

# Amendment to MTW Supplement & Capital Fund 5-Year Action Plan

























July 1, 2023 - June 30, 2024 *PUBLIC REVIEW DRAFT* 



# **Public Comment Period**

# August 1, 2023, through September 15, 2023

# **Public Hearing:**

Everett Housing Authority's Board of Commissioners will conduct a public hearing at 4:00 PM on Friday, September 15, 2023, in person and via Zoom.

Information about joining the hearing will be posted to News and Announcement section of the Housing Authority's website (<a href="www.evha.org">www.evha.org</a>).

To request interpretation and/or disability accommodation for the public hearing, contact Chris Neblett at (425) 303-1186 or <a href="mailto:chrisn@evha.org">chrisn@evha.org</a> by September 11, 2023

# **How to Provide Public Comment:**

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# Section 1: MTW Supplement Amendment

# PHA Name: Everett

PHA Code: WA006

MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Amended Annual Submission

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

Everett Housing Authority's (EHA) MTW application envisioned using MTW flexibility to support three local initiatives that are in alignment with the three MTW statutory objectives as well as with EHA's 10-Year Strategic Plan:

- A streamlining and cost savings initiative
- A resident success initiative, focused on increasing employment, earned income, and self-sufficiency (including the Tiered Rent demonstration)
- · A housing choice and mobility initiative

EHA will design and test activities to further these local initiatives over the course of its 20-year term of participation in the MTW program. Proposed changes to policy and program administration, including requests for waivers, that will facilitate MTW demonstration activities will be described in successive MTW Supplements to the PHA Annual Plan. EHA will engage its residents, program participants, community partners, and community residents in the process of developing the MTW Supplement.

EHA's Annual Supplement for the fiscal year beginning July 1, 2023 included waivers focusing on streamlining (triennial reviews for elderly/disabled fixed-income households under the Simple Rent initiative); housing choice (balancing allocation of turnover vouchers between PBV graduates and households on the tenant-based waiting list); cost savings (affordable housing payment standard); and self-sufficiency (voluntary THRIVE+ self-sufficiency initiative for households participating in the tiered rent study).

This amended Supplement for the fiscal year beginning July 1, 2023 will add waivers allowing EHA to flexibly spend Section 8 Housing Assistance Payments (HAP) funding and other MTW flexible funding on local non-traditional activities in support of local initiatives and EHA's 10-Year Strategic Plan. These will be implementing during the fiscal year upon HUD approval.

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	nucuj.
b. Tiered Rent (HCV)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	Currently implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	Currently implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
a.HCV Alternative Family Selection Procedures (HCV)	Currently Implementing
b.HCV Policies for Addressing Increases in Family Income (HCV)	Currently Implementing
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic	Progress (PH)
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy	(PH)
17. Local, Non-Traditional Activities	
b. Service Provision	Plan to Implement in the Submission Year
c. Housing Development Programs	Plan to Implement in the Submission Year

# C. MTW Activities Plan that Everett Plans to Implement in the Submission Year or Is Currently Implementing

# 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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the cohort-specific Rent Reform study, EHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current or the new tiered rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households, and based on current income for newly-admitted

households.

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; 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 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.

Non-elderly, non-disabled families

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a mixed citizenship status family.

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.

EHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study, and train staff. Study enrollment began in January 2023 for

households with annual reexamination dates starting in May 2023 and will continue for a full year.

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 safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.

Please describe how the income bands are structured.

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes 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.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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy will have their rent calculated using gross income from the prior 12 months (except that new admissions to the program will have their rent

calculated using current 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.

Increased revenue

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.

Non-elderly, non-disabled families

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based and project-based units occupied by families participating in the tiered rent study and who are selected to pay rent under the tiered rent policy.

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.

EHA has worked with HUD and MDRC to develop policies, procedures, and forms to implement the tiered rent study and to train staff. Study enrollment began January 2023 for households with recertifications starting in May 2023 and for new

admissions starting May 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?

Provided Already

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

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

# Other (please explain)

All deductions, including the dependent allowance and deduction for unreimbursed childcare costs, will be eliminated for

families who are part of the tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the

demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these

deductions will be able to request a hardship adjustment to their rent calculation.

# 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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

EHA will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based or tenant-based vouchers. EHA currently has a third party determine rent reasonableness on EHA units, despite the fact that many of these units are subject to rent restrictions due to other funding sources such as RAD PBV rent restrictions. EHA incurs cost and additional staff time to have these determinations

done by a third party.

### 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 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 to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Vouchers used in units owned or controlled by EHA.

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.

EHA received HUD approval for this waiver and has begun implementing it.

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.

