regulations, and not owe HAWC money, or if you do owe money, be current in your repayment agreement. HAWC staff will remind households of the hardship policy during intake and regular reexamination meetings, and will initiate

hardship requests if the household reports circumstances that qualify (such as childcare expenses or lower current income).

Households can also request hardships between triennial recertifications. This can be done by submitting a request in writing using the agency form, with review from a supervisor. The process will be similar to the current process for requesting an interim review. The MTW activity will be suspended the next month following change reported by the 20<sup>th</sup> of the month. If the request is made after the 20<sup>th</sup>, the change will be effective the first of the following month.

If your hardship request is approved, you are not required to report subsequent income increases during the period of your hardship. Once a hardship is approved, it will not end early.

If your hardship request is not approved, you will be able to appeal the decision for further review. If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by HAWC's Hearing Officer.

When your hardship expires, you can request a renewal if your circumstances have continued. There is no limit to the number of hardships that a household may receive. If you do not request a renewal or the renewal is denied, your rent will return to the tiered rent assigned at your most recent triennial review. Triennial review schedules will not change due to hardship requests, approvals or denials.

#### **Translation Services**

To request a translation of this document into another language (Spanish, Vietnamese, Arabic, Somali, Japanese, Micronesian, etc), please call 503-846-4814 or email [voucherteam@co.washington.or.us](mailto:voucherteam@co.washington.or.us).

## Tiered Rent Transition Discount for Larger Families

Because the Tiered Rent Program no longer includes dependent deductions, households with five or more dependents sometimes see a significant increase in rent when they transition to the tiered rent program. To help these families retain housing stability, HAWC offers a transition hardship policy that caps the rent increase due to program change.

- 1) Does the household have annual childcare expenses above \$2,500? If yes, apply the affordability hardship to their tiered rent calculation.
- 2) Does the household have a decrease in income? If yes, apply the affordability hardship to their tiered rent calculation.
- 3) After #1 and #2, does the household still have a projected increase in monthly rent of more than \$30? AND does the household have 5 or more dependents? If yes, apply the discount to cap their rent increase at \$30 (see example below).

Please note that this policy only applies to programmatic rent increases as a result of a change in the calculation. If a household has an increase in income that moves them to a different tier on the rent schedule, the corresponding rent increase will still apply.

The occupancy specialist will use the steps above to calculate the discount that caps the programmatic rent increase at \$30. If there is an increase in income that moves the household to a different tier on the rent schedule, the occupancy specialist will determine that rent and then apply the discount.

Similarly, if the household moves to a different unit, the occupancy specialist will use the tiered schedule to determine rent, and then apply the discount.

- The transition discount is applicable only through the tiered rent study, ending in 2028-2029.
- The policy has a 12-month duration. At the expiration, the family has the option to confirm that they still meet the criteria for the policy and request a renewal.
- At the first triennial review, the enrollment discount will continue to be applied if the household still has 5 or more dependents.
  - If the household has new childcare expenses about \$2,500 or has experienced a decrease in income, authorization to continue to apply the enrollment discount will be determined by a supervisor.

See the example household on the next page for more information.

## Tiered Rent Transition Discount for Larger Families

### Example household:

Household A is a single-adult household with 5 dependents, \$17,631 in annual income and no childcare expenses. The transition to the Tiered Rent Program would result in an increase of \$56 in monthly rent – from current rent of \$128 to future rent of \$184.

Tier 8: \$437  
 Less utility allowance: \$253  
 Year 1 Rent (no discount): \$184  
 Current rent: \$128  
 Difference: \$56

Tier	Income Minimum	Income Maximum	Monthly Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846

The occupancy specialist will verify criteria and apply a [discount of \\$26](#) to cap the rent increase at \$30 – from a current rent of \$128 to a future rent of \$158.

Tier 8: \$437  
 Less utility allowance: \$253  
[Less transition discount: \\$26](#)  
 Year 1 Rent: \$158  
 Current rent: \$128  
 Difference: \$30

In Year 3, Household A reports an increase in earned income to \$28,000. This moves the household to Tier 12 on the schedule. Because the household still has 5 or more dependents and no childcare expenses, the occupancy specialist calculates the household’s rent and applies the same transition discount.

Tier 12: \$671  
 Less utility allowance: \$253  
[Less transition discount: \\$26](#)  
 Year 3 Rent: \$392

## Triennial Reexamination Schedule: Impact Analysis

This impact analysis applies to the following waivers:

3.a., 3.b. – Reexamination Schedule

**1. Impact on agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**

Although HAWC anticipates time savings in this activity, we do not anticipate an impact on agency finances.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay toward their housing costs)**

No anticipated impact

**3. Impact on agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

No anticipated impact. Although fewer families may transition from assistance in the time between triennial reviews vs annual reviews, this population tends to be relatively stable in their need for ongoing assistance and HAWC projects that any impact would be minimal.

