



TACOMA HOUSING AUTHORITY

RESOLUTION 2019-09-25 (1)

Date: September 25, 2019
To: THA Board of Commissioners
From: Michael Mirra
Executive Director
Re: Approval of THA's 2020 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 2020 Moving to Work (MTW) Plan.

Background

THA must submit an annual MTW Report and Plan to Housing and Urban Development (HUD). The Report describes how THA is performing as an MTW agency and the Plan describes existing activities and any new activities that the agency wishes to propose to HUD.

Each year, THA may propose 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 Housing and Urban Development (HUD) regulations.

The Policy, Innovation & Evaluation (PIE) team met with each department director and staff to understand the agency's MTW needs and priorities. Results of the consultation process informed which new activity ideas and/or revisions to existing activities would be included in the 2020 planning process.

Many staff suggestions align with current or forthcoming projects and many do not require MTW flexibility or new activities. These suggestions include:

- The evaluation of THA programs including the College Housing Assistance Program (CHAP) and the Family Self-Sufficiency Program (FSS). Jessica Thompson, PIE's new Project Manager 1 – Post Secondary Education will lead THA in its evaluation partnership with the HOPE Center, will explore expanding CHAP to Tacoma Public School Students and will strengthen our data sharing partnerships with property-based subsidy partners. PIE's Data Analyst, Anastasia Cale has started to work with the Community Support and Empowerment department to evaluate and potentially redesign the FSS program.
- Removing burdensome steps from THA's Housing Choice Voucher (HCV) hardship policies. PIE and Rental Assistance will partner to revise this process. Implementation requires changes to the Administrative Plan and January 2020 will be the implementation date.
- Exploring avenues to serve homeless populations. THA is pursuing this work through its upcoming commitments to project-based and property-based subsidy units.

2020 MTW Plan

For 2020, THA is not proposing any new activities for HUD approval. The 2020 Plan will activate two previously approved activities that have been on-hold:

1. **Exclude Excess Student Financial Aid for Students** – this activity was introduced and approved in the 2012 MTW Plan. It has been placed on-hold due to software constraints. Now that Open Door is fully operational, THA can get this done. Prior to this activity, under specific criteria, any income remaining after tuition and fees from the head of household or co-head's financial aid would be calculated into their total income. For "other adults" this excess income is calculated up to \$430. Under this approved activity, THA will no longer include this excess financial aid as part of the rent calculation. This is for both tenant-based and project-based housing programs. PIE will take the lead on implementation of this activity while working with Rental Assistance. Implementation will go live as of January of next year.
2. **Modify HQS** – This activity was recently approved by the way of two 2019 MTW Plan amendments. Last year, THA's Cabinet was briefed on the activity which allows THA to permit tenants to move into an inspected unit even if some items fail inspection as long as the items are not life-threatening. The second amendment to this activity permits THA to conduct its own HQS inspections on all THA owned/managed units; conduct its own rent reasonableness, and negotiate contract rents. This is particularly important for THA's upcoming RAD conversion of the remaining 323 public housing units at Salishan and Hillside.

In the 2020 MTW Plan, the activity that permitted THA to implement the Elementary School Housing Assistance Program (ESHAP) has been closed and merged with the activity that permits THA to invest in Pierce County's Rapid Rehousing programs. The MTW authorizations needed for the re-designed of ESHAP program are no longer necessary. Given its similar

framework to THA's Rapid Rehousing investment, these two programs will be reported separately, but within the same activity.

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/moving_to_work_-_2020_mtw_plan_-_2019-07-12_-_draft.pdf

Community and Staff Consultation

Throughout the month of June, staff was consulted regarding the 2020 MTW Plan. Through email and meeting solicitation, Policy, Innovation & Evaluation (PIE) received 21 ideas from staff. Most suggestions are operational or are previously approved activities that do not require MTW approval.

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.
- A Public Hearing meeting was held on Friday, July 19th at Bay Terrace from 4pm to 5pm.

No public comments were received during the public comment period.

Recommendation

Approve Resolution 2019-09-25 (1) authorizing THA's Executive Director to submit the Housing Authority of the City of Tacoma's Fiscal Year 2020 Moving to Work (MTW) Plan.



TACOMA HOUSING AUTHORITY

RESOLUTION 2019-09-25 (1)

(Approval of THA's 2020 Moving to Work Plan)

**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 (01/01/2020), 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)

Derek Young
Name of Authorized Official

Signature

Chairperson
Title
9-25-19
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.