



5-Year and Annual PHA Plan and MTW Supplement



July 1, 2025 – December 31, 2026



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

June 16, 2025

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

Re: Correction of Dates-Approval of Moving to Work Supplement to the PHA Plan
for Fiscal Year beginning 7/1/2025 through Fiscal Year Ending 12/31/2026

Dear Mrs. Swenson:

This letter serves as notification that the Annual PHA Plan & MTW Supplement to the PHA Plan 00577 for the Everett Housing Authority submitted for the Fiscal Year beginning 7/1/2025 through Fiscal Year Ending 12/31/2026 is approved. The Plan approved is version 2 submitted on 6/5/2025.

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 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 cursive script that reads "Janice King-Dunbar".

Janice King-Dunbar
Director
Office of Public Housing

CC: Pravin Krishnan, Acting MTW Program Director
Ann Becker, MTW Desk Officer

Table of Contents

Section 1: 5-Year and Annual Public Housing Agency Plan

- 5-Year PHA Plan
- PHA Annual Plan
- Key Accomplishments
- Civil Rights Certification
- Local Official Certification

Section 2: MTW Supplement

- MTW Supplement
- Tiered Rent Table
- Hardship Policy
- Waivers
- MTW Certifications of Compliance

Section 3: Resident and Public Review and Comment

- Resident Advisory Board Comments
- Public Comments
- Public Hearing

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 09/30/2027
---	---	---

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, 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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.								
A.1	<div><div><div><div><div>PHA Name: Housing Authority of the City of Everett</div><div>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025</div><div>The Five-Year Period of the Plan (i.e., 2019-2023): 2025-2029</div><div>Plan Submission Type <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</div></div><div><div>Availability of Information.</div><div>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 on 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 the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</div></div><div><div>How the public can access this PHA Plan:</div><div>EHA's PHA Plan can be accessed on the agency website at www.evha.org, by contacting Su Mon Han at sumonh@evha.org or by calling 425-303-1182, or by coming to the EHA administrative office at 3107 Colby Avenue, Everett, WA 98201, on Tuesdays, Wednesdays, or Thursdays between 9-12 or 1-3.</div></div></div><div><div><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)</div><table><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></table></div></div></div>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
		PH	HCV						
B.	Plan Elements. Required for all PHAs completing this form.								
B.1	<div><div>Mission.</div><div>State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</div></div> <div><div>EHA's mission statement, updated in February 2025, is:</div><div>"The Everett Housing Authority creates affordable housing and fosters healthy communities where households thrive."</div></div>								
B.2	<div><div>Goals and Objectives.</div><div>Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low-income, and extremely low-income families for the next five years.</div></div> <div><div>1. Create 1,500 EHA-owned or -supported housing units by 2030</div><div>2. Direct our resources towards creating diverse, healthy communities of opportunity where children and adults flourish</div><div>3. Foster a workplace where every employee is proud of their contribution to EHA's mission</div><div>4. An individual's race or other immutable characteristics will have no influence on their success in EHA programs or their potential within the organization</div></div>								
B.3	<div><div>Progress Report.</div><div>Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</div></div> <div><div>During the prior 5-year period, EHA has made significant progress toward accomplishing the goals in its 10-year strategic plan, the goals of which were adopted as the 5-year goals and objectives in the 2020-2024 PHA Plan. A full description of the goals and progress is attached.</div></div>								
B.4	<div><div>Violence Against Women Act (VAWA) Goals.</div><div>Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</div></div>								

	<p>Pursuant to the requirements of the Violence Against Women Reauthorization Act of 2022 or successor laws, Everett Housing Authority (EHA) will remain attentive to the needs of applicants, program participants, and their respective family members who are victimized by all forms of domestic violence, including stalking and dating violence. The Section 8 Housing Choice Voucher and Project-Based Voucher programs have enacted policies that protect the rights of both applicants and participants affected by domestic violence. When it can be shown that criminal activity or lease violations are related to domestic violence perpetrated against victims and their families, such individuals will not be disqualified for admission or have their assistance terminated. EHA refers victims of domestic violence to appropriate legal and social service agencies, including but not limited to: the police department, the court system (for restraining orders), Northwest Justice Project (offers legal aid for low income individuals), Domestic Violence Services of Snohomish County, Pathways for Women. EHA operates Pivotal Point Apartments, a 20-unit Project-Based Voucher development for victims of domestic violence, in partnership with DVS of Snohomish County</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>A significant amendment or modification to the 5-Year Plan is any addition to or deletion of EHA's Five Year Goals and Objectives.</p>
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan? Y <input checked="" type="checkbox"/> N <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</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>

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Form identification: WA006-Housing Authority of the City of Everett form HUD-50075-5Y (Form ID - 2295) printed by Janinna Attick in HUD Secure Systems/Public Housing Portal at 06/20/2025 05:03PM EST

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 09/30/2027
---	---	---

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>WA006</u> PHA Type: <input checked="" type="checkbox"/> Small</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>0</u> Number of Housing Choice Vouchers (HCVs) <u>3703</u> Total Combined <u>3703</u> 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>How the public can access this PHA Plan: EHA's PHA Plan can be accessed on the agency website at www.evha.org, by contacting Su Mon Han at sumonh@evha.org, or by calling 425-303-1192, or by coming to the EHA administrative office at 3107 Colby Avenue, Everett, WA 98201, on Tuesdays, Wednesdays, or Thursdays between 9-12 or 1-3.</p> <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> </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						
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program							
		PH	HCV												

