

EVERETT
HOUSING AUTHORITY

Annual PHA Plan and MTW Supplement



July 1, 2024 - June 30, 2025



U.S. Department of Housing and Urban Development

Seattle Regional Office
Seattle Federal Office Building
Office of Public Housing
909 First Avenue, Suite 360
Seattle, WA 98104-1000

September 4, 2024

Mary Swenson, Acting Executive Director
Housing Authority of the City of Everett
3107 Colby Ave
Everett, WA 98201

Re: Approval of the PHA Annual Plan and Moving to Work Supplement to the PHA Plan with an Agency Specific Waiver for Fiscal Year beginning 7/1/2024 through Fiscal Year Ending 6/30/2025

Dear Mrs. Swenson:

This letter is to inform you that Department of Housing and Urban Development has completed its review of the Agency Specific Waiver Inspection & Rent Reasonableness Efficiency Improvements request submitted as part of Everett Housing Authority's Moving to Work (MTW) Supplement (Form 00388) to its Fiscal Year beginning 7/1/2024, through Fiscal Year Ending 6/30/2025 is approved on 9/4/2024. The Plan approved is version 3.

The waiver request listed below is approved. Your agency is free to move forward with the implementation of the activity(s) described in the MTW Supplement to the PHA Plan.

Inspection & Rent Reasonableness Efficiency Improvements:

The Everett Housing Authority is seeking to waive 24 CFR 982.352(b)(1)(v)(A)(1) – (A)(3), 24 CFR 983.303(f), and certain provisions of section 8(o)(11) of the 1937 Housing Act to implement Inspection & Rent Reasonableness Efficiency Improvements through an Agency Specific Waiver. For units receiving tenant-based assistance, this request will allow the PHA to perform inspections, rent reasonableness determinations, and negotiate contract rent for units owned or controlled by the PHA in accordance with 24 CFR 982.506. Instead of using a HUD-approved Independent Entity, EHA will apply the existing process in place for MTW waiver 5.c, where, for project-based assisted units, EHA self-conducts inspections and rent determinations, with a random sample of self-conducted inspections and

rent determinations reviewed by the Housing Authority of Snohomish County (HASCO) for quality control purposes. EHA will send HASCO a list of self-conducted inspections and rent reasonableness determinations monthly for HASCO to conduct quality control reviews on and identify the inspections and rent determinations that are randomly selected for review. EHA will provide a copy of the self-conducted inspection and rent determination documentation to HASCO with the list to facilitate the quality control review.

The Department's approval of this MTW Supplement is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement, your PHA must comply with the rules, standards, and policies established in the MTW Supplement as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved MTW Supplement (i.e., HCV Administrative Plan, Public Housing Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved MTW Supplement and all required attachments and documents must be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions, please contact your Portfolio Management Specialist, Crystal Simpson at Crystal.R.Simpson@hud.gov or 206-220-5182.

Sincerely,

Julie Foss
Acting Director
Office of Public Housing

CC: John Concannon, MTW Program Director
Ann Becker, MTW Desk Officer



U.S. Department of Housing and Urban Development

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July 01, 2024

Mary Swenson, Acting Executive Director
Housing Authority of the City of Everett
3107 Colby Ave
Everett, WA 98201

Dear Mrs. Swenson:

This letter is to inform you that the Housing Authority of the City of Everett's Annual PHA Plan and Moving to Work (MTW) Supplement for the Fiscal Year beginning July 1, 2024, is conditionally approved.

The Department of Housing and Urban Development is still reviewing the **AGENCY-SPECIFIC WAIVER** request(s) submitted as part of the **Housing Authority of the City of Everett's** Moving to Work (MTW) Supplement to its **Fiscal Year beginning July 1, 2024**. You will receive a response in a separate letter.

The following waivers remain under review:

- Agency-specific waiver 1: Inspection and Rent Reasonableness Efficiency Improvements

The Department's approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved PHA Plan and MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved PHA Plan and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions, please contact your Portfolio Management Specialist, Crystal Simpson at Crystal.R.Simpson@hud.gov or 206-220-5182.

Sincerely,

A handwritten signature in black ink that reads "Janice King-Dunbar". The script is cursive and fluid, with the first name "Janice" and last name "Dunbar" clearly legible.

Janice King-Dunbar
Director
Office of Public Housing

CC: John Concannon, MTW Program Director
Ann Becker, MTW Desk Officer

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

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

Definitions.

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

A.	PHA Information.																									
A.1	<p>PHA Name: <u>Housing Authority of the City of Everett</u> PHA Code: <u>WA 006</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Small</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>196</u> Number of Housing Choice Vouchers (HCVs) <u>3,759</u></p> <p>Total Combined <u>3,955</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>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"> EHA’s website: www.evha.org 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. <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <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>						Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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B.	<p>Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).</p>
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Five-Year PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Although this section is not a required part of the Annual Plan submission, EHA is submitting a summary of key accomplishments over FY 2023-24 as attachment a01.</p>

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

C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attachment d01</p>									
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attachment e01</p>									
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>									
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>									
D.1	<p>Affirmatively Furthering Fair Housing.</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>Fair Housing Goal:</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>Fair Housing Goal:</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>Fair Housing Goal:</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>	Fair Housing Goal:	<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.	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>		Fair Housing Goal:	<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.

Certifications of Compliance with PHA Plan and Related Regulations (Small PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning July 1, 2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):
 - 903.7a Housing Needs
 - 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
 - 903.7c Financial Resources
 - 903.7d Rent Determination Policies
 - X 903.7h Demolition and Disposition
 - 903.7k Homeownership Programs
 - 903.7r Additional Information
 - X A. Progress in meeting 5-year mission and goals
 - B. Criteria for substantial deviation and significant amendments
 - C. Other information requested by HUD
 - X 1. Resident Advisory Board consultation process
 - X 2. Membership of Resident Advisory Board
 - 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of

the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For a PHA Plan that includes a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Everett
PHA Name

WA 006
PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 2024 - 2025

X Annual PHA Plan for Fiscal Year 2024-25

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

Name of Executive Director (acting): Cynthia Andrews

Name of Board Vice-Chair: Cynthia Andrews

Signature 
Cynthia Andrews (Mar 27, 2024 09:24 PDT)

Date Mar 27, 2024
Mar 27, 2024

Signature 
Cynthia Andrews (Mar 27, 2024 09:24 PDT)

Date Mar 27, 2024
Mar 27, 2024

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

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

Attachment d01 – FY 2024-25 PHA Annual Plan: Housing Authority of the City of Everett

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

I, Kembra Landry, the City of Everett Community Development Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year 2024-25 of the Housing Authority of the City of Everett is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Everett
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

EHA's proposed plan are consistent with the City's Consolidated Plan by supporting goals of
housing rehabilitation, creation of new units, and social service provision for low/moderate income
households.

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

Name of Authorized Official:	Title:
Kembra Landry	Community Development Manager
Signature: <u>Kembra Landry</u>	Date: 2/16/2024

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

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

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

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).

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

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

<p>1.b. - Tiered Rent (HCV)</p> <p>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</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>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>

<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</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>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.</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>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver was previously approved.</p>
<p>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</p> <p>The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.</p>
<p>Please describe how the income bands are structured</p> <p>Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.</p>
<p>Please upload the tiered rent policy table that shows the income bands.</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
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? Provided Already
Which deduction(s) will be eliminated, modified, or added? Dependent allowance; Unreimbursed childcare costs; Other (please explain)
Other (please explain) All deductions, including the dependent allowance and deduction for unreimbursed childcare costs, will be eliminated for families who are part of the tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these deductions will be able to request a hardship adjustment to their rent calculation.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. EHA will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based 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.
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. PBV-assisted units owned or controlled by EHA.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. EHA began implementing the waiver.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Please explain or upload a description of the quality assurance method. EHA's reasonable process will include using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an EHA staff person who is trained on PBV rent reasonableness regulations. EHA will implement a streamlined process for units where the requested rent is demonstrably below market because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has HUD approval to use another local housing authority and a contracted inspector for inspections of EHA-owned units). No document is attached.
Please explain or upload a description of the rent reasonableness determination method. EHA uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates at least 3 unassisted rent comparables for the subject unit, matching the unit characteristics and making adjustments based on unit-specific factors, similar to the approach used by property appraisers, and determines if the rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about rent reasonableness regulations reviews the comparables to confirm that they are comparable to the subject unit. No document is attached.

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

Cost effectiveness; Self-sufficiency
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>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.</p> <p>Triennial reviews under the Simple Rent initiative apply to elderly and disabled households with mostly fixed income sources.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Tenant-based and project-based voucher units occupied by families who are eligible for either the Tiered Rent or Simple Rent policy.</p>
<p>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.</p> <p>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.</p> <p>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.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver was previously approved.</p>
<p>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</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>Does the MTW activity require an impact analysis?</p> <p>Provided Already</p>
<p>What is the recertification schedule?</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>How many interim recertifications per year may a household request?</p> <p>2 or more</p>
<p>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</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>3.d. - Self-Certification of Assets (HCV)</p>
<p>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</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>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>This waiver has been fully implemented.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please state the dollar threshold for the self-certification of assets.</p> <p>\$50,000.</p>

<p>5.c. - Third-Party Requirement (HCV)</p>
<p>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</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 PBV units that it owns or controls. 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>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies to all family types</p>

<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>EHA-owned or controlled units under the project-based voucher program.</p>
<p>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.</p> <p>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.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>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.</p> <p>No document is attached.</p>

<p>5.d. - Alternative Inspection Schedule (HCV)</p>
<p>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</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new</p>

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

9.d. - Alternative PBV Selection Process (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 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.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW 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 (i.e., applicants) only
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. Project-based voucher units that are selected under this alternative process.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A - new activity
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

9.h. - Limit Portability for PBV Units (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW 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. The MTW activity applies to all properties with project-based vouchers.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. 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.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

11.a.HCV - Alternative Family Selection Procedures (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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 that will be offered to households participating in the Tiered Rent study (both treatment and control group households) in lieu of the traditional Family Self-Sufficiency program (the traditional FSS program will continue to be offered to non-study 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 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.

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

Self-sufficiency

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

Neutral (no cost implications)

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

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

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

Currently assisted households only

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

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.

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

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

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

Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional. Non-rent study households will continue to be offered the option to participate in the traditional FSS 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.

Staff have begun developing the THRIVE+ program and plan to start enrollment in May 2024.

