

EVERETT
HOUSING AUTHORITY

Annual PHA Plan and MTW Supplement



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



Public Comment Period

February 9, 2023, through March 27, 2023

Public Hearing:

Everett Housing Authority's Board of Commissioners will conduct a public hearing at noon on Monday, March 27, 2023. Information about joining the hearing will be posted to the Housing Authority's website (www.evha.org) on March 13.

To request interpretation and/or disability accommodation, contact Chris Neblett at (425) 303-1186 or chrisn@evha.org by March 13, 2023.

How to Provide Public Comment:

Phone: (425) 303-1186 or (425) 339-1006, TTY 711

Email: chrisn@evha.org or mtw@evha.org

Mail: Everett Housing Authority
P.O. Box 1547
Everett, WA 98206-1547

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

Applicability. The Form HUD-50075-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>PHA Name: <u>Housing Authority of the City of Everett</u> PHA Code: <u>WA 006</u> PHA Type: <input checked="" type="checkbox"/> Small PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>196</u> Number of Housing Choice Vouchers (HCVs) <u>3,623</u> Total Combined _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B.	Plan Elements Submitted with 5-Year PHA Plans. 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.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Five-Year PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Although this section is not a required part of the Annual Plan submission, EHA is submitting a summary of key accomplishments over FY 2022-23 as attachment a01.</p>

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>Plan Elements Submitted All Other Years (Years 1-4). 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.</p>	
B.1	<p>New Activities</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N <input type="checkbox"/> <input checked="" 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).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. See attachment b01.</p> <p>(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. See attachment b01</p> <p>(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.</p>
B.2	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 11/28/2022.</p>
<p>C Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attachment c01</p>

C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 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.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).							
D.1	<p data-bbox="196 415 553 443">Affirmatively Furthering Fair Housing.</p> <p data-bbox="196 468 1433 590">Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item</p> <table border="1" data-bbox="196 611 1456 1564"> <tr> <td data-bbox="196 611 1456 653">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="196 653 1456 1062"> <p data-bbox="207 684 902 716"><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> <p data-bbox="207 751 1430 827">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> <tr> <td data-bbox="196 1062 1456 1094"></td> </tr> <tr> <td data-bbox="196 1094 1456 1136">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="196 1136 1456 1503"> <p data-bbox="207 1161 902 1192"><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> </td> </tr> <tr> <td data-bbox="196 1503 1456 1535"></td> </tr> <tr> <td data-bbox="196 1535 1456 1564">Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<p data-bbox="207 684 902 716"><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> <p data-bbox="207 751 1430 827">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>		Fair Housing Goal:	<p data-bbox="207 1161 902 1192"><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p>		Fair Housing Goal:
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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).

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. ([Notice PIH 2011-47](#))

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

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

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 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.

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 Toward 5-Year Goals during Plan Year 2022-23

Goal 1 -- Create 1,500 EHA-owned or supported housing units by 2030 primarily through new development:

- Continued 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. Lease-up of units is anticipated to begin sometime in the Spring of 2023, with construction and lease-up expected to be completed by Fall 2023.
- Budgeted \$12.6 million for predevelopment activities for a new mixed-income community, the Park District, on the remaining 12.33-acres of the Baker Heights site. Major activities will include rezoning of site parcels, vacating existing streets, environmental impact studies, and the demolition of vacant units that comprised the former Baker Heights public housing development. This project will encompass the phased construction or development of as many as 1,500 residential units, parks, and other community amenities.
- Engaged in design and permitting processes for Benjamin Young Senior Apartments, a project that will entail the construction of up to 125 units on adjacent parcels (3826 Rucker, 1311 39th St.) in Everett.
- Secured permanent bond financing for Huntington Park Apartments, a 381-unit complex near Everett Mall purchased in March 2022 with the goal of preserving the property as workforce housing.
- Received an A+ investment grade issuer credit rating and an A+ social bond rating from Standard and Poor's. These ratings will provide EHA with quicker access to the bond market, a broader range of potential investors, and greater flexibility in the financing of its development activities.