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	Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA since its last Five-Year PHA Plan submission? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources. <input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination. <input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each element(s): (c) The PHA must submit its Deconcentration Policy for Field Office Review.
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. 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. 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 the Plan year EHA may consider making other PBV commitments in support of its Five-Year Plan objectives.
B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. During the prior 5-year period, EHA has made significant progress toward accomplishing the goals in its 10-year strategic plan, the goals of which were adopted as the 5-year goals and objectives in the 2020-2024 PHA Plan. A full description of the goals and progress is attached.
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. The most recent 5-Year Action Plan for 2024-2028 was approved in EPIC on 2/3/2025.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> (b) If yes, please describe: EHA had a finding regarding HQS inspections starting in FY 2021-2022. The finding continued in the subsequent audit for FY 2022-2023. The issue has since been corrected. More information can be found in the financial statements on EHA's website at https://www.evha.org/annual-financial-statements
	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.

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 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 Assistance 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.</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.</p> <p>(d) The PHA must submit its Deconcentration Policy for Field Office Review.</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>
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 <input checked="" type="checkbox"/> N <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>Although no formal comments were provided, EHA is providing a summary of the RAB meeting that was held to discuss the PHA Plan and MTW Supplement.</p>
C.2	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><u>Form HUD-50077-CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y <input type="checkbox"/> N <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>

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

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

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

Form identification: WA006-Housing Authority of the City of Everett Form HUD-50075-SM (Form ID - 3651) printed by Janinna Attick in HUD Secure Systems/Public Housing Portal at 06/20/2025 05:03PM EST

Progress Meeting Previous 5-Year Plan Goals and Objectives

2020-2024

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

Objectives	Progress
<p>Implement highly innovative and increasingly cost-effective development strategies. These may include:</p> <ul style="list-style-type: none"> • Nontraditional development models, for example, design-build versus design-bid-build; • Energy-efficient and sustainable modular housing; • Innovative building materials such as cross-laminated timber (CLT). <p>EHA's development activities will generate increased annual net cash flow to support EHA's mission through:</p> <ul style="list-style-type: none"> • Maximizing income from developer fees; • Generating net cash flow from operations of new properties; • Creating a sustainable pipeline of tax credit syndications and re-syndications; • Continuing existing and pursue additional strategic dispositions to increase affordable housing stock. <p>EHA's development activities will address the effects of institutional racism by championing diversity, equity and inclusion. These activities will include:</p> <ul style="list-style-type: none"> • Developing housing primarily in communities of opportunity, especially those where subsidized housing has been excluded; 	<p>In March 2022, EHA completed the acquisition of the 381-unit Huntington Park Apartments, which is located in an amenity-rich neighborhood with access to transit, services, and jobs.</p> <p>In April 2023, EHA completed conversions of 9 HUD Section 202 for the Elderly properties to Project-Based Voucher assistance via the Rental Assistance Demonstration (RAD), ensuring the long-term viability of these properties.</p> <p>EHA has initiated multiple development projects during the prior 5-year period:</p> <ul style="list-style-type: none"> • Master planning for the Park District project on the site of the former Baker Heights development. When a proposed plan to sell the property to Washington State University did not move forward, EHA pivoted to a plan to redevelop the site with up to 1,500 units. • Site acquisition of three parcels on Rucker Avenue, and design work, for development of the future Ben Young Senior Housing, which will include a portion of units subsidized with project-based vouchers. • Site acquisition of a parcel in South Everett, in partnership with the Sno-Isle Libraries, for construction of a future

<ul style="list-style-type: none"> Investing in neighborhoods where housing has deteriorated due to market forces and public policy; Significantly increasing housing for families with children; Engaging with all neighborhoods to advocate for acceptance of multifamily nonmarket housing to address our communities' needs. <p>EHA's development activities will target populations whose needs have either been neglected or will grow substantially in the next decade. These will include, but not be limited to:</p> <ul style="list-style-type: none"> Households with children, especially homeless families; Elderly households and individuals. 	<p>library/community space combined with affordable housing (Mariner Community Campus)</p> <p>In addition, EHA completed construction and lease-up of the 105-unit Madrona Square Apartments, the first phase of redevelopment on the former Baker Heights property. 67 of the units receive project-based voucher assistance and are targeted to serving families with children in Everett Public Schools experiencing homelessness.</p>
--	---

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

Objective	Progress
<p>Transform existing properties into communities of opportunity.</p> <ul style="list-style-type: none"> Use community health survey data and other sources of community and resident input to identify priority needs for individual communities—families with children, elderly, mixed populations. Align existing staff and other resources with programs and strategies that address identified priorities. Expand the Family Self-Sufficiency Program (FSS) and related self-sufficiency programs to increase participant income-earning potential and asset building. Leverage EHA resources to substantially increase access to existing and future opportunities available in the community 	<p>During the five-year period, EHA continued to provide high-quality service coordination to residents of all EHA properties.</p> <p>EHA created a Housing Locator position, which provides navigation and lease-up assistance to voucher households.</p> <p>In Fiscal Year 2024-2025, EHA implemented Small Area Fair Market Rent-based payment standards for the Housing Choice Voucher program, which over time will enable families to afford units in communities of higher opportunity.</p> <p>In Fiscal Year 2024-2025, EHA authorized the use of Housing Choice Voucher Administrative fees to assist clients with</p>

(e.g., Everett Community College and new Washington State University campus).

