



**EVERETT**  
HOUSING AUTHORITY

## **Annual PHA Plan and MTW Supplement**



**July 1, 2024 - June 30, 2025**  
***PUBLIC REVIEW DRAFT***



## **Public Comment Period**

**February 8, 2024, through March 25, 2024**

### **Public Hearing:**

Everett Housing Authority's Board of Commissioners will conduct a public hearing at noon on Monday, March 25, 2024. Information about joining the hearing will be posted to the Housing Authority's website ([www.evha.org](http://www.evha.org)) on March 15.

To request interpretation and/or disability accommodation, contact Chris Neblett at (425) 303-1186 or [chrisn@evha.org](mailto:chrisn@evha.org) by March 15, 2024.

### **How to Provide Public Comment:**

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

**Email:** [chrisn@evha.org](mailto:chrisn@evha.org) or [mtw@evha.org](mailto:mtw@evha.org)

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

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

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

**Definitions.**

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

A.	PHA Information.																				
A.1	<div> <div> PHA Name: <u>Housing Authority of the City of Everett</u> PHA Code: <u>WA 006</u> </div> <div> PHA Type: <input checked="" type="checkbox"/> Small </div> <div> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> </div> <div> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) </div> <div> Number of Public Housing (PH) Units <u>196</u> Number of Housing Choice Vouchers (HCVs) <u>3,759</u> </div> <div> Total Combined <u>3,955</u> </div> <div> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </div> <div> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>Everett Housing Authority’s proposed 2024-25 Annual Plan is available for public review at the following locations:</p> <ul style="list-style-type: none"> <li>EHA’s website: <a href="http://www.evha.org">www.evha.org</a></li> <li>EHA’s main administrative office at 3107 Colby Ave., Everett, WA. The office is open by appointment only. Members of the public who wish to review the proposed Plan and related material should call Chris Neblett at (425) 303-1186 to schedule an appointment.</li> </ul> </div> <div> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) </div> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> </div>	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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Lead PHA:																					

<b>B.</b>	<b>Plan Elements Submitted with 5-Year PHA Plans.</b> Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).
<b>B.1</b>	<b>Revision of Existing PHA Plan Elements.</b>  (a) Have the following PHA Plan elements been revised by the PHA since its last <b>Five-Year PHA Plan</b> submission?  Y   N <input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input type="checkbox"/> Financial Resources. <input type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification  (b) If the PHA answered yes for any element, describe the revisions for each element(s):  (c) The PHA must submit its Deconcentration Policy for Field Office Review.
<b>B.2</b>	<b>New Activities.</b>  (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?  Y   N <input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.
<b>B.3</b>	<b>Progress Report.</b>  Although this section is not a required part of the Annual Plan submission, EHA is submitting a summary of key accomplishments over FY 2023-24 as attachment a01.

<b>B.4</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
<b>B.5</b>	<b>Most Recent Fiscal Year Audit.</b> (a) Were there any findings in the most recent FY Audit? Y   N <input type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe:
<b>Plan Elements Submitted All Other Years (Years 1-4).</b> Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.	
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<b>B.2</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. <b>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 09/26/2023.</b>
<b>C Other Document or Certification Requirements for Annual Plan Submissions.</b> Required in all submission years.	
<b>C.1</b>	<b>Resident Advisory Board (RAB) Comments.</b> (a) Did the RAB(s) have comments to the PHA Plan? Y   N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <b>See attachment c01</b>



C.2	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>See attachment d01</b></p>									
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><b>See attachment e01</b></p>									
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N  <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>									
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>									
D.1	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item</p> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td></tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td></tr> <tr> <td>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.</td></tr> </table> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td></tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td></tr> <tr> <td></td></tr> </table> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td></tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td></tr> <tr> <td></td></tr> </table>	<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	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.	<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>		<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	
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## **Key Accomplishments Toward 5-Year Plan Goals during Plan Year 2023-24**

