



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

2024 Annual Update

To be submitted: May 15, 2024

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Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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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> PHA Name: <u>Housing Authority of Washington County</u> PHA Code: <u>OR022</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>244</u> Number of Housing Choice Vouchers (HCVs) <u>3,034</u> Total Combined <u>3,278</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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> Melissa Sonsalla, Policy and Planning Manager: (503) 846-4794 or housingservices@washingtoncountyor.gov 161 NW Adams Ave, Suite 2000, 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: https://www.washingtoncountyor.gov/housing/plans-policies-reports </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"/> PHA Consortia: (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:											
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan 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 type="checkbox"/> <input checked="" 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>See Attachment 2.0</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>See Attachment 2.5.</p>
B.2	<p>New Activities.</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>See Attachment 3.0</p>
B.3	<p>Progress Report.</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>See Attachment 4.0.</p>
B.4.	<p>Capital Improvements. 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 Attachment 1.6: HUD Form 50075.2 approved by HUD on 02/27/2023</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

C.	Other Document and/or Certification Requirements.				
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></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>See Attachment 5.0.</p> <p>The Resident Advisory Board meeting is scheduled for April 2024. The Public Hearing is scheduled for the May 7, 2024 Housing Authority Board of Directors meeting.</p>				
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment 1.3.</p>				
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment 1.4.</p>				
C.4	<p>Challenged Elements. 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"/></p> <p>If yes, include Challenged Elements.</p>				
D.	Affirmatively Furthering Fair Housing (AFFH).				
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>See Attachment 6.0.</p> <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.</p> <table border="1" data-bbox="180 1623 1455 1745"> <tr> <td data-bbox="180 1623 375 1650">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 1675 751 1703"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> </table> <table border="1" data-bbox="180 1772 1455 1894"> <tr> <td data-bbox="180 1772 375 1799">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 1824 751 1852"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> </table>	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>
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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. ([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

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. ([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.

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.

Privacy Act Notice. 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.

PHA NAME: Washington County

PHA Code: OR022

MTW Supplement for PHA Fiscal Year Beginning: 07/01/2024

PHA Program Type: Combined

MTW Cohort Number: 2

MTW Supplement Submission Type: Annual Submission

Plan to Implement in Submission Year

Currently Implemented

1. Tiered Rent Program
 - 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
2. Rent Simplification
 - a. Agency Specific: Income Verification
 - b. 1.v., 1.w. - Calculation of Asset Income
 - c. 1.t., 1.u. - Calculation of Medical Expense Deduction
 - d. Agency Specific: Discontinue Earned Income Disallowance (EID)
3. Triennial Reviews for Seniors & People with Disabilities
 - a. 3.a., 3.b. – Reexamination Schedule
4. HQS Inspection Processes
 - a. 5.c. – HQS Third-Party Requirement
 - b. 14.a. – Moving On Program: Waive Initial HQS Requirement
5. Local Project-Based Voucher Program
 - a. 2.d. – Rent Reasonableness – Third-Party Requirement
 - b. 5.a. – Pre-Qualifying Unit Inspections
 - c. 5.d. – Alternative Inspection Schedule
 - d. 9.a. – Increase PBV Program Cap
 - e. 9.b. – Increase PBV Project Cap
 - f. 9.c. – Eliminate PBV Selection Process for PHA-owned projects
 - g. 9.h. – Limit Portability for PBV Units
6. Agency Specific: Waiver of Waitlist Requirements
7. Agency Specific: Strategic Waitlists
8. Alternate Payment Standards
 - a. 2.b. – Payment Standards – Fair Market Rents
9. Alternative Utility Allowance Schedule
 - a. 1.i., 1.j. – Alternative Utility Allowance
10. Agency-Specific: Homeownership Program [PENDING HUD APPROVAL]

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 in our community. 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 years as an MTW agency, HAWC has focused on strategies for cost reduction and administrative effectiveness. In Year 1 (FY 2022-2023) we implemented our tiered rent study, as well as a triennial review schedule for seniors and people with disabilities and simplified aspects of the rent calculation. Changes like these create efficiencies for our staff and better understanding and transparency for the households we serve. In FY 2023-24, we expanded on these approaches, proposing a simplified utility allowance schedule and a locally designed payment standard, both to consider the conditions of our local community and respond to housing stability needs.

In FY 2024-2025 we are focusing on fully implementing approved waivers, analysis of activities to determine impact on households, and preparation for upcoming activities. We are not requesting any additional waivers in FY 2024-2025.

HAWC is not proposing any new waivers for 2024-25 at this time.

Currently Implemented

Tiered Rent Program

1.a., 1.b. + Safe Harbor – Tiered Rents

Narrative

Originally approved in the FY2022 PHA Plan.

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.

Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC began enrolling eligible

households in the Tiered Rent Program in January 2023. Enrollment will continue through households with a recertification effective date of April 2024, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.
MTW Statutory Objective: Cost effectiveness; Self-sufficiency
Cost Implications: Increased expenditures; decreased revenue
Different Policy by HH Status / Family types / Sites: This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.
Need Safe Harbor Waiver? Yes - Certain provisions of sections 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.628. Safe Harbor 1.a.i. & 1.b.i. 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 <u>midpoint</u> of the tier.
Need Hardship Policy? YES (attached)
Hardship Policy applies to more than this activity? This hardship policy applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.
Has the Hardship Policy been modified since last submission? No
How many hardship requests have been received in the most recent fiscal year? How many approved? How many denied? How many pending? 127 hardships requested – 127 approved
Need Impact Analysis? YES (attached)
Impact Analysis applies to more than this activity? This impact analysis applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.
Custom Questions Please describe how the income bands are structured? 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 upload the tiered rent policy table that shows the income bands. What is the income basis for assigning households to income bands? This activity uses different definitions of income through MTW Waivers 1.r and 1.s: elimination of deductions

Tiered Rent

1.r, 1.s. – Elimination of Deductions

Narrative Originally approved in the FY2022 PHA Plan.
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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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through households with a recertification effective date of April 2024, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.

MTW Statutory Objective: Cost effectiveness

Cost Implications: Increased expenditures; decreased revenue

Different Policy by HH Status / Family types / Sites: This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

Need Safe Harbor Waiver? No

Need Hardship Policy? YES (attached)

Hardship Policy applies to more than this activity? This hardship policy applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.

Has the Hardship Policy been modified since last submission? No

How many hardship requests have been received in the most recent fiscal year? How many approved? How many denied? How many pending? 127 hardships requested; 127 hardships approved

Need Impact Analysis? YES (attached)

Impact Analysis applies to more than this activity? This impact analysis applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.

Custom Questions

Which deductions will be eliminated?

Dependent allowances

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.

Tiered Rent Program

3.a., 3.b. + Safe Harbor – Alternative Reexamination Schedule

Narrative

Originally approved in the FY2022 PHA Plan.

HAWC is utilizing 3.a. 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.

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through households with a recertification effective date of April 2024.

At this point there have been no changes to the activity.

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures; Give incentives to families to obtain employment and become economically self-sufficient

Cost Implications: Cost neutral (part of Tiered Rent Program)

Different Policy by HH Status / Family types / Sites:

Tiered Rent Program:

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

Triennial Reviews:

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are seniors or people with disabilities.

Need Safe Harbor Waiver?

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

3.a.ii. and 3.b.ii.

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 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.

Need Hardship Policy? YES (attached)

Hardship Policy applies to more than this activity? This hardship policy applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.

Has the Hardship Policy been modified since last submission? No

How many hardship requests have been received in the most recent fiscal year? How many approved? How many denied? How many pending? 0

Need Impact Analysis? YES (attached)

Impact Analysis applies to more than this activity? This impact analysis applies to 1.a., 1.b., 1.r., 1.s., 3.a., and 3.b.

Custom Questions

Recertification schedule is once every three years.

Households may request 0 interim recertifications per year.

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.

Rent Simplification

Agency Specific: Income Verification

Documentation to be uploaded

Full description

Originally approved in the FY2022 PHA Plan.

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. The waiver has helped to streamline processes in verifying income during the reexamination process.

Has there been a change in how the waiver is being implemented from when it was originally approved? No

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 implemented after receiving HUD approval on January 25, 2023.

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.

Rent Simplification

1.v, 1.w. + Safe Harbor - Alternative Income Inclusions/Exclusions (Calculation of Asset Income)

Narrative

Originally approved in the FY2022 PHA Plan.

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. (Safe Harbor Waiver requested.)

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval in March 2023 and implemented in the following months. The waiver has been helpful in streamlining the asset verification process.
MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures
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.
Different Policy by HH Status / Family types / Sites: 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.
Need Safe Harbor Waiver? Yes – This activity will apply to both work-able and elderly and/or disabled households.
Need Hardship Policy? No
Hardship Policy applies to more than this activity? No
Need Impact Analysis? No
Impact Analysis applies to more than this activity? No
Custom Questions What inclusions or exclusions will be eliminated, modified, or added? Asset income: HAWC will disregard asset income when total assets for the household are less than \$100,000.

Rent Simplification

1.t., 1.u. – Standard Deductions (Calculation of Medical/Disability Expense Deduction)

<p>Narrative</p> <p>Originally approved in the FY2022 PHA Plan.</p> <p>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.</p> <p>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.</p> <p>Medical /disability expense information can only be submitted <u>once</u> 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.</p>
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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

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval in March 2023 and implemented in the following months. The waiver has simplified the medical calculation for households, improving administration as well as participant understanding.

MTW Statutory Objective: Cost effectiveness

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.

Different Policy by HH Status / Family types / Sites: 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.

Need Safe Harbor Waiver? No

Need Hardship Policy? Yes – MTW Hardship Policy

Hardship Policy applies to more than this activity? Yes

Has the Hardship Policy been modified since last submission? No

How many hardship requests have been received in the most recent fiscal year? How many approved? How many denied? How many pending? No

Need Impact Analysis? Yes – See upload

Impact Analysis applies to more than this activity? No

Custom Questions

How much will the single standard deduction be in the fiscal year? N/A - \$0

Rent Simplification

Agency Specific: [Discontinue Earned Income Disallowance \(EID\)](#)

Documentation to be uploaded

Full description

Originally approved in the FY2022 PHA Plan.