Significantly increase access to communities of opportunity through the Housing Choice Voucher Program.

- Identify residential areas with low poverty, good public schools, and access to transportation, employment opportunities, and other amenities where families with children can flourish.
- Explore and implement alternative payment standards to increase access to such “communities of opportunity.”
- Pursue resources like the Mobility Demonstration funded by Congress in 2019 and 2020 budgets to fund activities under this objective.
- Direct resources to assist voucher holders with their housing choices, for example, housing search assistance.
- Use potential flexibilities through the Moving to Work Demonstration Program (or other demonstration opportunities) and/or waivers to design programs and policies that align with this objective.

Develop new housing opportunities primarily in communities of opportunity (See Strategic Objective #1).

deposit assistance, utility deposit assistance, holding fees, and for owner incentive and/or retention payments, which will assist our families with leasing units that may better suit their needs.

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

Objective	Progress
<p>EHA will create a culture of inclusion by maximizing the use of staff ideas and talents to pursue this objective and EHA's mission as a whole, by:</p> <ul style="list-style-type: none"> • Using qualitative and quantitative means (e.g., Staff Advisory Group, focus groups, surveys) to gather staff input in developing EHA's plans and initiatives related to this objective; • Tailoring extent of staff outreach to the type and significance of impacts of policy, plan or program changes; • Ensuring that all staff who volunteer their thoughts and ideas represent a maximum of diversity—race, gender, orientation, and so on. <p>EHA will create a culture where all staff personally and corporately embrace excellence, by:</p> <ul style="list-style-type: none"> • Establishing stretch goals and high standards for individuals, teams, departments and agency-wide; • Acknowledging and rewarding organizational, team and personal achievement; • Continuing high performer status under HUD assessment programs; • Continuous improvement in operations outcomes; • Local, state and national recognition for agency achievement; <p>Pursuing access to achievement-based demonstration programs, e.g., Moving to Work Demonstration.</p> <p>EHA will establish a culture of appreciation by:</p>	<p>In 2021, EHA was admitted to the Moving to Work (MTW) demonstration as part of the cohort studying Tiered Rents. In addition to the cohort-specific rent policy, as an MTW agency, EHA has the ability to implement other waivers.</p> <p>In May 2024, numerous EHA staff participated in Supervision and Management training offered by a third-party trainer.</p> <p>EHA conducts an annual Employee Engagement and Satisfaction Survey. Results are used by the Executive Director and leadership team to identify areas for increased focus and training.</p> <p>EHA's annual budget includes budgeted amounts for each department to provide ongoing training and development to employees.</p> <p>In 2024, EHA conducted a compensation study, which was used as the basis for implementing a new compensation structure, which will increase competitiveness of EHA positions in the market, as well as increase the predictability of salaries for existing EHA staff.</p> <p>EHA regularly creates staff work groups for review and implementation of policy and procedure updates, to ensure staff consultation in planning processes, as well as providing leadership opportunities, building cross-department relationships, and identifying areas for increased efficiency in agency operations.</p>

<ul style="list-style-type: none"> • Ensuring that all staff and teams have clearly defined goals and objectives and the means to monitor progress towards those goals and objectives; • Regularly recognizing the achievement of individual and team accomplishments through a variety of means and media; • Developing a consistent performance evaluation process that is used as the basis for compensation adjustments. <p>EHA will foster a culture of growth through opportunities for staff development.</p> <ul style="list-style-type: none"> • All supervisors are committed to the career growth of every assigned staff. • All employees have opportunities for training and education to enhance their opportunities for advancement whether with EHA or not. 	
---	--

Goal 4: The race—as well as other physical or social or 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.

Objective	Progress
<p>EHA will effect agency-wide culture shift that normalizes and prioritizes DEI as an organizational imperative.</p> <ul style="list-style-type: none"> • EHA’s senior leadership will be responsible for guiding this culture shift. <ul style="list-style-type: none"> • Their actions and behavior will demonstrate a personal dedication to diversity, equity and inclusion. 	<p>EHA operationalized multiple improvements that further DEI and racial equity, including:</p> <ul style="list-style-type: none"> • Requiring that all hiring panels include at least one person of color, and that all interviews include at least one question about DEI • Increasing the number of languages that surveys and outreach materials are translated into, to ensure that