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

- Completed 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 began in Spring of 2023 and was completed at the end of October 2023.
- Continued entitlement activities for a new mixed-income community, the Park District. Primary entitlement activities include public meetings, 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.
- Initiated entitlement activities for the Park District's NE Quadrant ("Phase 2"). This development project anticipates approx. 250 units of housing in addition to public amenities including a park, civic partnership services, and neighborhood retail services.
- Engaged in design and permitting processes for Benjamin Young Senior Apartments, an Everett city central project with transportation and service proximity that anticipates up to 140 units and exterior amenity space.
- Executed a Memorandum of Understanding with Sno Isle Libraries for a joint development partnership in the Mariner community. The intent of this partnership is to acquire and develop land for the purposes of a mixed use, transit-oriented development (TOD) project including but not limited to library, civic amenities, and affordable housing uses.
- Obtained a \$20M credit line facility from Key Bank to provide increased financial resiliency to the agency as risk mitigation against potential cash reserves and cash flow volatility and to reduce cost of capital for short term financing needs.
- Continue to maintain an A+ investment grade issuer credit rating and an A+ social bond rating from Standard and Poor's. The S&P rating provides 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:**

- 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. Enrollment will be complete in April 2024.



- 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.
- Released a Request for Proposals to update EHA's website to improve the quality of information provided to participants and community members, including to improve housing search and mobility resources for participants. The website update is expected to be completed in the 2024-2025 program year.
- The Resident Services Department engaged in the following activities in conjunction with this goal:
  - Received comprehensive report from the Providence Institute for Healthier Communities, Health & Well Being Monitor Survey we conducted at the end of the previous fiscal year. 367 EHA households responded to the survey providing information about their health & well-being and the types of services and activities they need or desire. This information will offer invaluable insights into the programming and community partnerships that warrant our attention or require our focus.
  - Organized a Pacific Science Center (PacSci) on Wheels event at our new 105-unit Madrona Square Apartment community. This educational pop-up science event for families was made possible because PacSci donated their staff and materials. This event was attended by 64 residents. Due to this success, PacSci also participated at our Grandview Back-to-School Resource Fair event extending their reach to more families.
  - Hosted the annual Grandview Community Back-to-School Resource Fair that included 11 community organizations and agencies that provided information and resources for residents. In partnership with three of our local Managed Health Care Organizations, EHA received \$1,000 in donations to provide food, beverages, and giveaway items for all attendees. The event was attended by 164 residents from 42 different households. This was a 60% increase in attendance over the previous year.
  - Based on the technology assistance needs identified by residents in our previous Health & Well Being Monitor survey, we purchased 10 iPads for resident use and organized 'introduction to iPad' workshops across 18 Senior Properties. These 'loaner' iPads will provide digital access for residents that cannot afford to purchase their own device.
  - In a continued response to our older adult resident technology needs, we have developed a new partnership with Verizon. At no cost to EHA, Verizon staff are providing food and training at multiple senior properties teaching residents how to use their smart phone no matter the model or carrier. This instruction will help reduce frustration and isolation by making sure they can more easily access their email, information on the internet, participate in telehealth appointments, complete housing reviews, and communicate with family and friends.

- Facilitated the first Health & Wellness Resource Fair at the 151-unit Bakerview senior & disabled apartment community. 21 agencies and organizations were on-site to provide resources and direct access to free pet care, eyeglasses, Medicare enrollment, and more. We received \$500 in donations that contributed to food and prize giveaways. This very successful event was attended by 71 residents, which included 17 residents from other Delta neighborhood EHA properties.
- Received training for all Resident Service staff from the End of Life WA organization. This training will allow staff to conduct on-site workshops for residents to promote and provide the necessary tools and choices for advanced planning so they can make informed decisions consistent with their values prior to their end of life.
- The Family Self Sufficiency program enrolled 15 new households and graduated 4 participants, one of which accrued \$40,793 in escrow money! All current FSS Participants have successfully converted to the new and improved FSS Contract of Participation allowing them the ability to accrue more escrow as their earned income increases. We will also expand the FSS program opportunity to more households by recruiting a second FSS Program Coordinator to serve previously homeless PBV residents that live at our new Madrona Square property and a portion of our community HCV clients.
- This was the first full year with a monthly Resident Newsletter, which included EHA information, tools and resources both within the community and online, and local free events for both individuals and families.
- Connected with multiple local and state agencies and organizations with the EHA Facebook page, sharing 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.
- Implemented 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.
- During this time of hybrid work with many offices open limited hours or by appointment only, EHA continued to refine its remote and hybrid work tools and processes so that employees who work in person, hybrid, and remote, were able to collaborate, effectively perform their job duties, and be proud of their contribution to EHA's mission.
- Continued to hold virtual Town Hall Meetings to keep staff informed and engaged in carrying out the agency's mission.
- Held the annual in-person all-staff summer picnic, providing opportunities for staff to interact outside of the office.

