



**Annual PHA Plan and  
MTW Supplement**  
**July 1, 2022 to June 30, 2023**  
*Public Review Draft*

## Everett Housing Authority's Proposed PHA Annual Plan & MTW Supplement

### Effective July 1, 2022

Public review period runs January 14 through February 27, 2022.

During the public review period written comments on the draft Plan and Supplement may be submitted by mail (Everett Housing Authority, PO Box 1547, Everett, WA 98206, Attn: Chris Neblett), or via email to [chrisn@evha.org](mailto:chrisn@evha.org).

The Housing Authority's Board of Commissioners will hold a public hearing by video conference and telephone to receive public comments on the proposed PHA Annual Plan on **Monday, February 28, 2022**. The Board meeting will be called to order at 12:00 PM and the hearing will begin **at 12:15 PM**. Participants can join the meeting via Zoom videoconference by going to [www.zoom.us/join](http://www.zoom.us/join) and using meeting ID 673-982-739 or by phone by dialing (253) 215-8782 and using meeting code 673-982-739 and password 514202.

Persons with disabilities or limited English proficiency requiring assistance or accommodations to participate fully in the hearing should contact Chris Neblett at (425) 303-1186, or via email at [chrisn@evha.org](mailto:chrisn@evha.org), by February 12, 2022.

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

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

**Definitions.**

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

A.	PHA Information.																								
A.1	<p> <b>PHA Name:</b> Housing Authority of the City of Everett <span style="float: right;"><b>PHA Code:</b> WA 006</span>  <b>PHA Type:</b> <input checked="" type="checkbox"/> Small  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): 07/2022  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) 245  <b>Number of Public Housing (PH) Units</b> 245    <b>Number of Housing Choice Vouchers (HCVs)</b> 3,369  <b>Total Combined</b> 3,614  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission    <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> Everett Housing Authority's proposed 2022-23 Annual Plan is available for public review at the following locations: <ul style="list-style-type: none"> <li>EHA's website: <a href="http://www.evha.org">www.evha.org</a></li> <li>EHA's main administrative office at 3107 Colby Avenue, Everett, WA is currently closed to the public as an emergency measure to limit the spread of the COVID 19 coronavirus. Members of the public who wish to make arrangements to review the proposed Plan and related material should call (425) 626-0108.</li> </ul> </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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<b>B.</b>	<b>Plan Elements Submitted with 5-Year PHA Plans.</b> Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).					
<b>B.1</b>	<b>Revision of Existing PHA Plan Elements.</b>  (a) Have the following PHA Plan elements been revised by the PHA since its last <b>Five-Year PHA Plan</b> submission?  Y   N <input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input type="checkbox"/> Financial Resources. <input type="checkbox"/> <input type="checkbox"/> Rent Determination. (check w/Janinna re MTW) <input type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input type="checkbox"/> Pet Policy. <input type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification  (b) If the PHA answered yes for any element, describe the revisions for each element(s):  (c) The PHA must submit its Deconcentration Policy for Field Office Review.					
<b>B.2</b>	<b>New Activities.</b>  (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?  Y   N <input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.					
<b>B.3</b>	<b>Progress Report.</b>  Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. Although this section is not a required part of the Annual Plan submission, EHA is submitting a summary of key accomplishments over FY 2021-22 as attachment a01.					

<b>B.4</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
<b>B.5</b>	<b>Most Recent Fiscal Year Audit.</b> (a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> (b) If yes, please describe:
<b>Plan Elements Submitted All Other Years (Years 1-4).</b> Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.	
<b>B.2</b>	<b>New Activities</b> (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. <b>see attachment b01</b> (c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan. <b>see attachment b01</b> (d) The PHA must submit its Deconcentration Policy for Field Office Review. N/A. EHA no longer has any occupied public housing units; therefore, a deconcentration policy is not applicable.
<b>B.4</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/07/2020.
<b>C</b>	<b>Other Document or Certification Requirements for Annual Plan Submissions.</b> Required in all submission years.
<b>C.1</b>	<b>Resident Advisory Board (RAB) Comments.</b> (a) Did the RAB(s) have comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/>

	<p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <b>see attachment c01</b></p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>see attachment d01</b></p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>see attachment e01</b></p>
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N</p> <p><input type="checkbox"/>   <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D.	<b>Affirmatively Furthering Fair Housing (AFFH).</b>					
D.1	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item</p> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>EHA is not subject to the AFH reporting requirement to date; however, an updated Analysis of Impediments to Fair Housing Choice was completed on May 16, 2019.</p> </td> </tr> </table> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </td> </tr> </table> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> </table>	<b>Fair Housing Goal:</b>	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>EHA is not subject to the AFH reporting requirement to date; however, an updated Analysis of Impediments to Fair Housing Choice was completed on May 16, 2019.</p>	<b>Fair Housing Goal:</b>	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>	<b>Fair Housing Goal:</b>
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*Describe fair housing strategies and actions to achieve the goal*

## Instructions for Preparation of Form HUD-50075-SM Annual Plan for Small PHAs

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

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

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

**B. Plan Elements.** PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

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

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

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

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

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

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

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



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

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

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

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

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

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

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

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

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

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including name, 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; 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. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). ([24 CFR §903.7\(h\)](#))

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

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental 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 ([24 CFR §903.7\(b\)](#)).

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

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

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

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

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

**B. Annual Plan Elements Submitted All Other Years (Years 1-4).** PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

**B.1 New Activities.** If the PHA intends to undertake any new activities related to these elements 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 or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for HOPE VI or Choice Neighborhoods is a separate process. See guidance on HUD’s website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6) . (Notice PIH 2010-30)

☐ **Mixed Finance Modernization or Development.** 1) A description of any housing (including 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:

<http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

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

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental 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.2 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.”

**C. Other Document and/or Certification Requirements.**

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

**C.2 Certification by State or 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 CRT-SM, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077 CRT-SM, *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 (AFFH).**

**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 in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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

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

**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.

### **Key Accomplishments during Plan Year 2021-22**

#### **As it relates to 5 Year Plan Goal 1 -- Create 1,500 EHA-owned or supported housing units by 2030 primarily through new development:**

- Began construction of 105 tax credit units on a 2.45-acre parcel of the Baker Heights neighborhood through a tax credit partnership, Everett Housing Legacy LLLP, to include 67 Project-Based Voucher (PBV) units designated for extremely low-income homeless families with children enrolled in Everett Public Schools.
- Initiated plans for a new mixed-income community, the Park District, on the remaining 12.33-acres of the Baker Heights site. This project will encompass as many as 1,500 residential units, parks, and other community amenities, all of which will be constructed in phases.
- Purchased adjacent parcels (3826 Rucker, 1311 39<sup>th</sup> St.) in Everett for the development of up to 150 units of senior housing.
- Authorized disposition of Royal Oakes, a 16-unit complex unencumbered by use restrictions or debt, the sale of which is anticipated to result in net proceeds of around \$1.5 million, which can potentially be leveraged through tax credits, debt, or public funding to acquire around 100 housing units.
- Began negotiations to purchase the 381-unit Huntington Park Apartments near Everett Mall with the goal of preserving the property as workforce housing.
- Explored the use of bond financing to generate a new source of development and acquisition funding, contingent on receiving a credit rating from Standard and Poor's.