<ul style="list-style-type: none"> • Commitment to ongoing growth in DEI knowledge through self-study and other internal and external opportunities. • They will hold themselves, each other and assigned staff accountable for behavior that demonstrates practices of diversity, equity and inclusion. • All staff will demonstrate understanding of EHA’s mission to undo institutional racism. <ul style="list-style-type: none"> • Staff will embody a sense of welcome and inclusion for colleagues and residents regardless of differences in physical/social/sexual orientation. • Staff will attend all required DEI training workshops and put learning outcomes into practice within agency work. • Staff will hold each other accountable for behavior that demonstrated practices of diversity, equity, and inclusion. <p>DEI will provide the conceptual lens for all EHA program and policy development and implementation.</p> <ul style="list-style-type: none"> • Regularly updated demographic and other DEI-related data will drive the development of programs, policies and procedures. • Human resources programs and policies will be implemented to create and sustain a racially inclusive organization. • All operational programs and policies will be examined and become consistent with the characteristics of such an organization. 	<p>limited English proficiency households have full access to communications from EHA</p> <ul style="list-style-type: none"> • Implementing new tools for usage and tracking of language resources, to ensure all staff are aware of and able to access translation and interpretation resources • Offering leadership-specific and agencywide DEI and racial equity training opportunities to staff on a regular basis. • In June 2024, EHA implemented several changes to improve the agency’s in-person services for participants and the public. These changes include: <ul style="list-style-type: none"> ○ Expanded open hours/days ○ Hiring bilingual staff ○ Installing a new, user-friendly kiosk in its public lobby for participants without easy access to these resources could use them without charge • EHA additionally added staff in a new Customer Service-oriented position that expanded voucher participants’ access to in-person help with their housing authority paperwork, even without a prior appointment.
--	--

Develop and nurture community and national networks and relationships to advance diversity, equity and inclusion at all levels.

- Participate in local neighborhood associations and councils to build local relationships and counteract NIMBYism.
- Partner with and/or joining key organizations such as NAHRO, GARE, C3, and Leadership Snohomish, to amplify and enhance DEI effectiveness.
- Consult with and learn from local cultural affinity organizations about the diverse needs of Snohomish County and to ensure equity in program development and implementation.

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 09/30/2027

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 X 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 07/2025 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/TMS 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

WA006

PHA Name

PHA Number/HA Code

☒ 5-Year PHA Plan for Fiscal Years 2025-2029

☒ Annual PHA Plan for Fiscal Year 2025

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: **MRS Mary Swenson**


Signature

3/24/25
Date

Name of Board Chairman: **Koren Smith**


Signature

3/24/25
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.

Form identification: *WA006-Housing Authority of the City of Everett form HUD-50077-CRT-SM (Form ID - 144) printed by Janinna Attick in HUD Secure Systems/Public Housing Portal at 03/18/2025 06:23PM EST*

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 09/30/2027
---	--

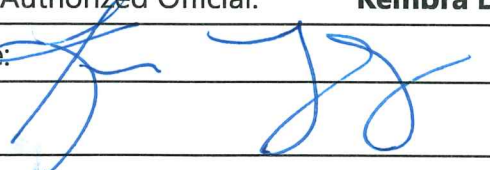
**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Kembra Landry, the Community Development Mgr certify that the 5-Year PHA Plan for fiscal years 2025-2029 and/or Annual PHA Plan for fiscal year 2025 of the WA006 - Housing Authority of the City of Everett is consistent with the 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 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 5-Year PHA Plan and MTW Supplement are 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: Kembra Landry	Title: Community Development Mgr
Signature: 	Date: <u>3/18/25</u>

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.

Form identification: *WA006-Housing Authority of the City of Everett form HUD-50077-SL (Form ID - 3333) printed by Su Mon Han in HUD Secure Systems/Public Housing Portal at 03/07/2025 03:13AM EST*

PHA Name : Everett

PHA Code : WA006

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2025

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.” 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 demonstration. 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 5-Year and Annual Plan.

For the upcoming fiscal year, EHA does not plan to request any additional MTW waivers. Instead, EHA will focus on implementation of existing waivers not yet implemented, and evaluation of waivers that are already being implemented, to determine if any improvements can be made or if additional waivers will be needed in future years to maximize the benefits of these waivers.

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)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
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

1.b. - Tiered Rent (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>As part of the cohort-specific Rent Reform study, EHA is comparing a tiered rent policy to the traditional rent policy. Qualifying families were randomly selected to either pay under the current or tiered rent policy. Under the tiered rent policy, families pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family is 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</p>

<p>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>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>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 May 2023 and was completed in April 2024. Approximately 950 families were enrolled in the study.</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>

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

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.

Other – another specifically defined target population or populations.

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

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.

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 this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

1.s. - Elimination of Deduction(s) (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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 will replace the medical/disability expense deduction threshold that is increasing to 10 percent of annual income under the Housing Opportunities Through Modernization Act (HOTMA) 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.

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

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.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

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 voucher units occupied by households who qualify for the medical/disability expense deduction.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. EHA received HUD approval for the waiver in January 2025 and plans to begin implementation during FY 2025-26 or when HOTMA is fully implemented.
Does this MTW activity require a hardship policy? Yes This document is attached.
Does the hardship policy apply to more than this MTW activity? Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.) 1.s. - Elimination of Deduction(s) (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? No
How many hardship requests have been received associated with this activity in the past year? No hardship were requested in the most recent fiscal year.
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? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? No
How much will the single standard deduction be in the Fiscal Year? \$

2.a. - Payment Standards- Small Area Fair Market Rents (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 is in a jurisdiction that is required to implement Small Area Fair Market Rent (SAFMR)-based payment standards. EHA has implemented 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 obtained 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 has the flexibility to designate zip codes within payment standards between 80% to 150% of the applicable SAFMR.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies 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 was approved during FY 2024-2025 and EHA is in the process of implementing.