Does this MTW activity require a hardship policy?

No

No document is attached.

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>
<p>Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?</p> <p>No</p>

<p>11.b.HCV - Policies for Addressing Increases in Family Income (HCV)</p>
<p>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</p> <p>See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation planning is underway.</p> <p>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.</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>Currently assisted households only</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p>

Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box. Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Staff are developing the THRIVE+ program and plan to start enrollment in May 2024
Does this MTW activity require a hardship policy? No No document is attached.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? No No document is attached.
What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program? 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.

17.b. - Service Provision
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative There are two activities included under this waiver. The first activity has been approved by HUD and is currently being implemented. The second activity is new this fiscal year (FY24). The first 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.

The second activity, which is being newly added this year, will 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?

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.

The Inspection Success fund will be used for items that can be used during inspections of either HCV or PBV units.

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

The first activity within this waiver has been approved, and EHA plans to use funding flexibility to pay for certain service coordination expenses.

The second activity, Inspection Success Fund, is newly added this year.

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>What types of services is the MTW agency providing?</p> <p>Service coordination at certain EHA-owned/controlled PBV properties; EHA may also provide high speed internet at certain EHA-owned/controlled PBV properties. New this year, EHA is creating an Inspection Success Fund to purchase small items to facilitate passed inspections.</p>
<p>How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?</p> <p>0</p>
<p>Does the MTW activity apply to all LNT units/properties?</p> <p>The MTW activity applies to specific units/properties</p>
<p>Describe which LNT units/properties participate in the MTW activity?</p> <p>Certain EHA-owned/controlled units that offer service coordination but are not assisted with PBVs, serving households up to 80% of area median income, could be assisted with service coordination funding. The Inspection Success Fund will not apply to LNT units.</p>
<p>Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?</p> <p>Yes</p>
<p># of persons receiving LNT services only in the most recently completed PHA fiscal year.</p> <p>0</p>

<p>17.c. - Housing Development Programs</p>
<p>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</p> <p>See the FY23 Supplement narrative for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>

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

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

E.	Agency-Specific Waiver(s).							
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, 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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? Yes</p>							
	<table border="1"> <thead> <tr> <th>Title</th> <th>Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td>Inspection and Rent Reasonableness Efficiency Improvements</td> <td>0</td> </tr> <tr> <td>Inspection and Rent Reasonableness Efficiency Improvements</td> <td>1</td> </tr> </tbody> </table>		Title	Supporting Documents Attached	Inspection and Rent Reasonableness Efficiency Improvements	0	Inspection and Rent Reasonableness Efficiency Improvements	1
	Title	Supporting Documents Attached						
Inspection and Rent Reasonableness Efficiency Improvements	0							
Inspection and Rent Reasonableness Efficiency Improvements	1							

E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: Does the MTW agency have any approved Agency-Specific Waivers? Yes				
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	PBV Choice Mobility, Affordable Payment Standard	No			
	Multiple Waivers	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	0

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

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

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

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

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?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
<p>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.</p>	

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
Tiered Rent Table**

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

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

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

Everett Housing Authority MTW Hardship Policy

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

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

What is a Hardship Exemption?

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

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

What Does EHA Consider a Hardship?

EHA considers the following situations to be hardships:

1. For automatic hardships, at time of triennial reexamination:
 - a. Your family qualifies for a large exemption under the traditional rent policy due to having 4 or more dependents at the time of your triennial reexamination.
 - a. Your family qualifies for a large exemption under the traditional rent policy due to have unreimbursed child/dependent care expenses over \$2,500 at the time of your triennial reexamination.
 - a. Your family has had a loss of income and the 12-month period used to calculate your new rent at your recertification does not reflect your current income
1. For hardships requested by the family, which can be requested at any time:
 - a. Your family has a loss of income that would drop the family into a lower rent tier than the one that you are currently in
 - a. Your family experiences a new or increased unreimbursed child/dependent care expense of over \$2,500 per year/\$209 per month

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

To qualify for a hardship exemption, you must:

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

What Help Can I Get Under the Hardship Policy?

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

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

How Long Will My Reduced Rent Last?

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

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

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

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

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

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

How Do I Request a Hardship Exemption?

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

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

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

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

How Will EHA Review My Hardship Request?

All family-initiated hardship requests will be reviewed by a staff supervisor to ensure consistency in the review process. When a family requests a hardship exemption, EHA will implement the hardship rent beginning the first of the month following the family's request. EHA will strive to review hardship requests within 10 business days of receiving a request and all documentation needed to process the request. EHA will prioritize requests where the family is on the verge of eviction or similar consequences.

What Happens if EHA Does Not Approve My Hardship Request?

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

If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by EHA's Hearing Officer. See Chapter 16 for additional information.

What Happens When My Hardship Expires?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Everett Housing Authority
Agency-Specific MTW Waiver 1:
Inspection and Rent Reasonableness Efficiency Improvements
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.
<p>EHA is requesting a waiver of the regulations at 24 CFR 982.352(b)(1)(v)(A)1-(A)(3); 24 CFR 983.303(f), and certain provisions of Section 8(o)(11) of the Housing Act of 1937 requiring the PHA to use an independent entity to perform inspections and rent reasonableness determinations on units owned or controlled by the PHA, as well as to assist the family in negotiating the rent to owner in accordance with 982.506.</p> <p>Instead, EHA will apply the existing process already in place for the waiver for PBV units, where EHA self-conducts inspections and rent determinations, with a random sample of self-conducted inspections and rent determinations reviewed by a third party each year for quality control purposes. EHA works with the Housing Authority of Snohomish County (HASCO) as the independent entity to conduct these functions.</p> <p>EHA will send HASCO a list of self-conducted inspections and rent reasonableness determinations monthly for HASCO to conduct quality control reviews on, and identify the inspections and rent determinations that are randomly selected for review. EHA will provide a copy of the self-conducted inspection and rent determination documentation to HASCO with the list to facilitate the quality control review.</p> <p>EHA has existing MTW waivers of the independent entity requirement in place which apply to project-based voucher (PBV) units owned or controlled by EHA; however, HUD has informed EHA that this waiver does not extend to tenant-based assistance in units owned or controlled by EHA.</p> <p>This activity contributes to EHA's streamlining and cost savings activities, by decreasing the cost spent on an independent entity, as well as staff time to coordinate independent entity inspections and rent determinations for a subset of EHA's portfolio.</p>
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?
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?
This activity applies to new admissions and currently assisted households, to the extent they choose to use their tenant-based voucher to occupy a unit owned or controlled by EHA
Does the MTW activity apply to all family types or only to selected family types?
This activity applies all family types, to the extent they choose to use their tenant-based voucher to occupy a unit owned or controlled by EHA
Please select the family types subject to this MTW activity.
All family types
If Other Selected in Previous Question: Please describe this target population.
N/A
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
No; this activity only applies to units owned or controlled by EHA, which do not have project-based subsidy and are therefore eligible for occupancy by tenant-based voucher holders
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
Tenant-based vouchers occupying units owned or controlled by EHA
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
EHA previously believed that our existing MTW waivers 2.d. and 5.c. included tenant-based vouchers. In May 2024, EHA was informed by HUD that the waiver did not include tenant-based voucher assisted units. This waiver is being requested to allow EHA to apply this flexibility to our entire portfolio.

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

1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)
This waiver is expected to reduce administrative costs. There are currently approximately 126 tenant-based voucher participants living in EHA-owned or EHA-controlled units. At a cost of \$100 per inspection,

conducted every 2 years, as well as initial inspections, EHA estimates that this waiver will save over \$6,000 per year in inspections costs. EHA also estimates administrative cost savings, for which EHA does not have a specific estimate, because of the amount of coordination required when a third party is conducting an inspection.
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)
No expected impact.
3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
No expected impact.
4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)
No expected impact.
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
EHA anticipates a modest positive impact on the HCV utilization rate, by decreasing the time from issuance to HAP contract execution for HCV families leasing a unit in a property owned or controlled by EHA. Over 1,000 units in EHA's portfolio have no unit-based rental subsidy, and are thus available to qualifying tenant-based voucher participants.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
This activity will contribute to the MTW statutory goal of cost effectiveness by decreasing administrative expenditures. It will also contribute to the statutory goal of housing choice by decreasing barriers for tenant-based voucher participants who choose to lease a unit owned or controlled by EHA, which is expected to decrease the time from issuance to HAP contract execution.
7. Impact on the agency's ability to meet the MTW statutory requirements
No expected impact.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity
No expected impact. This is an administrative efficiency that should not trigger any hardship requests.
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)
No expected impact.

Hardship Policy

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

However, families may request a review and explanation of the unit's rent reasonableness determination and results of the HQS inspection for all EHA-owned or -controlled units receiving HCV rental assistance. Furthermore, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan.

Comments Received at Public Hearing

None.

**Resident Advisory Board Meeting
Annual Plan and MTW Supplement
January 30, 2024**

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Tuesday, January 30, 2024, to receive comments and recommendations related to the development of the 2024-25 Public Housing Agency Annual Plan and MTW Supplement. This meeting took place at the main administrative office (3107 Colby) and via Zoom videoconference. Residents and program participants who attended this meeting were appointed to the RAB.

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Jason Morrow	Chief Real Estate Officer
Linda Baines	Deputy Director of Housing Management
Chris Neblett	Administrative Supervisor
Heather Stults	Strategic Engagement Manager
Anna Todd	Housing Choice Voucher Program Manager

RAB Members in Attendance:

Serena Sullivan – Scriber Pointe (PBV)	Risa Meinke – Broadway Plaza (PBV)
Brenda Meritt-Motta – PBV	Pedro Reyes-Sanchez – Broadway Plaza (PBV)
John Fischer – HCV	Maxine Ghansah -- HCV
Eiman Ibrahim – HCV	Michelle Grunder -- HCV
Houston Mojilong – HCV	Tenena Mori – PBV-New Century House
Cindy Burgett – Bakerview (PBV)	Jesse Larry – PBV-Woodlake Manor
Lisa Smith – Bakerview (PBV)	Vivian Adcock Broadway Plaza (PBV)
Sandra Carbary – HCV	Sister Mohammed – HCV
Kristina Ransopher – HCV	
Nicki Graham – HCV	
Zaineb Alaboudy – Wiggums Park Place (PBV)	
Amelia Wilson -- HCV	
Arkadiy Yashyn -- HCV	
Courtney Boyd -- HCV	

EHA staff members gave a presentation on the agency's planned activities to further its Five-Year Goals and Objectives over the course of the 2024-25 Annual Plan year. RAB members provided comments during and after this presentation. The RAB's comments and EHA's preliminary response specific to each are provided in the section below.