Goal 2 – Direct our resources towards creating diverse, healthy communities of opportunity where children and adults flourish:

- Rebranded EHA's local Moving to Work (MTW) demonstration program as Making Things Work in conjunction with EHA's selection to join the MTW Demonstration's rent reform study group.
- Began enrolling employment focused voucher participant households in the Tiered Rent study. The study will test a new way of setting rent that is intended to reward increases in income and decrease participant and staff administrative burden. EHA, through its THRIVE initiative, will also provide additional services to rent study households to help them achieve economic success.
- Utilized MTW's funding flexibilities to reallocate approximately \$4.5 million in Public Housing operating funds and a \$450,000 increase in the Voucher program Administrative Fee - as a means to achieve this 5-Year Plan goal and EHA's longer-term strategic objectives: i.e., transforming the HCV program into an effective mobility program to help families with children gain access to, and thrive in, communities of opportunity while also increasing EHA's capacity to create housing in communities of opportunity.

- Worked with a team of graduate students from the Evans School of Public Policy and Governance at the University of Washington to begin the work of creating 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:
 - Partnered with House Call Doctors PNW, a new medical agency in our community, to provide on-site Covid booster and flu shot clinics to 443 residents at 19 properties.
 - Facilitated events at 18 senior properties to gather information on preferred languages for written and verbal communication for tenants with Limited English Proficiency (LEP). This outreach will ensure effective and equitable communication between management and our senior LEP tenants, as was the case when the Resident Services team assisted the Asset and Housing Management teams with communications related to the RAD/PRAC conversions at several 202 properties.
 - Hosted an annual Back-to-School Community BBQ at the Grandview Homes community after a two-year hiatus due to the COVID pandemic. Volunteers and local community partners provided a meal and valuable information and resources to over 100 enthusiastic residents who participated in this community building event.
 - Prevented the dissolution of long-time Snohomish County YouthRAP community meeting by assuming leadership and providing a hybrid meeting space that allowed for virtual and in person participation. YouthRAP brings together local agencies and partners that provide vital resources to EHA youth and families and the larger community.
 - Updated the FSS Action Plan (HUD approved final version in November 2022) to incorporate new program rules and more thoroughly define procedures around administering the program. Held multiple training sessions to familiarize FSS program staff with the updated FSS Action Plan. Staff will be required to meet with all FSS participants individually and, after reviewing the benefits of the new rules, offer them the opportunity to sign a new Contract of Participation (COP) or retain their original COP. Going forward, all new participants will enroll under the new rules and COP.
 - Continued to successfully operate the FSS program despite staffing challenges caused by resignations. As of December 2022, a new Coordinator has been hired and is moving successfully through the onboarding process. Although the FSS program has experienced a lot of change, eight (8) families will graduate by the end of the fiscal year making room to enroll more families from our waitlist.
- Started disseminating a regular newsletter for residents and program participants in December 2022. Each edition includes articles around one or more themes (e.g., December's newsletter featured Holiday Resources), along with listings of area resources and events.
- Launched an EHA Facebook page in conjunction with the release of the resident newsletter. This duplicates some of the newsletter's content and also lists resources and events in the area that can help residents and program participants thrive.

Goal 3 – A workplace where every employee is proud of their contribution to EHA’s mission.

- Promoted 18 staff members to positions of greater responsibility within the agency.
- Developed a customer service survey specific to the Housing Management Department (Senior Properties, Family Properties) to measure resident levels of satisfaction with services provided by EHA staff. Survey will be administered prior to June 30, 2023
- During this time of hybrid work with offices open by appointment only, EHA refined its remote work tools and processes so that employees who continue to work remotely 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 and launched 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.
- Held the first all-staff breakfast event since the pandemic, honoring new and existing staff.

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:

- Continued efforts to make EHA an anti-racist organization through individual department initiatives and by referring staff to educational opportunities while seeking to re-fill the position of Diversity, Equity, and Inclusion Director.
- 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.
- Created “Addressing Tenant Racism” reference document for tenants. This document defined racist behaviors (explicit and implicit), the procedures for reporting racist incidents, and the consequences for engaging in racist behaviors, to include eviction for more egregious violations. Tenants were required to sign receipt and acknowledgement of this document.
- Continued to partner with NAHRO, Government Alliance on Race and Equity (GARE), C3 (Communities of Color Coalition), and Leadership Snohomish County (LSC), to amplify and enhance DEI effectiveness. Two EHA staff, including the Director of Human Resources and Administration, participated in LSC’s Leadership for Racial Equity cohort.

EHA intends to undertake the following activities over the course of FY 2023-24:

Demolition and/or Disposition

EHA plans to begin a phased demolition of remaining units in the Baker Heights neighborhood (WA 006 000 100) during calendar year 2023, subject to HUD approval for demolition and disposition. This activity is in preparation for development of a new mixed-income mixed-use 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. It is anticipated that the disposition will occur at fair market value to an external entity LLC for which EHA is the sole partner, subject to HUD approval.