#### **As it relates to 5 Year Plan Goal 2 – Direct our resources towards creating diverse, healthy communities of opportunity where children and adults flourish:**

- Executed a Moving to Work (MTW) Agreement with HUD in conjunction with EHA's selection to join the MTW Demonstration's rent reform study group.
- Began developing MTW program initiatives around EHA's vision of "thriving resident households," which will begin to be implemented in the upcoming Plan year. MTW's funding flexibilities will allow around \$4.5 million in Public Housing operating funds to be directed toward achieving EHA's strategic objectives.
- Began working with a team of graduate students from the Evans School of Public Policy and Governance at the University of Washington to develop an agency definition of communities of opportunity and identify those areas in our community, grounded in EHA's mission to replace systemic racism with equity for all.
- The Resident Services Department engaged in the following activities in conjunction with this goal:
  - Delivered lunches to vulnerable seniors and adults with disabilities at EHA properties in partnership with Homage Senior Services. Boxes of produce were also delivered to families at several properties in conjunction with the County's Nourishing Neighborhoods program up until August 2021, when residents communicated a decreased need for this resource.
  - Partnered with two local pharmacies to provide on-site flu shots at 12 properties in September 2021. Partnered with the Snohomish Health District to provide on-site Covid-19 vaccine boosters for more than 500 residents at 19 properties in November 2021.
  - Increased the FSS program's capacity by hiring a second FSS Coordinator, which will enable the addition of 35 new families to the program by June 2022. Over the course of the current Plan year, 12 families are anticipated to successfully graduate from the FSS program with a collective average escrow savings account of \$14,443. The expansion of FSS program resources will exhaust the FSS program waitlist for the first time in five years, and a new outreach effort is underway to recruit new families for participation in this program.
  - Reinstated plans to implement programs and strategies aligned with the results of a Community Health Survey administered in 2019, which were delayed over this time of remote work during the COVID pandemic.

**As it relates to 5 Year Plan Goal 3 – A workplace where every employee is proud of their contribution to EHA’s mission.**

- Administered a customer service survey across programs (HCV, Senior Properties, Family Properties) to measure resident and program participant levels of satisfaction with services provided by EHA staff during the second year of the COVID pandemic, when most staff were working remotely.
  - Customer satisfaction ratings averaged in the mid to high 90s, demonstrating the high level of professionalism and engagement by EHA employees during this challenging time.
- Adopted a Remote Work Policy enabling EHA employees to continue to work remotely up to full-time depending on position, in advance of staff returning to work in person (anticipated as March 1, 2022) after a lengthy period of most staff working remotely during the COVID pandemic.
  - During this time of remote work, EHA refined its remote work tools and processes so that employees were able to effectively perform their job duties and be proud of their contribution to EHA’s mission.
- Adopted a Financial Incentives Program to increase retention of current staff, reward staff who recruit external candidates for vacant EHA positions, and encourage existing staff to apply for and fill higher level vacant positions within the agency.
- Developed a new annual employee performance evaluation system -- based on feedback from a staff survey and assistance from a cross-departmental Performance Evaluation committee – to make it more objective and linked to agency values and goals.
- Continued to hold virtual Townhall Meetings during this time of remote work due to COVID that kept staff informed and engaged in carrying out the agency’s mission.

**As it relates to 5 Year Plan Goal 4 – The race – as well as other physical or social characteristics or sexual orientation – of any client or staff will have no impact on how they fare in EHA’s programs or their potential in the organization:**

- Adopted Juneteenth as an agency holiday, reflecting the agency’s commitment to make Diversity, Equity, and Inclusion an organizational imperative.
- Offered a required training on implicit bias to all EHA staff to increase staff awareness and tools to identify and mitigate these biases.
- Reinstated the Limited English Proficiency committee, which will develop an updated Language Access Plan and additional resources for the agency to better serve people with limited English proficiency.
- Developed tools and processes to help staff successfully handle racist actions by EHA tenants, either toward other tenants or toward EHA staff.
- Continued to partner with NAHRO, GARE, C3, and Leadership Snohomish County, to amplify and enhance DEI effectiveness.

**EHA intends to undertake the following activities over the course of FY 2022-23:**

Hope VI or Choice Neighborhoods

EHA is exploring the possibility of applying for a Choice Neighborhoods Implementation grant for the Baker Heights neighborhood over the course of Plan year 2022-23. EHA has not received a Planning grant but is currently engaged in a planning process for the neighborhood, referred to as the “Park District”, that is consistent with the vision of the Choice Neighborhoods Initiative.

Demolition and/or Disposition

EHA plans to begin demolition of remaining units in the Baker Heights neighborhood (WA 006 000 100) during calendar year 2022, subject to HUD approval, and may use Public Housing Capital Funds to finance part of the cost of this activity. This activity is in preparation for development of a new mixed-income community, the Park District, on the remaining 12.33-acres of the Baker Heights site. This new development will encompass as many as 1,500 residential units, parks, commercial spaces, and other community amenities to be built in phases.

Project-Based Vouchers

In conjunction with the ongoing construction of 105 tax credit units on a portion of the Baker Heights neighborhood (Baker Heights Legacy) through an affiliate, Everett Housing Legacy LLLP, EHA has executed an Agreement to Enter into a Housing Assistance Payments Contract (AHAP) for 67 Project-Based Voucher (PBV) units designated for extremely low-income homeless families with children in the McKinney-Vento program through Everett Public Schools. EHA also plans to provide 22 Project-Based Vouchers for Housing Hope’s Twin Lakes Landing II, housing designated for homeless families with children in the McKinney-Vento program.