EHA will include this preliminary response to the RAB's comments, and other public comments received during the public review period, for EHA's Board of Commissioners to consider at the March 25, 2024, public hearing on the Annual Plan and MTW Supplement. The Board may amend or revise one or more of these preliminary responses prior to adopting the Plan at the conclusion of the March 25 public hearing.

RAB Comments/EHA's Response:

1. A RAB member asked if landlords will be able to utilize the MTW inspection flex fund to purchase larger items (i.e., appliances like refrigerators and dishwashers).

The MTW flex fund is small in scale and limited to the purchase of smaller items (i.e., switch plate covers, smoke detectors) that will enable units to pass HQS inspections the first time out without the need for a reinspection. Landlords of subsidized units may be able to access funds to cover more substantial damages through the Landlord Mitigation Program that is administered by the state Department of Commerce.

2. A RAB member asked whether tenant based voucher program participants will be eligible to use their voucher to move into the Ben Young Senior Housing complex once construction is complete.

All units at this senior housing complex will be subsidized through the project-based voucher program, so a tenant-based voucher program participant would have to give up their voucher to live there (and would be eligible to be placed on the tenant-based voucher interest list after a year's tenancy).

3. A RAB member expressed concerns about the demolition process for the remaining vacant units in the former Baker Heights neighborhood, which will be redeveloped as the Park District: will adequate safety measures be used to ensure hazardous materials are disposed of correctly, and will EHA salvage any of the usable building materials following demolition?

EHA is subject to state and federal regulations that require ensuring the contractors responsible for the demolition follow proper abatement protocols (i.e., remove any toxic material from the site) before demolition can begin and other requirements related to health and safety during the demolition process. EHA's agreement with the contractors give the vendor discretion as to whether or not to salvage building material. Given the age and rudimentary nature of this former public housing development, it is unlikely that the building material would be of any salvageable value.

4. RAB members had questions about the process for issuing tenant based vouchers to residents of EHA owned project based voucher developments.

Tenants of EHA's project-based voucher properties are eligible to request a tenant-based voucher after one year of successful tenancy. Those tenants are placed on a "current interest list" and are issued vouchers in date and time order of placement on the list. Tenants of EHA properties that are not subsidized with project-based vouchers can only apply for a tenant-based voucher when the HCV (Section 8) waiting list is opened to new applicants.

The waiting list has been closed since 2018 due to the large number of applicants on the list, and it is not known at this time when it will re-open; however, there will be advance notice on the EHA website (www.evha.org) and Facebook page, and in the Everett Herald before the HCV waiting list is re-opened to new applicants. Information about the status of program/property waiting lists can always be found on the EHA website by clicking on the "Check Availability" button on the homepage of www.evha.org.

MTW Safe Harbor and Agency-Specific Waivers Meeting February 7, 2024

Meeting Notifications

The MTW Safe Harbor and Agency-Specific Waivers Meeting was advertised to EHA participants and members of the public via a news post on the EHA website, as well as on EHA's social media, and was also announced to the Resident Advisory Board at their January 30, 2024, meeting.

Website news post:

<https://www.evha.org/news/eha-mtw-waivers-meeting-february-7-2024-2pm>

EHA: MTW WAIVERS MEETING FEBRUARY 7, 2024 AT 2PM

EVERETT HOUSING AUTHORITY: MTW WAIVERS MEETING
WEDNESDAY, FEBRUARY 7
2:00-3:00PM

PUBLIC COMMENT BEGINS FEBRUARY 8

EHA residents, program participants, partners, and community members: We invite you to attend a virtual meeting to learn about and comment on waivers that EHA plans to implement as part of our 2024-2025 Moving to Work (MTW) Supplement, which will go into effect July 1, 2024.

Learn more about our proposed Agency-Specific Waiver, the Inspection Success Fund!

Unable to attend the meeting? A recording of this meeting will be made available and we are asking for public comment beginning Thursday, February 8 until Monday, March 25. Share your feedback!

Questions? Email mtw@evha.org or leave a message at (425) 339-1006.

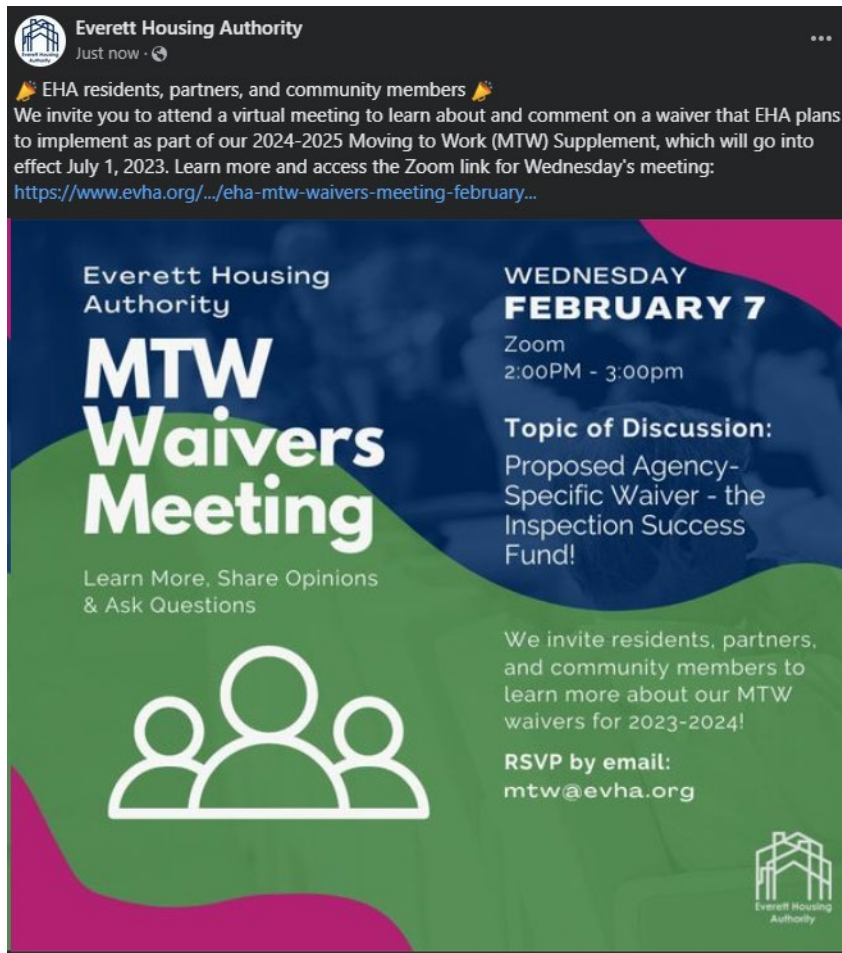
ZOOM INFORMATION: WEDNESDAY, FEBRUARY 7 AT 2:00PM

Join by Phone: (253) 205-0468

Meeting URL: <https://zoom.us/j/98370270226>

Meeting ID: 983-7027-0226

Facebook:



EHA Staff Attending:

Janinna Attick
Chris Neblett
Heather Stults

Director of Policy and Innovation/MTW Coordinator
Administrative Supervisor
Strategic Engagement Manager

Meeting Attendees:

None. However, the meeting was recorded and posted to EHA's YouTube page, where it has received 26 views: <https://youtu.be/MwbJAKRczTw?si=NfG3AyhfzlqWWcS>

Presentation

Director of Policy and Innovation Janinna Attick gave a presentation [appended at the end of the meeting notes].

Q&A/Comments

None

Incorporating Feedback into the MTW Supplement

EHA engaged the public to develop the waivers, solicited comments/questions, consulted its Resident Advisory Board, considered the comments/questions before approving the Supplement and determined that no modifications to the Supplement were warranted.



MTW WAIVERS MEETING

FEBRUARY 7, 2024

AGENDA



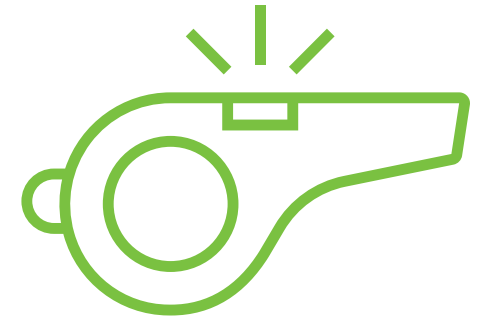
- Ground Rules
- Introductions
- Background
- Standard MTW Waivers
- Agency-Specific Waiver
- Comments/Questions
- Next Steps



GROUND RULES



- Meeting is recorded so staff can review comments later – staff presentation portion will be posted publicly
- Raise your hand or use the “raise hand” feature (for Zoom) if you have a question or comment ***at the end of the presentation***
 - You’ll be called on once recognized
- Keep questions/comments on topic and limit to two minutes or less



EHA STAFF INTRODUCTIONS



Janinna Attick

Director of Policy & Innovation/MTW Coordinator

Chris Neblett

Administrative Supervisor

Heather Smith

Strategic Engagement Manager



BACKGROUND



WHAT IS “MTW”?



