Tacoma Housing Authority

Executive Director
Michael Mirra

Board of Commissioners
Derek Young, Chair | Stanley Rumbaugh, Vice Chair
Dr. Minh-Anh Hodge | Dr. Arthur C. Banks | Shennetta Smith

To: April Black, Deputy Executive Director
From: Jess Thompson, Project Manager
Date: July 1, 2020
Subject: College Housing Assistance Program Alignment Proposal

1.   BACKGROUND

The College Housing Assistance Program (CHAP) began in 2014 as a pilot program that provides housing assistance to homeless and near-homeless students at Tacoma Community College (TCC). TCC has a student population of nearly 14,000 students. It is the largest college in the South Puget Sound Region. In comparison to students of other colleges, TCC students are older, lower income, more likely to be parents, more likely to be working, and more likely to be their family's first to attend college. A notable number of TCC students do not have stable housing. In 2019, Temple University's Hope Center surveyed TCC students about basic needs. 63% of TCC students responding to the survey reported serious housing insecurity within the 12 months prior to the survey; 23% reported that within those 12 months they experienced homelessness.[1]

CHAP voucher participants receive a rental assistance subsidy in the form of a voucher. The voucher is used to secure housing on the private rental market. THA contributes housing resources to CHAP. That is its main and usually only contribution. THA is not funded for other elements often essential to CHAP, including marketing of programs to students, the determination of their needs, the provision of support service or the monitoring of their academic progress. These elements must come from the post-secondary partner and other community partners. TCC operates the program, provides case management services, and assistance with security deposits and move in fees when funding allows.

The CHAP pilot housed 47 homeless TCC students and their children. The pilot's evaluation tracked their retention/graduation rates and grade point average, in comparison with homeless TCC students who did not fit in the pilot. The results after two years were very encouraging and impelled CHAP's expansion to up to 150 vouchers. 25 of the 150 vouchers are set-aside for a program that is under development to serve returning citizens who are exiting corrections.

In 2018, the CHAP program expanded to include housing assistance that is tied to a property. THA partners with property owners near the campuses of TCC and the University of Washington, Tacoma (UW Tacoma) to reserve apartments for homeless or near homeless students. THA pays down the rents to levels affordable to students. This property based rental assistance is tied to the unit, whereas the CHAP voucher assistance is tied to the student.

[1] Hope Center for College, Community, and Justice. (2020). Washington State Community and Technical Colleges #RealCollege Survey. Retrieved from https://hope4college.com/wp-content/uploads/2020/02/2019_WashingtonState_Report.pdf

Today, THA's CHAP program provides or finances housing in three ways:

- THA provides rental assistance voucher subsidies to help pay rent on the private rental market;

- THA provides apartments it purchased near campus;

- THA signs long term contracts with private developments near the campuses to reserve apartments for homeless or near homeless college students. THA pays down the rents to levels affordable to the students through property-based subsidies.

This memo is a proposal to align program requirements across the property based and tenant based subsidy models. Tenant based subsidy requirements are governed by the THA Administrative Plan. Changes require approval by THA's Board of Commissioners. Property based subsidies are not governed by the Administrative Plan. In the past, the CHAP program requirements did not apply to students using property based subsidies. This proposal also seeks to give the education partners the authority to waive select program requirements in cases of a natural disaster or pandemic.

The education partners have been working with THA to develop an MOU and Program Manual for CHAP as a whole. The intent to develop program-wide requirements is to ensure an equitable experience and simplify the tracking and data collection carried out by the education partners. A single Program Manual and consistent program requirements will benefit all parties.

The section that follows outlines the program requirements suggested by and negotiated with the education partners.

2. CHAP PROGRAM ALIGNMENT PROPOSAL

2.1. Current Program Requirements

Tenant based vouchers provide rental assistance for students to rent in the private rental market. CHAP vouchers are HOP subsidies. HOP provides households with a fixed subsidy based on household size instead of income. Voucher holders must meet eligibility and program requirements. This component of CHAP is governed by THA's Administrative Plan.

