

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

2024 Annual Update Submitted: May 14, 2024

#### TABLE OF CONTENTS

- 1.0 HUD Forms
  - 1.1. 50075-HP
  - 1.2. 50075-MTW (also submitted via online form)
  - 1.3. 50077-SL
  - 1.4. 50077-ST-HCV-HP
  - 1.5. 50077-CR Civil Rights
  - 1.6. 50075.2 Capital Fund
- 2.0 Revisions of Existing PHA Plan Elements
- 3.0 New Activities
- 4.0 Annual Progress Statement for FY 20223-2024
- 5.0 Resident Advisory Board (RAB) Comments
- 6.0 Fair Housing

# Streamlined Annual PHA Plan (High Performer PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

**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	PHA Type: High Perfo PHA Plan for Fiscal Year Be PHA Inventory (Based on An Number of Public Housing (I Total Combined	rmer  ginning: (MM/ inual Contributi PH) Units  Annual Su  In addition to the fice location(s) was allable for inspendent of the PHAs must post strongly encourar PHA Plans.  Planning Manageman be viewed by yor.gov/housing was provided to ing Choice Vour	ons Contract (ACC) units at time of 244 Number of Housing bmission	f FY beginning, above)  (Choice Vouchers (HCVs)  nual Submission  nust have the elements listed belaced plan Elements, and all information and the PHA must provide information and Annual Plan but excluded each Asset Management Project on their official website. PHAs are services@washingtoncountyor.ge 2000, Hillsboro, Oregon 97124 and dress or online at:	ow readily availa tion relevant to the tion on how the pur- from their stream (AMP) and main re also encourage gov	ne public hearing ublic may nlined office or central ed to provide each
	Participating PHAs	PHA Code		Program(s) not in the	No. of Units in Each Program	
	rarucipating rmAs	rna Code	Program(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:					

В.	Plan Elements
B.1	Revision of Existing PHA Plan Elements.
	(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual <u>PHA Plan</u></b> submission?
	Y N  □ Statement of Housing Needs and Strategy for Addressing Housing Needs. □ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. □ Financial Resources. □ Rent Determination. □ Homeownership Programs. □ Safety and Crime Prevention. □ Pet Policy. □ Substantial Deviation. □ Significant Amendment/Modification
	(b) If the PHA answered yes for any element, describe the revisions for each element below:
	See Attachment 2.0
	(c) The PHA must submit its Deconcentration Policy for Field Office Review.
	See Attachment 2.5.
B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N
B.3	Progress Report.  Provide a description of the DHA's progress in meeting its Mission and Goals described in the DHA 5 Year Dlan
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.  See Attachment 4.0.
	SECALIZATION TO
B.4.	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.  See Attachment 1.6: HUD Form 50075.2 approved by HUD on 04/26/2024
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N □ ⊠
	(b) If yes, please describe:

C.	Other Document and/or Certification Requirements.		
C.1	Resident Advisory Board (RAB) Comments.		
	(a) Did the RAB(s) have comments to the PHA Plan?		
	Y N ⊠ □		
	(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.		
	See Attachment 5.0.		
	The Resident Advisory Board meeting was held on March 25, 2024. The Resident Advisory Board members did not have specific questions or comments, other than expressing support for the work done by staff.  The Public Hearing was held at the May 7, 2024 Housing Authority Board of Directors meeting.		
C.2	Certification by State or Local Officials.		
C.2	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.		
	See Attachment 1.3.		
C.3	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.		
	Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan.		
	See Attachment 1.4.		
C.4	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.		
	(a) Did the public challenge any elements of the Plan?  Y N  □   ✓		
	If yes, include Challenged Elements.		
D.	Affirmatively Furthering Fair Housing (AFFH).		
D.1	Affirmatively Furthering Fair Housing.		
	See Attachment 6.0.		
	Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.		
	Fair Housing Goal:		
	Describe fair housing strategies and actions to achieve the goal		
	Fair Housing Goal:		
	Describe fair housing strategies and actions to achieve the goal		

		Fair Housing Goal:
		Describe fair housing strategies and actions to achieve the goal
		actions for Preparation of Form HUD-50075-HP al Plan for High Performing PHAs
A.	PHA	A 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.	Plai	n 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 deher 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

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))

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).