EHA's reasonable process will include using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an EHA staff person who is trained on HCV and PBV rent reasonableness regulations. EHA will implement a streamlined process for units where the requested rent is demonstrably below market because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has HUD approval to use another local housing authority and a contracted inspector

for inspections of EHA-owned units).

No document is attached.

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

EHA uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates at least 3 unassisted rent comparables for the subject unit, matching the unit characteristics and making adjustments based on unit-specific factors, similar to the approach used by property appraisers, and determines if the rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about HCV and PBV rent reasonableness regulations reviews the comparables to confirm

that they are comparable to the subject unit.

No document is attached.

# 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

EHA has received approval for two separate waivers implementing triennial reexaminations for different household types. In FY22 (see FY22 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

In FY23 (see FY23 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled, and the household has at least 90% of their income from fixed sources. EHA is calling this initiative Simple Rent and it is part of EHA's overall streamlining

efforts under the MTW Demonstration.

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; 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 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.

Triennial reviews under the Tiered Rent Demonstration apply to non-elderly, non-disabled households who are selected to

be part of the Tiered Rent group.

Triennial reviews under the Simple Rent initiative apply to elderly and disabled households with mostly fixed income

sources.

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Tenant-based and project-based voucher units occupied by eligible families for either the Tiered Rent or Simple Rent policy.

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.

N/A for FY23 proposed (Elderly/Disabled families) - newly approved activity.

FY22 waiver implementing tiered rent for employment-focused families - HUD waiver approved and enrollment in rent study began in January 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?

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 safe harbor waiver is for Tiered Rent triennials and allows EHA to implement the tiered rent policy as designed by

HUD.

# Does the MTW activity require an impact analysis?

Provided Already

### What is the recertification schedule?

Other

For the Tiered Rent study, tiered rent households will be on a triennial reexamination schedule. No interim reviews will be made and no adjustments will be made to TTP between reexaminations unless the family requests a hardship.

For the Simple Rent initiative for primarily fixed income elderly/disabled households, a full reexamination will be done every three years, and a streamlined reexamination to apply cost of living adjustments will occur annually in between.

### 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.

FY23 approved for Qualifying Elderly/Disabled Households under Simple Rent:

If a household's income increases in between triennial reexaminations, aside from published COLAs, the family total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. Families may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a family believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. See the FY23 MTW Supplement for a full description of this hardship policy.

### FY22 approved (Tiered Rent Demonstration):

The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See the FY23 MTW Supplement for a full description of this hardship policy.

# 3.d. - Self-Certification of Assets (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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented by EHA. This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This activity contributes to our larger streamlining

initiative, which seeks to achieve greater efficiency and remove administrative barriers.

# 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.

HUD approved the waiver and EHA has implemented the waiver.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

# 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

See the FY22 MTW Supplement for a full description of this activity.

EHA will be allowed to complete HQS inspections on units that it owns. This will contribute to our streamlining and cost savings initiative, as EHA currently expends significant resources coordinating and paying third-party inspectors to

complete HQS inspections on units that the agency owns or controls.

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 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 to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW

### activity.

EHA-owned or controlled units under the tenant-based and project-based voucher program.

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.

Waiver approved by HUD and being implemented by EHA.

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

No

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

Following will explain the quality assurance method

EHA will continue to inspect units to the HQS standard found at 24 CFR 982.401, or the current standard required by HUD, and any staff conducting inspections will be trained on the HQS standard. A random sample of EHA-owned or controlled units that have been inspected by an EHA staff person will be selected for a quality control inspection by a third party. In addition, the majority of EHA-owned units with voucher assistance are also assisted with other public funding such as low-income housing tax credits, State, and or local funding which requires regular physical inspections and will provide an additional level of quality assurance. Participants will be able to request an interim inspection. EHA will obtain

the services of a third-party entity to determine if PHA-owned units pass HQS, upon the request of HUD.

No document is attached.

# 11.a.HCV - Alternative Family Selection Procedures (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

This waiver, already approved by HUD, is part of EHA's THRIVE initiative, which has the goal of increasing self-sufficiency for employment-focused households participating in the tiered rent study. Under this activity, EHA will be creating an alternative self-sufficiency program in lieu of the traditional FSS program that will be offered to households participating in the Tiered Rent study (both treatment and control group households). This program will use an alternative method of calculating escrow that is based on the family completing milestones during their contract of participation. Participants will sign a 5-year contract of participation with a potential extension up to 2 years. Self-sufficiency and economic success coaching and referrals will be provided by the specialists working with the rent study families.

Participation in the program will be optional.

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

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?

Currently assisted households only

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. Non-elderly, non-disabled families participating in the tiered rent study (both tiered rent and standard rent policy households). Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional. 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. This activity was approved by HUD and staff are in the process of developing the program parameters. Does this MTW activity require a hardship policy? Nο No document is attached. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? Does the MTW activity require an impact analysis? Nο No document is attached. Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?