- Federal demonstration – called Moving to Work
- At EHA, we are calling it “Making Things Work”
- Allows us to set local policies and use funding flexibly to meet local needs
- Three objectives: cost effectiveness, helping families become self-sufficient, increasing housing choice

2024-2025 ACTIVITIES



MTW STANDARD WAIVERS



- Conduct *voucher* inspections every 3 years in EHA-managed buildings
 - EHA staff conduct *management* inspections annually
- Modifications to PBV contracting for upcoming EHA developments:
 - Streamline process to award PBVs to EHA-developed properties
 - Increase how much of EHA's voucher portfolio can be project-based (HUD limit is 50%)

MTW AGENCY-SPECIFIC WAIVER



- Create inspection flex fund to help units pass more quickly
 - Switch plate covers, smoke detectors, etc.
- Initial estimate of \$10,000 for the fiscal year
- Rationale: changing inspection requirements, landlord satisfaction



COMMENTS AND NEXT STEPS



COMMENTS/QUESTIONS



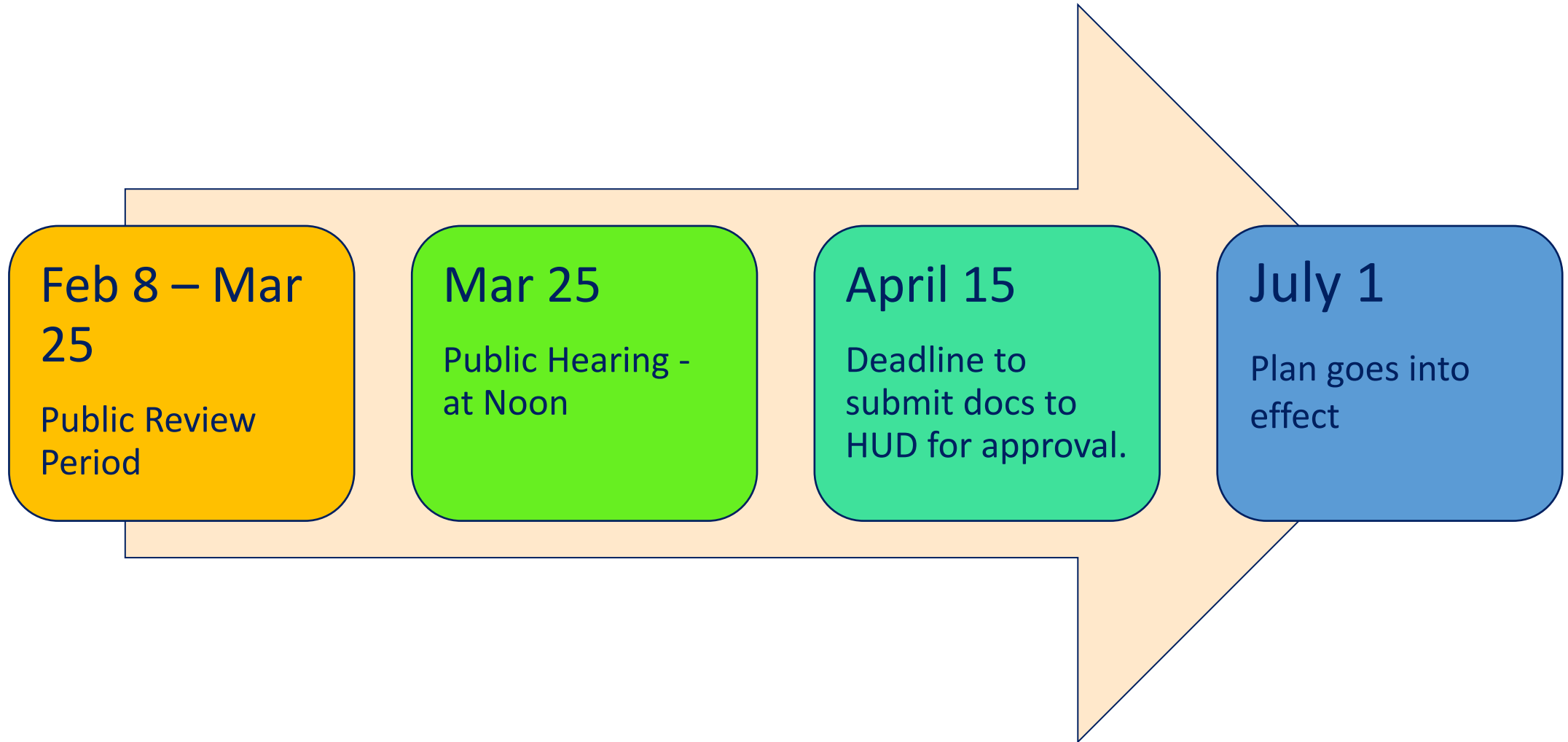
Floor is now open for comment

Please raise your hand to be recognized (*9 if joining by phone)

- State your name and if you are an EHA participant or a member of the public
- Comments should relate to what's been presented
- Limit comments to 2 min



NEXT STEPS





**Annual Plan and MTW Supplement Public Hearing
March 25, 2024**

A public hearing on Everett Housing Authority's proposed 2023-2024 PHA Annual Plan and MTW Supplement was held as part of the Housing Authority's regular Board of Commissioners meeting on March 25, 2024.

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Jason Morrow	Chief Real Estate Officer
Linda Hoston	Director of Human Resources and Administration
Kristen Cane	Senior Director of Asset Management and Housing Choice Vouchers
Cal Cuellar	Interim Director of Housing Management
Jaysen Garcia	Executive Assistant and Communications Coordinator
Heather Stults	Strategic Engagement Manager
Chris Neblett	Administrative Supervisor

Others Attending:

None

Presentation

Board Vice-Chair Cynthia Andrews convened the public hearing and opened the floor to public comment on the Housing Authority's proposed 2024-2025 PHA Annual Plan and MTW Supplement.

Administrative Supervisor Chris Neblett provided a brief overview of the Annual Plan and MTW Supplement.

Q&A/Comments

None

With no additional questions or comments, Board Vice-Chair Andrews called once more for public comment on the proposed PHA Annual Plan and MTW Supplement and, receiving none, adjourned the public hearing.

EHA Analysis and Responses to Comments on FY 2024 MTW Supplement

EHA received no formal written public comments on its FY 2024 Annual Plan or MTW Supplement.

EHA had multiple residents and participants at its January 30, 2024, Resident Advisory Board (RAB) meeting. No members of the public attended either the February 7, 2024, Agency-Specific Waivers meeting or the March 25, 2024, public hearing.

Prior to Board approval of the MTW Supplement, the public's responses to the waiver proposals were considered and after PHA consideration and consultation with the RAB, no changes to the MTW Supplement were warranted.

EHA provided answers to resident and participant questions within the context of the public meetings where the questions were posed. These questions and EHA's responses are included in the documentation provided for these meetings with the MTW Supplement.

MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Everett Housing Authority

WA006

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

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

Cynthia Andrews

Vice Chair, EHA Board of Commissioners

NAME OF AUTHORIZED OFFICIAL**TITLE**

Cynthia Andrews (Mar 27, 2024 09:27 PDT)

Mar 27, 2024**SIGNATURE****DATE**

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



U.S. Department of Housing and Urban Development

Seattle Regional Office
Seattle Federal Office Building
Office of Public Housing
909 First Avenue, Suite 360
Seattle, WA 98104-1000

January 23, 2025

Mary Swenson, Executive Director
Housing Authority of the City of Everett
3107 Colby Ave
Everett, WA 98201

Re: Amendment of the Annual PHA Plan and Moving to Work Supplement to the PHA Plan for Fiscal Year beginning 7/1/2024 through Fiscal Year Ending 6/30/2025

Dear Mrs. Swenson:

This letter serves as notification that Everett Housing Authority is amending its Annual PHA Plan & MTW Supplement to the PHA Plan (HIP MTWS Form 00489) submitted for the Fiscal Year beginning 7/1/2024, version 3 is approved to incorporate the following revisions:

Annual PHA Plan:

- No changes were made to the Annual PHA plan, however, a new RAB meeting was held so the new meeting minutes were provided.

MTW Supplement to the Annual PHA Plan:

- Added policy in activity 1.u Standard Deductions
- Added policy in activity 2.a Small Area Fair Market Rents
- Amended policy in activity 3.b Alternative Reexamination Schedule for Households

The Department's approval of this MTW Supplement is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice.

In providing assistance to families under programs covered by this MTW Supplement, your PHA must comply with the rules, standards, and policies established in the MTW Supplement as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved MTW Supplement and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions, please contact your Portfolio Management Specialist, Crystal Simpson at Crystal.R.Simpson@hud.gov or 206-220-5182.

Sincerely,

Crystal Simpson
Portfolio Management Specialist
Office of Public Housing

CC: John Concannon, MTW Program Director
Ann Becker, MTW Desk Officer

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

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

Definitions.

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

A.	PHA Information.																									
A.1	<div> <div>PHA Name: <u>Housing Authority of the City of Everett</u> PHA Code: <u>WA006</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 type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission</div> <div> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>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"> EHA’s website: www.evha.org 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 materials should call Su Mon Han at (425) 303-1182 to schedule an appointment. </div> <div> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </div> <table border="1"> <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> <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> </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:											
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:																										

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

	<p>Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.</p>
B.1	<p>New Activities</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. See attachment b01.</p> <p>(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan. See attachment b01</p> <p>(d) The PHA must submit its Deconcentration Policy for Field Office Review. N/A. EHA no longer has any occupied public housing units; therefore, a deconcentration policy is not applicable.</p>
B.2	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 09/26/2023.</p>
C	<p>Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> See attachment c01</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attachment c01</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attachment d01</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attachment e01</p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>						
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>						
D.1	<p>Affirmatively Furthering Fair Housing.</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" data-bbox="196 726 1458 1472"> <tr> <td data-bbox="196 726 1458 768">Fair Housing Goal:</td></tr> <tr> <td data-bbox="196 768 1458 982"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>EHA is not subject to the AFH reporting requirement to date; however, an updated Analysis of Impediments to Fair Housing Choice was completed on May 16, 2019.</p> </td></tr> <tr> <td data-bbox="196 982 1458 1024">Fair Housing Goal:</td></tr> <tr> <td data-bbox="196 1024 1458 1218"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </td></tr> <tr> <td data-bbox="196 1218 1458 1260">Fair Housing Goal:</td></tr> <tr> <td data-bbox="196 1260 1458 1453"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </td></tr> </table>	Fair Housing Goal:	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>EHA is not subject to the AFH reporting requirement to date; however, an updated Analysis of Impediments to Fair Housing Choice was completed on May 16, 2019.</p>	Fair Housing Goal:	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>	Fair Housing Goal:	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>
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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: Amended Annual Submission

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.” Since joining the demonstration, EHA has focused on using its MTW flexibility to support three broad local initiatives that are in alignment with the three 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.

This amended MTW Supplement focuses on waivers to help EHA successfully implement HUD policy changes, including the Housing Opportunities through Modernization Act (HOTMA) and payment standards based on Small-Area FMRS (SAFMRS).

Specific waivers being requested in this amended MTW Supplement include:

- EHA is requesting to eliminate the requirement imposed by HOTMA to conduct an interim reexamination for all income increases of at least 10%. Instead, income increases will be disregarded until the family's next scheduled reexamination.
- EHA is requesting to modify the HOTMA requirement to increase the medical expense deduction threshold from 3% to 10% in phases, and instead is proposing to set the medical expense deduction threshold to 5%.
- To increase housing choice and ensure that families have access to communities of opportunity, EHA is requesting to be allowed to set small area FMR-based payment standards at up to 120% of the applicable zip code-based FMR. This will provide the highest level of flexibility to EHA in grouping zip codes within payment standard tiers and ensuring that high opportunity areas are accessible to participants.