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)

Momeownership 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: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4</a>
	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: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (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	<b>Progress Report.</b> 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))
Oth	ner Document and/or Certification Requirements

#### C.

- 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 (OR)

PHA Code: OR022

MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

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

#### LONG-TERM MTW GOALS

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

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

1. Tenant Rent Policies	nueu).
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
i. Alternative Utility Allowance (PH)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Currently Implementing
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Currently Implementing
u. Standard Deductions (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	To amorting map of the first of
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
h. Limit Portability for PBV Units (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic F	Progress (PH)
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Currently Implementing
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy	(PH)
17. Local, Non-Traditional Activities	

# C. MTW Activities Plan that Washington County (OR) Plans to Implement in the Submission Year or Is Currently Implementing

#### 1.a. - Tiered Rent (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

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.

#### Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

# Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

#### Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

#### What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

# Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The standard MTW waiver provides that when a tiered rent is adopted, TTP/rent is based on the income at the bottom of

the tier. For the Tiered Rent Program, the study design has established TTP/rent at 28% of the midpoint of the tier.

#### 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.

#### Please upload the tiered rent policy table that shows the income bands.

This document is attached.

#### What is the income basis for assigning households to income bands?

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

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

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

# Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

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.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

#### Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

#### What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

# Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The standard MTW waiver provides that when a tiered rent is adopted, TTP/rent is based on the income at the bottom of

the tier. For the Tiered Rent Program, the study design has established TTP/rent at 28% of the midpoint of the tier.

#### 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.

This document is attached.

#### What is the income basis for assigning households to income bands?

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

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

#### 1.i. - Alternative Utility Allowance (PH)

# Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.\*

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval of this waiver in June 2023 and implemented the simplified utility allowance effective October 1,

2023.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

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.

#### 1.j. - Alternative Utility Allowance (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.\*

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval of this waiver in June 2023 and implemented the simplified utility allowance effective October 1,

2023.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

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.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

# Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

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.

#### Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

# Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

#### Does this MTW activity require a hardship policy?

Yes

This document is attached.

#### Does the hardship policy apply to more than this MTW activity?

Yes

# Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule

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

#### Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

#### How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

#### Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

#### Does the MTW activity require an impact analysis?

Provided Already

#### Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs; Other

#### 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.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

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.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the 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.
Does this MTW activity require a hardship policy?
Yes
This document is attached.
Does the hardship policy apply to more than this MTW activity?
Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to
multiple MTW activities.) 1.r Elimination of Deduction(s) (PH); 1.s Elimination of Deduction(s) (HCV); 3.a Alternative Reexamination Schedule
for Households (PH); 3.b Alternative Reexamination Schedule for Households (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No
How many hardship requests have been received associated with this activity in the past year? 127.00
How many hardship requests were approved?
127
How many hardship requests were denied?
0
How many are pending?
0
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Yes
This document is attached.
Does the impact analysis apply to more than this MTW activity?
Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs; Other (please explain)

#### 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.

#### 1.t. - Standard Deductions (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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

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

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

Medical / Disability expense Deduction

\$0 - \$1.500 \$0

\$1,500 - \$1,999 \$1,000

\$2,000 - \$2,999 \$2,000

\$3,000 - \$3,999 \$3,000

\$4,000 - \$4,999 \$4,000

\$5,000 - \$5,999 \$5,000

\$6,000 - \$6,999 \$6,000

\$7,000 - \$7,999 \$7,000

\$8,000 - \$8,999 \$8,000

\$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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue: Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.
Doos this MTW activity require a hardship policy?
Does this MTW activity require a hardship policy?
Yes
This document is attached.
Does the hardship policy apply to more than this MTW activity?
Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)
2.b Payment Standards- Fair Market Rents (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No
How many hardship requests have been received associated with this activity in the past year?
No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Yes
This document is attached.
Does the impact analysis apply to more than this MTW activity?
Yes
How much will the single standard deduction be in the Fiscal Year?
\$0

#### 1.u. - Standard Deductions (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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

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

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

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

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

\$9,000 - \$9,999 \$9,000

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

#### Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

**Provided Already** 

How much will the single standard deduction be in the Fiscal Year?

\$0

#### 1.v. - Alternative Income Inclusions/Exclusions (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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 approved.)

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval in March 2023 and implemented in the following months. The waiver has been helpful in

streamlining the asset verification process.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

#### What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

This activity will apply to both work-able and elderly and/or disabled households.

#### What inclusions or exclusions will be eliminated, modified, or added?

HAWC will disregard asset income when total assets for the household are less than \$100,000.

#### 1.w. - Alternative Income Inclusions/Exclusions (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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 approved.)

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval in March 2023 and implemented in the following months. The waiver has been helpful in

streamlining the asset verification process.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

#### What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

This activity will apply to both work-able and elderly and/or disabled households.

#### 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.

#### 2.b. - Payment Standards- Fair Market Rents (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2023 PHA Plan.

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).