**4. Impact on agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

No anticipated impact

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

No anticipated impact

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

HAWC anticipates an increase in administrative efficiency and cost effectiveness through this activity. After review of the time spent on a typical annual recertification, HAWC projects approximately 900 hours in time savings per year, due to shifting these households to a triennial recertification schedule.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

No anticipated impact

**8. Impact on rate of hardship requests and the number granted/denied as a result of this activity**

No anticipated impact

**9. Impact on protected classes (and any associated disparate impact)**

No anticipated impact

## MTW Activities: Hardship Policy

HAWC offers a hardship policy when households have mitigating circumstances and believe an MTW activity constitutes a financial or other hardship for the family. To qualify for a hardship, you must be following all program rules and regulations, and not owe HAWC money, or if you do owe money, be current in your repayment agreement. HAWC staff will remind households of the hardship policy during intake and regular reexamination meetings, and consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.

Households must submit the request for the MTW Hardship Policy in writing. The process will be similar to the current process for requesting an interim review. If approved, the MTW activity will be suspended the next month following change reported by the 20<sup>th</sup> of the month. If the request is made after the 20<sup>th</sup>, the change will be effective the first of the following month.

### **Households must identify which MTW Activity they are requesting to be suspended:**

- Medical / Disability Expense Calculation
- Mixed-Eligibility Family Subsidy Reduction
- Triennial Reviews for Seniors/People with Disabilities
- Other: \_\_\_\_\_

*(Please note that the Tiered Rent Program includes a separate hardship policy.)*

### **Households must identify the situation that qualifies them for hardship.**

- Family has experienced a decrease in income of more than \$2,500 because of loss or reduction of income, death in the family, or loss or reduction of earnings or other assistance;
- Family has experienced an increase in expenses of more than \$2,500, such as a large medical expense

### **Households must provide verification**

- Attach any written documentation, such as pay stubs or receipts
- Additional explanation: \_\_\_\_\_

If your hardship request is approved, the MTW activity will be suspended and your rent calculation and process will be based on non-MTW regulations. **Please note that calculating rent based on non-MTW regulations may not always result in a rent reduction.** The hardship will be effective until the next annual update or review, up to 12 months.

If your hardship request is not approved, you will be able to appeal the decision for further review. If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by HAWC's Hearing Officer.

## Public Comment

The 45-day public comment period ran February 14, 2022 through March 30, 2022. A draft of the PHA Plan and MTW Supplement was made available for review on the Housing Authority website.

Residents, participants and community partners were invited to four virtual public meetings, held between March 11 and 18, 2022. Fifteen guests attended public meetings. Comments and questions are included here. (Some comments and questions have been edited or paraphrased for clarity.)

### **Will the slides/materials be available for review?**

Yes. Slides from the presentation were sent to all who provided their email address. In addition, the slideshow was posted to the Housing Authority website.

### **How will current tenants know if they could benefit from this?**

Invitations to attend the public meetings were emailed to all current residents and participants. The invitations also included links to the publicly posted documents and a one-page flyer about our MTW Activities (available in English and Spanish). As activities are implemented, detailed information will be shared with clients via email, mailed letters and telephone calls as appropriate.

### **Will materials be translated into other languages?**

Yes. As activities are implemented, we will translate informational materials into requested languages. If written translation is not available, we will utilize language lines to provide verbal interpretation services.

### **Since work-able households may have bigger fluctuations in income, why does the Tiered Rent Program move to triennial reviews?**

The Tiered Rent Program is a pilot program that will run for six years and outcomes will be tracked by a research company. One of the concepts this is testing is whether offering households more time between reporting income increases helps to remove disincentives for seeking work or increasing income.

### **One commenter expressed concerns that households with increases in income may not save that income between triennial reviews.**

### **Why are seniors and people with disabilities not eligible for the Tiered Rent Program?**

The Tiered Rent Program is targeted toward our work-able households who typically have more ability to increase income year to year. Senior and disabled households are often on fixed incomes. We are proposing triennial reviews for those households this year, and hope to further explore simplifying their rent calculation in future years.

### **How were eligible ages determined for the Tiered Rent Program?**

The Tiered Rent Program is a six-year demonstration targeted at work-focused households. With these considerations in mind, program designers wanted households to remain in the program the full six years. Because households with a head, co-head or spouse aged 56 or older would be considered a

senior household during that six-year timeframe, the eligible age was determined to be 55 years and younger.

**Are there any work training programs being proposed?**

Not in this year's MTW activities. The Housing Authority has the ability to propose new MTW activities each year, and we hope to focus on additional work supports in future years.

**Has HAWC considered partnering with other service providers for the voucher set-aside program? For example, Portland Community College has a large number of homeless students.**

We are hopeful that the first voucher set-aside program with Beaverton School District will be successful, and will create a template for expanding the program to other service providers (such as Portland Community College). At this time we are only working with Beaverton School District.

**How is the priority changing for Project-Based Voucher transfers?**

Under current rules, after a household has lived in a Project-Based Voucher unit for 12 months, they can request a tenant-based voucher and be given priority above those on the waitlist. Because of our extensive waitlist for tenant-based vouchers and the known need in the community, we want to ensure we're able to continue to serve households who are not yet receiving rent assistance. For this reason, we are proposing that a Project-Based Voucher household will only receive priority for a tenant-based voucher upon completion of a reasonable accommodation request, such as a VAWA transfer.

**If the Board approves the MTW activities, how soon are they implemented?**

Activities will be implemented after July of this year, but the timeline for individual activities is different. Simplifications to rent calculations will be implemented later this year, and will be effective at the resident's next recertification. The Tiered Rent Program is currently scheduled to begin for December recertifications. We will send more information to households as we roll out each activity.