**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
- Conducted a Request for Proposals to hire a consultant to provide diversity, equity, and inclusion (DEI) training and coaching to EHA staff. Two firms were identified to provide initial DEI training to senior leadership to determine which firm would be retained to offer training and coaching to all staff. Those initial trainings were offered in late CY 2023.
- 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, 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, previously participated in LSC’s Leadership for Racial Equity cohort.

## **EHA intends to undertake the following activities over the course of FY 2024-25:**

### Demolition and/or Disposition

EHA continues planning for the demolition of remaining units in the Baker Heights neighborhood (WA 006 000 100) during calendar year 2024, subject to any required HUD approval, permitting, and design/construction logistics. This activity is in preparation for development of a new mixed-income mixed-use community, the Park District, on the remaining-acreage 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.

EHA has initiated the entitlement process and predevelopment activities for the NE Quadrant of the Park District masterplan. 'Phase 2' will encompass approximately 250 units of housing in addition to public amenities including but not limited to park space, civic partnership amenity services, and retail amenity services.

### Project-Based Vouchers

EHA is currently in the predevelopment process for Benjamin Young Senior Apartments. The project will consist of up to 140 units of affordable senior 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 seniors.

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): 7/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

DRAFT

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

EHA was admitted to the federal Moving to Work (MTW) Demonstration in August 2021, as part of the Stepped and Tiered Rent Cohort. EHA calls its local MTW program “Making Things Work.” EHA envisions using its MTW flexibility to support three broad local initiatives that are in alignment with the street MTW statutory objectives as well as the agency’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.

During this upcoming fiscal year, EHA will continue to focus on waivers that will streamline program operations, reduce administrative burden, expand access to opportunity areas, and support the agency’s development efforts through use of MTW flexible funding for local, non-traditional activities, and streamlining of PBV contracting. EHA will also be examining modifications needed to make the program changes effectuated by the Housing Opportunities Through Modernization Act (HOTMA) work with EHA’s existing waivers and best meet local needs and market conditions.

All of the agency’s efforts will be guided by its vision of Thriving Resident Households and a commitment to engaging residents and participants in the development and implementation of the Making Things Work initiative at EHA.



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

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

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

<p><b>1.b. - Tiered Rent (HCV)</b></p> <p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>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.</p> <p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>
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<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased revenue; Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Non-elderly, non-disabled families</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>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.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Study enrollment began in January 2023 for households with annual reexamination dates starting in May 2023, as well as new admissions starting May 2023. Enrollment is expected to be complete in April 2024.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b></p> <p>The waiver was previously approved.</p>
<p><b>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</b></p> <p>The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.</p>
<p><b>Please describe how the income bands are structured.</b></p> <p>Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.</p>
<p><b>Please upload the tiered rent policy table that shows the income bands.</b></p> <p>This document is attached.</p>

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

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

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

**1.s. - Elimination of Deduction(s) (HCV)****Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

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

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

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

Cost effectiveness; Self-sufficiency

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

Increased revenue

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families

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

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

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

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

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

Study enrollment began in January 2023 for households with annual reexaminations starting in May 2023, and for new admissions starting May 2023. Study enrollment is expected to be complete in April 2024.

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

Provided Already
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> Provided Already
<b>Which deduction(s) will be eliminated, modified, or added?</b> Dependent allowance; Unreimbursed childcare costs; Other (please explain)
<b>Other (please explain)</b> 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.

<b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> 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. Prior to approval of this waiver, EHA had 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 incurred cost and additional staff time to have these determinations done by a third party.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b>

The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Vouchers used in units owned or controlled by EHA.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> EHA began implementing the waiver.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Please explain or upload a description of the quality assurance method.</b> EHA's reasonable process will include using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an EHA staff person who is trained on HCV and PBV rent reasonableness regulations. EHA will implement a streamlined process for units where the requested rent is demonstrably below market because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has HUD approval to use another local housing authority and a contracted inspector for inspections of EHA-owned units).  No document is attached.
<b>Please explain or upload a description of the rent reasonableness determination method.</b> EHA uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates at least 3 unassisted rent comparables for the subject unit, matching the unit characteristics and making adjustments based on unit-specific factors, similar to the approach used by property appraisers, and determines if the rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about HCV and PBV rent reasonableness regulations reviews the comparables to confirm that they are comparable to the subject unit.  No document is attached.