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).

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

Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased revenue; Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a mixed citizenship status family.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. 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 was completed in April 2024 and no additional families will be enrolled.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? Yes
What is the status of the Safe Harbor Waiver request? The waiver was previously approved.
Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity. The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.
Please describe how the income bands are structured Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.
Please upload the tiered rent policy table that shows the income bands.

This document is attached.

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

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)
1.r. and/or 1.s. "elimination of deductions"

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

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

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

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

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

Cost effectiveness; Self-sufficiency

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

Increased revenue

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

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

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

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

Study enrollment began in January 2023 for households with annual reexaminations starting in May 2023, and for new

admissions starting May 2023. Study enrollment was completed in April 2024 and no new households will be enrolled.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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

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

Other (please explain)

All deductions, including the dependent allowance and deduction for unreimbursed childcare costs, will be eliminated for families who are part of the tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these deductions will be able to request a hardship adjustment to their rent calculation.

1.u. - Standard Deductions (HCV)

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

EHA plans to replace the existing medical/disability expense deduction that has a threshold of 10 percent of annual income with a medical/disability expense deduction that has a threshold of 5 percent. "Medical/disability expense deductions" refer to unreimbursed health and medical care expenses and unreimbursed reasonable attendant care and auxiliary apparatus expenses as defined at 24 CFR 5.603. EHA is not proposing any modifications to the standard definition of expenses.

This activity will not apply to households who are subject to the tiered rent calculation as those households are not eligible for deductions.

EHA aims to achieve greater cost effectiveness with this waiver by applying a single threshold amount to all eligible households, which can be applied to both new admissions and current households. Households will be aware of their threshold amount and will not need to track phase-in periods to a higher threshold or have other changes made to their threshold amount. The activity will also encourage participant self-sufficiency as it allows households to retain more of their income for their needs, which they are best positioned to determine. EHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of EHA's overall rent reform initiative, this activity will contribute to a reduction in EHA staff time spent on the certification process.

An impact analysis and hardship policy are included with this submission.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>The MTW activity applies to voucher units occupied by households who qualify for the medical/disability expense deduction.</p>
<p>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.</p> <p>N/A - new activity</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>1.s. - Elimination of Deduction(s) (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>Yes</p>
<p>What considerations led the MTW agency to modify the hardship policy?</p> <p>Additions of waivers requiring specific hardship review criteria and processes.</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>How much will the single standard deduction be in the Fiscal Year?</p> <p>\$</p>

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)
<p>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</p> <p>EHA is in a jurisdiction that is required to implement Small Area Fair Market Rent (SAFMR)-based payment standards. EHA plans to implement SAFMR-based payment standards by creating three tiers of payment standards with zip codes grouped within these tiers. In connection with EHA's strategic plan objective to increase access to communities of opportunity, and with the MTW statutory goal of housing choice, EHA is requesting this waiver to provide additional flexibility in grouping zip codes within payment standard tiers to ensure that zip codes with higher opportunity are affordable to tenant-based voucher participants. Under this waiver, EHA would have the flexibility to designate zip codes within payment standards between 80% to 150% of the applicable SAFMR.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>N/A - new activity</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p>

This document is attached.

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

No

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

EHA plans to implement three tiers of payment standards. This waiver will grant EHA the flexibility to group zip codes within tiers as long as the applicable payment standard for that zip code is between 80% and 150% of the applicable

SAFMR.

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

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

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

EHA will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based 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.

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.

PBV-assisted units owned or controlled by EHA.

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

EHA began implementing the waiver.

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

No

Please explain or upload a description of the quality assurance method.

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

No document is attached.

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

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

No document is attached.

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

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

EHA has received approval for two separate waivers implementing triennial reexaminations for different household types. EHA is requesting a third waiver during FY 24. All initiatives are intended to streamline the rent determination process.

In FY22, 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. Families who are part of the Rent Reform demonstration and are selected to pay rent under the tiered rent policy will be placed on a triennial (every 3 years) reexamination schedule. It is anticipated that families will have an incentive to increase their earned income between reexaminations, as they will get to keep 100% of their additional earnings, instead of having to pay 30% of their additional earnings. This is also anticipated to decrease the staff time required to complete annual and interim reexaminations, although the benefit will be moderated by the need to provide hardship exemptions for some families.

In FY23, 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. If a family meets the following criteria, it will be enrolled in triennial reexaminations as part of the Simple Rent initiative: the head of household, co-head, and/or spouse is elderly or disabled, and at least 90% of the current family income is from a fixed income source (e.g., social security, pension). If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations. For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable.

In FY24, EHA proposes to waive certain provisions of 24 CFR 982.516(c)(3)(i) and HOTMA Section 102 to eliminate interim reviews in most circumstances. EHA calls this waiver Streamlined Interim Reviews. Under this waiver, EHA is proposing not to process interim reviews for any increases in earned and unearned income, including those that exceed a 10% increase in adjusted income, or such other amount established by HUD through notice. For new family members, EHA will incorporate any income for newly added members regardless of the amount at the time the new member is

<p>added. This waiver will impact all household types in the PBV and HCV programs, except those participating in the tiered rent study, as households in the rent study are not subject to interim reexaminations.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>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.</p> <p>Triennial reviews under the Simple Rent initiative apply to elderly and disabled households with mostly fixed income sources.</p> <p>Streamlined Interim Reviews waiver will apply to all households.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Tiered Rent and Simple Rent: Tenant-based and project-based voucher units occupied by families who are eligible for either the Tiered Rent or Simple Rent policy.</p> <p>Streamlined Interim Reviews will apply to all households.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about</p>

what has been accomplished or changed during the implementation.

FY22 Tiered Rent for employment-focused families - HUD waiver approved and enrollment in rent study began in January 2023. Enrollment began in May 2023 and was completed in April 2024.

FY23 Simple Rent waiver - EHA is currently in the planning stages for implementing this waiver and expects to roll it out in calendar year 2025, in conjunction with other changes being implemented for HOTMA.

FY24 Streamlined Interim Reviews waiver - N/A - new activity

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

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

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

What is the recertification schedule?

Other

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

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

For the Streamlined Interims waiver, families will be on the applicable annual or triennial reexamination schedule (if qualifying for Simple Rent). This waiver will eliminate interim reviews for income increases but make no changes to the full reexamination schedule.

How many interim recertifications per year may a household request?

2 or more

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

FY23 approved for Qualifying Elderly/Disabled Households under Simple Rent: If a household's income increases in between triennial reexaminations, aside from published COLAs, the family total tenant payment (TTP) will not increase.

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

FY24: for the Streamlined Interims waiver, families can continue to request an interim review for decreases in income in accordance with the current applicable HUD regulations and EHA policies. Interim reviews will be conducted when a family member is added, and any income from that new member will be factored into the family's TTP as part of the interim.

FY22 approved (Tiered Rent Demonstration): The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See the FY23 MTW Supplement for a full description of this hardship policy.

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

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

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

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

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

This waiver has been fully implemented.

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

No

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

\$50,000.

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

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

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

EHA will be allowed to complete HQS inspections on PBV units that it owns or controls. 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.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

EHA-owned or controlled units under the 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**

See the FY24 MTW Supplement for a full description of this activity. This activity has been approved by HUD and EHA is in the process of implementing it.

EHA will implement a triennial inspection schedule specifically for project-based voucher units operated by EHA. 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 admissions and currently assisted households?

Currently assisted households only

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

The MTW activity applies 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.

Project-based voucher units managed by EHA

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

Waiver was approved and is in the process of being implemented

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

No

9.d. - Alternative PBV Selection Process (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 FY24 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation is in process.

EHA will implement a streamlined alternative selection process for PBV contracts at properties developed or acquired and rehabilitated by EHA or a partnership of which EHA is a participant.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW 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 (i.e., applicants) only
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. Project-based voucher units that are selected under this alternative process.
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 was approved. EHA has not yet used the alternative process.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

9.h. - Limit Portability for PBV Units (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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 tiered prioritization system for turnover vouchers.
Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW 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 all properties with project-based vouchers
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. 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 were limited while EHA worked 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.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

11.a.HCV - Alternative Family Selection Procedures (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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 that will be offered to households participating in the Tiered Rent study (both treatment and control group households) in lieu of the traditional Family Self-Sufficiency program (the traditional FSS program will continue to be offered to non-study 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 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.
Which of the MTW statutory objectives does this MTW activity serve? Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>Currently assisted households only</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</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 traditional FSS and homeownership program participants.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</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. Non-rent study households will continue to be offered the option to participate in the traditional FSS program.</p>
<p>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.</p> <p>Staff have begun developing the THRIVE+ program and plan to start enrollment in late calendar year 2024 or early 2025.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>

Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?

No

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

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

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.

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

Self-sufficiency

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

Neutral (no cost implications)

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

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

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

Currently assisted households only

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

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

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

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

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

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

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

The THRIVE+ program is under development and enrollment is currently planned for late calendar year 2024 or early 2025.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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

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.

17.b. - Service Provision

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

There are two activities included under this waiver. Both activities have been approved by HUD.

The first allows for the use of HAP and other MTW funds for supportive services and related activities to support EH 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.

The second activity, which was approved in FY24, will 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, 2025. The Federally Assisted Housing Fire Safety Act of 2022 will require that, starting December 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?

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.

The Inspection Success fund will be used for items that can be used during inspections of either HCV or PBV units.

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

The first activity within this waiver has been approved, and EHA has begun to use funding flexibility to pay for certain service coordination expenses at PBV properties.

The second activity, Inspection Success Fund, was newly approved for FY24 and planning for implementation is in progress.

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.

EHA has also created an Inspection Success Fund to purchase small items to facilitate passed inspections.

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, could be assisted with service coordination funding in the future.

The Inspection Success Fund will not apply to LNT units.