**Comment: I think it's wonderful that people will have the extra time between recertifications to save their increased income, without seeing an increase in their rent.**

**Public Hearing for Safe Harbor Waivers and Agency Specific Waivers**

The meeting on March 18, 2022 served as the public hearing for Safe Harbor Waivers and Agency Specific Waivers. There were four guests at that meeting. There were no questions or comments.

**Public Hearing**

The Housing Authority Board of Directors will hold a public hearing on Tuesday, April 5<sup>th</sup>. Notice of Public Hearing was published in multiple news outlets February 16-24, 2022.

There were no questions or comments from the public hearing.



**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Jennie Proctor, the Community Development Manager  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2022 of the Housing Authority of Washington County is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

Washington County – Beaverton – Hillsboro Consortium

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

Please see memo as attached

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will  
prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:

Jennie Proctor

Title: Community Development Manager

Signature: Jennie H. Proctor

Digitally signed by Jennie H. Proctor  
Date: 2022.03.29 13:50:37 -0700

Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S.  
Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information  
are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to  
ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing  
instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD  
may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Date: March 29, 2022

To: Memo to File

From: Ann Hawkins – Housing and Community Development Specialist

Re: PHA Determination of Consistency with Consolidated Plan

Washington County Office of Community Development reviewed the Housing Authority of Washington County's request for Certification of Consistency with Consolidated Plan for its Annual Public Housing Agency (PHA) Plan.

The Annual PHA Plan addresses the Housing Authority of Washington County's plans to:

- Increase the availability of decent, safe and affordable housing by maintaining the supply of assisted housing in its Section 8 rental assistance program at 2,960 vouchers, preserving 244 public housing units of affordable housing, converting 32 additional Section 8 Housing Choice Vouchers to Project-Based Vouchers for specific housing needs.
- Improve community quality of life and economic vitality through promotion of income mixing in public housing, improving the quality of public housing and affordable housing stock, and ensuring accessibility of public housing units by making at least 5% of its units accessible to wheelchair users.
- Promote self-sufficiency and asset development of households by maintaining the size of Family Self-Sufficiency (FSS) Program over minimum requirements and providing Section 8 homeownership vouchers to eligible households and partnering with other agencies to provide supportive services to participating households.
- Increase affordable housing choices by partnering with various for-profit and non-profit agencies to assist in the development of new affordable housing communities throughout the county.
- Promote homeownership programs under Section 8 Housing Choice Homeownership Program and Section 32 Public Housing partnerships with State, County and non-profit agencies to provide essential counseling and down payment assistance loans

Request is consistent with the Con Plan for the following reasons:

- This project is consistent with the Con Plan by meeting three (3) goals identified in the 2020-2024 Consolidated Plan:
  - Provision of supportive services for homeless persons and families; provide support to projects that implement strategies from the Washington County Ten Year Plan to End Homelessness,
  - Provide new project-based rental assistance for extremely low-income households,
  - Provide a vast array of supportive services designed to assist low-income and vulnerable households to overcome barriers in an effort to achieve self-sufficiency.

**Certifications of Compliance with  
PHA Plans and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*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 \_\_\_ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning July 1, 2022, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The 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.
2. 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.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it 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.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing 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 by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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 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.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. 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), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. 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 regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA 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 PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).


Housing Authority of Washington County  
 PHA Name

OR (022)  
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2022

5-Year PHA Plan for Fiscal Years 20\_\_ - 20\_\_

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official Kathryn Harrington	Title Chair
Signature 	Date 4/8/22

**Civil Rights Certification**  
**(Qualified PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 02/29/2016

**Civil Rights Certification**

**Annual Certification and Board Resolution**


*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency 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, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Housing Authority of Washington County  
PHA Name

OR(022)  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Kathryn Harrington	Title	Chair
Signature		Date	4/8/22

Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 11/04/2021

Approved By: RAWSON, LAURE

Part I: Summary						
PHA Name : Housing Authority of Washington County		Locality (City/County & State)				
PHA Number: OR022		<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No: )		
A.	Development Number and Name	Work Statement for Year 1 2021	Work Statement for Year 2 2022	Work Statement for Year 3 2023	Work Statement for Year 4 2024	Work Statement for Year 5 2025
	AUTHORITY-WIDE	\$10,000.00	\$191,883.65	\$298,014.40	\$335,266.20	\$10,000.00
	WASHINGTON COUNTY HA (OR022000001)	\$771,065.00	\$589,181.35	\$483,050.60	\$445,798.80	\$771,065.00

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year 1 2021</b>				
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	AUTHORITY-WIDE (NAWASD)			\$10,000.00
ID0001	Operations(Operations (1406))	Not associated - Operations 244 units.		\$10,000.00
	WASHINGTON COUNTY HA (OR022000001)			\$771,065.00
ID0002	Siding Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Siding)	Siding replacement on 5 units		\$117,159.75
ID0003	Plumbing(Dwelling Unit-Interior (1480)-Plumbing)	Remove and replace deteriorated galvanized plumbing lines in 7 units with PEX lines.		\$107,159.75
ID0004	Cabinets(Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Cabinet replacement in 12 units		\$156,213.00
ID0006	Roofing(Dwelling Unit-Exterior (1480)-Roofs)	Replace roofing on 4 units.		\$39,053.25