EHA has submitted RAD confirmations of interest to HUD for a portfolio conversion of 9 HUD 202 PRAC properties to Project Based Vouchers and has submitted 8 of the 9 RAD applications to HUD. Conversions to PBV contracts are planned to occur from May 2022 to April 2023. There are a total of 369 PBV units at the following locations:

- 39 PBV units – Meadow Park - 1611 128th Street SW, Everett, WA
- 39 PBV units – Scriber Pointe - 19912 Scriber Lake Road, Lynnwood, WA
- 59 PBV units – Lake Woods - 12310 19th Place W, Everett, WA
- 39 PBV units – Evergreen Village - 12705 Avondale Way, Everett, WA
- 39 PBV units – Hawkins House - 9433 N Davies Road, Lake Stevens, WA
- 39 PBV units – Silver View - 11109 16th Avenue SE, Everett, WA
- 39 PBV units – Lynn Crest - 4629 194th Street SW, Lynnwood, WA
- 38 PBV units – Evergreen Court - 10809 16th Avenue SE, Everett, WA
- 38 PBV units – Village East - 864 Village Way, Monroe, WA

If HUD approves EHA’s RAD applications, EHA will receive 369 vouchers from HUD to project-base at the properties. Conversion of the HUD 202 PRAC portfolio to PBV contracts will ensure that the properties have sufficient funds available to address the capital needs of the properties over the long-term while maintaining ongoing rental assistance and support services for the residents to meet their needs.

Over the course of Plan year 2022-23 EHA may consider making other PBV commitments in support of its Five-Year Plan objective to target populations whose needs have either been neglected or will grow substantially in the next

decade, including but not limited to households with children, especially homeless families, and elderly households and individuals.

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**Resident Advisory Board Comments on Proposed 2022-2023 Annual Plan**

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Wednesday, December 16, 2021, to receive comments and recommendations related to the development of the 2022-23 Annual Plan. This meeting took place via Zoom videoconference as an emergency measure to decrease the spread of the COVID-19 coronavirus. Residents and program participants who attended this meeting were appointed to the RAB.

The following EHA staff members attended the meeting: Wendy Westby (HCV Program Director), Steve Yago (Deputy Director of Development), Janinna Attick (Sr. Policy Analyst), Chris Neblett (Hearing Officer/Admin Coordinator)

The following RAB members attended the meeting:

*Broadway Plaza (PBV program):* Risa Meinke, Pedro Reyes-Sanchez

*Grandview (RAD PBV program):* Kellie Fletcher

*Project-Based Voucher Program:* Elizabeth Edwards (Housing Hope New Century Village)

*Tenant-Based Voucher Program:* Sharon Jones

EHA staff members gave a presentation on the agency's planned activities to further its Five-Year Goals and Objectives over the course of the 2022-23 Annual Plan year. RAB members provided comments during and after this presentation. The RAB's comments and EHA's preliminary response specific to each are provided in the section below.

EHA will issue a final response to the RAB's comments, as well as all other public comments received during the public review period and at the February 28 public hearing on the Annual Plan, with the final iteration of the Plan that will be presented for approval by the Board of Commissioners at its March 28 regular meeting,

**RAB Comments/EHA's Response:**

1. Establish a jobs program for program participants, including residents of senior/disabled buildings, as an MTW demonstration activity.

*Although the MTW demonstration program's original intent was to encourage program participants to gain stable employment and increase their income, it has since evolved to allow PHAs to waive certain Voucher program regulations and be flexible with their funding in order to be able to design and test local strategies that assist program participants in gaining self-sufficiency.*

*EHA will concentrate its initial MTW demonstration activities around a study of rent reform for a non-elderly, non-disabled program participants: i.e.: streamlining the income calculation and revising rent policies to only account for income increases every three years. There are external programs that allow elderly or disabled persons to work a certain amount while retaining their benefits, and EHA will consider incorporating one or more of these programs into the plans and services it will offer to residents under MTW over the coming years.*

2. Consider revising subsidy standards that determine the bedroom size of a Voucher based on family size and composition so that parents, as well as children of the opposite sex, are assigned their own bedroom.

*Current subsidy standards for the HCV program assign one bedroom for the head of household and spouse co-head and one additional bedroom for every two children, regardless of gender or age.*

*EHA leaves it up to the Voucher holder to decide how their family will occupy the bedrooms in their home. For example, parent(s) may elect to convert a den or portion of a dining area to a sleeping space so that each child may have his and her own bedroom. In addition, a Voucher holder is permitted to lease a unit that has more bedrooms than the size of the Voucher issued, as long as the amount is within the family's rent cap, although the current rental market can make this challenging. Also, families who need an extra bedroom as a reasonable accommodation for a disability, such as to enable a live-in aide to reside in the unit, can request an accommodation from EHA.*

*EHA plans to retain its current subsidy standards in order to assist the maximum number of families with the amount of Voucher program funding HUD currently provides.*

3. Create a program that would give elderly program participants the opportunity to volunteer as mentors for families with children.

*EHA agrees that this would be beneficial to both the volunteer seniors as well as the families served, especially in multigenerational housing such as the Baker Legacy project currently under construction. EHA will explore the possibility of creating opportunities to create mentoring programs and affinity groups as an MTW activity.*

4. Develop systems to assist the growing homeless population in our area; especially those who are housing challenged due to drug or alcohol abuse, while also maintaining the rights of other residents to safe and orderly housing.

*EHA's mission as a provider of affordable housing includes a commitment to foster healthy communities where households thrive. That said, the agency is not organized to provide treatment services for housing applicants or program participants with negative behaviors stemming from the abuse of drugs or alcohol. Unfortunately, the need within our community for such services far exceeds the supply.*

*The eviction moratorium that was in effect during COVID made it difficult for landlords to pursue evictions for nuisance behaviors, including those tied directly to drug and alcohol abuse. The moratorium ended in November 2021, removing grey legal areas that served as barriers that inhibited landlords from enforcing lease provisions related to antisocial behaviors. As evictions for nuisance behavior pick up there will likely be a corresponding uptick to the homeless population comprised of those who are evicted. Unfortunately, there is no "safe landing" for those who are evicted based on health and safety infractions, as there is not enough affordable housing for everyone who needs it.*

**PHA Name :** Everett

**PHA Code :** WA006

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

**PHA Program Type:** Combined

**MTW Cohort Number:** 2

**MTW Supplement Submission Type:** Annual Submission

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## **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.

In the short term, EHA plans on using the fiscal year beginning July 1, 2022, when our first MTW Supplement will go into effect, to focus on implementing the Tiered Rent study, achieving greater administrative efficiencies across HUD programs, and making the PBV program work better. To that end, the specific MTW waivers that EHA is including in this year's supplement will be in support of those efforts.

EHA anticipates that a significant amount of staff effort will be focused on learning, resident outreach, and implementation of the Tiered Rent study during this first year. Streamlining other areas of program administration, such as allowing for self-certification of assets under \$50,000 and reducing the frequency of activities such as HQS inspections, will enable staff to dedicate more time to the demonstration and to supporting participant households.

As a first step toward implementing the housing choice and mobility initiative, during the first half of 2022, EHA will be partnering with graduate students at the University of Washington's Evans School of Public Policy & Governance who will support EHA in defining and identifying Communities of Opportunity in our operating area. The results of their work will be used over the course of EHA's participation in the MTW demonstration to support voucher holders in moving to opportunity areas as well as to inform future development activities.