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?

Yes

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 has implemented three tiers of payment standards. This waiver provides EHA with 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

EHA is using its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based or tenant-based vouchers. EHA previously 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 incurs cost and additional staff time to have these determinations done by a third party. This waiver is part of the overall goal to use MTW flexibility to streamline and reduce costs.

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

Cost effectiveness
<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>PBV-assisted units owned or controlled by EHA as well as units owned or controlled by EHA and occupied by EHA tenant-based voucher participants.</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. EHA has updated the waiver to incorporate the March 20, 2025 Operations Notice updates which allow this waiver to apply to tenant-based voucher participants in PHA-owned units.</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 a description of the quality assurance method.</p> <p>EHA's reasonable process includes using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations are 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).</p> <p>No document is attached.</p>
<p>Please explain or upload a description of the rent reasonableness determination method.</p> <p>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.</p> <p>EHA will administer this waiver in accordance with the applicable safe harbor requirements: 1) EHA shall make available</p>

the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area and 2) At HUD's request, EHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.

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 three separate waivers implementing modifications to reexaminations, all of which contribute to EHA's efforts to streamline the reexamination process for staff and participants.

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.

In FY23, EHA received approval for the Simple Rent initiative, 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.

In FY24, EHA received approval for the Streamlining Interim Reviews waiver. Under this waiver, EHA will not 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 as established by HUD through notice. EHA will incorporate income for any newly added family members regardless of the amount at the time the new member(s) are added to the household. This waiver applies to all household types, in the HCV and PBV programs, except those under the Tiered Rent policy, which eliminates interim reviews.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

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

to be part of the Tiered Rent group during the study enrollment period.

Simple Rent triennial reviews apply to elderly and disabled households with mostly fixed income sources.

Streamlined Interim Reviews will apply to all households except those subject to the Tiered Rent policy.

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

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

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

Tenant-based and project-based voucher units occupied by families who are eligible for one or more of the applicable MTW activities.

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.

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

FY23 Simple Rent waiver - EHA is finalizing details of implementation and expects to phase this in during CY2025, with 1/3 of eligible families being enrolled in Simple Rent each year for 3 years to ensure a consistent workload for staff.

FY24 Streamline Interim Reviews waiver - EHA plans to implement in conjunction with implementation of HOTMA, likely during FY2025-2026.

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 allowed 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.

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.

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.

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.

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

FY22 approved waiver. Under this waiver, EHA allows participants to self-certify assets of less than \$50,000 upon reexamination. This contributes to our streamlining initiative, as a significant amount of staff time goes to requesting and collecting verification documents for assets that have a negligible to no impact on the amount of HAP that the agency pays. It will also benefit assisted families by decreasing the amount of paperwork required.

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
<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 and is ongoing.</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>

5.c. - Third-Party Requirement (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>FY22 approved waiver. Under this waiver, EHA is allowed to complete housing quality 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 housing quality inspections on units that the agency owns or controls. In accordance with the updated MTW Operations Notice published 3/20/2025, EHA is updating this waiver to incorporate housing quality inspections conducted on EHA-owned or -controlled units occupied by EHA tenant-based voucher holders, which was previously allowed under a separate agency-specific waiver.</p> <p>EHA will administer this waiver in accordance with applicable safe harbor requirements: 1) The participant must be able to request an interim inspection. 2) Housing quality inspection standards must not be altered as found at 24 CFR 982.401. 3) At HUD's request, EHA must obtain the services of a third-party entity to determine if PHA-owned units pass housing quality standards.</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>

EHA-owned or controlled units under the project-based voucher program as well as EHA-owned or controlled units occupied by EHA tenant-based voucher holders.

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, and new staff are trained as needed due to turnover or capacity. In early 2025, EHA staff were trained in the successor NSPIRE inspection standard, which will be implemented by EHA in July 2025. As a result of this waiver, EHA no longer requires the services of a contract inspector, other than for 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.

Upon discovering any quality control issues during internal or third-party quality review inspections, EHA may require staff to complete additional training and will review standard operating procedures for any needed updates to ensure quality control on subsequent inspections.

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

FY24 approved waiver. EHA will 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.

EHA will administer this waiver in accordance with applicable safe harbor requirements: 1) Participant must be able to request an interim inspection, 2) Housing quality inspection standards as found at 24 C.F.R. 982.401 must not be altered, and 3) HUD must be able to conduct or direct EHA to perform an inspection at any time for health and safety, as well as accessibility, purposes.

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

<p>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 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>Project-based voucher units managed by EHA.</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 approved and implementation is in process.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

<p>9.d. - Alternative PBV Selection Process (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>FY24 approved waiver. EHA will 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.</p> <p>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.</p> <p>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.</p> <p>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. Because EHA has an approved MTW waiver in place to allow self-performance of inspections on EHA owned or controlled units, the safe harbor requirement to have an independent entity conduct a housing quality standards inspection before executing a PBV HAP contract for a unit owned or controlled by EHA does not apply (except as noted in the safe harbor requirements for that waiver 5.c).</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Housing choice</p>

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

FY23 approved waiver. 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 has implemented a tiered prioritization system for turnover vouchers:

1. Turnover vouchers will first be issued to households in RAD PBV properties and who live at Pivotal Point, which serves a vulnerable population of households who have experienced domestic violence, 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 increases 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 continues to process requests from PBV tenants for tenant-based assistance due to VAWA (domestic violence) or reasonable accommodations for a disability in accordance with applicable regulations.