Capital Fund Program - Five-Year Action Plan

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b>				
1	2021			
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0007	HVAC(Dwelling Unit-Interior (1480)-Mechanical)	Replace existing forced air heating systems with energy efficient units on 5 properties		\$78,106.50
ID0008	Paving and Concrete (Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Parking)	Replace driveways and concrete patio on 4 units		\$117,159.75
ID0009	Fencing(Non-Dwelling Site Work (1480)-Fencing)	Replace fencing on 5 units		\$39,053.25
ID0043	Accessibility Improvements(Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Accessibility improvements for 2 units		\$15,621.30
ID0044	Flooring replacement (Dwelling Unit-Interior (1480)-Flooring (non routine))	Remove existing flooring in 20 units to be replaced with a commercial grade vinyl-plank system.		\$101,538.45
	Subtotal of Estimated Cost			\$781,065.00



<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year 2 2022</b>				
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	AUTHORITY-WIDE (NAWASD)			\$191,883.65
ID0018	Operations(Operations (1406))	Not associated - Operations 244 units.		\$191,883.65
	WASHINGTON COUNTY HA (OR022000001)			\$589,181.35
ID0019	Plumbing(Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Upgrade interior bath tubs and plumbing in 2 units.		\$37,251.80
ID0020	Cabinets(Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Cabinet replacement in 8 units		\$149,007.20
ID0021	Siding Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Siding)	Siding replacement on 4 units		\$74,503.60
ID0022	Roofing(Dwelling Unit-Exterior (1480)-Roofs)	Replace roofing on 2 units.		\$22,351.08

Capital Fund Program - Five-Year Action Plan

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 2		2022		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0023	HVAC(Dwelling Unit-Interior (1480)-Mechanical)	Replace existing forced air heating systems with energy efficient units on 5 properties		\$74,503.60
ID0024	Paving and Concrete (Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping)	Replace driveways and concrete patio on 6 units		\$44,702.16
ID0025	Fencing(Non-Dwelling Site Work (1480)-Fencing)	Replace fencing on 8 units		\$44,702.16
ID0045	Resident Relocation Assistance(Contract Administration (1480)-Relocation)	Resident relocation assistance for Section 18 disposition of 60 units.		\$117,159.75
ID0055	Homeownership (Contract Administration (1480)-Relocation)	Homeownership counseling services to assist families to achieve mortgage readines.		\$25,000.00
	Subtotal of Estimated Cost			\$781,065.00





<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b>				
4	2024			
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	AUTHORITY-WIDE (NAWASD)			\$335,266.20
ID0034	Operations(Operations (1406))	Not associated - Operations 244 units.		\$335,266.20
	WASHINGTON COUNTY HA (OR022000001)			\$445,798.80
ID0035	Plumbing(Dwelling Unit-Interior (1480)-Plumbing)	Upgrade interior galvanized steel plumbing in 2 units.		\$37,251.80
ID0036	Cabinets(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Cabinet replacement in 6 units		\$74,503.60
ID0037	Siding Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Siding)	Siding replacement on 7 units		\$111,755.40
ID0038	Roofing(Dwelling Unit-Exterior (1480)-Roofs)	Replace roofing on 2 units.		\$22,351.08

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b>				
4	2024			
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0039	HVAC(Dwelling Unit-Interior (1480)-Mechanical)	Replace existing forced air heating systems with energy efficient units on 7 properties		\$74,503.60
ID0040	Paving and Concrete (Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping)	Replace driveways and concrete patio on 4 units		\$73,280.80
ID0041	Fencing(Non-Dwelling Site Work (1480)-Fencing)	Replace fencing on 4 units		\$22,351.08
ID0042	Electrical(Dwelling Unit-Interior (1480)-Electrical)	Upgrade electrical service to 2 properties		\$29,801.44
	Subtotal of Estimated Cost			\$781,065.00

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year 5 2025</b>				
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	AUTHORITY-WIDE (NAWASD)			\$10,000.00
ID0046	Copy of Operations(Operations (1406))	Not associated - Operations 244 units.		\$10,000.00
	WASHINGTON COUNTY HA (OR022000001)			\$771,065.00
ID0047	Copy of Siding Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Siding)	Siding replacement on 5 units		\$117,159.75
ID0048	Copy of Plumbing(Dwelling Unit-Interior (1480)-Plumbing)	Remove and replace deteriorated galvanized plumbing lines in 7 units with PEX lines.		\$107,159.75
ID0049	Copy of Cabinets(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Cabinet replacement in 12 units		\$156,213.00
ID0050	Copy of Roofing(Dwelling Unit-Exterior (1480)-Roofs)	Replace roofing on 4 units.		\$39,053.25

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 5		2025		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0051	Copy of HVAC(Dwelling Unit-Interior (1480)-Mechanical)	Replace existing forced air heating systems with energy efficient units on 5 properties		\$78,106.50
ID0052	Copy of Paving and Concrete (Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Parking)	Replace driveways and concrete patio on 4 units		\$117,159.75
ID0053	Copy of Fencing(Non-Dwelling Site Work (1480)-Fencing)	Replace fencing on 5 units		\$39,053.25
ID0054	Copy of Siding Replacement(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Siding)	Siding replacement on 5 units		\$117,159.75
	Subtotal of Estimated Cost			\$781,065.00