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.

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval of this waiver in June 2023 and implemented the updated payment standards effective October

1, 2023.

#### Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Nο

#### 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.

#### 2.d. - Rent Reasonableness - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

During implementation, rent reasonableness has been completed for all PHA owned units utilizing the Affordable

Housing/GoSection8 website.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

#### Please explain or upload a description of the 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.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

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

processes and certification of each review adheres to HUD's rent reasonableness standards.

No document is attached.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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

#### Tiered Rent Program

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

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

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.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

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.

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Tiered Rent Program: 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.

Triennial Reviews: HAWC received approval for this waiver in June 2022 and began transitioning households to a triennial

review schedule in December 2022.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing

#### this MTW activity.

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.

#### Does the MTW activity require an impact analysis?

Yes

This document is attached.

#### Does the impact analysis apply to more than this MTW activity?

Yes

# Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

#### What is the recertification schedule?

Once every three years

#### How many interim recertifications per year may a household request?

2 or more

### Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

Triennial Reviews: 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.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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

#### Tiered Rent Program

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

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

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity.
Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box.
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.
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.  Tiered Rent Program: 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.  Triennial Reviews: HAWC received approval for this waiver in June 2022 and began transitioning households to a triennial review schedule in December 2022.
Does this MTW activity require a hardship policy?
Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
Yes
What is the status of the Safe Harbor Waiver request?
The waiver was previously approved.
Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.
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

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

Triennial Reviews: 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.

#### 5.a. - Pre-Qualifying Unit Inspections (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

HAWC is proposing the option to allow pre-qualifying unit inspections, within 90 days of the participant occupying the unit. Allowing pre-qualifying inspections will streamline the process and allow households to move through occupancy more quickly.

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

- i. The pre-inspection must have been conducted within 90 days of the participant occupying the unit.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

#### what has been accomplished or changed during the 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.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

#### 5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Upon approval, HAWC implemented the waiver in FY2022. This waiver has helped to streamline HQS processes and

create cost effectiveness.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Nο

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

HAWC will continue to utilize our internal quality control process of HQS audits, ensuring that a minimum amount of inspections are reviewed by a secondary staff member. The agency will conduct quality control inspections utilizing 24 CFR 985.2(b) that determines the quality control sample size, whereas the PHA will perform quality control inspections to ensure housing quality. The sample selection will be drawn in an unbiased manner and reviewed by an agency supervisor or another qualified person other than the person who performed the original work. Sample pulls may occur monthly or

quarterly and notices will be sent to the participants and landlords.

No document is attached.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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

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

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

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

- i. Units must be inspected at least once every three years.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards as found at 24 CFR 982,401 must not be altered.
- iv. The Department must be able to conduct or direct the agency to perform an inspection at any time for health and safety,

as well as accessibility, purposes.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval of this waiver in June 2022. Implementation is currently pending the full roll out of NSPIRE

protocols to ensure cohesion.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. We

currently project-base approximately 15% of our total authorized units.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

#### 9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

# 9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. HAWC will continue to abide by the additional HUD selection requirements and will maintain transparency with our community.

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

- i. A subsidy layering review must be conducted.
- ii. The agency must complete site selection requirements.
- iii. (The agency is also implementing Activity 5.c. and will be waiving the third-party inspection requirements for all PBV properties. The agency has confirmed that Activity 5.c. overrides the Safe Harbor in Activity 9.c. with the MTW Office.) iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor.
- v. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

#### Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the 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.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

#### 9.h. - Limit Portability for PBV Units (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Originally approved in the FY2022 PHA Plan.

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.

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

- 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.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

HAWC received approval for this waiver in March 2023. Activity was implemented in 2024.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

#### 14.a. - Waive Initial HQS Inspection Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

#### Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Upon approval, HAWC implemented the waiver in FY2022. This waiver streamlines the HQS inspection process for

households that qualify.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

D.	Safe Harbor Waivers.
D.1	Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?
D.1	No Safe Harbor Waivers are being requested.