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

<p>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>
<p>Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. HAWC no longer has any households enrolled in EID. This has simplified administration of our rent assistance programs.</p>
<p>Has there been a change in how the waiver is being implemented from when it was originally approved? No</p>
<p>Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 960.255 and section 3(d) of the 1937 Act</p>
<p>MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures</p>
<p>Population groups and household types impacted by this activity: All</p>
<p>Cost Implications: Cost neutral</p>
<p>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.</p>
<p>Impact Analysis</p> <ol style="list-style-type: none"> 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. 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 the processes around administering the EID program. 7. Statutory Requirements – No projected impact. 8. Hardship requests – No projected impact. 9. Protected classes / Disparate impact – No projected impact.
<p>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.</p>
<p>Comments received + Agency response: No comments received.</p>

Narrative

Originally approved in the FY2022 PHA Plan.

HAWC is utilizing 3.a. 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.

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.)

<p>iii. Agency must implement an impact analysis.</p> <p>iv. Agency must include a hardship policy.</p>
<p>Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in June 2022 and began transitioning households to a triennial review schedule in December 2022.</p>
<p>MTW Statutory Objective: Cost effectiveness</p>
<p>Cost Implications: Decreased Expenditures - Analysis shows that this activity will be relatively cost neutral in impact on rents, as most households do not see significant rent increases year to year. This will be a cost savings to the agency, as staff will have a reduced number (approximately 1,000) of annual reviews to complete each year. [Neutral - We do not anticipate a staffing reduction, but this will give staff the opportunity to engage in supportive services for our clients.]</p>
<p>Different Policy by HH Status / Family types / Sites: Tiered Rent Program: This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible. Triennial Reviews: This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are seniors or people with disabilities.</p>
<p>Need Safe Harbor Waiver? No</p>
<p>Need Hardship Policy? Yes – Households have access to our standard hardship policy, and our MTW Hardship policy.</p>
<p>Hardship Policy applies to more than this activity? Yes</p>
<p>Has the Hardship Policy been modified since last submission? No</p>
<p>How many hardship requests have been received in the most recent fiscal year? How many approved? How many denied? How many pending? 0</p>
<p>Need Impact Analysis? Yes</p>
<p>Impact Analysis applies to more than this activity? No</p>
<p>Custom Questions: What is the recertification schedule? Once every three years How many interim recertifications per year may a household request? Unlimited Please describe briefly how the MTW agency plans to address changes in the family/household circumstances under the alternative reexamination schedule? Households will have access to our standard 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.</p>

HQS Inspection Processes

14.a. – Moving On Program: Waive Initial HQS Requirement

Narrative

Originally approved in the FY2022 PHA Plan.

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. This waiver streamlines the HQS inspection process for households that qualify.

MTW Statutory Objective: Cost effectiveness; Housing choice

Cost Implications: Neutral

Different Policy by HH Status / Family types / Sites: No

Need Safe Harbor Waiver? No

Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A

Need Impact Analysis? No

Impact Analysis applies to more than this activity? N/A

Custom Questions: N/A

HQS Inspection Processes

5.c. – HQS Third-Party Requirement

Narrative

Originally approved in the FY2022 PHA Plan.

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. This waiver has helped to streamline HQS processes and create cost effectiveness.

MTW Statutory Objective Cost effectiveness

Cost Implications Cost savings

Different Policy by HH Status / Family types / Sites All

Need Safe Harbor Waiver? No

Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A

Need Impact Analysis? No

Impact Analysis applies to more than this activity? N/A

Custom Questions

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.

Local Project-Based Voucher Program

2.d. – Rent Reasonableness – Third-Party Requirement

Narrative

Originally approved in the FY2022 PHA Plan.

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.

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.

Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: During implementation, rent reasonableness has been completed for all PHA owned units utilizing the Affordable Housing/GoSection8 website.

MTW Statutory Objective: Cost effectiveness

Cost Implications: Decreased expenditures

Different Policy by HH Status / Family types / Sites: All

Need Safe Harbor Waiver? No

Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A

Need Impact Analysis? No

Impact Analysis applies to more than this activity? No

Custom Questions

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.

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.

<p>Narrative</p> <p>Originally approved in the FY2022 PHA Plan.</p> <p>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.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:</p> <ul style="list-style-type: none"> 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.
<p>Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in June 2022 and utilizes pre-qualifying inspections for project-based units only, specifically for newly built or rehabilitated units. HAWC may look to expand to tenant-based units in the future.</p>
<p>MTW Statutory Objective Cost effectiveness</p>
<p>Cost Implications None</p>
<p>Different Policy by HH Status / Family types / Sites All</p>
<p>Need Safe Harbor Waiver? None</p>
<p>Need Hardship Policy? No</p>
<p>Hardship Policy applies to more than this activity? N/A</p>
<p>Need Impact Analysis? No</p>
<p>Impact Analysis applies to more than this activity? N/A</p>
<p>Custom Questions</p> <p>The pre-inspection period will be valid for 90 days.</p>

Local Project-Based Voucher Program

5.d. – Alternative Inspection Schedule

<p>Narrative</p> <p>Originally approved in the FY2022 PHA Plan.</p> <p>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.</p> <p>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</p>

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval of this waiver in June 2022. Implementation is planned for late FY2022/early FY2023.