<b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>	
<b>Work Statement for Year</b> 1	2021
<b>Development Number/Name General Description of Major Work Categories</b>	<b>Estimated Cost</b>
Housing Authority Wide	
Operations(Operations (1406))	\$10,000.00
Subtotal of Estimated Cost	\$10,000.00

<b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>	
<b>Work Statement for Year</b> 2	2022
<b>Development Number/Name General Description of Major Work Categories</b>	<b>Estimated Cost</b>
Housing Authority Wide	
Operations(Operations (1406))	\$191,883.65
Subtotal of Estimated Cost	\$191,883.65

<b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>	
<b>Work Statement for Year</b> 3	2023
<b>Development Number/Name General Description of Major Work Categories</b>	<b>Estimated Cost</b>
Housing Authority Wide	
Operations(Operations (1406))	\$298,014.40
Subtotal of Estimated Cost	\$298,014.40

<b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>	
<b>Work Statement for Year</b> 4	2024
<b>Development Number/Name General Description of Major Work Categories</b>	<b>Estimated Cost</b>
Housing Authority Wide	
Operations(Operations (1406))	\$335,266.20
Subtotal of Estimated Cost	\$335,266.20

<b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>	
<b>Work Statement for Year</b> 5	2025
<b>Development Number/Name General Description of Major Work Categories</b>	<b>Estimated Cost</b>
Housing Authority Wide	
Copy of Operations(Operations (1406))	\$10,000.00
Subtotal of Estimated Cost	\$10,000.00

## Attachments 2.0 Revisions of Existing PHA Plan Elements

### **2.1 Financial Resources**

The Housing Authority of Washington County (HAWC) entered into our MTW ACC agreement in November 2021. As of this date, HAWC has the flexibility to apply fungibility among public housing operating funds, public housing capital funds, and Housing Choice Voucher funds.

### **2.2 Rent Determination**

In Fiscal Year 2022-2023, HAWC will implement the Tiered Rent Program, as part of our selection into Cohort 2 of the HUD Moving to Work program. In this program, rent is determined using rent schedule based on the family's gross income, within tiers of \$2,500. The family's rent will be based on 28% of the midpoint of the corresponding tier. Families will have triennial reviews and will not be required to report income increases between reviews.

Only specific work-able households will be eligible for the program, and of those eligible households, half will be chosen via random selection through the MDRC software. The Tiered Rent Program is a six year demonstration, and will end in 2028-2029. Please see attachment 1.2 50075-MTW Supplement for more details about the Tiered Rent Program.

In our 50075-MTW Supplement, HAWC is also proposing a triennial review schedule for households that are seniors or people with disabilities. Households will not need to report changes in income between triennial reviews, unless they have a loss of income and are seeking rent reduction. HAWC will still update COLA, payment standards, utility allowances and run EIV every year, send rent notice and informational letters to the household reminding them that they're on a triennial review, as well as a reminder to update medical expenses within 30 days if applicable.

Lastly, HAWC is also proposing a number of waivers to simplify the way rents are calculated for our residents and participants. These changes in calculation are intended to increase efficiency for staff, as well as improve clarity and understanding for residents and participants. Proposals include:

- Changing the income verification hierarchy, to increase use of tenant-provided documents and tenant self-certification over third-party verification (written or oral);
- Only including asset income in the calculation of rent if the household's total assets are valued at \$100,000 or more;
- Simplifying the calculation of the medical or disability expense deduction, the process of verifying the expense, and limiting medical/disability expense reporting to once every 12 months;
- Discontinuing the Earned Income Disallowance (EID) program, with current EID participants utilizing the calculation through July 2023; and
- Simplifying the proration of mixed-eligibility households so that it is no longer dependent on the number of members in the household.

Please see attachment 1.2 50075-MTW Supplement for more details about these initiatives. These changes are also included in our Admin and ACOP Plans. HAWC will implement these policies in 2022-2023 Fiscal Year, following HUD approval.

### **2.3 Homeownership Programs**

HAWC currently operates a Homeownership Program and has five participants. In the 2022-2023 Fiscal Year, HAWC will continue to provide interest classes and information sessions. The program will continue to coordinate with the Family Self-Sufficiency (FSS) program to support participants with a homeownership goal.

### **2.4 Significant Amendment/Modification**

Attachment 1.2 50075-MTW Supplement describes waivers and activities that HAWC is seeking approval for, using our Moving to Work (MTW) flexibility. HAWC was selected for MTW status in May 2021. Our agreement is for participation for 20 years. This is our first submission of proposed MTW activities.

The Housing Authority of Washington County (HAWC) is framing our MTW strategies to align with the goals stated in our Agency Plan: 1) Increase the availability of decent safe, and affordable housing; 2) improve community quality of life and economic vitality; 3) promote self-sufficiency and asset development of families and individuals; and 4) ensure equal opportunity in housing for all Americans. The flexibility offered by the MTW program enables HAWC to implement and test strategies that move the agency closer to these goals.

Throughout our participation as an MTW agency, HAWC will explore strategies for cost reduction and effectiveness. We will shift focus from paperwork and verifications to improving household outcomes. With the innovation and flexibility offered by MTW participation, we will encourage our staff and community partners to think outside the box and find ways to improve and streamline processes.