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 with a Housing Assistance Payment Contract to be executed in 2023.

EHA is currently in the predevelopment process for Benjamin Young Senior Apartments. The project may consist of up to 135 units of affordable housing. In the program year, EHA is anticipating an Agreement to Enter into a Housing Assistance Payments Contract (AHAP) for a portion of the units with Project Based Vouchers which may be designated for low-income elders.

Over the course of Plan year 2023-24 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.

PHA Name : Everett

PHA Code : WA006

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

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

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

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

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

The fiscal year beginning July 1, 2022, was EHA's first full fiscal year as part of the MTW demonstration. In EHA's first MTW Supplement, EHA focused on implementation of the Tiered Rent study, which is the signature initiative for EHA's MTW cohort. The Tiered Rent demonstration will study a new way of setting rents for some employment-focused (non-elderly, non-disabled) families that is expected to provide incentives for families to increase their earned income and also to reduce administrative burden for EHA. Other waivers implemented during the 2022-2023 fiscal year were focused on streamlining operations.

In this upcoming MTW Supplement, EHA will be expanding its efforts to streamline the rent calculation and reexamination process, focusing on households headed by people who are elderly or have disabilities.

EHA will also be creating a new self-sufficiency program for households who are participating in the Tiered Rent study. This self-sufficiency program will have some of the attributes of the traditional Family Self-Sufficiency Program, but will be designed in a way that allows a larger number of families to benefit, and ensures that Tiered Rent treatment group households who are on a triennial reexamination schedule can benefit from the program.

In furtherance of EHA's goal to make the PBV program work better in the local community, EHA will be implementing changes to the way that tenant-based vouchers are allocated to residents of PBV properties. 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).

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

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

1.b. - Tiered Rent (HCV)
See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.
As part of the cohort-specific Rent Reform study, EHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current or the new tiered rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households, and based on current income for newly-admitted households.
This MTW activity serves the following statutory objectives:
Cost effectiveness;Self-sufficiency
This MTW activity has the following cost implications:
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 due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a mixed citizenship status family.

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

EHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study, and train staff. Study enrollment is scheduled to occur during calendar year 2023 and early 2024.

This MTW activity requires a Safe Harbor Waiver.

The waiver was previously approved.

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

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.

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

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

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

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

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

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

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

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

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Increased revenue

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 tiered rent study and who are selected to pay rent under the tiered rent policy.

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

EHA has worked with HUD and MDRC to develop policies, procedures, and forms to implement the tiered rent study and to train staff. Study enrollment began January 2023.

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

Attached Hardship policy applies to:

1.s. - Elimination of Deduction(s) (HCV);2.b. - Payment Standards- Fair Market Rents (HCV);3.b. - Alternative Reexamination Schedule for Households (HCV)}

The hardship policy has been modified based on following considerations:

EHA updated the hardship policy to reflect additional MTW waivers being requested in a single policy for ease of staff and participant reference. No changes were specifically made to the hardship policy for waivers associated with the tiered rent study.

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.

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 tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these deductions will be able to request a hardship adjustment to their rent calculation.

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

EHA is requesting a waiver of the regulations at 24 CFR 982.503(a)(3), which requires the agency to set a single payment standard for all units of a particular size. Instead, EHA will implement two payment standards: a market rate payment standard, and a separate affordable housing payment standard that will apply to low-income housing tax credit units (other than those owned or controlled by a PHA) with an income set-aside of 60% AMI or less. This will only apply to tenant-based voucher tenancies, not tenancies under the project-based voucher program.

The affordable housing payment standard will be set at no less than 80% of the applicable metro area fair market rent, at an amount that exceeds the applicable 60% area median income tax credit rent limit for the unit size. These limits are publicly available on the Commission's website and updated annually: <https://www.wshfc.org/Managers/Map.aspx>. For the upcoming fiscal year, EHA will set the affordable payment standard at 90% of the metro area fair market rent for each bedroom size. EHA will review fair market rents annually in comparison to 60% area median income tax credit limits when setting the affordable housing payment standard.

This activity contributes to EHA's overall voucher program streamlining and cost-savings initiative by decreasing the amount of HAP dollars spent on units where the tax credit landlord is charging a rent that exceeds the 60% AMI rent.