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 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

FY23 approved waiver. 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 traditional 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.

Details of the program are being finalized and it is expected to be offered to rent study households in CY2025.

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>FY23 approved waiver. 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.</p> <p>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>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> <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 (both tiered rent policy and standard rent policy 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>Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy 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>Details of the THRIVE+ program are being finalized and it is expected to be offered to households in CY2025.</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>
<p>What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?</p> <p>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.</p>

<p>17.b. - Service Provision</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>This waiver previously included two activities: a supportive services activity and an inspection success activity.</p> <p>Based on HUD guidance that these activities do not require an MTW waiver when provided to PBV or HCV-assisted households, EHA is revising the waiver to remove mention of the inspection success fund and revising the description of the supportive services activity to allow for this activity to be provided at non-PBV assisted units.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency; 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 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>Service coordination activities support residents of EHA properties, including those with PBV assistance. EHA may choose to use this waiver to pay for supportive services for non-PBV residents that meet requirements for LNT assistance.</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>As noted above, this waiver was updated based on feedback from HUD to focus on services provided to non-PBV households. EHA has not yet chosen to apply this flexibility to provide services to households not assisted by PBVs, but may choose to do so in the future.</p>
<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 properties; EHA may also provide high speed internet at certain EHA-owned/controlled properties.</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>EHA is currently only using this waiver to assist PBV units. However, 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.</p>
<p>Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?</p> <p>No</p>

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

<p>activity contributes to a larger initiative</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>EHA will implement this waiver in accordance with applicable safe harbor requirements: 1) Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low income, 2) EHA is subject to Notice PIH 2011-45 or any successor notice and/or guidance, 3) EHA must comply with section 30 of the 1937 Housing Act, and</p> <p>4) Any MTW Funding awarded to a third party provider must be competitively bid.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; 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>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>Units that receive funding under this activity - specific units are to be determined.</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 was approved. EHA has not yet chosen to spend LNT funding on development of non-PBV units.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

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
TBD - future opportunities	TBD - acquisition, rehabilitation, and/or new construction possible	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
---------------------------------	--	--	----------------------------	-----------------------	---	---	---	--

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
---------------------------------	--	--	----------------------------	-----------------------	---	---	---	--

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
---------------------------------	--	--	----------------------------	-----------------------	---	---	---	--

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																			
	<table border="1"> <thead> <tr> <th>Title</th> <th>Has there been a change in how the waiver is being implemented from when it was originally approved?</th> <th>Please provide a description of what has changed.</th> <th>Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.</th> <th>If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?</th> </tr> </thead> <tbody> <tr> <td>Modify Verification Hierarchy</td> <td>No</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Modify Discrepancy Threshold</td> <td>No</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					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?	Modify Verification Hierarchy	No				Modify Discrepancy Threshold	No			
	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?															
	Modify Verification Hierarchy	No																		
Modify Discrepancy Threshold	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
---------------------------	---	---	-----------------------------	----------

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?
------------------------	--------	------	------	------	------	-------	-------------	------------------	-------------------------------	--	---	---	--

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.	

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 led 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 Tiered Rent Demonstration https://www.mdrc.org/work/publications/rent-reform-subsidized-hous</p>
--	---	---	---

**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 Tiered Rent Impact Analysis**

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

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>The Tiered Rent demonstration is expected to have a positive impact on EHA's ability to meet the statutory goals of cost effectiveness and self-sufficiency. Moving to triennial reexaminations and eliminating deductions, combined with some of the other streamlining waivers EHA plans to request, is expected to reduce staff time associated with annual reexaminations; however, this will be somewhat mitigated by the time spent review hardship requests.</p> <p>Not requiring families to report income increases between triennial reexaminations is expected to provide an incentive for families to increase their earned income since they will be able to keep more of their earned income between reexaminations, which will contribute to the MTW statutory goal of self-sufficiency.</p> <p>Because the tiered rent calculation will use gross instead of adjusted income, EHA will also calculate the initial family share using gross instead of adjusted income. In other words, at initial occupancy, tenant-based voucher participants will now be able to lease a unit with rent plus utility costs equal to 40% of their gross, rather than adjusted, income. This could have a modest benefit to families in increasing their housing choice, especially families with significant deductions.</p>
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
<p>Families who are selected to pay tiered rent are anticipated to request a higher number of hardships than under the current rent policy, as a result of the loss of deductions and interim reviews. Families who have a significant number of dependents, and/or families who have significant unreimbursed child care expenses, are expected to be the most likely to receive hardship exemptions.</p> <p>Based on EHA's analysis, about 172 households, or about 19% of households eligible for the rent study, currently have 4 or more dependents and/or have unreimbursed child care expenses of \$2,500 or more. Since half of these families are likely to be in the control group, they will not need to request a hardship.</p> <p>An additional number of households who are part of the tiered rent group and who experience a loss of income between triennial reexaminations may request hardship exemptions, but this number is difficult to estimate. EHA intends to track hardship requests to determine the impact of the policy on participant families and on staff time spent processing hardship requests.</p>
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)