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> EHA has received approval for two separate waivers implementing triennial reexaminations for different household types.  In FY22 (see FY22 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.  In FY23 (see FY23 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled, and the household has at least 90% of their income from fixed sources. EHA is calling this initiative Simple Rent and it is part of the overall streamlining efforts EHA is undertaking with its MTW flexibility.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>

Cost effectiveness; Self-sufficiency
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased revenue; Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies only to selected family types
<b>Please select the family types subject to this MTW activity.</b> Other – another specifically defined target population or populations.
<b>If Other Selected in Previous Question: Please describe this target population in the text box.</b> Triennial reviews under the Tiered Rent Demonstration apply to non-elderly, non-disabled households who are selected to be part of the Tiered Rent group.  Triennial reviews under the Simple Rent initiative apply to elderly and disabled households with mostly fixed income sources.
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Tenant-based and project-based voucher units occupied by families who are eligible for either the Tiered Rent or Simple Rent policy.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> FY22 Tiered Rent for employment-focused families - HUD waiver approved and enrollment in rent study began in January 2023. Enrollment is expected to be complete in April 2024.  FY23 Simple Rent waiver - EHA is currently in the planning stages for implementing this waiver and expects to roll it out later in the 2024-2025 fiscal year.
<b>Does this MTW activity require a hardship policy?</b> Provided Already



<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b></p> <p>The waiver was previously approved.</p>
<p><b>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</b></p> <p>The safe harbor waiver is for Tiered Rent triennials and allows EHA to implement the tiered rent policy as designed by HUD.</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Provided Already</p>
<p><b>What is the recertification schedule?</b></p> <p>Other</p> <p>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.</p> <p>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.</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>2 or more</p>
<p><b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b></p> <p>FY23 approved for Qualifying Elderly/Disabled Households under Simple Rent: If a household's income increases in between triennial reexaminations, aside from published COLAs, the family total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. Families may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a family believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.</p> <p>See the FY23 MTW Supplement for a full description of this hardship policy.</p> <p>FY22 approved (Tiered Rent Demonstration): The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See the FY23 MTW Supplement for a full description of this hardship policy.</p>

<p><b>3.d. - Self-Certification of Assets (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>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.</p> <p>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.</p>

<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>This waiver has been fully implemented.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please state the dollar threshold for the self-certification of assets.</b></p> <p>\$50,000.</p>

<p><b>5.c. - Third-Party Requirement (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>EHA will be allowed to complete HQS inspections on units that it owns. This contributes to our streamlining and cost savings initiative, as EHA previously expended significant resources coordinating and paying third-party inspectors to complete HQS inspections on units that the agency owns or controls.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>

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

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

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

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

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

Additional EHA staff were trained and certified in the HQS inspection standard in FY23 to facilitate implementation of this waiver. EHA no longer requires the services of a contract inspector, other than for the quality assurance inspections.

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

No

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

Following will explain the quality assurance method

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

No document is attached.

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

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

EHA plans to implement a triennial inspection schedule specifically for project-based voucher units operated by EHA. These units are already inspected annually by EHA property management staff as part of their standard property management oversight, which includes very similar inspection criteria. Removal of the requirement to complete an additional inspection, or to have to complete an inspection following two separate inspection criteria, will decrease staff time spent on administrative activities. EHA plans to continue to conduct inspections of non-EHA managed voucher units at least biennially.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

<b>admissions and currently assisted households?</b> Currently assisted households only
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Project-based voucher units managed by EHA.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> N/A - new activity.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No

<b>9.d. - Alternative PBV Selection Process (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> EHA plans to implement an alternative selection process for PBV properties developed or acquired and rehabilitated by EHA or through a affiliate or partnership of which EHA is a participant. Instead of conducting an RFP, EHA will award PBVs to new EHA-affiliated developments or acquisition/rehabilitation projects based on threshold criteria: 1) The units proposed for PBV assistance at the development will serve households at or below 50% of the area median income, 2) the development demonstrates the need for PBV subsidy based on an operating pro forma showing that PBV subsidy is needed to serve the target income population for the proposed assisted units while ensuring that the development is financially feasible, and 3) the commitment of PBVs will not result in EHA exceeding the applicable PBV program cap (including any increases to the cap under approved MTW waivers).  This waiver will decrease the administrative burden and staff cost associated with conducting a competitive process to award PBVs to a development that is being constructed or acquired and rehabilitated by EHA or an EHA affiliate or partnership. This waiver is in alignment with EHA's Strategic Plan, as well as its PHA Plan objectives, to increase EHA's housing portfolio by 1,500 units primarily through new construction, and to increase access to housing in communities of opportunity.  In awarding PBVs to any property, EHA will meet the following safe harbor requirements for this waiver: EHA will continue to follow the requirements of PIH Notice 2013-27, and EHA will have an independent entity conduct HQS inspections before executing a PBV HAP contract.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness; Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>