As is the case with the current regulations restricting rents to the payment standard, the gross rent will be capped at the applicable affordable housing payment standard. In the case of overhoused families, the gross rent cannot exceed the applicable affordable housing payment standard for the unit size. In addition, the approved rent must not exceed the reasonable rent for other comparable, unassisted units.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

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

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

This MTW activity applies to:

New admissions and currently assisted households

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

The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: This activity applies to tenant-based voucher tenancies in low-income housing tax credit units with set asides at or below 60% of area median income,

excepting units owned or controlled by a PHA.

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

N/A - new activity.

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

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.

Following will explain the payment standards by FMR:

The affordable housing payment standard will be set at a percentage of the FMR that will be no less than 80% of the metro area FMR and will equal or exceed the 60% area median income maximum tax credit for the unit size.

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

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

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

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

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

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

This MTW activity applies to:

New admissions and currently assisted households

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

The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: Units owned or controlled by EHA.

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

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

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 because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has HUD approval to use another local housing authority and a contracted inspector for inspections of EHA-owned units). **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 rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about HCV and PBV rent reasonableness regulations reviews the comparables to confirm that they are comparable to the subject unit. **and attached for rent reasonableness determination method**

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

Proposed for FY23 (Elderly/Disabled Households):

In addition to offering triennial reexaminations to employment-focused households in the Tiered Rent Demonstration, EHA will also move to a triennial reexamination schedule for most elderly and disabled households. If a family meets the following criteria, it will be enrolled in triennial reexaminations as part of EHA's Simple Rent initiative.

- the head of household, co-head, and/or spouse is elderly or disabled, and
- at least 90% of the current family income is from a fixed income source (e.g., social security, pension)

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations. For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable.

Triennial reexaminations will be phased in for eligible families starting with the reexaminations effective in January 2024. A third of households will undergo a full review each year. In addition, EHA may modify the effective month of the family's reexamination within the same year in order to ensure a similar number of reexaminations are completed each month.

When triennial reexaminations begin for current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

Between full triennial reexaminations, families will undergo a streamlined reexamination annually that will consist of staff applying published cost of living adjustment (COLA) rates to fixed income sources and applying medical expense

deductions from the most recent full reexamination if claimed by the family.

Families will not be required to report increases in income between triennial reexaminations. The family may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

As with the Tiered Rent Demonstration triennial reexaminations, this schedule will also include implementing a local release form in lieu of the HUD 9886 that is valid for 40 months.

EHA's goals for utilizing triennial recertifications are to reduce cost and achieve greater cost effectiveness in federal expenditures while also encouraging participant self-sufficiency. Expanding to elderly and disabled households will build upon the efficiencies gained through triennial recertifications for the Tiered Rent Demonstration. As part of EHA's larger rent reform initiative, this activity will contribute to a reduction in EHA staff time spent on the certification process.

Previous waiver request for FY22 (Tiered Rent Demonstration):

See the FY22 MTW Supplement draft for a full description of this activity. HUD has approved this waiver EHA has begun enrolling families in the rent study.

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 has the following cost implications:

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 eligible families for either the Tiered Rent or Simple Rent policy.

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

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

FY22 waiver implementing tiered rent for employment-focused families - HUD waiver approved and enrollment in rent study began in January 2023.

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

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.

Recertification Schedule is

Other

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

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

Household may request 2 or more interim recertifications per year.

Proposed for FY 2023 for Qualifying Elderly/Disabled Households under Simple Rent

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

FY22 approved (Tiered Rent Demonstration):

The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See the FY22 MTW Supplement draft for a full description of this hardship policy.

3.d. - Self-Certification of Assets (HCV)

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

This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This activity contributes to our larger streamlining initiative, which seeks to achieve greater efficiency and remove administrative barriers.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

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

The MTW activity applies to all assisted households

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

HUD approved the waiver and EHA is implementing the waiver.

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.

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

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

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

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

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

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

This MTW activity applies to:

New admissions and currently assisted households

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

The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: EHA-owned or controlled units under the tenant-based and project-based voucher program.

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

Waiver approved by HUD and being implemented by EHA.

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

If [Upload file] options- Display 'Attached for quality assurance method'

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

Under this activity, EHA will be creating an alternative self-sufficiency program in lieu of the traditional FSS program that will be offered to households participating in the Tiered Rent study (both treatment and control group households). This program will use an alternative method of calculating escrow that is based on the family completing milestones during their contract of participation. Participants will sign a 5-year contract of participation with a potential extension up to 2 years.

Self-sufficiency and economic success coaching and referrals will be provided by the specialists working with the rent study families. Participation in the program will be optional.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

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 only to a subset or subsets of assisted households

This MTW activity applies to:

Currently assisted households only

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: Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional.