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

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

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

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

Everett Housing Authority
MTW Impact Analysis – 1.u. Standard Deduction: 5% Medical/Disability Expense Threshold

MTW Activities Covered by Impact Analysis	1.u. Standard Deduction: Medical/Disability Expense Threshold		
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)			
EHA is currently using a 3% threshold for medical/disability expenses (meaning, medical/disability expenses above 3% of income are deducted from income). HOTMA, upon implementation, will raise the threshold to 10% with a phase-in period and required temporary hardships. This proposed waiver would use the standard definition of Health and Medical Care Expenses and Unreimbursed Reasonable Attendant Care and Auxiliary Apparatus Expenses defined at 24 CFR 5.603, but set the threshold at 5% to deduct expenses with no phase-in. The average amount of medical expense per household is \$2,107.			
	3% Threshold (current)	5% Threshold (proposed)	10% Threshold (HOTMA required)
Number of Households Qualifying for Deduction	373	329	184
Sum of Deductible Expenses	\$642,948	\$482,815	\$205,840
HAP Cost of Deduction (annual)	\$192,884	\$144,844	\$61,752
In comparison to EHA’s current 3% threshold, this waiver will save approximately \$48,039 in subsidy per year and the average deduction per household will decrease by \$359. When compared to HOTMA’s 10% threshold, this waiver will account for an additional \$83,092 paid in subsidy per year and the average deduction per household will be \$622 higher. Since EHA has not yet implemented the HOTMA requirements, this waiver will increase revenue from household rent and decrease subsidy expenditures.			
Administrative savings will also decrease expenditures. By utilizing a 5% threshold, EHA households will not require phased-in relief or general relief from the 10% medical expense threshold increase. EHA would expect 189 phased-in relief hardships, which account for this figure. EHA cannot predict how many households would apply for general hardship relief, so any savings from those types of hardships would be in addition to this figure.			
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)			
Expected to increase the affordability of housing costs due to a lower medical expense threshold.			
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.			

<p>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</p> <p>No expected impact.</p>
<p>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</p> <p>No expected impact.</p>
<p>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</p> <p>This activity will contribute to the MTW statutory goal of cost effectiveness by simplifying the rent calculation process and lessen the administrative burden related to medical expenses.</p>
<p>7. Impact on the agency's ability to meet the MTW statutory requirements</p> <p>No expected impact.</p>
<p>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</p> <p>EHA expects a decrease in hardship requests as compared to what would be requested if the HOTMA policy is implemented. No other impacts expected.</p>
<p>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</p> <p>This waiver will impact disabled and elderly households more than others as they are the only households that qualify for the medical/disability expense deduction. This waiver will benefit these households as it lowers the threshold to have medical/disability expenses taken into account for their rent determination.</p>

Everett Housing Authority
MTW Impact Analysis – 2.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 – Alternative (Triennial) Reexamination Schedule for
Qualifying Elderly and Disabled Households

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

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

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

No expected impact.

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

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

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

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

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

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

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

Everett Housing Authority 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.

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 07/01/2025, 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.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and 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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), 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' for people with physical disabilities.
- (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 and should be made available electronically, upon request.

Everett Housing Authority

MTW PHA NAME

WA006

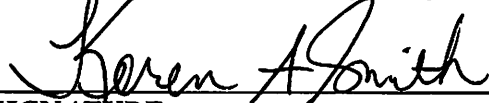
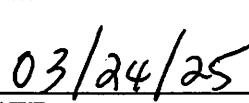
MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. § 3729, 3802).

Koren Smith

NAME OF AUTHORIZED OFFICIAL

Board Chair

TITLE

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.*

Resident Advisory Board Meeting
5-Year PHA Plan, Annual Plan/MTW Supplement, and Capital Fund 5-Year Action Plan
January 15, 2025

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Wednesday, January 15, 2025, to receive comments and recommendations related to the development of the 2025-2029 5-Year Public Housing Agency Plan, 2025-2026 Annual Plan/MTW Supplement, and Capital Fund 5-Year Action Plan. 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
Anna Todd	Deputy Director of Rental Assistance
Kristen Cane	Director of Asset Management
Su Mon Han	Policy Manager
Heather Stults	Communications & Engagement Manager
Linda Baines	Interim Director of Housing Management
Steve Yago	Deputy Director of Development

RAB Members in Attendance:

Maureen Maland (Broadway Plaza – PBV)	Teresia Kios (Madrona Square – PBV)
Joan Oxentencko (Broadway Plaza – PBV)	Altheana Enjene (Madrona Square – PBV)

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 2025-29 PHA Plan period. This included a presentation of the results of a survey conducted in December 2024 asking program participants, EHA staff members, and other stakeholders in the community what they felt were the greatest housing-related needs and challenges facing the local area. EHA staff also explained EHA’s status as a Moving to Work (“MTW”) agency and explained the status of previously proposed MTW waivers submitted to HUD, and concluded by announcing no new MTW waivers were being proposed by EHA this year. Finally, EHA staff described the plan for the Capital Fund program funding that EHA continues to receive.