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

No

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; Housing choice

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

Decreased expenditures

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

The MTW 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	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	0.00	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
Madrona Square	New construction	Gap financing	105.00	0.00	38.00	67.00	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	105.00	105.00	38.00	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	105.00	105.00	38.00	67.00	0.00	0.00

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, 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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: Does the MTW agency have any approved Agency-Specific Waivers? Yes				
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	Allow Residents of PBV Units to Resume Assistance after Zero HAP	No			
	Modify Verification Hierarchy	No			
	Modify Discrepancy Threshold	No			
	Inspection and Rent Reasonableness Efficiency Improvements	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	0

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

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

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
<p>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.</p>	

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

<p>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.</p>	<p>James Riccio, MDRC James.Riccio@mdrc.org</p>	<p>July 1, 2022 through June 30, 2028</p>	<p>Rent Reform in Subsidized Housing: Launching the Stepped and T Demonstration (https://www.mdrc.org/sites/default/files/Rent-Reform-in-Subsidizer)</p>
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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 an exemption under the traditional rent policy due to having 4 or more dependents at the time of your triennial reexamination and/or hardship renewal.
 - a. Your family qualifies for an exemption under the traditional rent policy due to have unreimbursed child/dependent care expenses over \$2,500 at the time of your triennial reexamination and/or hardship renewal.
 - a. Your family has had a loss of income and the 12-month period used to calculate your new rent at your recertification is less than 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 childcare 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 childcare 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 (childcare 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 staff 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 – Simple Rent

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: Standard Medical/Disability Expense Deduction (new for FY 2024)

Households experiencing a financial hardship as a result of the standard medical/disability expense deduction, can request a hardship exemption from the standard deduction. The hardship exemption will last until the family's next annual reexamination.

To request a hardship, a household must provide the following information with their hardship request:

- A detailed explanation of why the standard medical/disability expense deduction threshold has created a hardship for the household that may result in the household not being able to pay their rent
- A list of all anticipated medical expenses for the upcoming year
- Proof of medical expenses incurred over the past year to verify the list of anticipated expenses

When a family requests a financial hardship exemption, EHA will suspend the MTW activity by setting the medical/disability expense deduction threshold at 3% while the request is being processed, beginning the first of the month following the family's request, until EHA determines if the request is warranted.

During this suspension, EHA will determine whether the financial hardship exists. EHA will determine the nature of the hardship within 30 calendar days of the request being received. If EHA requests information from the family and it is not received within the 30 days after the original request was made, EHA may deny the request and require the family to repay the additional assistance paid during the suspension of the MTW activity period.

If EHA determines that the family has a qualifying financial hardship, EHA will suspend the MTW activity for the family until their next annual reexamination. The family will be eligible to request a renewal of the hardship exemption at the time of their annual reexamination if the hardship is continuing.

Hardship Policy: SAFMR-Based Payment Standards (new for FY 2024)

Households experiencing a hardship as a result of the payment standards activity may request a hardship exemption.

A financial hardship for a decrease in payment standards would only apply when the payment standard would decrease in an established unit (not at unit transfers or issuance of voucher, or household

composition changes that result in a change to the subsidy size/voucher size for the household (?)), where the payment standard is set at less than 90% of the zip code-based Fair Market Rent (FMR), and where:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the assisted family, or reduction in or loss of earnings or other assistance; and
- The family has experienced an increase in expenses because of changed circumstances, for medical expenses, childcare, or other costs impacting the family's TTP calculation.

When a family requests a financial hardship exemption, EHA will suspend the MTW activity (by setting the family's payment standard at no less than 90% of the applicable small area FMR) while the request is being processed, beginning the first of the month following the family's request, until EHA determines if the request is warranted.

During this suspension, EHA will determine whether the financial hardship exists. EHA will determine the nature of the hardship within 30 calendar days of the request being received. If EHA requests information from the family and it is not received within the 30 days after the original request was made, EHA may deny the request and require the family to repay the additional assistance paid during the suspension of the MTW activity period.

If EHA determines that the family has a qualifying financial hardship, EHA will suspend the MTW activity for the family until their next annual reexamination. The family will be eligible to request a renewal of the hardship exemption at the time of their annual reexamination if the hardship is continuing.

Everett Housing Authority
MTW Impact Analysis – 1.a. Payment Standards: Small Area Fair Market Rents

MTW Activities Covered by Impact Analysis	2.a. Payment Standards – Small Area Fair Market Rents
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)	
<p>EHA is in a jurisdiction that is required to implement payment standards based on Small Area Fair Market Rents (SAFMRs) effective January 1, 2025. EHA plans to implement this requirement by grouping zip codes into multiple tiers of payment standards. In order to provide the maximum flexibility in grouping zip codes, with the goal of increasing housing choice while also ensuring cost effectiveness, EHA is requesting this waiver to allow for payment standards within the safe harbor range of 80% to 150% of the applicable SAFMR.</p> <p>EHA expects little initial impact in HAP expenditures as EHA’s current experience is that rent reasonableness is acting as a limiting factor on gross rents exceeding the applicable payment standard. In addition, nearly 1/3 of EHA’s portfolio consists of project-based voucher (PBV) units, and EHA plans to continue using the metro area fair market rents to set rents for PBV contract units. However, over time as families may choose to lease in higher cost, higher opportunity areas, EHA expects that HAP expenditures may increase if families move to zip codes with higher payment standards.</p>	
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)	
<p>Because EHA plans to implement a permanent hold harmless policy, which will keep families at the existing payment standard amount if they are in an area set to set a decrease, there will be no impact on affordability. Families will be subject to the new payment standards when they move to a new unit.</p>	
3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	
No expected impact.	
4. Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	
No expected impact.	
5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program	
No expected impact.	
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice	
<p>This activity is expected to assist EHA in meeting the statutory goal of housing choice by increasing the allowable payment standard in certain zip codes to meet market needs and to increase access to higher</p>	

opportunity areas. It will also give EHA the flexibility to set lower payment standards in the future, which will contribute to the goal of cost effectiveness.

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

No expected impact.

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

No expected impact, as this waiver is planned to be used to increase payment standards, and EHA will be holding harmless all families who would be impacted by a decrease as a result of HUD-mandated SAFMR-based payment standard decreases. However, EHA is adopting a hardship policy that allows families to request a hardship waiver in situations when the MTW waiver would result in an in-place family being subject to a payment standard that is below 90% of the applicable SAFMR.

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

EHA does not expect this activity to have a differential impact on protected classes.

Everett Housing Authority
MTW Impact Analysis – 3.b. Alternative Reexamination Schedule for Households (HCV)
Streamlined Interim Reviews
July 1, 2024, to June 30, 2025

MTW Activities Covered by Impact Analysis	3.b. Alternative Reexamination Schedule for Households (HCV)
1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)	<p>In comparison to the requirements of HOTMA Section 102 set to go into effect 1/1/2025, EHA would expect a modest decrease in administrative expenses due to decreased staff time processing interims for all unearned income increases of 10% or more. The HOTMA policy would require EHA to calculate the increased income in order to determine whether the 10% threshold has been met, while this policy will eliminate the need for staff to conduct that calculation.</p> <p>EHA would also expect an increase in subsidy paid due to not increasing household rents in these cases. However, this agency specific waiver closely aligns with EHA's current interim reexamination policy before the release of HOTMA Section 102, which disregards income increases if the household already has that same source of income. Therefore, in comparison to current practice, EHA expects minimal changes to administrative expenses or subsidy expenditure.</p>
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)	<p>Positive impact on the affordability of housing costs. Families with an increase of 10% or more in income will not have to increase their portion of rent unless a new member with income from any source is being added to the household.</p>
3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	<p>No expected impact.</p>
4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	<p>No expected impact.</p>
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	<p>No expected impact.</p>
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice	<p>This MTW activity is expected to assist EHA in meeting the statutory goal of cost effectiveness by decreasing staff time spent processing interim reexaminations. It will also contribute to the goal of self-sufficiency by giving households an incentive to increase their income without an immediate increase in their portion of rent.</p>
7. Impact on the agency's ability to meet the MTW statutory requirements	<p>No expected impact.</p>

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

No expected impact.

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

No expected differential impact on protected classes.

Resident Advisory Board Meeting
Annual Plan, MTW Supplement, and Capital Fund 5-Year Action Plan Amendment
August 15, 2024

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Thursday, August 15, 2024, to receive comments and recommendations related to an amendment to the 2024-25 Public Housing Agency Annual Plan and MTW Supplement, and an update to the Capital Fund 5-Year Action Plan. This meeting took place via Zoom videoconference and telephone. Residents and program participants who attended this meeting were appointed to the RAB.

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Su Mon Han	THRIVE Program Manager
Melanie Pilkenton	Interim Co-Director, HCV Program
Heather Stults	Communications and Engagement Manager
Anna Todd	Interim Co-Director, HCV Program

RAB Members in Attendance:

Tenena Mori – Aspenwood (PBV)
Nicki Graham – HCV
Teresia Kios – Madrona Square (PBV)
Raetta Ewing – Evergreen Court (PBV)
JamieJoyce Bennett – Evergreen Court (PBV)
Sandra Carbary – HCV

EHA staff members gave a presentation on the proposed amendments to the Annual Plan and MTW Supplement, and the planned use of Capital Fund grant pursuant to the 5-Year Action Plan.

RAB Comments/EHA's Response:

1. A RAB member shared they had just went through their recertification. They asked if that with the changes mentioned in the presentation, if that means they no longer need to provide pay stubs or social security award letters during the recertification process.

Social security letters will still be useful and EHA Certification Specialists will still need to establish a 12-month window of income. However, wage information will be captured so no more paystubs will be needed from clients in most cases. Self-employed clients will need to still certify pay.

2. RAB member asked how clients can make sure they are on the Resident Advisory Board, as they do not remember formally being welcomed to it. They also inquired what next steps would be as part of the RAB.

HUD dictates that as a PHA, we need to have a RAB. Some PHAs have a standing RAB, versus EHA reached out to those who participated in the RAB meeting from January 2024 and invited them to attend this meeting. Later this year, there will be broader outreach to clients for the 2025 meetings.

3. A resident from Evergreen Court shared that they are not getting communication on changes in the building, and that there are some additional things that do not seem to be getting done. They asked how they can become an advocate for EHA and individual needs at properties?

The EHA representatives at this meeting focus more on policy needs and not property management. Concerns would be passed to property management staff. The client added that sometimes it seemed difficult to receive a response, or that a request was handled but was not communicated back to the residents. The contact information for the Interim Director of Housing Management was shared as an additional solution.

4. A RAB member inquired as to who does the audit for the grant shown in the presentation. They also shared that they really appreciated being on this call and invited to participate.

