



TACOMA HOUSING AUTHORITY

RESOLUTION 2020-11-18 (2)

Date: November 18, 2020
To: THA Board of Commissioners
From: Michael Mirra
Executive Director
Re: Approval of Revision to the Administrative Plan

This resolution would authorize revisions to Tacoma Housing Authority's (THA) Administrative Plan.

Background

All public housing authorities must adopt a written Administrative Plan that establishes local policies for administration of the program in accordance with Housing and Urban Development (HUD) requirements. The Administrative Plan and any revisions of the plan must be formally adopted by THA's Board of Commissioners.

THA is proposing revisions to the Administrative Plan clarifying its existing policies on its methods for selecting applicants from the waitlist. The revisions make clarifying changes to its selection process for special admissions. Special admissions are different from general waitlist applicants. Special admissions are applicants who have been approved to participate in a program for which THA has received a special allocation of vouchers. These applicants may be placed and selected from the waitlist during periods of time when the waitlist is closed. Special admission programs include: Veteran's Affairs Supportive Housing (VASH), Family Unification Program (FUP), Children's Housing Opportunity Program (CHOP), College Housing Assistance Program (CHAP), Non-Elderly Disable (NED) and Mainstream vouchers.

The changes proposed make no changes to the existing policies and procedures but clarify the language currently used in the Administrative Plan.

Recommendation

Authorize revisions to the selection method policies in THA's Administrative Plan as outlined in Resolution 2020-11-18 (2).



TACOMA HOUSING AUTHORITY

RESOLUTION 2020-11-18 (2) **(Approval of Revision to the Administrative Plan)**

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

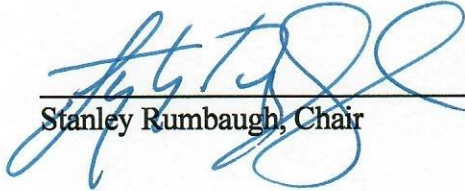
WHEREAS, The purpose of the Administrative Plan is to establish policies for carrying our programs in a manner consistent with HUD requirements and local goals and objectives contained in THA's Moving to Work Plan; and

WHEREAS, Changes to the Administrative Plan must be approved by THA Board of Commissioners; now therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

THA's Executive Director is authorized to revise THA's Administrative Plan Chapter 4 related to the selection process for special program admissions from THA's waitlist.

Approved: November 18, 2020



Stanley Rumbaugh, Chair

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The source of HCV funding also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. The PHA must maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

THA Policy³

The PHA administers the following types of targeted funding:

Family Unification Program (FUP) Vouchers

Veterans Administration Supportive Housing (VASH) Vouchers

³ Addition of the College Housing Assistance and Children's Housing Opportunity Programs to this list was approved by the BOC on January 28, 2015.

Non-Elderly Disabled (NED) Vouchers

College Housing Assistance Program (150 HOP Vouchers)

Children's Housing Opportunity Program (20 HOP Vouchers)

~~Other HUD special program vouchers~~

~~MTW McCarver Elementary School Initiative~~

~~[Attachment C Section C.2., C.10., D.1.b, and D.3.b. MTW Agencies are permitted to do this through recent HUD authorization. This authorization allows MTW agencies to use Section 8 and 9 funds for uses beyond those authorized in Sections 8 and 9, provided those activities continue to serve families at or below 80% area median income (AMI) and meet one of the three MTW statutory purposes.]~~

~~THA will use its MTW authority to provide rental assistance for eligible families with students at McCarver for the duration of their enrollment at the school. THA will begin with serving up to 50 families and assess the results on stability and educational outcomes. THA believes that increased housing stability should show in better school performance.~~

~~THA will integrate two key components as a part of this initiative: (1) condition this rental assistance on the parents' commitment to their children's education and cooperation with the school. THA will provide support through its community partners to help parents do this; (2) THA also will ask the School District to complement this investment of housing dollars into McCarver School with its own reciprocal investment of resources and reform to make McCarver as excellent a school as leading edge school practices can make it.~~

~~Throughout a family's participation in the project their compliance with program requirements will be monitored by a case worker assigned to that family. If a family has difficulty meeting the requirements, the case worker will provide additional support. Should the family be determined to be unable or unwilling to comply with the requirements, their participation will be ended and the voucher will be granted to another qualifying family. Should a family drop out of the program for any reason, their voucher will be granted to another qualifying family.~~

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

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4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

THA Policy

THA will select all households by date and time of application. There will only be preferences for the following:

- The Executive Director will, at his discretion, identify when, and if, to make a set number of HOP subsidies available in response to a federally-declared disaster. When these vouchers are made available, households that can document that they have been displaced by a presidentially declared Major Disaster Declaration (MDD) will be eligible for this preference. Displaced households will be able to apply, even if the waiting list is closed, and receive this emergency preference. In order to qualify the applicant must provide evidence that the family resided in the disaster area before occurrence. Eligibility will be verified by Tacoma Housing Authority. To demonstrate need the applicant may provide, as verified by FEMA, an assessment of damage to their property showing their pre-disaster residence is either uninhabitable or inaccessible. Applicant should provide documentation demonstrating a lack of, or insufficient insurance coverage to meet housing needs. Applicants must also meet PHA program eligibility requirements.
- The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.
- THA will offer a preference to the Families in Transition program
- THA will also offer preferences for RAD exits, PBV exits, displacement due to disaster, and transfers.
- THA will allow those on the transfer waitlist to be served ahead of those on the regular waitlist in accordance with Chapter 12 of THA's ACOP. As of July 1, 2020 THA may

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offer a Housing Choice Voucher subsidy to households on the transfer waitlist for the following reasons:

Emergency Transfer
Reasonable Accommodation
Over-housed
Under-housed

Until a comprehensive transfer waitlist policy revision is completed, households that refuse a Housing Choice Voucher offer will remain on THA's transfer list.