HAWC will also build on our efforts to partner and create leverage points for both services and housing development. We will think creatively on how to increase the number of units available to our low-income households, while also entering into partnerships that will help our residents improve their opportunities in education, increasing their earnings and meeting goals for their families.

HAWC is committed to centering equity and inclusion in the work we do, to include policies or processes that are considered or changed within the scope of MTW. We will examine practices with a lens toward equity, and engage our households and community partners, with specific outreach to communities of color and tribal communities that have often been excluded from the decision-making process.

In our first year as an MTW agency, HAWC is focusing on strategies for cost reduction and administrative effectiveness. Our community has experienced significant instability and change in the last two years, and our focus on simplifying processes for the agency and for households will bring better understanding and transparency to our work. A full list of the waivers HAWC is proposing, including narrative descriptions and analysis of the impact on households and the agency, is included in Attachment 1.2 50075-MTW Supplement.

## **2.5 Deconcentration Policy for Field Office Review**

(Excerpt below from HAWC's Admissions and Continued Occupancy Plan)

### **Deconcentration of Poverty and Income-Mixing**

[24 CFR 903.1 and 903.2]

HAWC admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of HAWC deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

HAWC deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by HAWC with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by HAWC with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

#### *Steps for Implementation*

[24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, HAWC must comply with the following steps:

1. HAWC must determine the average income of all families residing in all HAWC's covered developments. HAWC may use the median income, instead of average income, provided that HAWC includes a written explanation in its annual plan justifying the use of median income.

#### HAWC Policy

HAWC will determine the average income of all families in all covered developments on an annual basis.

2. HAWC must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, HAWC has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

#### HAWC Policy

HAWC will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.



3. HAWC must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).
4. HAWC with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.
5. Where the income profile for a covered development is not explained or justified in the annual plan submission, HAWC must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances HAWC's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the HAWC in consultation with the residents and the community through the annual plan process to be responsive to local needs and HAWC's strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under HAWC's deconcentration policy. HAWC must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under HAWC's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, HAWC will be considered to be in compliance with the deconcentration requirement and no further action is required.

#### HAWC Policy

For developments outside the EIR HAWC will take the following actions to provide for deconcentration of poverty and income mixing:

- Skipping a family on the waiting list to reach another family in an effort to further the goals of the HAWC's deconcentration policy:
- If a unit becomes available at a development below the EIR, the first eligible family on the waiting list [or transfer list] with income above the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list [or transfer list] with income above the EIR will be offered the unit. The process will continue in this order. For the available unit at the development below the EIR, if there is no family on the waiting list [or transfer list] with income above the EIR, or no family with income above the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list [or transfer list] in preference order regardless of income.
- If a unit becomes available at a development above the EIR, the first eligible family on the waiting list [or transfer list] with income below the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list [or transfer list] with income below the EIR will be offered the unit. The process will continue in this order. For the available unit at the development above the EIR, if there is no family on the waiting list [or transfer list] with income below the EIR, or no family with income below the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list [or transfer list] in preference order regardless of income.
- Skipping of families for deconcentration purposes will be applied uniformly to all families.
- A family has the sole discretion whether to accept an offer of a unit made under HAWC's deconcentration policy. HAWC shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under HAWC's deconcentration policy. However, HAWC shall uniformly limit the number of offers received by applicants [and transfer families], described in this Chapter.

## Attachments 3.0 New Activities

### **3.1 Demolition and/or Disposition**

The Housing Authority of Washington County may consider the disposition of its remaining 244 Public Housing dwelling units if HUD does not provide enough Operating Subsidy and/or Capital Fund Grants to effectively operate and maintain safe, decent and sanitary dwelling units under the Public Housing program.

The Housing Authority will be utilizing HUD approved repositioning strategies in its Public Housing Portfolio. The Housing Authority is requesting HUD approval of a Section 18 Disposition for a total of 60 scattered sites throughout Washington County. These single-family homes will be sold at Fair Market Value. Current residents will have the opportunity to purchase their home before it goes to the general market. In addition, HAWC will work with local jurisdiction such as Cities for the possible purchase of the homes. After this offer is made but not accepted the homes will be sold to the general public with the use of a professional real estate broker. The value of the homes will be determined by a standard competitive market analysis done by the brokerage at the time of listing. It is anticipated that the sale of 60 homes at an average sale price of \$320,000 will generate approximately \$17,800,000 over a period that will encompass several fiscal cycles. These funds will be maintained and used to purchase multifamily properties as the appropriate properties come to market and meet all the Housing Authorities requirements. Tenant relocation will be paid from the operating fund.

### **3.2 Conversion of Public Housing to Tenant Based Assistance**

If the Section 18 application is approved, HAWC will apply for and expects to receive 60 Tenant Protection Vouchers for the benefit of the Public Housing residents impacted by the sale activity. HAWC will also assign a Housing Navigator to each household to serve as a primary resource to address any barriers. Relocation counseling services will include housing search assistance, credit counseling and budget management courses through third party partnerships, homeownership readiness counseling, renter's certification classes, and tenant protection voucher education.

### **3.3 Project Based Vouchers**

Project Based Vouchers (PBVs) are vouchers assigned to a specific unit or property, and not transferable when the resident moves from the unit or property. PBVs enable HAWC to place vouchers in properties or communities with additional services, to focus housing opportunity for various types of challenging populations, such as chronically homeless or special needs households. HAWC currently has 218 total units across 20 contracts in our community.