The state auditor's office conducts the audit. EHA contract with a private auditor.

5. A RAB member asked if a recording of this presentation would be made available.

Yes, a recording would be available and shared within the next few weeks.

6. A RAB members asked what changes were being made with the \$53M HUD awarded a few months ago.

EHA clarified that this money is used for housing assistance payments (HAP).

7. A resident inquired as to how to get more information on how to utilize vouchers at EHA.

The project-based voucher holders can inquire and be added to an interest list. EHA will then reach out and invite them to a briefing, which then will give them 160 days to utilize their Housing Choice Voucher.

8. A RAB member shared that they feel like they go through two recertification processes each year and inquired if there was any way to coordinate doing them both at once.

Potentially, with some of the changes through HOTMA, there will be the option to combine these processes. Through safe-harbor verifications, the certification specialists at EHA would be able to use those same verifications to calculate client rent, which would translate to only one process for the client.

9. A resident inquired as to who they contact for building updates, as HUD failed their building on their last review.

The property staff would be best to contact, with their contact information available on our website property pages.

MTW Safe Harbor and Agency-Specific Waivers Meeting September 12, 2024

Meeting Notifications

The MTW Safe Harbor and Agency-Specific Waivers Meeting was advertised to EHA participants and members of the public via a news post on the EHA website, a legal notice in the local paper, the Everett Herald, as well as on EHA's social media, and was also announced to the Resident Advisory Board at their August 15, 2024, meeting.

Website news post:

<https://www.evha.org/news/eha-amended-2024-2025-annual-plan-mtw-supplement-and-capital-fund-available-for-review>

EHA's Amended 2024-2025 Annual Plan, MTW Supplement, and Capital Fund Available for Review

Date Posted: 08/22/2024

Category: Board of Commissioners

Everett Housing Authority's amended PHA Annual Plan and MTW (Moving to Work) Supplement, and Capital Fund 5-Year Action Plan, effective July 1, 2024, is available for public review and comment. Click [HERE](#) to view the draft.

Proposed amendments to Everett Housing Authority's (EHA) Fiscal Year 2024-2025 Annual Plan, describing its strategies for meeting local housing needs, its MTW Supplement, communicating the agency's planned activities as it relates to the MTW (Moving to Work) demonstration program, and its Capital Fund Program 5-Year Action Plan, describing proposed uses of EHA's Capital Fund grant, is available for public review and comment beginning August 22, 2024 until October 6, 2024. The amended Annual Plan and MTW Supplement documents will be effective beginning January 1, 2025. The Capital Fund 5-Year Action Plan will be subject to approval by the U.S. Department of Housing and Urban Development (HUD) prior to disbursement of funds for the proposed expenditures.

Written comments on all documents may be submitted during the public comment period by mail (Everett Housing Authority, PO Box 1547, Everett, WA 98206, Attn: Su Mon Han), or via email to sumonh@evha.org or to mtw@evha.org.

EHA conducted a virtual public meeting via Zoom on Thursday, September 12, 2024 at 2PM and presented information about MTW waivers to be included in the amended MTW Supplement. Information about how to join the virtual meeting was posted. If you were unable to attend, a recording of the meeting can be viewed here: <https://youtu.be/6Eekgw5-sU>

EHA's Board of Commissioners will conduct a public hearing at noon on Monday, October 7, 2024, to receive public comment on the draft amended Annual Plan, amended MTW Supplement, and Capital Fund Plan. Interested parties who wish to attend the hearing should call Heather Stults at (425) 303-1124 no sooner than 15 minutes in advance of the hearing to gain entrance to the Colby office. Information on how to access the hearing remotely via the Zoom meeting platform will be posted to EHA's website (www.evha.org) under News and Updates. Persons with disabilities or limited English proficiency who need assistance or accommodations to participate in the hearing should contact Heather Stults at (425) 303-1124 or heathers@evha.org by September 27, 2024.

Facebook:

**Everett Housing Authority**
September 11 at 2:17 PM · 🌐

Mark your calendars! EHA will conduct a virtual public meeting via Zoom on Thursday, September 12, 2024 at 2PM to present information about MTW waivers to be included in the amended MTW Supplement. Learn more:

[EVHA.ORG](#)
EHA's Amended 2024-2025 Annual Plan, MTW Supplement, & Capital...

 Send message

 2

 1

 Like

 Comment

 Share

Everett Herald:

EVERETT HOUSING AUTHORITY
AMENDED PHA ANNUAL PLAN, MTW SUPPLEMENT, AND
CAPITAL FUND 5-YEAR ACTION PLAN
Proposed amendments to Everett Housing Authority's (EHA) Fiscal Year 2024-2025 Annual Plan, describing its strategies for meeting local housing needs, its MTW Supplement, communicating the agency's planned activities as it relates to the MTW (Moving to Work) demonstration program, and its Capital Fund Program 5-Year Action Plan, describing proposed uses of EHA's Capital Fund grant, will be available for public review and comment beginning August 22, 2024 until October 6, 2024. The amended Annual Plan and MTW Supplement documents will be effective beginning January 1, 2025. The Capital Fund 5-Year Action Plan will be subject to approval by the U.S. Department of Housing and Urban Development (HUD) prior to disbursement of funds for the proposed expenditures.
Members of the public who wish to review the draft documents can find a link to the documents posted on the News & Updates section of the EHA website (www.evha.org) or contact Su Han to request a copy via email or regular mail. Written comments on the draft amended documents may be submitted via mail (Everett Housing Authority, Attn: Su Han, P.O. Box 1547, Everett, WA 98206-1547) or via email to sumonh@evha.org in the time leading up to a public hearing on these documents.
EHA will conduct a virtual public meeting via Zoom on Thursday, September 12, 2024 at 2:00 PM to present information about MTW waivers to be included in the amended MTW Supplement. Information about how to join the virtual meeting is posted to EHA's website (www.evha.org). If you are unable to attend, a recording of the meeting will be posted on the EHA website within 3 business days after the meeting.
EHA's Board of Commissioners will conduct a public hearing at noon on Monday, October 7, 2024, to receive public comment on the draft amended Annual Plan, amended MTW Supplement, and Capital Fund Plan. Interested parties who wish to attend the hearing should call Heather Stults at (425) 303-1124 no sooner than 15 minutes in advance of the hearing to gain entrance to the Colby office. Information on how to access the hearing remotely via the Zoom meeting platform will be posted to EHA's website (www.evha.org) under News and Updates. Persons with disabilities or limited English proficiency who need assistance or accommodations to participate in the hearing should contact Heather Stults at (425) 303-1124 or heathers@evha.org by September 27, 2024.
Published: August 22, 2024. EDH1001208

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Su Mon Han	THRIVE Program Manager
Anna Todd	Deputy Director of Rental Assistance

Meeting Attendees:

None. However, the meeting was recorded and posted to EHA's YouTube page, where it has received 4 views: <https://www.youtube.com/watch?v=6Eekgw5-sU>

Presentation

Director of Policy and Innovation Janinna Attick gave a presentation [appended at the end of the meeting notes].

Q&A/Comments

None

Incorporating Feedback into the MTW Supplement

EHA engaged the public to develop the waivers, solicited comments/questions, consulted its Resident Advisory Board, considered the comments/questions before approving the Supplement and determined that no modifications to the Supplement were warranted.



MTW WAIVERS MEETING

SEPTEMBER 12, 2024

AGENDA



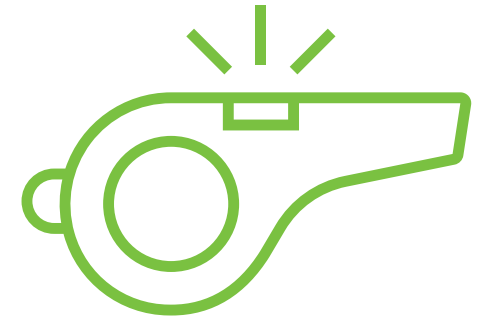
- Ground Rules
- Introductions
- Background
- Standard MTW Waivers
- Agency-Specific Waiver
- Comments/Questions
- Next Steps



GROUND RULES



- Meeting is recorded so staff can review comments later – staff presentation portion will be posted publicly
- Raise your hand or use the “raise hand” feature (for Zoom) if you have a question or comment ***at the end of the presentation***
 - You’ll be called on once recognized
- Keep questions/comments on topic and limit to two minutes or less



EHA STAFF INTRODUCTIONS



Janinna Attick

Director of Policy & Innovation/MTW Coordinator

Su Mon Han

THRIVE Program Manager

Heather Smith

Communications and Engagement Manager

Anna Todd

Deputy Director of Rental Assistance



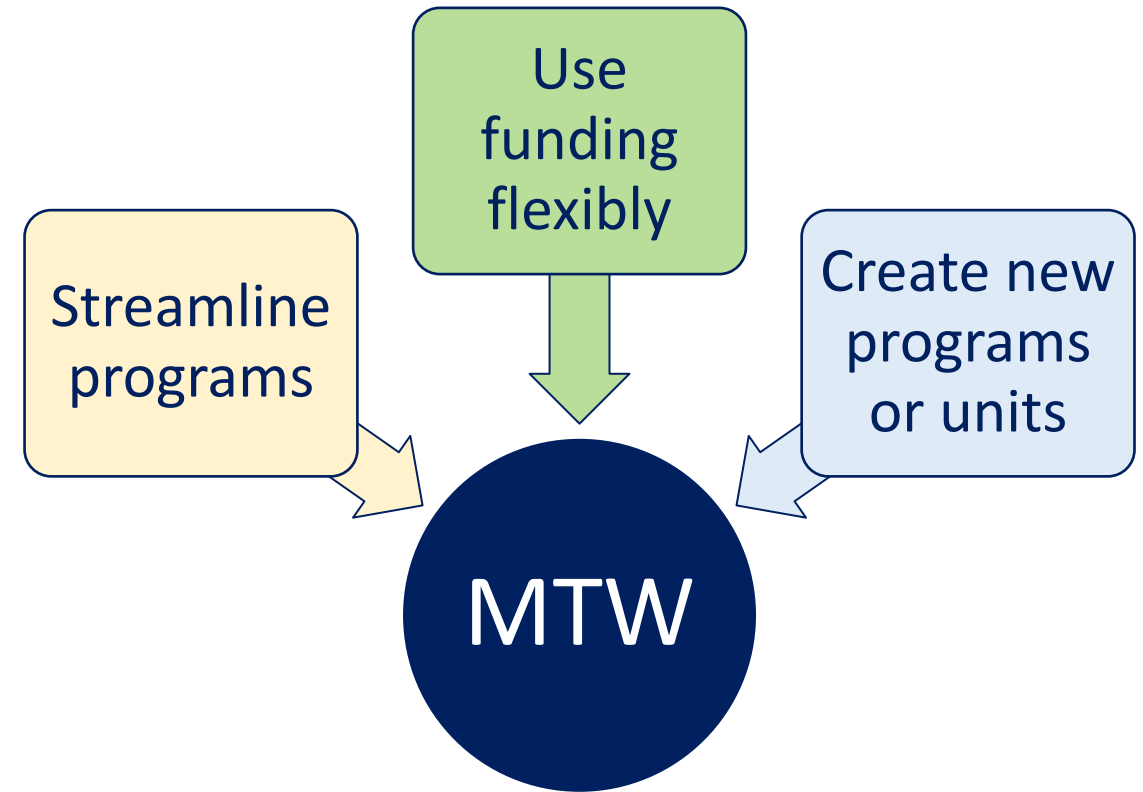
BACKGROUND



WHAT IS MTW?



