



TACOMA HOUSING AUTHORITY

RESOLUTION 2014-9-24 (1)

DATE: September 24, 2014
TO: Board of Commissioners
FROM: Michael Mirra, Executive Director
RE: Approval of THA's 2015 Moving to Work Plan

This resolution authorizes the executive director to submit THA's 2015 Moving to Work Plan to HUD for HUD's approval. Each year, THA proposes new MTW activities intended to meet the statutory goals of the MTW program:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

This year, we are proposing only one new activity. It will allow THA to expand its Housing Opportunity Program (HOP) to current voucher holders if necessary to manage budget cuts in 2015, should they occur, so THA is less likely to need to terminate the rental assistance of households.

We had initially thought to include in the 2015 plan a version of rent reform for the current voucher program. We held three (3) staff sessions during the first week of June; over half of the THA staff participated in these sessions. Staff considered three (3) rent reform-related proposals. The discussion and the questions that it raised made clear that we are not prepared to devise and implement such a proposal in 2015. In part we need more analysis to do before we begin our community consultation. The Board may recall its discussion about this and its approval that we delay that consultation and instead plan for such proposal in the 2016 plan.

This delay should be manageable since sequestration and its budget cuts are not due to resume until 2016. Congress's present two year budget agreement would mean that we will not see in 2015 any cuts beyond what we experienced in 2014. That would make 2015 manageable enough.

The risk is that Congress may undo that deal and impose cuts in 2015. The proposed new activity in 2015 will help THA manage that risk in a way that would make large scale terminations of families less likely should cuts occur. It would do this by allowing THA to extend HOP, and its "soup thinning" savings, to the present voucher program participants.

Otherwise, the only alternative way to manage substantial cuts under HUD's rules would be to terminate large numbers of them.

If HUD approves this activity, THA will amend the *Insufficient Funding* portion of its Administrative Plan to allow for immediate MTW rent reform. The amendment will reflect the methodology it will use to determine insufficient funding and how and to which households the activity will apply. THA will go through the public consultation process to reflect this methodology.

The draft plan can be viewed by typing in the following web address then clicking on "2015 Draft MTW Plan." <http://www.tacomahousing.net/content/moving-work-0>

Community and Staff Consultation

During the planning process, THA elicited a wide range of community and staff input about this proposal. After receiving approval from the Cabinet to go through the public hearing process, THA has taken the following actions to receive feedback:

- Staff planning sessions on June 2, 3, and 5, 2014.
- Direct mailings to all THA residents informing them of the plan, public hearings and options for submitting feedback.
- Public Hearings for current residents and all interested parties on August 20, 2014.
- Public Hearings for current residents and all interested parties on August 25, 2014.
- Met with the landlord advisory committee on August 26, 2014.

Feedback from staff, program participants, and advocates has been mostly supportive of the proposed activity. A full list of public comments is included in the draft plan on THA's website.

Recommendation

Approve Resolution 2014-9-24 (1) authorizing the Executive Director to submit the Housing Authority of the City of Tacoma's Fiscal Year 2015 Moving to Work (MTW) Plan. [NOTE: The resolution is in a form that HUD directs.]



TACOMA HOUSING AUTHORITY

RESOLUTION 2014-9-24 (1) Approval of THA's 2015 Moving to Work Plan

**Annual Moving to Work Plan
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 Annual Moving to Work Plan Amendment

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan Amendment for the PHA fiscal year beginning 1/1/2015, hereinafter referred to as "the Plan", 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 Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan Amendment;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. 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.
7. 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

8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

9. The 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 and implementing regulations at 49 CFR Part 24.

10. 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.

11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.

13. 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.

14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

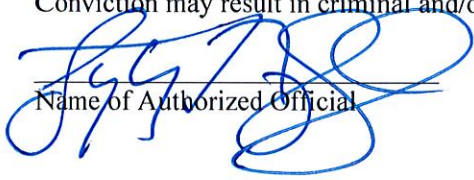
17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the 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 Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of Tacoma
PHA Name

WA005
PHA Number/HA Code

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


Name of Authorized Official

Chairperson
Title