The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions (i.e., applicants) only
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Project-based voucher units that are selected under this alternative process.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> N/A - new activity
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No

<b>9.h. - Limit Portability for PBV Units (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.  This waiver modifies the regulations at 24 CFR 983.261, which require EHA to give tenants who have lived in a project-based voucher (PBV) unit the next available opportunity for tenant-based assistance. This activity enables 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 has implemented 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. However, households in tier 2 who have been waiting at least 24 months for a voucher will be prioritized before issuing vouchers 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.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness; Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> The MTW activity applies to all properties with project-based vouchers.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> This waiver has been implemented and EHA continues to issue vouchers under choice mobility to PBV tenants pursuant to the waiver. The initial benefits of the waiver have been limited while EHA works through the list of existing PBV tenants on the list who have been waiting at least 24 months. EHA anticipates that over time, this waiver will allow EHA to increase the share of households who will be pulled from the regular waiting list.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No

<b>11.a.HCV - Alternative Family Selection Procedures (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation planning is underway.  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. EHA will not use income increases during participation in the



<p>alternative self-sufficiency program to change the eligibility status of a family for purposes of participation in the alternative self-sufficiency program or for the receipt of HCV or PBV assistance.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>Currently assisted households only</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Other – another specifically defined target population or populations.</p>
<p><b>If Other Selected in Previous Question: Please describe this target population in the text box.</b></p> <p>Households participating in the tiered rent study. The tiered rent study is targeted to households that are non-elderly, non-disabled, and also excludes mixed citizenship status families and current FSS and homeownership program participants.</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Staff have begun developing the THRIVE+ program and plan to start enrollment in May 2024.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>No</p> <p>No document is attached.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p>

No
<b>Does the MTW activity require an impact analysis?</b> No No document is attached.
<b>Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?</b> No

<b>11.b.HCV - Policies for Addressing Increases in Family Income (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation planning is underway.  This waiver is being implemented in connection with the 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. EHA will not use income increases during participation in the alternative self-sufficiency program to change the eligibility status of a family for purposes of participating in the alternative self-sufficiency program or for the receipt of HCV or PBV assistance.  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.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Self-sufficiency
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> Currently assisted households only
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies only to selected family types
<b>Please select the family types subject to this MTW activity.</b>

Other – another specifically defined target population or populations.
<b>If Other Selected in Previous Question: Please describe this target population in the text box.</b> Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> Staff are developing the THRIVE+ program and plan to start enrollment in May 2024
<b>Does this MTW activity require a hardship policy?</b> No  No document is attached.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> No  No document is attached.
<b>What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?</b> Families participating in the THRIVE + program will sign a 5-year contract of participation, with the possibility of up to a 2-year extension, agreeing to completion of specific milestones that will increase their economic success and earning potential. They will earn escrow credits for each activity that is completed. The final amount of the escrow payout at the end of the contract will be based on completion of the contract milestones as well as a cost neutrality calculation based on any family increases in earned income. The escrow payout can be no more than the amount of HAP cost savings generated based on increases in earned income by the family.

<b>17.b. - Service Provision</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> See the FY23 Supplement narrative for a full description of this activity. This activity has been approved by HUD and is currently being implemented.  This waiver allows for the use of HAP and other MTW funds for supportive services and related activities to support EHA residents and program participants. All activities will be in alignment with the EHA strategic plan and its mission statement to help households to thrive. Examples of activities that EHA may use MTW funding to support include paying for service coordinators at EHA-owned/controlled properties, both with and without PBVs, to connect residents to resources to enhance the quality of their lives and increase self-sufficiency and provision of high-speed internet at certain

EHA-owned/controlled properties with and without PBVs. Access to internet allows residents to participate in online services, search for jobs, and complete required voucher review activities online. All activities will support households at or below 80% of area median income.