- Federal demonstration through U.S. Dept. of Housing and Urban Development (HUD) called **“Moving to Work”**
- At EHA, we are calling it **“Making Things Work”**
- Allows us to set local policies and use funding flexibly to meet local needs

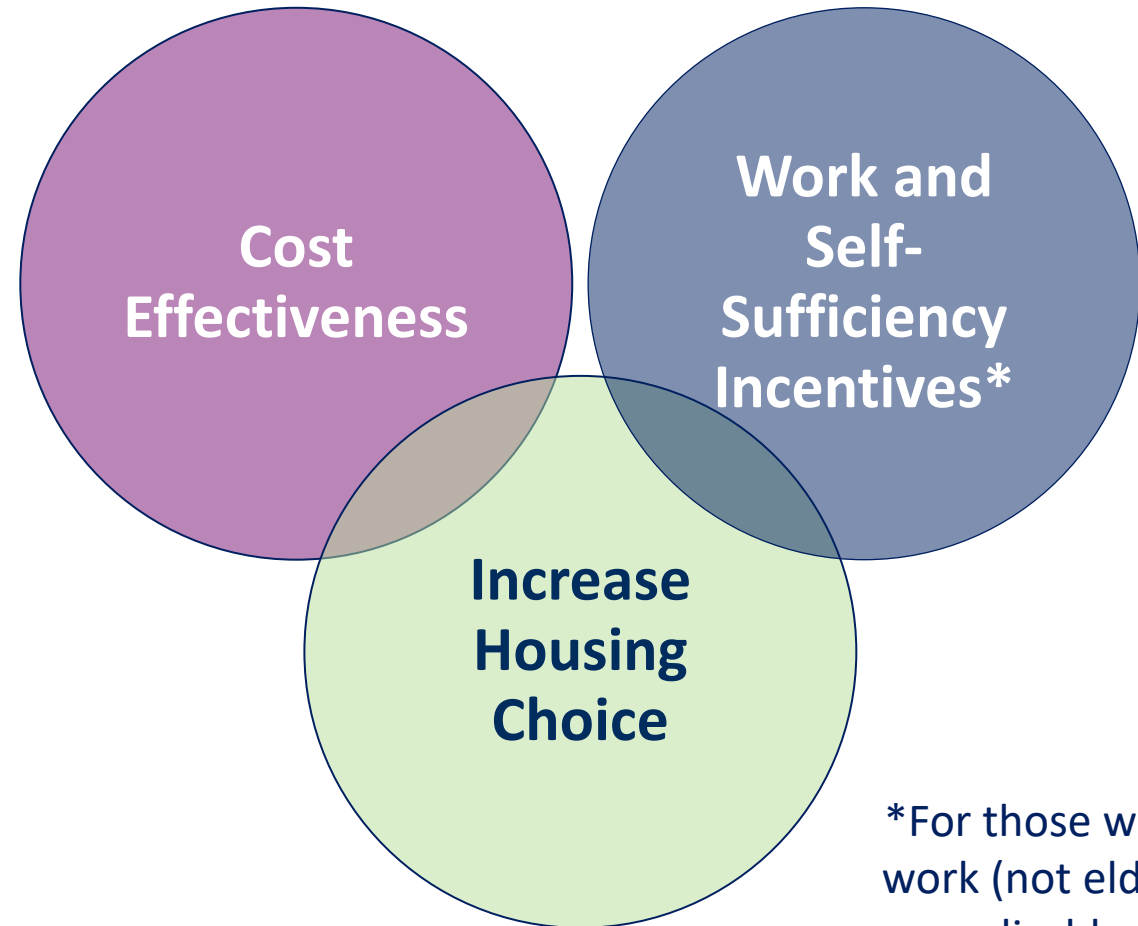


MTW STRATEGIC OBJECTIVES



Three objectives:

1. Cost effectiveness
2. Helping families become self-sufficient
3. Increasing housing choice



*For those who can work (not elderly or disabled)

MEETING REQUIREMENT



- Public meeting for new MTW Waivers required when Agency-Specific or Safe Harbor Waivers are proposed
- In this meeting, EHA presenting new Agency-Specific MTW Waiver that will be proposed to HUD
- No Safe Harbor Waivers to propose this time

NEW PROPOSED WAIVERS



MTW AGENCY-SPECIFIC WAIVER



- **Proposed Waiver 1:** FMRs up to 120%, to enable small area FMR implementation flexibility.
- **Proposed Waiver 2:** HOTMA-related; Eliminate interim increase reviews – allow tenants to keep more \$\$ until next A/R, streamline work for staff.
- **Proposed Waiver 3:** HOTMA-related; Medical expense deductions at 5% instead of 3%, no phase-in or hardships – instead of going up to 10% over two years – benefits tenants, easier for staff to implement.

COMMENTS AND NEXT STEPS



COMMENTS/QUESTIONS



Floor is now open for comment

Please raise your hand to be recognized (*9 if joining by phone)

- State your name and if you are an EHA participant or a member of the public
- Comments should relate to what's been presented
- Limit comments to 2 min





**Annual Plan and MTW Supplement Public Hearing
October 7, 2024**

A public hearing on Everett Housing Authority's proposed amendments to the 2024-2025 PHA Annual Plan and MTW Supplement was held as part of the Housing Authority's regular Board of Commissioners meeting on October 7, 2024.

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Melanie Pilkenton	Director of Rental Assistance
Linda Baines	Interim Director of Housing Management
Jaysen Garcia	Executive Assistant and Communications Coordinator
Heather Stults	Communications and Engagement Manager
Su Mon Han	THRIVE Program Manager
Shannon Atkins	Resident Services Manager (Aging and Disability Services)
Kimberly Wilson	Interim Chief Financial Officer
Mary Swenson	Executive Director

Others Attending:

None

Presentation

Board Chair Koren Smith convened the public hearing and opened the floor to public comment on the Housing Authority's proposed 2024-2025 PHA Annual Plan and MTW Supplement.

Director of Policy and Innovation Janinna Attick provided a brief overview of the purpose of the public hearing.

Q&A/Comments

None

With no additional questions or comments, Board Chair Smith called once more for public comment on the proposed PHA Annual Plan and MTW Supplement and, receiving none, adjourned the public hearing.

EHA Analysis and Responses to Comments on FY 2024 Amended Annual Plan/MTW Supplement

EHA received no formal written public comments on its FY 2024 Amended Annual Plan/MTW Supplement.

EHA had multiple residents and participants at its August 15, 2024, Resident Advisory Board (RAB) meeting. No members of the public attended either the September 12, 2024, Agency-Specific Waivers meeting or the October 7, 2024, public hearing.

Prior to Board approval of the MTW Supplement, the public's responses to the waiver proposals were considered and after PHA consideration and consultation with the RAB, no changes to the MTW Supplement were warranted.

EHA provided answers to resident and participant questions within the context of the public meetings where the questions were posed. These questions and EHA's responses are included in the documentation provided for these meetings with the MTW Supplement.

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

I, Vicki Dorway, the Community Development Specialist
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year 2024-2025 of the Everett Housing Authority is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Everett, WA

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

EHA's proposed amended MTW Supplement to its Annual Plan is consistent with the
City's Consolidated Plan by supporting the goals of housing construction and providing affordable
housing choices, including areas with higher opportunity, for low/moderate income households and
ensuring they are available to tenant-based voucher participants.

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

Name of Authorized Official:

Vicki Dorway

Title:

Community Development Specialist

Signature:



Date:

8/28/24

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

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

**Certifications of Compliance with
PHA Plan and Related Regulations
(Small PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 07/01/2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last

Annual PHA Plan (check all policies, programs, and components that have been changed):

- ☐ 903.7a Housing Needs
- ☐ 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
- ☐ 903.7c Financial Resources
- ☐ 903.7d Rent Determination Policies
- ☐ 903.7h Demolition and Disposition
- ☐ 903.7k Homeownership Programs
- ☐ 903.7r Additional Information
- ☐ A. Progress in meeting 5-year mission and goals
- ☐ B. Criteria for substantial deviation and significant amendments
- ☐ C. Other information requested by HUD
- ☐ 1. Resident Advisory Board consultation process
- ☐ 2. Membership of Resident Advisory Board
- ☐ 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of

the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For a PHA Plan that includes a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 24 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Everett

WA006

PHA Name

PHA Number/HA Code


5-Year PHA Plan for Fiscal Years 20__ - 20__

☒ Annual PHA Plan for Fiscal Year 20 24-25

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

Name of Executive Director: Mary Swenson


Name of Board Chairman: Koren Smith


Mary Swenson (Oct 9, 2024 18:19 PDT)

Oct 9, 2024

Signature

Date


Koren Smith (Oct 10, 2024 10:51 PDT)

10/10/2024

Signature

Date

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

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










Annual Plan Certification 2024 Amended

Final Audit Report

2024-10-10

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MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Housing Authority of the City of Everett

WA006

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

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

Koren Smith

Board Chairperson

NAME OF AUTHORIZED OFFICIAL**TITLE***Koren Smith*

Koren Smith (Oct 10, 2024 10:32 PDT)

SIGNATURE**Oct 10, 2024****DATE**

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







MTW Certification of Compliance 2024 Amended

Final Audit Report

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