CHAP participants using the tenant-based voucher are limited to up to five (5) years of assistance. During their time on the program, participants must be enrolled in a degree program and making progress toward a degree. Participants who complete the credits required to graduate with an Associate's or Bachelor's degree may receive up to one (1) year of additional housing payment assistance, not to exceed five (5) total years of assistance. The added time (up to one year) begins at the time the credits were completed.

Currently, the participant must meet the following conditions while in the program:

a) Enrolled in credited developmental and college level classes. Summer quarter students must participate in an approved community service activity or in an internship. Students must be enrolled in 12 credits after two quarters on the program (except when a student has submitted an education degree completion plan signed by their Advisor and it shows that the required classes needed are less than full time. This plan will be honored as appropriate participation upon review of the college program staff);

b) After two quarters on the program, maintain a cumulative 2.0 (GPA) or higher for each quarter on the program. If the cumulative GPA drops below a 2.0, the participant would be granted a one (1) quarter grace period;

c) Have attempted to access FAFSA and if eligible, maintain an active FAFSA;

d) Provide full cooperation with the college program staff assigned to the student;

e) Participate in a Financial Literacy workshop before the end of their second quarter of enrollment in this program;

f) Allow THA and the partner institution to share individually identifiable information about the participants and their household to assist with referrals and potential success; and

g) Any remaining conditions not listed are identified in Chapter 12 of THA's Administrative Plan.

2.2. Revised Program Requirements

During the process of developing an MOU between THA, TCC, UW Tacoma, and TPS, the following modifications were agreed upon by all parties:

- Allow part-time enrollment
- Do not use GPA alone to define academic progress
- Allow participants to disenroll and/or withdraw for up to two quarters
- Remove the summer quarter requirement and financial literacy course

Both institutions felt that these modifications were more aligned with student needs and would offer added flexibility for students overcoming multiple barriers.

THA has already implemented these requirements at two of the properties with property based subsidies. THA plans to implement the program requirements at the other properties through contract amendments or re-negotiation.

2.3. Expanded Post-Graduation Assistance
Last year THA's Board of Commissioners approved up to an additional year of housing assistance, not to exceed five years of total assistance, for students graduating with an Associate's or Bachelor's degree. The intent is for students to have an "income building year" to use their new post-secondary credentials to secure a living wage job.

During MOU negotiations the education partners and PIE staff proposed expanding the additional year of assistance to students completing certificate programs and those transferring to a non-participating school or apprenticeship program.

2.4. Proposed Policy Language
The chart below compares the requirements of students participating in the Tenant-Based to the Property-Based Subsidy requirements. Areas that differ by program are represented in red text and underlined in the chart below. PIE staff are recommending adopting the Property Based Subsidy requirements for the Tenant-Based Programs to bring consistency across the programs.

Enrollment & Academic Requirements	
Current Requirements for Tenant-Based Programs	**Proposed/Implemented for Property Based Subsidy**
Enrolled in credited developmental and college level classes. Summer quarter students must participate in an approved community service activity or in an internship. Students must be enrolled in 12 credits after two quarters on the program	*Maintain at least part-time enrollment of 6 credits or more at a participating institution,*
After two quarters on the program, maintain a cumulative 2.0 (GPA) or higher for each quarter on the program. If the student's cumulative GPA drops below a 2.0, the participant would be granted a one (1) quarter grace period;	*Make satisfactory academic progress towards a degree or certificate program. If the student's cumulative GPA drops below a 2.0, the participant must be responsive to recommendations and referrals to academic support services.*

Other Requirements	
Current	**Proposed/Implemented for PBS**
Have attempted to access FAFSA and if eligible, maintain an active FAFSA.	Have attempted to access FAFSA and if eligible, maintain an active FAFSA.
Provide full cooperation with the college program staff assigned to the student.	Provide full cooperation with the college program staff assigned to the student.
Participate in a Financial Literacy workshop before the end of their second quarter of enrollment in this program.	**Remove:** Participate in a Financial Literacy workshop before the end of their second quarter of enrollment in this program
In compliance with FERPA, allow THA, TCC, UW Tacoma, and TPS to share individually identifiable information about the participants and their household to assist with referrals and potential success.	In compliance with FERPA, allow THA, TCC, UW Tacoma, and TPS to share individually identifiable information about the participants and their household to assist with referrals and potential success.
	Comply with all lease terms, including paying their share of the rent on time and in full, being a good neighbor and taking care of the apartment
Comply with other conditions in Chapter 12 of THA's Administrative Plan.	Comply with other conditions in Chapter 12 of THA's Administrative Plan.