MTW Statutory Objective: Cost effectiveness

Cost Implications: Cost savings

Different Policy by HH Status / Family types / Sites: All

Need Safe Harbor Waiver? No

Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A

Need Impact Analysis? No

Impact Analysis applies to more than this activity? N/A

Custom Questions (None)

Local Project-Based Voucher Program

9.a. – [Increase PBV Program Cap](#)

Narrative

Originally approved in the FY2022 PHA Plan.

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.
Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. We currently project-base approximately 16.5% of our total authorized units.
MTW Statutory Objective Increase housing choice
Cost Implications Neutral
Different Policy by HH Status / Family types / Sites All
Need Safe Harbor Waiver? No
Need Hardship Policy? No
Hardship Policy applies to more than this activity? N/A
Need Impact Analysis? No
Impact Analysis applies to more than this activity? N/A
Custom Questions What percentage of total authorized units will be authorized for project-basing? 50%

Local Project-Based Voucher Program

9.b. – Increase PBV Project Cap

Narrative Originally approved in the FY2022 PHA Plan. 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.
Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. This waiver will create operational efficiency and expanded housing choice.
MTW Statutory Objective Increase housing choice
Cost Implications Neutral
Different Policy by HH Status / Family types / Sites All
Need Safe Harbor Waiver? No
Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A
Need Impact Analysis? No
Impact Analysis applies to more than this activity? N/A
Custom Questions (None)

Local Project-Based Voucher Program

9.c. – Eliminate PBV Selection Process for PHA-owned projects

<p>Narrative Originally approved in the FY2022 PHA Plan.</p> <p>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.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:</p> <ul style="list-style-type: none"> 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. <p>Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. This waiver will create operational efficiency and housing choice.</p>
Cost Implications Neutral
Different Policy by HH Status / Family types / Sites All
Need Safe Harbor Waiver? No
Need Hardship Policy? No
Hardship Policy applies to more than this activity? N/A
Need Impact Analysis? No
Impact Analysis applies to more than this activity? N/A
Custom Questions (None)

Local Project-Based Voucher Program

9.h. – Limit Portability for PBV Units

<p>Narrative Originally approved in the FY2022 PHA Plan.</p> <p>HAWC is proposing to change the current requirement to provide a tenant-based voucher when requested by a PBV household from 12 months after PBV tenancy to 24 months. 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.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:</p> <ul style="list-style-type: none"> i. Portability under this activity must not be restricted for more than 24 months. 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.
<p>Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in March 2023. Implementation is planned for late FY2022/early FY2023.</p>
<p>MTW Statutory Objective Increase housing choice</p>
<p>Cost Implications Neutral</p>
<p>Different Policy by HH Status / Family types / Sites All</p>
<p>Need Safe Harbor Waiver? No</p>
<p>Need Hardship Policy? No</p>
<p>Hardship Policy applies to more than this activity? N/A</p>
<p>Need Impact Analysis? No</p>
<p>Impact Analysis applies to more than this activity? N/A</p>
<p>Custom Questions (None)</p>

Waiver of Waitlist Requirements

[Agency Specific: Waiver of Waitlist Requirements](#)

Documentation to be uploaded

<p>Full description Originally approved in our FY2022 PHA Plan.</p> <p>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</p>
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aside an agreed-upon number of tenant-based vouchers, when partnering with a service provider to prioritize Housing Choice Vouchers 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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in November 2023 and will work through implementation in 2024.

Has there been a change in how the waiver is being implemented from when it was originally approved? No.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 982.207

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:

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.

Strategic Waitlists

[Agency Specific: Strategic Waitlists](#)

Documentation to be uploaded

Full description

Originally approved in our FY2022 PHA Plan.

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.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in November 2023. There have been no changes in implementation.

Has there been a change in how the waiver is being implemented from when it was originally approved? No.
Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 983.251(c) and 983.251(d)
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).
<p>Impact Analysis</p> <ol style="list-style-type: none"> 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.

Payment Standards

2.b. – Payment Standards – Fair Market Rents

<p>Narrative</p> <p>Originally approved in the FY2023 PHA Plan.</p> <p>To best meet the local needs of our community, the Housing Authority of Washington County is requesting a waiver that allows us to adopt and implement local policies to establish payment standards based on Fair Market Rents (FMR).</p> <p>In FY2023-24, HAWC will create and apply two different voucher payment standards: Market Rate Voucher Payment Standard will generally apply to units in the private rental market. These payment standards will be set between 100% and 110% of area Fair Market Rents. Affordable Housing Voucher Payment Standards will generally apply to units with a nonprofit or tax credit status. These payment standards will be set between 90% and 100% of area Fair Market Rents.</p>
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At adoption of these differing payment standards, the Affordable Housing Voucher Payment Standard will start at our current rate so no household will have a reduction of VPS.