In furtherance of EHA's goal to make the PBV program work better, we will be rebalancing issuance of turnover vouchers between households moving from PBV units and households being assisted from the tenant-based waiting list. We will also request a waiver that will address a challenge in our Rental Assistance Demonstration (RAD) PBV units, where households lose their voucher assistance at relatively low income levels due to the low rents, and then are not able to reactivate voucher assistance if they experience an income decrease later on.

All of our efforts will be guided by our vision of Thriving Resident Households and our commitment to engaging residents in the development and implementation of MTW in Everett.

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

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

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

<b>1.b. - Tiered Rent (HCV)</b>
As part of the cohort-specific Rent Reform study, EHA will be comparing a tiered rent policy to the traditional rent policy. Qualifying families will be randomly selected to either pay under the current or tiered rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The family's rent will be based on 28% of the midpoint of the income tier corresponding to the family's income. Income will be calculated based on the family's gross income for the prior year.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased revenue Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded for one of the other reasons listed above.
N/A - this is a new activity for the agency.

<p>This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>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.</p>
<p>Please see attached tiered rent policy table that shows the income bands.</p>
<p>The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.</p>
<p>This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) This activity uses different definition of income because we are using the following MTW waivers: 1.r. and/or 1.s. "elimination of deductions"</p>

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<p><b>1.s. - Elimination of Deduction(s) (HCV)</b></p>
<p>As part of the Rent Reform demonstration, 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).</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Increased revenue</p>

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: All tenant-based and project-based units occupied by families participating in the Rent Reform demonstration and who are selected to pay rent under the tiered rent policy.
N/A
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.s. - Elimination of Deduction(s) (HCV) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.s. - Elimination of Deduction(s) (HCV) 3.b. - Alternative Reexamination Schedule for Households (HCV)
Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs 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 Rent Reform demonstration 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.

<b>2.c. - Rent Reasonableness – Process (HCV)</b>
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following method is used to determine rent reasonableness and the motivations for using a method different from the standard method:

<b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>
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. This waiver is part of EHA's overall goals to use MTW flexibility to streamline and reduce costs.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures



An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types
This MTW activity applies to the following housing choice voucher unit types: Units owned or controlled by EHA.
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following will explain 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, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations reviewed by a third party annually as a further quality assurance measure. and attached for quality assurance method
Following will explain 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 owner's requested rent 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. and attached for rent reasonableness determination method

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
Families who are part of the Rent Reform demonstration and are selected to pay rent under the tiered rent policy will be placed on a triennial (every 3 years) reexamination schedule. The anticipated outcome from this change is that families will have an incentive to increase their earned income between reexaminations, as they will get to keep 100% of their additional earnings, instead of having to pay 30% of their additional earnings toward rent at the time of their next interim or annual reexamination as applicable. This is also anticipated to decrease the staff time required to complete annual and interim reexaminations, although the benefit will be moderated by the need to provide hardship exemptions for some families.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased revenue Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: Tenant-based and project-based voucher units occupied by families who are participating in the Rent Reform demonstration and are selected to pay rent under the tiered rent policy.
N/A
This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.s. - Elimination of Deduction(s) (HCV) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.s. - Elimination of Deduction(s) (HCV) 3.b. - Alternative Reexamination Schedule for Households (HCV)
Recertification Schedule is Once every three years
Household may request 0 interim recertifications per year.
In accordance with the policies established for the Rent Reform demonstration, families who are selected to pay under the tiered rent policy will have their income reexamined every 3 years. If the family experiences a decrease in income that would place the family in a lower rent tier, in lieu of an interim reexamination, the family can request a hardship rent. The hardship rent will be provided for up to 12 months and if the hardship persists, the family can request one or more renewals, up until the family's next triennial reexamination.

<b>3.d. - Self-Certification of Assets (HCV)</b>
EHA will allow participants to self-certify assets of less than \$50,000 upon reexamination. This will contribute to EHA's streamlining initiative, as a significant amount of staff time goes to requesting and collecting verification documents for assets that have a negligible to no impact on the amount of HAP that the agency pays. It will also benefit assisted families by decreasing the amount of paperwork required.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

<b>5.c. - Third-Party Requirement (HCV)</b>
EHA will be allowed to complete HQS inspections on units that it owns. This will contribute to EHA's 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. EHA has a significant portfolio of PBV-assisted units as well as several unsubsidized properties that may be occupied with tenant-based voucher holders. EHA currently pays an independent entity to complete these inspections, which are in addition to regular inspections that EHA staff complete as well as inspections by other public funders such as the Washington State Housing Finance Commission, since most of these properties have other public funding.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types
This MTW activity applies to the following housing choice voucher unit types: Project-based voucher units and units occupied by EHA tenant-based voucher participants who live in units owned or controlled by EHA.
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Everett MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The quality assurance method: Following will explain the quality assurance method – A random sample of EHA-owned or controlled units that have been inspected by an EHA staff person will be randomly 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. If [Upload file] options- Display 'Attached for quality assurance method"

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

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

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		<b>0</b>

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

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

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

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.	Nina Castells, MDRC. Nina.Castells@mdrc.org	July 1, 2022 through June 30, 2028	

**Everett Housing Authority  
Tiered Rent Table**

<b>Rent Tier</b>	<b>Tier Annual Gross Income Minimum</b>	<b>Tier Annual Gross Income Maximum</b>	<b>Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)</b>
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896
34	\$82,500	\$84,999	\$1,954
35	\$85,000	\$87,499	\$2,012
36	\$87,500	\$89,999	\$2,071
37	\$90,000	\$92,499	\$2,129
38	\$92,500	\$94,999	\$2,187



[Continued from Previous Page]			
Rent Tier	Tier Annual Gross Income Minimum	Tier Annual Gross Income Maximum	Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)
39	\$95,000	\$97,499	\$2,246
40	\$97,500	\$99,999	\$2,304
41	\$100,000	\$102,499	\$2,362
42	\$102,500	\$104,999	\$2,421
43	\$105,000	\$107,499	\$2,479
44	\$107,500	\$109,999	\$2,537
45	\$110,000	\$112,499	\$2,596
46	\$112,500	\$114,999	\$2,654
47	\$115,000	\$117,499	\$2,712

*The 2021 Median Family Income for the Seattle-Bellevue Metropolitan Area, as determined by HUD, is \$115,700, which is partway through Rent Tier 47.*

## Hardship Policy for Tiered Rent Study

### *What is a Hardship Exemption?*

There are generally two categories of hardship exemptions that a family participating in the Tiered Rent group can receive. ("Family" is defined by EHA to include households of a single person, couples, and households with and without children.)