No

# 11.b.HCV - Policies for Addressing Increases in Family Income (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

This waiver is part of EHA's THRIVE + initiative, the alternative self-sufficiency program offered to households in the tiered rent study, both tiered rent policy and standard rent policy households. Under this activity, EHA is implementing an alternative to the traditional FSS program that provides a milestone-based escrow deposit model, instead of the traditional model of escrow deposits based on increases in earned income. The goal for the

alternative model is to provide incentives for families to increase their earned income without tying the escrow deposits to the reexamination, since tiered rent policy households will have fewer opportunities to escrow during their contract of participation. Families will earn escrow credits for completing activities that will increase their financial and economic well-being and earning potential. The amount of escrow payout at the end of the contract of participation will be limited to

no more than the amount of HAP cost savings generated by the family based on increases in earned income during their contract of participation, so that the escrow payout is offset by increases in family earnings, similar to the traditional FSS program. Which of the MTW statutory objectives does this MTW activity serve? 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? Currently assisted households only 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. Non-elderly, non-disabled households participating in the tiered rent policy (both standard rent and tiered rent households). Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Units occupied by households participating in the tiered rent study. 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. This activity was approved by HUD and program planning is underway. Does this MTW activity require a hardship policy? Nο No document is attached. 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?

No

No document is attached.

# What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?

Escrow deposits will be made based on completion of self-sufficiency related milestones rather than specific increases in earned income, but the total escrow account amount released to the family will be limited by the amount of HAP savings resulting from increased income.

### 17.b. - Service Provision

# 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

EHA is requesting this waiver to allow for the use of HAP and other MTW funds for supportive services and related activities to support EHA residents and program participants. All activities will be in alignment with EHA's strategic plan and its mission statement to help households to thrive. Examples of activities that EHA may use MTW funding to support include paying for service coordinators at EHA-owned/controlled properties, both with and without PBVs, to connect residents to resources to enhance the quality of their lives and increase self-sufficiency and provision of high-speed internet at certain EHA-owned/controlled properties with and without PBVs. Access to internet allows residents to participate in online services, search for jobs, and complete required voucher review activities online. All activities will

support households at or below 80% of area median income.

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

Self-sufficiency; 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.

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 to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

# Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Different supportive services activities will support different program participants. For example, service coordination activities support residents of EHA-owned and controlled PBV properties.

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.

N/A - new activity

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

No

# What types of services is the MTW agency providing?

Service coordination at certain EHA-owned/controlled PBV properties; provision of high speed internet at certain

EHA-owned/controlled PBV properties

How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?

0

# Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to specific units/properties

# Describe which LNT units/properties participate in the MTW activity?

Certain EHA-owned/controlled units that offer service coordination but are not assisted with PBVs, serving households up

to 80% of area median income.

Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?

Yes

# of persons receiving LNT services only in the most recently completed PHA fiscal year.

0

# 17.c. - Housing Development Programs

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

EHA is requesting MTW authority to use MTW funds, including up to 10% of HAP, to pay for activities associated with EHA development projects. This activity is in line with EHA's strategic objective to increase the agency's housing portfolio by at least 1,500 units, primarily through new development. EHA has identified multiple projects in various phases of development or in the pipeline that may receive MTW funding through this activity, as well as the potential for additional opportunities that may be identified during the upcoming fiscal year, as housing acquisition and development is

opportunistic, particularly desirable properties in high opportunity areas and/or close to transit.

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.

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 to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Units that receive funding under this activity - specific units are to be determined.

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.

N/A - new activity

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

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Bakerview/Grandview	Rehabilitation	TBD; likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00
TBD - Future Opportunities	TBD - could be acquisition, rehabilitation, and/or new construction	TBD	0.00	0.00	0.00	0.00	0.00	0.00
Madrona Square	New construction	Permanent sponsor note	67.00	105.00	0.00	67.00	0.00	0.00
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	Land acquisition, new construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Madrona Square	New construction	Permanent sponsor note	67.00	105.00	0.00	67.00	0.00	0.00
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	Land acquisition, new construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00

# Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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# Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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I	D.	Safe Harbor Waivers.
١.	D.1	Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?
	υ. i	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.
E.1	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 Agency-Specific Waivers are being requested.
	Agency-Specific Waiver(s) for which HUD Approval has been Received:
	Does the MTW agency have any approved Agency-Specific Waivers?
E.2	Yes
	Has there been a change in how the waiver is being implemented from when it was originally approved?
	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 Total Operating Subsidement Year (FFY) Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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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.	# 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.	# 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:

I NAME/							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 Everett'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
Stepped and Tiered Rent Demonstration. EHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. EHA will be studying a Tiered Rent model. An independent research team lead by MDRC will work with HUD, EHA, and the other selected PHAs to assist in implementation and evaluate the effects of the alternative rent policy.	James Riccio, MDRC James.Riccio@mdrc.org	July 1, 2022 through June 30, 2028	

# Section 2: Capital Fund Program 5-Year Action Plan

# Capital Fund Program - Five-Year Action Plan

Status: Draft Approval Date: Approved By: 02/28/2022

Part I: Summary								
PHA Name: Housing Authority of the City of Everett		Locality (City/County & State)  X Original 5-Year Plan		☐ Revised 5-Year Plan (Revision No:		)		
PHA Number: WA006								
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		
	AUTHORITY-WIDE	\$849,606.00	\$849,606.00	\$849,606.00	\$849,606.00	\$849,606.00		

Part II: Supporting Pages -	Physical Needs Work Statements (s)
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Work Statement for Year 1

2023

WOIR State	Work Statement for Year 1 2023					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	<b>Estimated Cost</b>		
	AUTHORITY-WIDE (NAWASD)			\$849,606.00		
ID0017	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements.		\$1,000.00		
ID0033	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan		\$847,606.00		
ID0034	Audit(Contract Administration (1480)-Audit,Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Audit fees		\$1,000.00		
	Subtotal of Estimated Cost			\$849,606.00		

Audit(Contract Administration (1480)-Audit)

Subtotal of Estimated Cost

ID0043

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)						
Work State	ment for Year 2	2024					
Identifier	Development Number/Name		General Description of Major Work Categories	Quantity	<b>Estimated Cost</b>		
	AUTHORITY-WIDE (NAWASD)				\$849,606.00		
ID0029	Management Fees(Administration (1410)-Salaries)		Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements		\$1,000.00		
ID0042	Moving to Work Initiatives(MTW (1492))		Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan.		\$847,606.00		

Audit Fees

\$1,000.00

\$849,606.00

Work Statement for Year 3

2025

,, 0111 5 666 6	Work Statement for Tear 5						
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost			
	AUTHORITY-WIDE (NAWASD)			\$849,606.00			
ID0031	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements		\$1,000.00			
ID0045	Moving to Work Initiatives(MTW (1492))	Moving to work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in out Moving to Work plan.		\$847,606.00			
ID0046	Audit(Contract Administration (1480)-Audit)	Audit Fees		\$1,000.00			
	Subtotal of Estimated Cost			\$849,606.00			

Subtotal of Estimated Cost

Part II: Sup	Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Stater	Work Statement for Year 4 2026					
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost		
	AUTHORITY-WIDE (NAWASD)			\$849,606.00		
ID0022	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements		\$1,000.00		
ID0036	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan		\$847,606.00		
ID0037	Audit(Contract Administration (1480)-Audit)	Audit fees		\$1,000.00		

\$849,606.00

Part II: Supporting Pages -	Physical Needs Work Statements (s)	
Work Statement for Year	5	2027

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$849,606.00
ID0047	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements		\$1,000.00
ID0048	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan		\$847,606.00
ID0049	Audit(Contract Administration (1480)-Audit)	Audit fees		\$1,000.00
	Subtotal of Estimated Cost			\$849,606.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1 2023	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Fees(Administration (1410)-Salaries)	\$1,000.00
Moving to Work Initiatives(MTW (1492))	\$847,606.00
Audit(Contract Administration (1480)-Audit,Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	\$1,000.00
Subtotal of Estimated Cost	\$849,606.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 2 2024	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Fees(Administration (1410)-Salaries)	\$1,000.00
Moving to Work Initiatives(MTW (1492))	\$847,606.00
Audit(Contract Administration (1480)-Audit)	\$1,000.00
Subtotal of Estimated Cost	\$849,606.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 3 2025	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Fees(Administration (1410)-Salaries)	\$1,000.00
Moving to Work Initiatives(MTW (1492))	\$847,606.00
Audit(Contract Administration (1480)-Audit)	\$1,000.00
Subtotal of Estimated Cost	\$849,606.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4 2026	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Fees(Administration (1410)-Salaries)	\$1,000.00
Moving to Work Initiatives(MTW (1492))	\$847,606.00
Audit(Contract Administration (1480)-Audit)	\$1,000.00
Subtotal of Estimated Cost	\$849,606.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 5 2027	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Fees(Administration (1410)-Salaries)	\$1,000.00
Moving to Work Initiatives(MTW (1492))	\$847,606.00
Audit(Contract Administration (1480)-Audit)	\$1,000.00
Subtotal of Estimated Cost	\$849,606.00