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

N/A - new activity

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.

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

This waiver is being requested in connection with EHA's THRIVE + initiative, the alternative self-sufficiency program offered to households in the tiered rent study, both tiered rent policy and standard rent policy households. Under this activity, EHA is implementing an alternative to the traditional FSS program that provides a milestone-based escrow deposit model, instead of the traditional model of escrow deposits based on increases in earned income. The goal for the alternative model is to provide incentives for families to increase their earned income without tying the escrow deposits to the reexamination, since tiered rent policy households will have fewer opportunities to escrow during their contract of participation.

Families will earn escrow credits for completing activities that will increase their financial and economic well-being and

earning potential. The amount of escrow payout at the end of the contract of participation will be limited to no more than the amount of HAP cost savings generated by the family based on increases in earned income during their contract of participation, so that the escrow payout is offset by increases in family earnings, similar to the traditional FSS program.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

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 only to a subset or subsets of assisted households

This MTW activity applies to:

Currently assisted households only

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: Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).

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

N/A - new activity

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 is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program:

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>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.</p> <p>Please see attached for Agency-Specific Waiver(s) requested this year.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>The MTW agency should describe any changes in how the waiver is being implemented now compared to when it was originally approved.</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

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

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

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

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

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

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

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	Yes - This table lists evaluations of Everett's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

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

Everett Housing Authority MTW Hardship Policy

If a requirement or provision of an MTW activity may constitute a financial or other hardship for EHA households, EHA will create a hardship policy. EHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a household requests a hardship exemption from a required MTW activity, EHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by EHA for the duration of EHA's participation in the MTW demonstration program and available for public review and inspection.

Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

What is a Hardship Exemption?

The Tiered Rent policy is intended to benefit assisted households by allowing them to increase their income without an immediate increase in their total tenant payment (TTP). Households will have an income examination every three years, and in between the triennial reexaminations their TTP will not increase. In addition, their TTP will not increase even at a triennial reexamination unless their income rises into a higher tier. However, some households may need a hardship exemption to avoid negative consequences of the tiered rent. A hardship exemption is a temporary rent that is lower than the family's assigned Tiered Rent.

There are several situations for which a family in the Tiered Rent group can receive a hardship exemption. Some are automatic based on the information the family submits to EHA at the time of their reexamination, and some will require the family to report information to EHA between reexaminations.

What Does EHA Consider a Hardship?

EHA considers the following situations to be hardships:

1. For automatic hardships, at time of triennial reexamination:
 - a. Your family qualifies for a large exemption under the traditional rent policy due to having 4 or more dependents at the time of your triennial reexamination.
 - a. Your family qualifies for a large exemption under the traditional rent policy due to have unreimbursed child/dependent care expenses over \$2,500 at the time of your triennial reexamination.
 - a. 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

1. For hardships requested by the family, which can be requested at any time:
 - a. Your family has a loss of income that would drop the family into a lower rent tier than the one that you are currently in
 - a. Your family experiences a new or increased unreimbursed child/dependent care expense of over \$2,500 per year/\$209 per month

- a. Your family has 4 or more dependents due to additions to the household between triennial reexaminations
- a. Your family faces another unexpected situation, such as the death of a family member or a major medical expense, and requires temporary rent relief to avoid eviction for non-payment of rent 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 for 6 months or less
- 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.

If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship. Once the PHA approves a hardship, the hardship will not end early.

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. You will be required to provide supporting documentation to verify your hardship.

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. When a family requests a hardship exemption, EHA will implement the hardship rent beginning the first of the month following the family's request. 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. See Chapter 16 for additional information.

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.

Hardship Policy: Elderly/Disabled Households Triennial Recertifications (NEW FOR FY23)

Households experiencing a decrease in income may request an interim reexamination.

If a household believes they have another circumstance that qualifies as a financial hardship, the household must complete the Hardship Request form and include proof of the hardship.

The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Hardship Policy: Elderly/Disabled Deduction (NEW FOR FY23)

EHA is proposing to increase the elderly/disabled deduction from \$400 to \$525, and adjust this amount annual in accordance with inflation, rounded to the next lowest multiple of \$25.

Since the increased deduction is to the benefit of the family, EHA does not anticipate that families will need to request an exemption from this policy. However, households retain their right to request a financial hardship and the standard hardship policy applies.

Hardship Policy: Health and Medical Expense Threshold (NEW FOR FY23)

Elderly/disabled families with unreimbursed medical expenses greater than 3% of annual income, but less than 10% of income, who claim a financial hardship as a result of the increased threshold, can request a hardship rent.