Type of Hardship Exemption	Who Requests?	When?
Automatic	EHA	At triennial (every three years) recertification, based on information provided by the family as part of the recertification.
Requested by Family	Participant Family	<p>Between triennial recertifications, if the family has a life event or change in circumstance that presents a hardship for the family to afford their calculated rent payment</p> <p>At triennial recertification, if the information used to calculate the family's rent payment does not accurately reflect their current circumstances, and their calculated rent payment would present a hardship</p>

### *What Does EHA Consider a Hardship?*

EHA considers the following situations to be hardships:

- For automatic hardships:
  - Your family qualifies for a large exemption under the traditional rent policy due to such factors as having 4 or more dependents or unreimbursed child/dependent care expenses over \$2,500 at the time of your triennial reexamination.
- For hardships requested by the family:
  - Your family has a loss of income that would drop the family into a lower rent tier than the one that you are currently
  - Your family has had a loss of income and the 12-month period used to calculate your new rent at your recertification does not reflect your current income
  - Your family experiences a new or increased unreimbursed child/dependent care expense of over \$2,500 per year/\$209 per month
  - Your family faces another unexpected situation, such as a major medical expense, and requires temporary rent relief to avoid eviction or a similar situation

To qualify for a hardship exemption, you must:

- Be following all program rules and regulations
- Not owe EHA any money, or if you do owe money, you have a repayment agreement in place and you are current on your payments

### ***What Help Can I Get Under the Hardship Policy?***

If your hardship request is approved, your temporary new rent will be lower than the assigned tiered rent.

- For child care expenses, the family will be placed in the rent tier that matches their income after deducting any unreimbursed child care expenses.
- For families with 4 or more dependents, the family's rent will be reduced by one tier from the tier that corresponds to their income.
- For family-requested hardships, the temporary rent will be based on the rent tier that corresponds to the family's reduced income, or based on the rent tier that corresponds to the family's income after deducting any extraordinary expenses.

### ***How Long Will My Reduced Rent Last?***

The hardship rent is temporary and will last between 1 and 12 months. EHA will work with you to determine how long the hardship rent should last, based on your family's circumstances, including how long you expect to have a lower income.

Generally, automatic hardships due to child care expenses over \$2,500 and/or having 4 or more dependents will be approved for 12 months, and the family can request additional renewals as long as the circumstance leading to the hardship (child care expenses, 4 or more dependents) will continue.

For family-requested hardships, the hardship rent will generally be granted for:

- 6 months if the hardship is expected to last between 3 and 6 months
- 9 months if the hardship is expected to last between 6 and 9 months
- 12 months if the hardship is expected to last for more than 9 months

The family can request extensions of the hardship rent prior to its expiration if the circumstance requiring the hardship rent continues.

### ***How Do I Request a Hardship Exemption?***

EHA will remind you of this Hardship Policy during the intake and reexamination processes.

EHA will provide automatic hardship exemptions based on the information you provide at your triennial recertification.

You will be able to request a hardship exemption at any time between triennial recertifications. The application process will be done via RENTCafé and will be similar to the current process for requesting an interim review when you have a change of circumstance.

EHA will also consider if you qualify for a hardship exemption at the time of a potential termination of assistance related to the Tiered Rent policy.

### ***How Will EHA Review My Hardship Request?***

All family-initiated hardship requests will be reviewed by a staff supervisor to ensure consistency in the review process. EHA will strive to review hardship requests within 10 business days of receiving a request and all documentation needed to process the request. EHA will prioritize requests where the family is on the verge of eviction or similar consequences.

### ***What Happens if EHA Does Not Approve My Hardship Request?***

If your hardship request is not approved, or if you think that you should have received an automatic hardship and you did not, you will be able to appeal EHA's determination of your monthly rent.

If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by EHA's Hearing Officer.

### ***What Happens When My Hardship Expires?***

You can request a renewal of your hardship rent if it is expiring and your family continues to experience a hardship.

Once the hardship rent and any extensions expire, your rent will return to the tiered rent assigned at your most recent triennial recertification until your next triennial recertification is completed or unless you are approved for a new hardship.

**Everett Housing Authority  
MTW Tiered Rent Impact Analysis**

<b>MTW Activities Covered by Impact Analysis</b>	1.b. Tiered Rent (HCV) 1.s. Elimination of Deductions (HCV) 3.b. Alternative Reexamination Schedule for Households (HCV)
<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>	
<p>The estimated average change in total tenant payment (TTP)/rent paid by families under the tiered rent policy as compared with the current policy is -\$8. Aggregating this average across the approximately 460 families estimated to be in the tiered rent group generates a modest increase in HAP costs to the agency of about \$44,000 per year.</p> <p>It is also possible that families in the tiered rent group will increase their incomes between triennial reexaminations, resulting in higher HAP expenditures for these families than would have been spent under the current rent policy due to not capturing HAP savings from income increases. However, it is difficult to estimate the difference between the HAP that would have been paid under the current rent policy compared with the new rent policy over time. The rent reform demonstration should provide a new source of data for EHA, HUD, and other PHAs on the costs and benefits of triennial reexaminations.</p>	
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>	
<p>As noted above, the estimated average change in TTP/rent across all families in the tiered rent group is -\$8. 70% of families in the tiered rent group are expected to see either no change in their TTP/rent, or a decrease in their rent.</p> <p>About half (49%) of families are expected to see a rent decrease under the tiered rent policy. 21% are expected to see no change. 30% are expected to see a rent increase; however only 5% of households will see a rent increase of \$50 or more.</p> <p>Families who experience a rent increase under the tiered rent policy will have the ability to request a hardship exemption to mitigate the impact of the policy. 41% of families expected to have a rent increase have 4 or more dependents and another 14% have child care expense or other deductions that exceed \$2,500.</p> <p>All families who are expected to see an increase of \$50 or more will likely qualify for either the child care expense hardship or the hardship for 4 or more dependents which will reduce or eliminate any rent increase they experience.</p>	
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>	
<p>It is possible that a small number of families who are part of the tiered rent group could increase their income between triennial reexaminations to such a level that they would continue to receive HAP assistance for longer than they would under the current policy, if their income increases enough for them to afford the full rent. However, the impact on turnover is expected to be very small within the overall scope of EHA's program size.</p>	