Project-Based Vouchers

Project-Based Contract	Contracted Units		Project-Based Contract	Contracted Units
Alma Gardens	8		The Mary Ann	8
Alma Gardens - VASH	5		Orchards	24
Barcelona	8		PLUSS	12
Bridge Meadows	8		Pomeroy Place	15
Cedar Grove	8		Pomeroy Place - VASH	5
Cornelius Place	11		Red Rock Creek Commons	24
Fir Crest Manor	14		Sunset View	24
Housing Team/SAMHSA	3		Tom Brewer House	13
The Knoll	8		Viewfinder	8
The Knoll - VASH	4		Viewfinder - VASH	8

Housing Authorities are permitted by HUD regulations to convert up to a maximum of 20% of their Housing Choice Voucher allocation to PBVs. In our 50075-MTW Supplement, HAWC is proposing the use of an MTW waiver to raise that cap to 50% of the Housing Choice Voucher allocations, and 100% of a contracted project. (See Attachment 1.2 50075-MTW Supplement.)

In the 2022-2023 Fiscal Year, HAWC will continue to expand this program and add up to 32 additional Project Based Vouchers in four Metro bond projects, as approved in the previous PHA Plan.

In addition and as described above, if the Section 18 application is approved, HAWC expects to receive 60 Tenant Protection Vouchers for the benefit of the Public Housing residents impacted by the sale activity. HAWC will explore this and other alternatives allowed under repositioning.

In our 50075-MTW Supplement, HAWC is also proposing use of MTW waivers to modify our local PBV program in the following ways:

- Waiver of requirement for third-party to perform rent reasonableness and HQS inspections for units that HAWC owns;
- Pre-qualifying unit inspections within 90 days of occupancy;
- Eliminate PBV Selection Process for PHA-owned projects; and
- Limit portability for PBV units to VAWA transfers and reasonable accommodation requests.

Please see attachment 1.2 50075-MTW Supplement for more details about these initiatives. HAWC will implement these policies in 2022-2023 Fiscal Year, following HUD approval.

## Attachment 4.0 Annual Progress Statement for FY 2021-2022

### **Goal: Increase the availability of decent, safe, affordable housing.**

The Housing Authority of Washington County (HAWC) has increased the availability of decent, safe and affordable housing by:

- Continuing to focus in increasing our lease-up rate in the midst of the COVID-19 pandemic. The effects of the pandemic on available rentals, processing time, client availability and staffing challenges have kept our lease-up rates below the initial goal of 95%. Current utilization rate is approximately 92%, and staff continue to work strategically toward once again meeting our goal.
- Leveraging private and public funds to increase affordable housing opportunities through new development, acquisition, and partnerships.
- Seeking additional vouchers through the Veterans Affairs Supportive Housing (VASH) Program, Mainstream Vouchers, and Family Youth Initiative (FYI) Vouchers.
- Converting Housing Choice Vouchers to Project-based Vouchers for specific housing needs.
- Pursuing the transfer of property owned by Washington County as the result of property tax foreclosure actions to the Housing Authority for use as affordable rental units.
- Increasing the long-term sustainability of the Low Rent Public Housing Program.

The Housing Authority of Washington County has also improved the quality of assisted housing by:

- Continually evaluating and improving Public Housing and Voucher management practices.
- Publishing a participant newsletter periodically throughout the year to notify program participants of important program information, and other topics of interest. This newsletter was published on a quarterly basis. - The Housing Authority is engaging residents and the RAB on a more regular basis through online meetings which at this point in time is more effective than a newsletter.
- Increasing customer satisfaction by providing customers a comment card to share their feelings about their experience with the Housing Authority of Washington County.
- Holding Resident Advisory Board meetings, no less than 2 times a year. - The Housing Authority adapted to the challenges of the pandemic and held RAB meetings virtually.
- Hold Landlord Training Courses 2-3 times per year. - these meetings did not take place this year due to the pandemic. In the future, online/virtual options will be explored.

The Housing Authority of Washington County has increased affordable housing choices by:

- Providing a map to all Housing Voucher Program Participants at their briefing showing areas of poverty deconcentrating to allow Voucher participants to more easily locate units in areas of low poverty concentration.
- Developing a database that pinpoints housing with features accessible to persons with disabilities in Washington County, and creating a special packet with detailed information about these dwellings, as well as neighborhood information, including public transportation schedules.
- Partnering with various developers to assist in the development of new affordable housing communities throughout the county: The Housing Authority of Washington County is a partner in an 81-unit development that opened in December 2021, and in another 144-unit project that

began construction in November 2021. In addition, the Authority is the owner of two new projects totaling 90 units that will be available for occupancy later in 2022. Combined with two partner projects completed in 2020 the Housing Authority of Washington County is assisting with development of 699 units in the 2020-2022 two year period.

- Promoting home ownership programs under Section 8 Housing Choice Voucher Homeownership Program and Section 32 Public Housing. Homeownership Program. Participants have benefited from partnerships with State, County and non-profit and for-profit agencies to provide essential counseling and down payment assistance loans. There are currently five (5) active members in this program.

