



# TACOMA HOUSING AUTHORITY

## RESOLUTION 2018-09-26 (3)

**Date:** September 26, 2018  
**To:** THA Board of Commissioners  
**From:** Michael Mirra  
Executive Director  
**Re:** Approval of Tacoma Housing Authority's 2019 Moving to Work Plan

*This resolution would authorize Tacoma Housing Authority's (THA) Executive Director to submit the Housing Authority of the City of Tacoma's Fiscal Year 2019 Moving to Work (MTW) Plan. The new plan would seek HUD approval of one new change: "Modify Housing Quality Standards (HQS) for Initial Inspections" to simplify the inspection process for initial inspections of units receiving THA's rental subsidy."*

### Background

Each year, THA may propose to HUD that THA undertake 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.*

MTW "activities" are best described as new things THA wishes to do that require waiving HUD regulations. This year, the Policy, Innovation & Evaluation (PIE) team consulted with THA staff and community members. PIE met with each department director and staff to understand the agency's MTW needs and priorities. Rental Assistance and Client Support and Empowerment teams were consulted at their regularly scheduled department meetings. An additional "open call" meeting was scheduled for all THA staff to drop-in if interested. Results of the consultation process informed which new activity ideas and/or revisions to existing activities would be included in the MTW Planning memo to THA's Cabinet for inclusion in the 2019 planning process. PIE also hosted community meetings.

While many of staff's suggestions would not require further MTW flexibility, staff voiced the desire to take another look at many of THA's existing activities and their policy implications. Examples include portability policies, reviewing income eligibility at admission, serving special populations and the Family Self-Sufficiency program pay points. Revisions to these policies will



require further research and are not being presented to the Board at this time. Each policy will be evaluated separately as time and department capacity allow. The discussion did elicit one proposal. This resolution would authorize THA to include it in the 2019 MTW that THA would submit to HUD for HUD's approval.

### **Modify THA's HQS Standards for Initial Inspections**

The 2019 MTW Plan proposes to modify THA's Housing Quality Standards (HQS) for initial inspections of housing that THA's rental assistance would subsidize. This would simplify the inspection process for initial inspections. The proposed activity will permit landlords to self-certify in cases where fail items are non-life threatening. THA will determine whether a fail item is life threatening or not using a prescribed list that THA will develop for the purpose. THA will develop this list in using the city code and in consultation with THA's Landlord Advisory Group. The list will account for lead-based paint requirements due to its significant impact on the health of young children. Other housing authorities, such as King County Housing Authority, are implementing similar activities as a way to respond to landlord's request to make renting to voucher holders simpler. The goal of this proposed change is to make it simpler for landlords to rent to voucher holders.

During a recent HUD site visit, the PIE team shared this proposal with HUD staff. HUD reminded THA of its obligation to ensure units meet HQS and to be mindful of lead paint exposure in units built before 1978. In order to do so THA will continue to conduct internal audits for quality control and the unit will be subject to its annual inspection. In addition to any items that pose an imminent risk to the life and safety of the resident, THA will continue to include all lead-based paint requirements as part of this prescribed fail list.

Any changes to the MTW Plan that are approved by the board and HUD will be updated in THA's Administrative Plan.

The draft plan can be viewed by following this link:

[http://www.tacomahousing.net/sites/default/files/2019\\_draft\\_moving\\_to\\_work\\_plan.pdf](http://www.tacomahousing.net/sites/default/files/2019_draft_moving_to_work_plan.pdf)

### **Community and Staff Consultation**

During the planning process, there was a wide range of community and staff input. The activity that is included in the Plan arose from feedback THA received from its property owner partners during a large consultation we undertook in fall 2017 where there was strong support for more lenient inspections.

In addition to the property owner feedback, staff brainstorming sessions and two public meetings were held in August. After receiving approval from the Cabinet to proceed with the public hearing process, THA has taken the following actions to receive feedback:

- Staff planning sessions.
- Public comment notice and draft MTW Plan made available on THA's website.
- One afternoon and one evening Public Hearing for current residents and all interested parties on August 15<sup>th</sup>.
- PIE introduced the new proposed activity during a HUD MTW site visit.





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### Certifications of Compliance

**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\***

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2019), 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 MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2)The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) 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.

(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 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.

(5)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.

(6)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, for the MTW PHA's

jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7)The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), 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). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8)The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9)In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender 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.

(10)The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

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

(13)The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(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 24 CFR 85.20 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 OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.

(21)The MTW 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.

(22)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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW 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)

Dr. Minh-Anh Hodge  
**Name of Authorized Official**

Chair  
**Title**

  
Signature

  
Date

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