<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
No expected impact
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
<p>The Tiered Rent demonstration is expected to have a positive impact on EHA's ability to meet the statutory goals of cost effectiveness and self-sufficiency. Moving to triennial reexaminations and eliminating deductions, combined with some of the other streamlining waivers EHA plans to request, is expected to reduce staff time associated with annual reexaminations; however, this will be somewhat mitigated by the time spent review hardship requests.</p> <p>Not requiring families to report income increases between triennial reexaminations is expected to provide an incentive for families to increase their earned income since they will be able to keep more of their earned income between reexaminations, which will contribute to the MTW statutory goal of self-sufficiency.</p> <p>Because the tiered rent calculation will use gross instead of adjusted income, EHA will also calculate the initial family share using gross instead of adjusted income. In other words, at initial occupancy, tenant-based voucher participants will now be able to lease a unit with rent plus utility costs equal to 40% of their gross, rather than adjusted, income. This could have a modest benefit to families in increasing their housing choice, especially families with significant deductions.</p>
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
No expected impact
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>
<p>Families who are selected to pay tiered rent are anticipated to request a higher number of hardships than under the current rent policy, as a result of the loss of deductions and interim reviews. Families who have a significant number of dependents, and/or families who have significant unreimbursed child care expenses, are expected to be the most likely to receive hardship exemptions.</p> <p>Based on EHA's analysis, about 172 households, or about 19% of households eligible for the rent study, currently have 4 or more dependents and/or have unreimbursed child care expenses of \$2,500 or more. Since half of these families are likely to be in the control group, they will not need to request a hardship.</p> <p>An additional number of households who are part of the tiered rent group and who experience a loss of income between triennial reexaminations may request hardship exemptions, but this number is difficult to estimate. EHA intends to track hardship requests to determine the impact of the policy on participant families and on staff time spent processing hardship requests.</p>
<b>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</b>

Families with children will experience the largest impact from the loss of deductions, as elderly and disabled households are excluded from the tiered rent demonstration. EHA will mitigate this impact by providing hardship rent reductions for families with 4 or more dependents and families with unreimbursed child care expenses of \$2,500 or more.

Families with Asian, Black/African American, and Native Hawaiian/Pacific Islander heads of household are more likely to have 4 or more dependents than families with White or American Indian/Alaska Native heads of household.

Families with White and Asian heads of household, Black/African American heads of household, and White heads of household are more likely to have child care expenses exceeding \$2,500 compared with all other racial groups.

Assisting families with 4 or more dependents and child care expenses exceeding \$2,500 via the hardship policy will address the disparate impact of the loss of these deductions on these groups.



**Everett Housing Authority  
Safe Harbor MTW Waivers  
July 1, 2022, to June 30, 2022**

**Summary of Safe Harbor Waivers**

Everett Housing Authority (EHA) is requesting Safe Harbor waivers for the following MTW activities:

<b>MTW Waiver</b>	<b>Safe Harbor Waiver Requested</b>
<b>Tenant Rent Policies</b>	
1.b. Tiered Rent (HCV)	<p>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 example, if an income band is \$2,500 to \$4,999, then the rent for the band must be set using \$2,500.</p> <p>Instead, EHA will establish TTP/rent at 28% of the <i>midpoint</i> of the tier.</p>
<b>Reexaminations</b>	
3.b. Alternative Reexamination Schedule for Households (HCV)	<p>The standard MTW waiver provides that when an alternative reexamination schedule is established, the housing authority must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased by 10% or more.</p> <p>Instead, households can request a hardship exemption under EHA's Hardship Policy if the household has a decrease in gross income that drops the family into a lower rent tier.</p>

**1.b. Tiered Rent (HCV)**

**Description of Standard MTW Waiver:** The agency may implement changes to the TTP calculation to create a system based upon income bands.

**Statutes and Regulations Waived:** Certain provisions of sections 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.628.

**Safe Harbors:**

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

**Requested Safe Harbor Waiver and Explanation**

EHA is requesting this Safe Harbor waiver in connection with its participation in the Rent Reform demonstration. This waiver will apply to households who are eligible for the Rent Reform demonstration and selected to pay rent under the Tiered Rent policy. The study design requires EHA and the other

demonstration sites to set tenant TTP/rent for Tiered Rent households at 28% of the midpoint of the tier instead of the bottom of the tier as specified in the standard 1.b. waiver.

For recertifications, income used to identify the household's rent tier is calculated retroactively. The recertifications will occur triennially, rather than annually. Households do not report income increases between recertifications. A hardship policy will be available for households who face rent burden as a result of an income decrease or other adverse circumstances.

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

**Description of Standard MTW Waiver:** The agency may establish an alternative reexamination schedule for households.

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

#### **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.
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

#### **Requested Safe Harbor Waiver and Explanation**

EHA is requesting this Safe Harbor waiver in connection with its participation in the Rent Reform demonstration. This waiver will apply to households who are eligible for the Rent Reform demonstration and selected to pay rent under the Tiered Rent policy. The study design requires EHA and the other demonstration sites to conduct a reexamination of each Tiered Rent household's income every three years (triennially).

However, rather than providing an interim reexamination once per year if the household has a decrease in gross income of 10% or more as specified in the standard 3.b. waiver, EHA will offer a hardship policy that allows households to request a hardship rent if they experience a decrease in gross income that drops the household into a lower rent tier.

This waiver will provide administrative relief to EHA by decreasing the frequency of reexaminations, while providing households with the hardship policy as a way to get rent relief if they experience a decrease in income.

**Everett Housing Authority  
Agency-Specific MTW Waivers  
July 1, 2022, to June 30, 2022**

**Summary of Agency-Specific Waivers**

**EHA**

<b>Description of Activity</b>	<b>Specific Waiver Requested</b>
1. Modify Prioritization for Tenant-Based Vouchers	24 CFR 983.261
2. Allow Residents of RAD PBV Units to Resume PBV Assistance After Loss of Subsidy and Subsequent Income Decrease	24 CFR 983.258, Section 1.6.C.9 of the RAD Notice (PIH Notice 2019-23)
3. Modify Income Verification Hierarchy for Reexaminations	Provisions of PIH Notice 2018-18
4. Modify Discrepancy Threshold for Income Verifications	Provisions of PIH Notice 2018-18

**MTW Agency-Specific Waiver 1: Modify Prioritization for Tenant-Based Voucher Assistance**

**Core Waiver Questions**

<b>Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</b>
<p>EHA is proposing a waiver of the regulations at 24 CFR 983.261, which requires EHA to give tenants who have lived in a project-based voucher (PBV) unit the next available opportunity for tenant-based assistance.</p> <p>Instead, EHA is proposing to implement a policy of providing one voucher to assist someone from the tenant-based waiting list for each voucher given to a tenant moving out of a PBV unit.</p> <p>This waiver, along with the other PBV-related agency-specific waiver that EHA is requesting, are initial steps that EHA is taking to make the PBV program work better in Everett. EHA has a significant portfolio of PBV units, including RAD PBV and regular PBV units owned by EHA, as well as PBV contracts at properties not owned by EHA.</p> <p>EHA has identified several challenges with the current regulation at 24 CFR 983.261, including a large and growing list of PBV households who are waiting on vouchers that requires staff time to administer, no turnover on EHA's waiting list except for special purpose vouchers like Mainstream and Non-Elderly Disabled, and impacts on vacancy at specific properties when EHA has a larger number of vouchers available to issue to PBV tenants on the tenant-based voucher interest list. EHA has also seen that the success rate among PBV households leasing with a tenant-based voucher is around 30%, which is much lower than the success for tenant-based voucher households.</p> <p>This initial change, as well as future changes, are expected to contribute to the MTW statutory goals of cost effectiveness and housing choice.</p>