Adjustments to payment standards will be applied at the household's move in, recertification, or contract rent increase.

Payment standards impact all voucher subsidy holders as it is factored in the maximum subsidy. Since affordable housing units have other regulations to keep rents lower, we anticipate there will be no reduction in assistance or rent amounts while renting an affordable housing unit. This will also open more opportunities to rent units above market rent if they are privately owned.

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

- i. Payment standard must be between 80% and 120% of the FMR.
- ii. Agency must implement an impact analysis.
- iii. Agency must implement a hardship policy.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval of this waiver in June 2023 and implemented the updated payment standards effective October 1, 2023.

MTW Statutory Objective: Increase housing choice; Cost effectiveness

Cost Implications: Cost neutral

Different Policy by HH Status / Family types / Sites: HCV households

Need Safe Harbor Waiver? No

Need Hardship Policy? Yes

Hardship Policy applies to more than this activity? Yes – see MTW Hardship Policy

Need Impact Analysis? Yes

Impact Analysis applies to more than this activity? No

Custom Questions

Please explain the payment standards by FMR.

Market Rate Voucher Payment Standard will generally apply to units in the private rental market.

These payment standards will be set between 100% and 110% of area Fair Market Rents.

Affordable Housing Voucher Payment Standards will generally apply to units with a nonprofit or tax credit status. These payment standards will be set between 90% and 100% of area Fair Market Rents.

Simplified Utility Allowance Schedule

1.i., 1.j. - Utility Allowances

Narrative

Originally approved in the FY2023 PHA Plan.

HAWC is requesting a waiver to create an alternative utility allowance schedule for public housing and voucher units. The current utility allowance is extensive and difficult for tenants to use. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

HAWC will create a utility allowance schedule that considers location, bedroom size, and only whether the household pays heat/electricity and water/sewer/garbage.

Upon implementation and moving forward, updates to the household's utility allowances will be applied at the household's next regularly scheduled review or update.

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

- i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.*

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval of this waiver in June 2023 and implemented the simplified utility allowance effective October 1, 2023.

MTW Statutory Objective: Cost effectiveness

Cost Implications: Cost neutral

Different Policy by HH Status / Family types / Sites: All HCV and PH households

Need Safe Harbor Waiver? No

Need Hardship Policy? No

Hardship Policy applies to more than this activity? N/A

Need Impact Analysis? No

Impact Analysis applies to more than this activity? N/A

Custom Questions

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

HAWC will create a simplified utility allowance schedule that considers location, bedroom size and only whether the household pays heat/electricity and water/sewer/garbage. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

Homeownership Program [PENDING HUD APPROVAL]

Agency Specific: Homeownership Program

Documentation to be uploaded

Full description:

Originally submitted in our FY2023 PHA Plan. As of 03/15/2024, this activity is still waiting for approval.

HAWC currently operates a traditional Homeownership Voucher Program and currently has five participants. Analysis of this program has shown that the program is expensive, has limitations that make it burdensome for both staff and households, and does not appear to create long-term self-sufficiency.

HAWC is proposing a locally designed homeownership program. HAWC will phase out the current homeownership voucher program in favor of an alternative program that supports homeownership based on local best practices. Aspects of the program include:

- Expanded eligibility to include households who have succeeded in increasing their income to levels that qualify for appropriate mortgages
- Partnership with local organizations that are experts in facilitating homeownership for low-income households
- Changes in household participation requirements, to focus on programs and education that leads to successful homeownership
- Down payment assistance that can serve to reduce 15- or 30-year interest rates and eliminate the requirement for Private Mortgage Insurance, creating long term savings for the household.

The current average per unit cost for our homeownership voucher participants is \$1,626 per month – more than 50% higher than the average per unit cost for Housing Choice Voucher participants. Nearly all homeownership voucher participants remain on the program for the full 15 or 20 years, meaning that very few attain increases in income that indicate full self-sufficiency. The cost of lifetime subsidy for the average homeownership voucher participant is nearly \$300,000.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: As of March 2024, HAWC is still waiting final HUD approval of this waiver.

Statute, Regulation or Operations Notice to be waived:

982.627(a)(1) – Waive to enable HAWC to admit both Section 8 Housing Choice Voucher households and public housing households

982.643(a)(1) – Waive to enable HAWC to admit both Section 8 Housing Choice Voucher households and public housing households

982.643(b) – Waive to enable HAWC to create a simplified flat downpayment grant amount, uncoupled from payment standards and total tenant payment calculations.

982.643(f) – Waive to enable HAWC to implement the downpayment assistance grant program.

MTW Statutory Objective: Self-sufficiency

Population groups and household types impacted by this activity: All
Cost Implications: Cost neutral
Implementation timeline: Upon approval, HAWC will end enrollment of new households into the homeownership voucher program. Households currently enrolled in the homeownership voucher program will be allowed to continue the original program through the end of their participation. HAWC will implement the alternative homeownership program in FY 2023.
<p>Impact Analysis</p> <ol style="list-style-type: none"> 1. Agency finances – The program will be set up to be neutral in impact to agency finances. 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 – Encourage self-sufficiency. 7. Statutory Requirements – No projected impact. 8. Hardship requests – No projected impact. 9. Protected classes / Disparate impact – No projected impact.
Hardship Policy: See the attached MTW hardship policy.
Comments received + Agency response: HAWC received multiple comments in full support of revising the homeownership program to increase access and strategically move households toward self-sufficiency.