If approved, the hardship will allow the family to deduct health and medical expenses that exceed 6.5% of annual income (halfway between the original threshold of 3% and the new threshold of 10%).

To request a hardship, the household must complete the Hardship Request form and include proof of all unreimbursed medical expenses for the prior 12 months. The form will be made available in an accessible format upon request as a reasonable accommodation. The request will be reviewed and the household notified of the approval or denial in a timely manner.

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Health and medical expense hardships will last until the household's next annual or triennial reexamination. If a household is approved for a hardship, and subsequently incurs additional unreimbursed medical expenses while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with proof of all applicable medical expenses. There is no limit on the number of hardships that a household may receive.

Hardship Policy: Affordable Housing Payment Standard (NEW FOR FY23)

Households facing a hardship as a result of the application of the affordable housing payment standard may apply for a temporary financial hardship waiver. If approved, EHA will phase in the application of the lower affordable housing payment standard over two years.

To request a hardship, the household must complete the Hardship Request form and include proof of financial hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. The request will be reviewed and the household notified of the approval or denial in a timely manner.

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Everett Housing Authority
MTW Impact Analysis - Affordable Housing Payment Standard

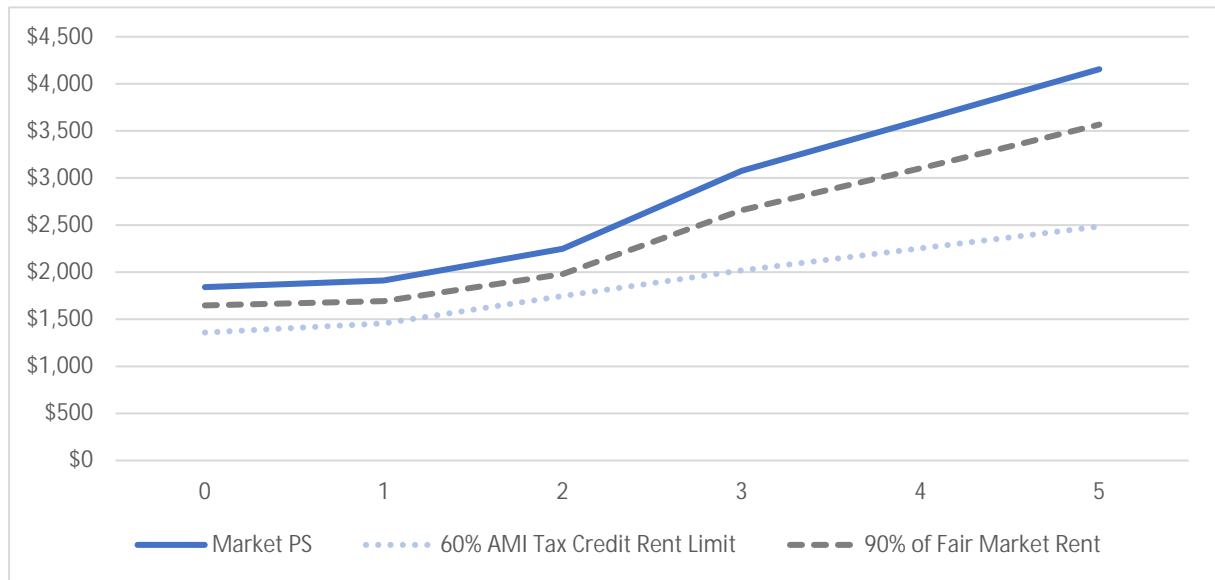
MTW Activities Covered by Impact Analysis	2.b. Payment Standards – Fair Market Rent
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1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)

EHA estimates that, after full implementation, based on current fair market rents and with an affordable housing payment standard set at 90% of the metro area fair market rent, this activity will generate HAP cost savings of approximately \$212,000 per year. EHA anticipates a modest increase in administrative cost associated with administering the additional payment standard.

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)

No expected impact on families renting a unit that is the same or smaller than the bedroom size on their voucher, since the affordable housing payment standard will be the same or higher than the applicable tax credit rent limit for the unit.



This activity will only impact housing affordability for overhoused families, since the affordable housing payment standard for the family’s issued size may be lower than the 60% AMI tax credit rent for a larger unit size. However, families will be able to request a hardship to phase in the change, which will give families time to adjust to the decreased payment standard.