<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activities applies to a subset of assisted households.
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
New admissions (from the EHA waiting list) and currently assisted households in PBV units who have requested to move with tenant-based assistance.
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to properties with project-based vouchers.
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
All properties with project-based vouchers.
<b>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.</b>
N/A – new activity

### Implementation Timeline for Waiver

- April 2022: MTW Supplement Submitted to HUD
- June 2022: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2022: Waiver goes into effect

## Impact Analysis

<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
This MTW activity is expected to have a modest financial benefit to EHA, due to decreasing turnover in PBV units owned or operated by EHA, which will decrease staffing costs for unit turns and processing new PBV applicants for replacement tenants, as well as materials associated with unit turns.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
No expected impact
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
This MTW activity is expected to decrease the amount of time that families spend on the regular tenant-based voucher waiting list, by ensuring that 50% of available turnover vouchers are given to households on the regular tenant-based waiting list. Historically, EHA has not been able to offer vouchers to families from the regular waiting list for several years, except for special targeted vouchers like Mainstream and Non-Elderly Disabled.
This activity is expected to increase the amount of time that households spend on the PBV interest list.
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
No expected impact
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
This MTW activity is expected to have a positive impact on the utilization rate in the HCV program, because historically, PBV households issued tenant-based vouchers have had a much lower leasing success rate than families who are being assisted directly from the tenant-based waiting list, and also because it is expected to lower turnover in PBV units, which can take 1-2 months or longer to refill when they become vacant.
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This MTW activity is expected to positively impact the goals of cost effectiveness and housing choice.
It will contribute to cost effectiveness by decreasing unit turn costs in PBV units and increasing utilization in the overall HCV program. It will also contribute to housing choice by ensuring that households on the tenant-based waiting list, who are overwhelmingly extremely low-income and either cost-burdened or literally homeless, have the same opportunity to receive tenant-based voucher assistance as households who are already assisted in a PBV unit.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
No expected impact
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>

Little to no expected impact. EHA has not been able to issue vouchers to households on the PBV interest list since 2019, and during that time has already been processing requests for tenant-based assistance as reasonable accommodations or related to protections under the Violence Against Women Act from households living in PBV units, and will continue to process these requests.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

No expected impact

**Hardship Policy**

EHA will continue to maintain an interest list for PBV households to request tenant-based assistance based on the date and time of the request once the household has lived in their PBV unit for at least 12 months.

Households will continue to be able to request immediate tenant-based assistance or a move to another PBV unit as a reasonable accommodation for a disability or related to protections for victims of domestic violence under the Violence Against Women Act. EHA will review such requests in accordance with EHA's Housing Choice Voucher Administrative Plan and its ADA Section 504 Plan.

Households living in a wrong-sized PBV unit will continue to be offered either PBV assistance in an appropriately sized unit, or tenant-based voucher assistance, in accordance with Chapter 17 of EHA's Housing Choice Voucher Administrative Plan.

**Comments Received at Public Hearing**

[To come]

## MTW Agency-Specific Waiver 2: Allow RAD PBV Residents to Resume PBV Assistance After Loss of Subsidy and Subsequent Income Decrease

### Core Waiver Questions

**Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.**

EHA is proposing to waive the requirement that after 180 days receiving zero HAP, a household living in an EHA RAD PBV unit can continue to occupy the unit but loses their voucher assistance and cannot regain voucher assistance unless they get on the regular waiting list.

Instead, EHA is proposing that these families will be able to request to have their voucher assistance reinstated if they have a subsequent decrease in income that would qualify them for voucher assistance in their PBV unit again. This waiver was identified based on feedback from both staff at RAD PBV properties and residents of RAD PBV properties who provided feedback to EHA on our MTW planning efforts.

Because EHA's RAD PBV rents are significantly below market (the rents at all three RAD PBV properties are less than half of EHA's voucher payment standard), and are thus affordable to households with modest incomes, households are reaching zero HAP well before they have an income that would allow them to be considered self-sufficient and afford market rents. If the household has a subsequent income decrease, they are no longer able to pay the rent and are at risk of incurring significant debt to the housing authority or losing their housing due to nonpayment of rent.

<b>Bakerview and Grandview</b>	<b>Current RAD Rent</b>	<b>EHA Payment Standard (PS)</b>	<b>RAD Rent as a % of PS</b>
Studio	\$579	\$1,465	40%
1 BR	\$661	\$1,567	42%
2 BR	\$637	\$1,890	34%
3 BR	\$852	\$2,694	32%
4 BR	\$1,042	\$3,172	33%
6 BR	\$1,355	\$4,123	33%

<b>Pineview</b>	<b>Current RAD Rent</b>	<b>EHA Payment Standard (PS)</b>	<b>RAD Rent as a % of PS</b>
2 BR	\$616	\$1,890	33%
3 BR	\$871	\$2,694	32%
4 BR	\$1,064	\$3,172	34%

The current policy provides a disincentive for households to seek to increase their earned income above the point where the household no longer receives HAP, which is much lower than for regular PBV and HCV units, since the RAD rents are below market. If they are not able to retain that level of income for more than 180 days, they will not have the safety net of the voucher available.

It also presents a financial risk to the agency that the household will not be able to pay the rent if they lose their voucher assistance and are not able to afford the rent without the voucher. EHA incurs

significant costs and typically does not recover lost rent when a tenant is not able to pay the rent, and the tenant is then at risk of homelessness.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness and self-sufficiency.
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenses.
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activities applies to a subset of assisted households – those living in EHA RAD PBV housing.
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
Currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to properties with project-based vouchers.
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
This MTW activity applies to EHA RAD PBV units.
<b>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.</b>
N/A – new activity

#### Implementation Timeline for Waiver

- April 2022: MTW Supplement Submitted to HUD
- June 2022: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2022: Waiver goes into effect