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 (FY 2022)

This impact analysis applies to the following waivers:

- a. 1.a., 1.b. + Safe Harbor – Tiered Rents (approved in FY 2022)
- b. 1.r., 1.s. – Elimination of Deductions (approved in FY 2022)
- c. 3.a., 3.b. + Safe Harbor – Reexamination Schedule (approved in FY 2022)

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%
Rent Increase Increments		
\$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
Rent Increase Increments						
\$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 current 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 current 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"> • This hardship will be reviewed by and require approval from a supervisor. • The household will be asked to provide documentation demonstrating the expense. • The hardship may last for 3 months, 6 months, or 12 months depending on remedy. • The household may request that the hardship be renewed.

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 20th of the month. If the request is made after the 20th, 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.

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 (FY 2022)

This impact analysis applies to the following waivers:

3.a., 3.b. – Reexamination Schedule (approved in FY 2022)

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

Medical/Disability Expense Deduction: Impact Analysis (FY 2022)

This impact analysis applies to the following waivers:

1.t, 1.u. – Standard Deductions (approved in FY 2022)

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

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. 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

Payment Standards: Impact Analysis

This impact analysis applies to the following waivers:

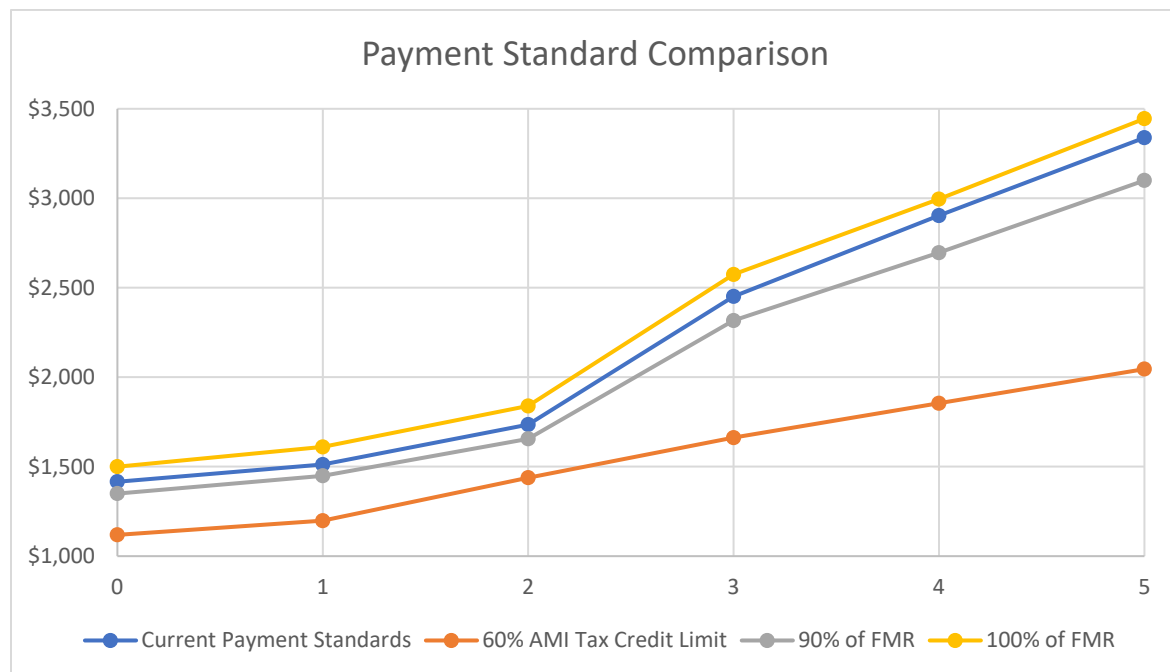
2.b. – Payment Standards – Fair Market Rents

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 this waiver to be cost neutral. Savings from the application of the Affordable Housing Payment Standard will likely supplement increases to the Market Rate Payment Standard.

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. Because 90% of FMR is consistently above the 60% AMI Tax Credit Limit, we do not anticipate the lower Affordable Housing Payment Standard limits will have an impact on affordability for families.



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

This activity is projected to housing choice. Lowering the payment standard range for Affordable Housing will enable a higher payment standard for Market Rate housing.

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

Standard Hardship Policy

Policies as established in Chapters 6-III.B. of the HCV Program Administrative Plan and the Public Housing ACOP.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request. The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

PHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption			
Assume the PHA has established a minimum rent of \$50.			
Family Share – No Hardship		Family Share – With Hardship	
\$0	30% of monthly adjusted income	\$0	30% of monthly adjusted income
\$15	10% of monthly gross income	\$15	10% of monthly gross income
N/A	Welfare rent	N/A	Welfare rent
\$50	Minimum rent	\$50	Minimum rent
Minimum rent applies. TTP = \$50		Hardship exemption granted. TTP = \$15	

PHA Policy

To qualify for a hardship exemption, a written request for a hardship exemption must be submitted by the family. An advocate or social service provider may also submit a request for an exemption on behalf of the family. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent. The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

PHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed, and the hardship is now a long-term hardship.