This processing method will work as follows: All applicants will be required to place their application in a drop-box located outside THA's administrative offices. Applications will be logged into the system there will be a lottery after the application period ends.

- THA will provide an admission preference for "Mainstream Voucher Targeted Funding" a special programs preference. This preference is given to applicants who have been approved to participate in a program for which THA has received a special allocation of vouchers.

When the waitlist is suspended or closed, applications from households who are being referred for these targeted or special assistance programs will continue to be accepted and placed on the waitlist. These applications will be processed in the order the referral was received from the partner agencies.

These targeted or special assistance programs are as follows:

- **Veterans Administration – Supportive Housing (VAHH)**

This program serves veterans experiencing homelessness. Households are referred by caseworkers at the Veteran's Administration and must be actively engaged in case management services with the VA to be eligible.

- **Youth & Family Special Programs**

These programs serve families with children who are homeless, at risk of homelessness, at risk of separation as a result of poor living conditions, exiting THA-recognized emergency shelters or transitional housing, and survivors of domestic violence. Referrals are made from supportive service providers and government child welfare agencies that are operating under a written agreement with THA to provide housing search, crisis intervention, housing stabilization, and/or case management services to participants. Examples include Family Unification Program, CHOP.

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- **College Housing Assistance Program**

This program serves students who are homeless or at risk of homelessness who are enrolled in post-secondary education. Referrals come from higher education institutions that are operating under a written agreement with THA.

- **Voucher Programs for Non-Elderly & Disabled Households**

THA administers a limited number of NED Vouchers which are utilized to serve households whose head, co-head or spouse is non-elderly and disabled who are transitioning from a nursing home or other healthcare institution. Referrals are made from agencies operating under a written agreement with THA and providing services to households.

THA administers a limited number of Mainstream Vouchers which are utilized to serve households with a disabled adult household member under the age of 62. For this allocation, the head, co-head or spouse does not have to have a disability. Qualifying applicants will be offered these vouchers in the following order:

1) Current residents in THA owned units with a disabled adult household member under the age of 62, but only during a specified time period designated by THA, determined by agency need.

2) Current applicants on THA's waitlist with a disabled adult household member under the age of 62, but only during a specified time period designated by THA, determined by agency need.

3) Applicants referred by:

A consortium of partnering agencies that are operating under a written agreement with THA to provide services to participants. Referral applicants must have a disabled adult household member under the age of 62, and meet at least one of the following criteria:

- transitioning out of institutional and other segregated settings
- at serious risk of institutionalization
- previously experienced homelessness and currently a client in a permanent supportive housing or rapid rehousing program
- currently experiencing homelessness or at risk of experiencing homelessness during a specified time period designated by THA, determined by agency need.

- for non-elderly persons with disabilities transitioning out of institutional and other segregating settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless. Said preference must be documented by a reliable source (i.e.,

institution, medical or behavioral health provider, Department of Social and Health Services, or supportive services partner).

- In addition to regular openings, THA will occasionally have limited openings for placement onto its Consolidated Wait List. These limited openings will target specific populations based on a funding source or a specific family size based on THA owned property unit availability. The goal will be to have a suitable pool of applicants that would have a maximum of 24 months waiting time to receive assistance. As a result of this, THA may limit the number of successful applicants based on this wait time criterion. This will allow THA to serve successful applicants in a reasonable time frame. Successful applicants may also be offered alternate assistance due to THA managing a consolidated waitlist which includes tenant based subsidies as well as property based subsidies. An applicant will be considered for admission to any program for which they are eligible until such time that documentation is presented that establishes a client ineligible for a housing program(s).

Any public notice announcing a waiting list opening and application procedure will be simple, direct, and clear but with sufficient detail to inform applicants of the time and place to apply, any limitations on who may apply, and any other information the applicant may need to successfully submit the application. The notification process will also comply with HUD fair housing requirements, such as adopting suitable means to assure that the notice reaches eligible individuals with disabilities and those with limited-English proficiency.

- THA will select from the waitlist after the lottery in a sequential manner. Only those with a preference mentioned above will be eligible to be pulled before those on the waitlist.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

THA is not required to follow the HUD Income Targeting Requirements of its MTW programs. For MTW programs, at least 75% of new admissions for the HCV and Public Housing Program will have incomes at or below 50% AMI.

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary

termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

THA Policy

The PHA will monitor progress in meeting the MTW income targeting requirement throughout the calendar year. Very low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families either according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. When selecting families from the waiting list PHAs are required to use targeted funding to assist only those families who meet the specified criteria, and PHAs are not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

THA Policy

THA will utilize a lottery system for selecting off its waitlist. Applicants will be pulled off the voucher waitlist after the lottery is run. In most instances, the person at the top of the lottery list will be the next person selected. THA will retain the right to issue a voucher or to allow placement on the waitlist for someone not currently on the voucher waitlist. In these instances, it must be documented in the tenant file why the household was issued a voucher outside of the lottery waitlist. THA will monitor income targeting limits to ensure that at least 75% of all families are at 50% of AMI or below.

The Consolidated Waitlist was established by date/time of application and waitlist pulls will be in that order.