## Impact Analysis

<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
EHA anticipates little to no cost to administer this, as it will only affect a subset of RAD PBV tenants. EHA currently operates 332 RAD PBV units, across three sites: Bakerview (serving elderly and disabled tenants), Grandview (serving families), and Pineview (serving families). Of these, only a subset will likely qualify for the waiver based on income changes over time.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
This will increase affordability for the small number of affected families who lose their voucher assistance due to an increase in their income and subsequently need the voucher assistance again while living in their RAD PBV unit.
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
This policy could slightly increase the amount of time that families are on the waiting list, because a household in a RAD PBV unit would receive a voucher which may otherwise have gone to a family on the waiting list.
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
While this policy will not impact the termination rate of families, it has the potential to reduce the number of tenants who are evicted or have other adverse impacts due to their inability to pay rent.
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This MTW activity will have a positive impact on the MTW statutory goal of self-sufficiency by providing tenants in RAD PBV units with a safety net that may encourage them to increase their earned income. It will also have a modest positive impact on the MTW statutory goal of cost effectiveness as it will decrease the lost revenue or expenses associated with a tenant not paying their rent, and the eviction and collections processes.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
It is possible that some households who benefit from this waiver will be above the extremely low-income limit. However, given the small number of households who will likely benefit from this waiver relative to EHA's overall voucher program size, it should not measurably impact EHA's ability to meet the statutory requirements.
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>
EHA expects only a handful of requests under this waiver annually, and even fewer that will require an informal review if their request for assistance is denied.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

Since a significant number of EHA's RAD PBV units are larger units that serve families, EHA anticipates a positive impact on families with children. Some of EHA's RAD PBV units also serve elderly and disabled households; although most of these households are on fixed incomes and are unlikely to have significant changes in their incomes or to lose their assistance due to zero HAP.

**Hardship Policy**

Because this waiver is a benefit to existing assisted households living in RAD PBV units, EHA does not believe a specific hardship policy for this waiver is warranted.

However, households requesting to reinstate their PBV assistance as a result of this waiver will be able to request an informal review of the housing authority's decision to deny assistance in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan if their application to reinstate RAD PBV assistance is denied, just as others who are denied voucher assistance can.

**Comments Received at Public Hearing**

[To come]

### MTW Agency-Specific Waiver 3: Modify Income Verification Hierarchy for Reexaminations

#### Core Waiver Questions

**Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.**

EHA is proposing a waiver to the verification hierarchy found in PIH Notice 2018-18, "Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System", which lists the hierarchy of verification techniques for verifying income. EHA is only proposing to use this modified hierarchy for *reexaminations*.

A comparison of the current hierarchy to EHA's proposed hierarchy can be found below. The revised hierarchy eliminates the use of the written third-party verification form, and puts tenant declaration ahead of oral third-party verification.

This waiver contributes to EHA's streamlining and cost savings initiative under MTW, by decreasing the time and complexity of the income reexamination process. This is expected to be especially beneficial for households who are part of the tiered rent group of the rent reform demonstration, since EHA will be calculating retrospective income, which should be available in EIV for most of the time period and most income sources. However, EHA's experience with the use of tenant declarations during the COVID-19 pandemic has found this to be a useful tool, particularly for verifying income changes such as job losses.

PIH Notice 2018-18			EHA MTW Proposed Hierarchy		
Level	Verification Technique	Ranking	Level	Verification Technique	Ranking
6	Enterprise Income Verification (EIV) and Income Validation Tool (IVT)	Highest (Mandatory)	6	Enterprise Income Verification (EIV) and Income Validation Tool (IVT)	Highest (Mandatory)
5	Upfront Income Verification (UIV) using non-HUD system	Highest (Optional)	5	Upfront Income Verification (UIV) using non-HUD system	Highest (Optional)
4	Written Third Party Verification	High	4	Written Third Party Verification	High
3	Written Third Party Verification Form	Medium-Low	3	Tenant Declaration	Medium
2	Oral Third-Party Verification	Low (Mandatory if written third party verification is not available)	2	Written Third Party Verification Form	Medium-Low
1	Tenant Declaration	Low (Use as a last resort when unable to obtain any type of third-party verification)	1	Oral Third-Party Verification	Low

<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activities applies to all assisted households.
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
New admissions (after their initial income certification) and currently assisted households.
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to all tenant-based units and all properties with project-based vouchers.
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
All.
<b>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.</b>
N/A – new activity

#### Implementation Timeline for Waiver

- April 2022: MTW Supplement Submitted to HUD
- June 2022: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2022: Waiver goes into effect

## Impact Analysis

<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
EHA estimates a modest decrease in staff time spent verifying certain income sources; however, it is difficult to quantify at this time. This is not expected to have an impact on the agency's per-family contribution.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
No expected impact
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
No expected impact
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
No expected impact
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This MTW activity is expected to positively impact EHA's ability to meet the statutory goal of cost effectiveness by decreasing the staff time spent verifying income sources at reexamination.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
No expected impact
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>
No expected impact as this is an administrative efficiency change that should not require a hardship exemption.
<b>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</b>
No expected impact

## Hardship Policy

This is an administrative efficiency that should not require assisted families to request a hardship exemption.

However, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan.

## Comments Received at Public Hearing

[To come]

DRAFT

#### MTW Agency-Specific Waiver 4: Modify Discrepancy Threshold for Income Verifications

##### **Core Waiver Questions**

<b>Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</b>
<p>EHA is proposing a modification of the procedure in PIH Notice 2018-18 to increase the threshold for a discrepancy between the information in EIV or the Income Verification Tool (IVT) report and the family's reported income from \$2,400 to \$4,800.</p> <p>This waiver contributes to EHA's streamlining and cost savings initiative under MTW, by decreasing the time spent investigating income discrepancies identified using EIV or IVT information.</p> <p>Currently, due to EHA's policy of only counting income increases from new sources of income at interim reviews, most discrepancies identified do not have an impact on the family's housing assistance. EHA anticipates that, due to the new method of calculating income and rent for households in the tiered rent policy group, the amount of "false positive" income discrepancies identified will only increase for those households. This waiver will mitigate the impact of the new rent policy.</p>
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activities applies to all assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
Both new admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to all HCV tenant-based units and properties with project-based vouchers

<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
All tenant-based units and properties with project-based vouchers.
<b>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.</b>
N/A – new activity

### Implementation Timeline for Waiver

- April 2022: MTW Supplement Submitted to HUD
- June 2022: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2022: Waiver goes into effect

### Impact Analysis

<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
This MTW activity is expected to have a modest financial benefit to EHA, due to decreasing the amount of staff time spent investigating and resolving discrepancies, most of which are found to have no impact on the housing assistance payment.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
No expected impact
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
No expected impact
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
No expected impact
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This MTW activity is expected to positively impact the goal of cost effectiveness.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
No expected impact
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>



No expected impact
<b>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</b>
No expected impact

### **Hardship Policy**

This is an administrative efficiency that should not require assisted families to request a hardship exemption.

However, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan.

Families who have a HAP overpayment as a result of an income discrepancy can request a repayment agreement with EHA in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan.

### **Comments Received at Public Hearing**

[To come]