PHA Policy

The PHA will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of this plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

PHA Policy

The hardship period ends when any of the following circumstances apply:

- 1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- 2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- 3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

MTW 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 20th of the month. If the request is made after the 20th, 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 Housing Operating Subsidy Grant Reporting

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$ 1,004,472	\$ 1,004,472	\$ -	09/30/2029
2022	\$ 1,000,068	\$ 1,000,068	\$ -	09/30/2030
2023	\$ 1,013,195	\$ 1,013,195	\$ -	09/30/2031
2024	\$ 413,032	\$ 238,167	\$ 174,865	09/30/2032

MTW Statutory Requirements

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80% - 50% Area Median Income	-
49% - 30% Area Median Income	-
Below 30% Area Median Income	-
Total Local, Non-Traditional Households	0

HAWC did not operate any Local, Non-Traditional programs during the most recently completed Fiscal Year or prior full calendar year.

Establishing Reasonable Rent Policy

HAWC participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. The design of the tiered rent reform program is currently being developed with guidance from the independent research team lead by MDRC and HUD's office of Policy Design and Research. The focus of the study will be to implement an income tiered rent with tenant rent established at 28% of gross income at the mid-point income of the tier. This program enables families within the tier to increase income without an impact to the tenant rent for a period of three years. Following the three-year period, the family income will be reviewed and a new income tier rent established for the subsequent three-year period. Enrollment in this study group began in fiscal year 2022-2023 and is intended to complete enrollment within 12 months. The study will continue through a 6-year period that includes two cycles of triennial recertification for study participants.

Evaluations

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. HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.

MDRC Contact: Nina Castells; Nina.Castells@mdrc.org

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 implemented 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 are eligible for the program, and of those eligible households, half will be chosen via random selection through the MDRC software. HAWC began enrolling households in the Tiered Rent Program study for effective dates beginning May 1, 2023 and will end enrollment after one year. 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 FY 2022, HAWC is also received a waiver to implement 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.

In FY 2022 HAWC also received approval for 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. Waivers 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

In FY 2023, HAWC received approval to implement a simplified utility allowance schedule and a locally designed payment standard that takes into account the differences between market rate and affordable units. HAWC also requested approval to implement an alternative homeownership program. As of March 2024, this waiver is still pending approval.

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.

2.3 Homeownership Programs

HAWC currently operates a Homeownership Voucher Program and has five participants.

As part of our FY 2023-2024 50075-MTW Supplement, HAWC proposed a change to the homeownership program. HAWC will phase out the homeownership voucher program in favor of an alternative program that supports homeownership based on local best practices. Aspects of the program include:

- Expanded eligibility to include households who have succeeded in increasing their income to levels that qualify for appropriate mortgages
- Partnership with local organizations that are experts in facilitating homeownership for low-income households
- Changes in household participation requirements, to focus on programs and education that leads to successful homeownership
- Down payment assistance that can serve to reduce 15- or 30-year interest rates and eliminate the requirement for Private Mortgage Insurance, serving to create long term savings for 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 upon approval from HUD. As of March 2024, this waiver is still pending approval.

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.

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 years as an MTW agency, HAWC has focused on strategies for cost reduction and administrative effectiveness. In Year 1 (FY 2022-2023) we implemented a triennial review schedule for seniors and people with disabilities and simplified multiple aspects of the rent calculation. Changes like these create efficiencies for our staff and better understanding and transparency for the households we serve. In FY 2023-24, we expanded on these approaches, proposing a simplified utility allowance schedule and a locally designed payment standard, both to consider the conditions of our local community and respond to housing stability needs.

In FY 2024-2025 we are focusing on fully implementing approved waivers, analysis of activities to determine impact on households, and preparation for upcoming activities. We are not requesting any additional waivers in FY 2024-2025. A full list of previously requested and approved waivers, 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.

On December 13, 2023, HUD approved the HAWC request of Section 18 Disposition for a total of 60 scattered sites throughout Washington County. Current residents will have the opportunity to purchase their home with the support of a local homeownership education program. Resident sales will be our first priority.

In addition, HAWC will work with local jurisdictions and non-profit partners who will ensure the homes will continue to provide affordable housing opportunity to the community. After the first two priorities have been met, HAWC will sell any remaining homes on the open market to the general public.

The value of the homes will be determined by a standard competitive market analysis done by the brokerage. It is anticipated that the sale of 60 homes at an average sale price of \$365,000 will generate approximately \$21,885,000 over a period that will encompass several fiscal cycles. These funds will be used to renovate existing affordable housing properties and/or build new affordable housing developments. Tenant relocation will be paid from the operating fund.