**Goal: Improve community quality of life and economic vitality.**

The Housing Authority of Washington County provide an improved living environment for its program participants by:

- Promoting income mixing in public housing by assuring access for lower income families into higher income developments.
- Continually improving the quality of its public housing and affordable housing stock through preventative maintenance inspections and rehabilitation when necessary: The Housing Authority of Washington County has assembled funding for the significant rehabilitation of five projects in its affordable housing portfolio totaling 332 units. The rehabilitation and financial restructuring of the projects will ensure they are well-positioned to provide safe and healthy housing for low-income households for the long-term.
- Ensuring the accessibility of public housing units by maintaining at least 5% of its units accessible to wheelchair and mobility impaired users; 2% of the units will be designed for those with visual or hearing impairments.

**Goal: Promote self-sufficiency and asset development of families and individuals.**

The Housing Authority of Washington County has promoted the self-sufficiency of participating households by:

- Voluntarily maintaining its Family Self-Sufficiency Program size over minimum requirements.
- Providing no-cost financial education to FSS program participants and providing access to Individual Development Accounts (IDA).
- Providing Homeownership Vouchers to families who are eligible.
- Partnering with other agencies, such as the State of Oregon Adult and Family Services Division and Work Source, to provide supportive services to participating households, including case management, supportive services, and/or employment services.
- Continue with programs such as Health Careers Northwest (HCNW) sponsored by Work Source and federal grants.
- Established an independent model and program for self-funding of a program noted as "Housing Plus".

**Goal: Ensure Equal Opportunity in Housing for all.**

The Housing Authority of Washington County has promoted all principles of Fair Housing by:

- The Housing Authority of Washington County is committed to providing access to affordable housing regardless of race, color, religion national origin, sex, familial status, disability, marital status, source of income, sexual orientation, gender identity, and domestic violence status.
- Furthermore, the Housing Authority of Washington County provides a suitable living environment for families living in affordable housing, regardless of race, color, religion national origin, sex, familial status, disability, marital status, source of income, sexual orientation, and gender identity. The Housing Authority of Washington County also provides preference points to honorably discharged veterans and victims of domestic violence.
- Finally, the Housing Authority of Washington County does its utmost to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

## Attachment 5.0 Resident Advisory Board (RAB) Comments

Q: Why is the agency selling units it owns, when there is a lack of affordable housing in the County?  
The 60 units that have been selected to be sold are single-family units scattered throughout the County. Some of the units have significant maintenance needs and they're expensive to maintain. Proceeds from the sale of the units will be held by the housing authority to be used to build new, more efficient multi-family affordable housing in the community.

The Housing Authority is also in the process of adding more than 800 units of affordable housing to the County through the Metro affordable housing bond. Construction of these units will take some time, but we are very excited to be putting this much affordable housing back into the community.

Q: What is the voucher shopping time for people? Are people leasing up?  
Vouchers are issued for up to 120 days, but the current lease-up time is about 50 days. We still feel that there should be more affordable housing available to voucher holders in our community, but participants are finding housing.

### Questions related to 50075-MTW Supplement

Q: If the Board approves the MTW activities, how soon are they implemented?  
Activities will be implemented after July of this year, but the timeline for individual activities is different. Simplifications to rent calculations will be implemented later this year, and will be effective at the resident's next recertification. The Tiered Rent Program is currently scheduled to begin for December recertifications. We will send more information to households as we roll out each activity.

Comment: I think it's wonderful that people will have the extra time between recertifications to save their increased income, without seeing an increase in their rent.



## Attachment 6.0 Fair Housing

Note: The Housing Authority of Washington County has had an Assessment of Fair Housing and is therefore not required to complete Section D. of the 50075 PHA Annual Plan. We are including the information below for agency transparency.

Washington County is the most racially diverse county in the state. The Housing Authority of Washington County has made advancing fair housing and racial equity a priority for our programs. Decades of housing policy from the federal to local level have contributed to disparate outcomes for communities of color in housing. People of color are much more likely to struggle with unaffordable housing, displacement and homelessness. Disparity in housing stability and affordability for persons of color is directly linked with economic disparity, as well as historic and systemic housing injustice through practices such as redlining. HAWC seeks and takes advantage of opportunities to address this inequity and to meet the needs of historically marginalized communities.

HAWC, along with Washington County, and the cities of Hillsboro and Beaverton, receives federal housing and community development funds from the U.S. Department of Housing and Urban Development (HUD) and is, therefore, required to periodically prepare an Analysis of Impediments to Fair Housing (AI). The most recent AI was completed in 2020 as part of the Consolidated Plan update. The AI must “affirmatively further” fair housing according to HUD’s *Fair Housing Guide* by:

- Analyzing and eliminating housing discrimination in the jurisdiction
- Promoting fair housing choice for all persons
- Providing opportunities for inclusive housing occupancy patterns
- Promoting housing that is structurally accessible and usable by all people, regardless of ability
- Fostering compliance with the nondiscrimination clauses of the Fair Housing Act

The 2020 AI identified three Fair Housing strategy areas, and accompanying actions for each:

1. Fair Housing awareness and discrimination
2. Access to affordable housing in good condition
3. Barriers to housing choice / access and community amenities

[Click here](#) to view the full Fair Housing Matrix from the 2020 Consolidated Plan, with additional details about each strategy and the actions associated.