# E. Agency-Specific Waiver(s). Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I. In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable. For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement. Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? No **E.1**

Agency-Specific Waiver(s) for which HUD Approval has been Received:

**Does the MTW agency have any approved Agency-Specific Waivers?** Yes

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agence was previously required to prepare impact analysis, was final impact analys prepared at the time discontinuation?
Income Verification	No			
Discontinue Earned Income Disallowance (EID)	No			
Homeownership Program	No			
Waiver of Waitlist Requirements	No			
Strategic Waitlists	No			
A. Income Verification D. Discontinue Earned Income Disallowance (EID) F. Amended Title: Waiver of Waitlist Requirements G. Strategic Waitlists H. Homeownership Program	No			

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

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	\$0	2029-09-30
2022	\$1,000,068	\$1,000,068	\$0	2030-09-30
2023	\$1,013,195	\$1,013,195	\$0	2031-09-30
2024	\$413,032	\$238,167	\$174,865	2032-09-30

G.	MTW Statutory Requirements.
	75% Very Low Income – Local, Non-Traditional.
G.1	HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

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

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

G.2 Establishing Reasonable Rent Policy.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes

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

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

PROPERTY NAME/ ADDRESS	BB		_		_	_	TOTAL UNITS	POPULATION TYPE*	Type' is	# of Section 504 Accessible (Mobility)**	,	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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# G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

# H. Public Comment

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

### I. Evaluations.

Yes - This table lists evaluations of Washington County (OR)'s MTW activities, including the names of evaluators and available reports

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

Title and short description	Evaluator name and contact information	Time period	Reports available
HAWC's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. HAWC will be studying a tiered rent model. An independent research team led by MDRC will work with HUD, HAWC, and the other selected agencies to assist in implementation and evaluate the effects of the alternative rent policy.	MDRC Contact: Nina Castells; Nina.Castells@mdrc.org	HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.	None

OMB No. 2577-0226 Expires: 03/31/2024

# MTW CERTIFICATIONS OF COMPLIANCE

# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

# Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

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

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

OMB No. 2577-0226 Expires: 03/31/2024

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

(OR 022)	
MTW PHA NUMBER/HA CODE	

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

NAME OF AUTHORIZED OFFICIAL TITLE

OS/14/2024 DATE

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

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

#### U. S Department of Housing and Urban Development

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

I, Shannon Wilson, the	Program Manager
Official's Name	Official's Title
certify that the 5-Year PHA Plan for fiscal year 2024 of the Housing Authority of Wash	hington County is consistent with the
Consolidated Plan or State Consolidated Plan inc Housing Choice or Assessment of Fair Housing (	
Washington County – Beaverton – Hillsboro Con Local Jurisa	
pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7	7(o)(3) and 903.15.
Provide a description of how the PHA Plan's cont State Consolidated Plan.	ents are consistent with the Consolidated Plan or
Please see attached memo.	
I hereby certify that all the information stated herein, as well as any information provents prosecute false claims and statements. Conviction may result in criminal and/or civil process.	
Name of Authorized Official:	Title:
Shannon Wilson	Program Manager, Office of Community Development
Signature:	Date: 4/16/24

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

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

Date: April 16, 2024

To: Memo to File

From: Shannon Wilson, Program Manager

Re: PHA Determination of Consistency with Consolidated Plan

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

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

- Increase the availability of decent, safe and affordable housing by maintaining the supply
  of assisted housing, increasing the per-project cap on Project-Based Section 8 vouchers,
  and using federally funded programs to leverage local support to achieve more affordable
  units in Washington County.
- Improve community quality of life and economic vitality through promotion of income
  mixing in public housing, improving the quality of public housing and affordable housing
  stock through significant rehabilitation of 592 units, and ensuring accessibility of public
  housing units by making at least 5% of its units accessible to wheelchair users and 2%
  designed for those with visual or hearing impairments.
- Promote self-sufficiency and asset development of households by maintaining the size of Family Self-Sufficiency (FSS) Program over minimum requirements and pursuing a new locally based homeownership program.
- Increase affordable housing choices by partnering with various for-profit and non-profit
  agencies to assist in the development of new affordable housing communities throughout
  the county.
- Ensure equal opportunity in housing for all in our community through short and long-term Moving to Work Goals.

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

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

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

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

# PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_\_\_ 5-Year and/or\_X\_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning July 1, 2023, in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a
  pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of Washington County PHA Name	OR (022) PHA Number/HA Code
X Annual PHA Plan for Fiscal Year 2024	
5-Year PHA Plan for Fiscal Years 20 20	
I hereby certify that all the information stated herein, as well as any information prosecute false claims and statements. Conviction may result in criminal and/or	n provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> HUD will civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).
Name of Executive Director	Name Board Chairman
05/14/2024	they Hat OS/14/2024
Signature Date	Signature Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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

# Civil Rights Certification (Qualified PHAs)

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

# **Civil Rights Certification**

#### **Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning July I, 2023 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.

ashington County	OR(022) PHA Number/HA Code	
		secute
	Name of Board Chairperson:	
05/14/2024 Date	Signature Dr	12024 ate
	above, as well as any information provided in the control of the c	PHA Number/HA Code  above, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will provious may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)  Name of Board Chairperson:

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.