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

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

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

This waiver has been approved, and EHA plans to use funding flexibility to pay for certain service coordination expenses.

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

No

**What types of services is the MTW agency providing?**

Service coordination at certain EHA-owned/controlled PBV properties; EHA may also provide high speed internet at certain EHA-owned/controlled PBV properties

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

0

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

The MTW activity applies to specific units/properties

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

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

to 80% of area median income.

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

Yes

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

0

#### 17.c. - Housing Development Programs

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

See the FY23 Supplement narrative for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

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

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

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

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

HUD approved the waiver and EHA has begun implementing the waiver by expending funds on certain development

activities.

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

No

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

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

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	New construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00
Bakerview/Grandview	Rehabilitation	TBD; likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00

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



Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Madrona Square	New construction	Gap financing	67.00	105.00	0.00	67.00	0.00	0.00

**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
	New construction	Gap financing	67.00	105.00	0.00	67.00	0.00	0.00

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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></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, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>Yes, the Agency-Specific Waiver request is attached.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>Yes</p> <p><b>Has there been a change in how the waiver is being implemented from when it was originally approved?</b></p> <p>No</p>

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

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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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		<b>0</b>

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

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

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

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

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

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

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

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

DRAFT

**Everett Housing Authority**  
**Agency-Specific MTW Waiver 1:**  
**Inspection Success Fund**  
**July 1, 2024, to June 30, 2025**

**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 requesting approval to use MTW funding to create an Inspection Success Fund that the Inspections team will use to purchase an inventory of small items needed to address minor items that cause a unit to fail an inspection. Examples of items that EHA anticipates purchasing using the fund are battery-sealed smoke detectors and switch plate/outlet covers. The goal of the fund is to increase the percentage of units that pass an inspection on the first attempt and decrease the time for a unit to pass inspection, thereby reducing staff time spent on reinspections and verifying corrective actions, reducing the amount of time before a participant can move into a new unit, and increasing landlord satisfaction with the HCV program.

The upcoming new housing inspection standard for the HCV program, the National Standards for the Physical Inspection of Real Estate (NSPIRE) will require that each bedroom have a smoke detector installed. EHA will be implementing the NSPIRE standard starting October 1, 2024. The Federally Assisted Housing Fire Safety Act of 2022 will require that, starting December 29, 2024, smoke detectors in federally assisted units have a sealed battery. EHA anticipates that these new requirements will increase the rate of failed inspections while landlords become familiar with them. In addition, EHA already frequently encounters units with minor fail items such as a cracked switch plate or outlet cover.

This waiver will allow EHA inspection staff to purchase and retain a supply of battery-sealed smoke detectors and switch plate and outlet covers that can be installed during inspections to allow the unit to pass inspection immediately. EHA staff may also identify other items to purchase using the Success Fund that would be consistent with the goal of increasing the pass rate of inspections.

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

Housing Choice, Cost Effectiveness.

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

Decreased Cost.

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

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 and currently assisted households.
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
This activity applies to tenant-based voucher tenancies. It does not apply to project-based vouchers.
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
This activity applies to tenant-based voucher units that are undergoing an HQS or NSPIRE inspection.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>
N/A – new activity.

#### Implementation Timeline for Waiver

- April 2024: MTW Supplement Submitted to HUD
- June 2024: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2024: Waiver goes into effect

#### Impact Analysis

<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
EHA estimates spending up to \$10,000 on this activity in the first year.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
No expected impact.
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
No expected impact.

<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
No expected impact.
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
This activity may have a modest positive impact on the utilization rate in the HCV program, by decreasing the length of time from the time that a participant submits a Request for Tenancy Approval for a unit to the time that the unit passes inspection and the participant can move in to the unit.
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This activity will contribute to the goal of cost effectiveness by decreasing staff time and travel spent on reinspections. It will also contribute to the goal of housing choice by increasing landlord satisfaction. EHA anticipates that smaller landlords, who may have units in higher opportunity areas or single-family homes, are most likely to benefit from this waiver, as they are less likely to be familiar with inspection requirements and be prepared to meet these requirements.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
No expected impact.
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>
No expected impact.
<b>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</b>
No expected impact.

### **Hardship Policy**

This is an administrative efficiency that is targeted at HCV landlords and should not require assisted families to request a hardship exemption.

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

[To come.]