Of the approximately 618 families who are expected to receive the affordable housing payment standard, 162 (26%) are renting a unit that is larger than the voucher bedroom size based on their family composition. Some of these households may have a reasonable accommodation for a larger size unit. The table below shows the number of overhoused families by voucher and bedroom size.

Voucher Size	2-BR Unit	3-BR Unit	4-BR Unit	5-BR Unit	Total
1	112	1			113
2		31	2		33
3			14	1	15
4				1	1
Total	112	32	16	2	162

The table below shows the expected maximum amount that overhoused families will pay beyond their standard rent portion, based on 90% of the fair market rent for the affordable housing payment standard, and current 60% AMI LIHTC maximum rents.

Voucher Size	2-BR Unit	3-BR Unit	4-BR Unit	5-BR Unit
1	\$54	\$326	--	--
2	--	\$39	\$273	--
3	--	--	\$0	\$0
4	--	--	--	\$0

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

No expected impact.

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)

No expected impact.

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

No expected impact.

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

This activity will contribute to the MTW statutory goal of cost effectiveness by decreasing HAP expenditures.

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

No expected impact.

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

EHA expects that most of the 162 overhoused families will initially request hardships to phase in the impact of the affordable housing payment standard.

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

The race of households who are overhoused in tax credit units with a tenant-based voucher is comparable to the overall population in tax credit units. Asian and Black/African American households are slightly **underrepresented** while White, Native American/Alaska Native and Native Hawaiian/Pacific Islander households are slightly **overrepresented**. There appears to be no difference in impact based on ethnicity (Hispanic or Non-Hispanic).

Race	Not Overhoused	Overhoused	Total
Other	0%	0%	0%
American Indian or Alaska Native Only	0%	2%	1%
Any Other Combination	0%	0%	0%
Asian Only	4%	2%	3%
Black/African American Only	16%	15%	16%
Native Hawaiian/Other Pacific Islander Only	1%	2%	1%
White Only	76%	77%	76%
White, American Indian/Alaska Native	1%	0%	0%
White, Asian	0%	0%	0%
White, Black/African American	1%	1%	1%

Ethnicity	Not Overhoused	Overhoused	Total
Hispanic	7%	7%	7%
Non-Hispanic	93%	93%	93%

Elderly and disabled families are slightly underrepresented while households who are not elderly or disabled are overrepresented.

Elderly/Disabled Family?	Not Overhoused	Overhoused	Total
No	25%	29%	26%
Yes	75%	71%	74%

Families without dependent children, and those with 2, 3, or 4 dependents, are overrepresented.

Number of Dependents	Not Overhoused	Overhoused	Total
0	70%	73%	71%
1	14%	8%	12%
2	7%	10%	8%
3	4%	6%	5%
4	2%	1%	2%
5	2%	0%	1%
6	1%	1%	1%

Everett Housing Authority
MTW Impact Analysis – Alternative (Triennial) Reexamination Schedule for
Qualifying Elderly and Disabled Households

MTW Activities Covered by Impact Analysis	3.b. Alternative Reexamination Schedule (HCV)
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)	
<p>EHA anticipates moderate administrative cost savings over the course of three years as the Simple Rent initiative is phased in for qualifying elderly and disabled families. EHA has not completed a comprehensive time study, but an organizational review completed for a peer housing authority estimated that each annual reexamination takes about 1.2 hours to complete.</p> <p>EHA estimates that a streamlined Simple Rent review will take approximately 0.25 to 0.5 hours per household, with the primary activities being to apply any cost-of-living adjustments (COLAs), calculate the applicable tenant rent, and send the updated notice of rent to the participant and landlord. As a result, EHA estimates a 60% reduction in staff time spent on A/Rs for the approximately 1,700 households who qualify for the Simple Rent initiative since only 1/3 of these households will need a full review each year.</p> <p>EHA does not estimate any significant change in the agency’s per-family contribution, as 75% of the elderly/disabled families who are eligible for Simple Rent have 100% of their income coming from fixed sources, and the remainder have 90% or more of their income from such sources – mostly Social Security retirement and/or disability, and some with pensions.</p>	
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)	
<p>Because EHA plans to automatically apply COLA adjustments to fixed income sources, Simple Rent families will likely see little to no change in their total tenant payment (TTP) compared to what they would have paid under the current policy. Families experiencing a decrease in income can request an interim reexamination to have their rent adjusted.</p>	
3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	
<p>No expected impact.</p>	
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)	
<p>Minimal to no expected impact. Families on a triennial reexamination cycle may receive fewer termination notices for noncompliance with providing required documentation.</p>	
5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program	
<p>No expected impact.</p>	
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice	

This activity promotes the MTW statutory goals of cost effectiveness. Moving to triennial reexaminations, coupled with other streamlining waivers that EHA is requesting and those already implemented, is expected to reduce staff time associated with the reexamination process.