Capital Fund Program - Five-Year Action Plan

Status: Approved Approved Date: 04/26/2024 Approved By: TADE, JOCELLE 02/28/2022

Part	Part I: Summary							
PHA	Name: Housing Authority of Washington County	Locality (City/County & State)  X Original 5-Year Plan		Revised 5-Year Plan (Revision No:		)		
PHA	A Number: OR022							
Α.	Development Number and Name	Work Statement for Year 1 2023	Work Statement for Year 2 2024	Work Statement for Year 3 2025	Work Statement for Year 4 2026	Work Statement for Year 5 2027		
	WASHINGTON COUNTY HA (OR022000001)	\$993,829.00	\$993,829.00	\$993,829.00	\$993,829.00	\$993,829.00		

2577-0274 02/28/2022

U.S. Department of Housing and Urban Development

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1

2023

work State	work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	
	WASHINGTON COUNTY HA (OR022000001)			\$993,829.00	
ID0070	MTW(MTW (1492))	Capital Funds designated for MTW fungibility.		\$993,829.00	
	Subtotal of Estimated Cost			\$993,829.00	

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work State	Work Statement for Year 2 2024					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
	WASHINGTON COUNTY HA (OR022000001)			\$993,829.00		
ID0071	MTW(MTW (1492))	Capital Funds designated for MTW fungibility.		\$993,829.00		
	Subtotal of Estimated Cost			\$993,829.00		

U.S. Department of Housing and Urban Development Office of Public and Indian Housing 2577-0274 02/28/2022

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work States	Work Statement for Year 3 2025					
Identifier	Development Number/Name		General Description of Major Work Categories	Quantity	Estimated Cost	
	WASHINGTON COUNTY HA (OR022000001)				\$993,829.00	
ID0073	MTW(MTW (1492))		Capital Funds designated for MTW fungibility.		\$993,829.00	
	Subtotal of Estimated Cost				\$993,829.00	

Office of Public and Indian Housing 2577-0274 02/28/2022

Work Stater	Work Statement for Year 4 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	
	WASHINGTON COUNTY HA (OR022000001)			\$993,829.00	
ID0074	MTW(MTW (1492))	Capital Funds designated for MTW fungibility.		\$993,829.00	
	Subtotal of Estimated Cost			\$993,829.00	

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work State	Work Statement for Year 5 2027					
Identifier	Development Number/Name		General Description of Major Work Categories	Quantity	Estimated Cost	
	WASHINGTON COUNTY HA (OR022000001)				\$993,829.00	
ID0072	MTW(MTW (1492))		Capital Funds designated for MTW fungibility.		\$993,829.00	
	Subtotal of Estimated Cost				\$993,829.00	

# Attachments 2.0 Revisions of Existing PHA Plan Elements

#### 2.1 Financial Resources

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

#### 2.2 Rent Determination

In Fiscal Year 2022-2023, HAWC 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 lowincome 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 in 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 FIR
- 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 473 total units across 35 contracts in our community.

#### **Project-Based Vouchers**

Contracted Units	Project-Based Contract	Contracted Units
8	Nueva Esparanza	8
5	The Opal	24
32	Orchards	24
19	Plaza Los Amigos	16
4	PLUSS	12
20	Pomeroy Place	15
8	Pomeroy Place - VASH	5
25	Red Rock Creek Commons	24
8	The Ridge at Bull Mountain	38
8	Sunset View	24
11	Terrace Glen	8
7	Tom Brewer House	13
14	The Valfre at Avenida 26	8
3	Viewfinder	8
8	Viewfinder - VASH	8
4	Villager	5
9	Woodsprings	32
8		
	Units  8  5  32  19  4  20  8  25  8  8  11  7  14  3  8  4	Nueva Esparanza  The Opal  The Opal  Corchards  Plaza Los Amigos  Pluss  Pomeroy Place  Red Rock Creek Commons  Red Rock Creek Commons  Sunset View  Terrace Glen  Tom Brewer House  The Valfre at Avenida 26  Viewfinder  Viewfinder  Villager  Woodsprings

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 15% of our total authorized units.

In the 2024-20245 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 was held on Monday, March 25th. The Resident Advisory Board members did not have specific questions or comments, other than expressing support for the work done by staff.

## **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 be 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

<u>Click here</u> to view the full Fair Housing Matrix from the 2020 Consolidated Plan, with additional details about each strategy and the actions associated.