3.2 Conversion of Public Housing to Tenant Based Assistance

With the approval of the Section 18 disposition, 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 502 total units across 33 contracts in our community.

Project-Based Vouchers

Project-Based Contract	Contracted Units	Project-Based Contract	Contracted Units
Alma Gardens	8	Marilanne Terrace	9
Alma Gardens - VASH	5	Nueva Esperanza	8
Aloha Park	32	Orchards	24
Alongside	19	PLUSS	12
Alongside - VASH	4	Pomeroy Place	15
Amberwood	20	Pomeroy Place - VASH	5
Barcelona	8	Red Rock Creek Commons	24
Bonita Villa	25	The Ridge at Bull Mountain	38
Bridge Meadows	8	Sunset View	24
Cedar Grove	8	The Valfre at Avenida 26	8
Cornelius Place	11	Terrace Glen	8
Cornelius Village	7	Viewfinder	8
Fir Crest Manor	14	Viewfinder - VASH	8
Housing Team/SAMHSA	3	Villager	5
The Knoll	8	Tom Brewer House	13
The Knoll - VASH	4	Woodsprings	32
The Mary Ann	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 the FY2022-23 50075-MTW Supplement, HAWC received approval for 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.) As of March 2024, HAWC project-bases approximately 16.5% of our total authorized units.

In the 2024-2025 Fiscal Year, HAWC will continue to expand this program and add up to 40 additional Project Based Vouchers in two Metro bond projects, as approved in the previous PHA Plan.

In the FY2022-23 50075-MTW Supplement, HAWC also received approval 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
- Change portability for PBV units to tenant-based vouchers from 12 months to 24 months.

Please see attachment 1.2 50075-MTW Supplement for more details about these initiatives.

Attachment 4.0 Annual Progress Statement for FY 2023-2024

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 while understanding 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 HCV utilization rate is approximately 94%, and the ACC total utilization rate is 91.66%.
- Leveraging private and public funds to increase affordable housing opportunities through new development, acquisition, and partnerships.
- Addition of vouchers: 25 new Veterans Affairs Supportive Housing (VASH) Program and 13 new 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 Public Housing Program by implementing preventative maintenance programs to ensure properties remain in good condition and minimize the need for more extensive repairs.
- Diversifying funding sources to help ensure the long-term financial stability of the program and reduce dependence on a single source of funding.

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 and engaging residents and the Resident Advisory Board on a more regular basis.
- Considering opportunities to gather feedback about customer satisfaction, for example through comment card or link for feedback to share feelings about experiences with the Housing Authority of Washington County (in process).
- Holding Resident Advisory Board meetings quarterly, with additional opportunities for participation encouraged as available.
- Developing Landlord Training Courses to be held 2-3 times per year (in process).
- Encouraging residents to take an active role in the maintenance and management of their properties to help increase resident satisfaction and ensure the long-term viability of the program.
- Installing energy-efficient systems and appliances to help reduce energy costs and increase the sustainability and affordability of the program.

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.

- Utilizing a database that pinpoints housing with features accessible to persons with disabilities in Washington County and assisting clients with detailed information about these dwellings, as well as neighborhood information, including public transportation schedules to fit the individual's needs.
- Partnering with various developers to assist in the development of new affordable housing communities throughout the county: The Authority is the owner of one new project totaling 36 units (The Valfre) that was fully occupied in October 2022. There is one 54-unit PSH project owned by the Authority that is currently undergoing lease up which started in February 2023. Upcoming in 2023, an additional 449 units in five projects will complete construction and start lease up. Two projects with 190 units will be completed and start leasing up in 2024. The Authority is a partner in two of these projects, totaling 198 units, enabling them to receive affordable housing property tax waivers. In total, the Housing Authority of Washington County is assisting with 693 units that will be added during 2023-2024 two year period.
- Promoting home ownership programs under Section 8 Housing Choice Voucher 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.
- Partnering with culturally responsive community housing partners to offer mortgage readiness and financial counseling courses.

Goal: Improve community quality of life and economic vitality.

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

- Promoting income mixing in affordable 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: In 2023 the Housing Authority of Washington County (HAWC) leveraged the Low Income Housing Tax Credit to restore and preserve five affordable housing communities with a total of 332 units of housing through the AHP 4 project. The rehabilitation included upgrades and restoration of interior finishes, floors and fixtures, seismic upgrades, preservation and upgrades to the building envelope, and improvements to walkways, decks, exteriors, and landscaping. Exterior work was completed in early 2024. HAWC will continue preserving and upgrading affordable housing properties in 2024 through the AHP Phase II project, substantially rehabilitating another five properties and a total of 260 units. Construction on AHP Phase II began in January of 2024 and is expected to be complete in late fall of this year.
- 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.
- Actively pulling of the FSS interest list to brief and explain enrollment and eligibility.

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

The Resident Advisory Board meeting is scheduled for April 2024. This section will be updated with comments after the meeting.

Public Hearing

The Public Hearing is scheduled for the May 7, 2024 the Housing Authority Board of Directors meeting. This section will be updated with comments after the meeting.

Attachment 6.0 Fair Housing

Note: The Housing Authority of Washington County has not 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.