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

No expected impact.

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

EHA expects minimal hardship requests from Simple Rent. Qualifying elderly and disabled households on a triennial reexamination cycle will continue to have the option to request an interim reexamination due to an income decrease, and will only need to request a hardship for other financial hardships.

EHA intends to track hardship requests to determine the impact of the policy on participating families and the amount of staff time spent processing hardship requests.

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

This waiver specifically impacts, and benefits, elderly and disabled families (where the head, co-head, spouse, and/or sole member is age 62+, and/or has a disability) with mostly or entirely fixed income sources.

EHA estimates that of the nearly 1,900 elderly and disabled voucher families served by the agency, over 1,700 would qualify for Simple Rent – nearly 700 project-based voucher families and over 1,000 tenant-based families. However, no additional impacts are expected.

Simple Rent-eligible families are slightly more likely to be headed by a person of white race compared with other elderly and disabled families (77.5% compared with 75.9%). Nearly 80% are single-person households, compared with only 32% of non-Simple Rent families, and 92% have no dependents, compared with 48% of non-Simple Rent families.

Everett Housing Authority
Agency-Specific MTW Waiver 1:
Modify Turnover Voucher Prioritization
July 1, 2023, to June 30, 2024

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 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. This activity will enable EHA to prioritize limited resources to the neediest families and align available housing resources with community needs. Instead, EHA will implement a modified prioritization for turnover vouchers.

EHA typically experiences turnover of about 200 vouchers per year due to attrition. Under current policy, families living in PBV units are given priority to receiving tenant-based vouchers after only one year of residency, while retaining project-based voucher assistance at the unit, which reduces the number of tenant-based vouchers available to new families on the waiting list.

In addition, EHA has identified the need to prioritize choice mobility for tenants living at EHA's Pivotal Point property, which serves families who have experienced domestic violence. This 20-unit property is operated in partnership with Domestic Violence Services of Snohomish County, the local domestic violence services organization in our community. Due to the specific population served at this property, EHA has identified that these families would benefit from being prioritized for tenant-based assistance once they have lived at Pivotal Point for at least 12 months.

Under this MTW activity, EHA is proposing to implement a multi-tiered prioritization model:

1. Turnover vouchers will first be issued to households in RAD PBV properties and who live at Pivotal Point, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit.
2. Of the remaining turnover vouchers available during the calendar year, 20% will be issued to tenants moving out of a PBV unit, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit, and 80% will be issued to households on the tenant-based voucher waiting list.

This activity will increase housing choice for families who are not yet receiving housing assistance while maintaining the stability of families who are already housed, without impacting the rights of RAD PBV tenants to choice mobility.

EHA will continue to consider requests from PBV tenants for tenant-based assistance due to VAWA (domestic violence) or reasonable accommodations for a disability.

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

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activities applies to a subset of assisted households.
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions (from the EHA waiting list) and currently assisted households in PBV units who have requested to move with tenant-based assistance.
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies to all family types.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
N/A
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to properties with project-based vouchers.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
All properties with project-based vouchers.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
N/A – new activity.

Implementation Timeline for Waiver

- April 2023: MTW Supplement Submitted to HUD
- June 2023: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2023: Waiver goes into effect

Impact Analysis

<p>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</p>
<p>This MTW activity is expected to have a modest financial benefit to EHA, due to decreasing turnover in many 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.</p>
<p>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)</p>
<p>No expected impact.</p>
<p>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</p>
<p>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 80% of available turnover vouchers (excluding RAD properties and Pivotal Point) 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.</p> <p>This activity is expected to increase the amount of time that households (other than RAD households and households at Pivotal Point) spend on the PBV interest list.</p>
<p>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)</p>
<p>No expected impact.</p>
<p>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</p>
<p>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.</p>
<p>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</p>
<p>This MTW activity is expected to positively impact the goals of cost effectiveness and housing choice.</p> <p>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 a greater opportunity to receive tenant-based voucher assistance.</p>
<p>7. Impact on the agency's ability to meet the MTW statutory requirements</p>
<p>No expected impact</p>
<p>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</p>

Little to no expected impact. EHA has not been able to issue tenant-based 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

TBD