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 24, 2025, 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 24th public hearing.

RAB Comments/EHA’s Response:

- 1. A RAB member asked how EHA could make our communities healthier by preventing rampant drug use from overtaking apartment communities, such as the one she resided in (Broadway Plaza).**

The drug epidemic has become widespread, reaching into every corner of our county and most multi-family residences. Unfortunately, this is a wider problem whose root extends beyond the purview of a housing authority's area of influence. However, to address the daily safety and comfort of residential buildings owned by EHA as well as others, landlords are able to enforce penalties for lease-breaking activities such as drug-taking on their premises.

Now that the eviction moratoriums from the COVID era have lifted, EHA expects landlords' ability and responsiveness regarding drug-related lease violations to increase, making for cleaner and safer residential communities.

2. A RAB member asked why some apartment complexes advertised as “affordable” are charging monthly rents much higher than her entire monthly income.

Even though the rental prices charged at some affordable properties are too high for all income levels of households to afford, their prices are lower than the current market rents in our community and across many places in the United States. These properties partner with EHA to access the Low-Income Housing Tax Credit provided by the federal government to incentivize private developers to reserve a certain percentage of their market rate rental units for households below a certain income level, and charge a commensurate, slightly lower rental price.

Unfortunately, affordable properties whose rents are subsidized in this manner are not targeted toward being affordable to all income levels, aiming instead toward households who are working steadily but may not receive a high income. Many developers of affordable housing in the state use this tax credit and cater to households in this tier of income. In most cases at properties like these, additional housing subsidy—such as a Section 8 voucher—would be the only way to make the rental prices on their affordable units truly affordable to everyone in the community.

One of the core issues causing the currently high fair market rental prices is a result of persistent under-production of housing stock in the state and across the United States over decades, resulting in triple the demand versus the current housing supply. EHA believes that increasing the overall supply of housing—especially over the long term—will eventually help address the affordability issue, but the current supply-demand gap is a major obstacle.

3. A RAB member asked about how voucher systems (such as Section 8) fit into making rental units more affordable, particularly for individuals working full-time but still unable to afford market-rate rents.

Rental assistance, including the Section 8 voucher program, was conceived as a federally funded fail-safe aid for those in our communities who were unable—due to disability or advanced age, or due to temporary economic hardship—to achieve an income level commensurate with the local fair market rent levels.

As the rental market has outstripped incomes, programs like Section 8 are essential in bridging the gap between current income levels and rent levels in our community. Many participants who are employed—including many who are employed full-time—still need assistance to afford rental housing, because of the high market rents in Snohomish County. Rental assistance such as Section 8 vouchers as well as tax-credit-funded affordable units make housing more affordable by subsidizing part of the rent, allowing low-income tenants to live in units and communities that

might otherwise be out of reach for them. However, we recognize that the number of vouchers available is far below the demonstrated level of need in our community.

- 4. At EHA staff's request for opinions regarding how to shape agency policy regarding which households on the voucher program would be terminated first in the circumstance of inadequate government funding for all participants presently on our program, a RAB participant stated that she would prefer that such a situation should never come to pass, as the decision is too heart-rending to consider.**

EHA currently has a policy in place that defines which households currently participating in its voucher program would be exempt from terminations due to a lack of funding to cover all current program participants. However, a need has arisen to formalize policy which defines which families would be terminated first in those circumstances.

Though the decision has not yet been made, one potential option is to prioritize non-elderly, non-disabled households that have been on the program the longest to be first to lose assistance in the event of inadequate funding.

5-Year PHA Plan, Annual Plan/MTW Supplement, and CFP 5-Year Action Plan Public Hearing March 24, 2025

A public hearing on Everett Housing Authority's proposed 2025-2029 5-Year PHA Plan, PHA Annual Plan MTW Supplement, and Capital Fund 5-Year Action Plan was held as part of the Housing Authority's regular Board of Commissioners meeting on March 24, 2025.

EHA Staff Attending:

Mary Swenson	Executive Director
Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Chreatha Alston	Director of Human Resources
Melanie Pilkenton	Director of Rental Assistance
Erica Dias	Director of Property Management
Heather Stults	Communications and Engagement Manager
Steve Yago	Interim Director of Development
Jaysen Witt	Executive Assistant and Communications Coordinator
Shannon Atkins	Aging and Disability Services Program Manager

Others Attending:

Sandy Langdon	Financial Consultant
Jimmy Castro	HCV Participant

Public Hearing

Board Chair Koren Smith convened the public hearing and opened the floor to public comment on the Housing Authority's proposed 2025-2029 PHA 5-Year and Annual Plan, MTW Supplement, and Capital Fund Program 5-Year Action Plan at 12:11 PM.

Q&A/Comments

None

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

EHA Analysis and Responses to Comments on FY 2025 MTW Supplement

EHA received no formal written public comments on its FY 2025 PHA 5-Year Plan/Annual Plan/MTW Supplement.

EHA had multiple residents and participants at its January 15, 2025, Resident Advisory Board (RAB) meeting. One program participant attended the March 24, 2025, public hearing, but made no comments during the public hearing. No members of the public attended the 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.