Exceptions	
Current	**Proposed/Implemented for PBS**
A student may be enrolled in less than 12 credits if they have submitted an education degree completion plan signed by their Advisor and it shows that the required classes needed are less than full time. This plan will be honored as appropriate participation upon review of the college program staff.	Participants may disenroll or withdraw from classes for one term. A participant may request to extend their leave for an additional term as long as they meet regularly with program staff to ensure they will be able to re-enroll the following term.

End of Assistance	
Current	**Proposed/Implemented for PBS**
In addition to the reasons offered in Chapter 12 of THA's Administrative Plan, the college and THA will have the authority to terminate a College Housing Assistance Program household for reasons listed in the administration plan, the participant statement and the following: a) Failing to fulfill program requirements outlined in section 19.IV. of THA's Administrative Plan; b) Sixty (60) months of rental assistance; c) Twelve (12) months of rental assistance following graduation with an AA or BA degree.	In addition to the reasons offered in Chapter 12 of THA's Administrative Plan, the college and THA will have the authority to terminate a College Housing Assistance Program household for reasons listed in the administration plan, the participant statement and the following: a) Failing to fulfill program requirements outlined in section 19.IV. of THA's Administrative Plan; b) Sixty (60) months of rental assistance; c) Twelve (12) months of rental assistance following graduation with an AA or BA degree, completion of an Associate's or Bachelor's degree, a certificate program, or transfer to a non-participating college/university or apprenticeship program.

2.5. Temporary Suspension of Program Requirements During Natural Disaster or Pandemic

As a result of the COVID-19 pandemic, PIE staff worked with the education partners to explore temporary changes to accommodate students in this time. Specifically, TCC and UW Tacoma proposed suspending minimum credit requirements and academic progress requirements. This proposal was approved as an Executive Act and is in place until fall term of 2020.

The education partners requested that THA add a section to the CHAP Program Manual and THA Administrative Plan. The purpose of this section is to allow them to suspend certain program requirements in times where students may be affected by a natural disaster or pandemic. PIE supports this recommendation. Memorializing it in the Program Manual and Administrative Plan will allow the

education partners to respond quickly. This will help inform students of temporary program modifications promptly rather than waiting for THA leadership and Board of Commissioners to approve an Executive Act.

2.5.1. *Proposed Policy Language*
In times of a natural disaster or pandemic, minimum credit requirements and academic progress program requirements will be suspended for a period of time agreed upon by the Education Partners.

During the period of suspended requirements, participants will remain eligible as long as their income is at or below 80% AMI at the time of lease renewal or annual recertification.

3. CONSULTATION

3.1. Internal Consultation
PIE consulted with staff from Rental Assistance (RA). RA is the primary department at THA that works with CHAP. The Housing Specialist is in RA and handles reviewing applications, issuing vouchers, conducting annual recertification, and communicating with tenants if their assistance is ending. RA has stated full support for these recommendations. They believe the changes will help reduce barriers and improve access for the students we intend to serve.

Staff working on THA's Education Project have also reviewed the proposed changes. They did not raise concerns about the recommendations.

3.2. Consultation with Tacoma Community College and UW Tacoma
Both education partners were instrumental in developing these recommendations. They shared how program requirements can be modified to reflect their students' realities. THA has included the proposed language in an MOU between all parties.

3.3. Public Consultation
The scorecard (Appendix A) and this report will be posted on THA's website for the public. It will be posted for 30 days to allow for public review and comment. PIE staff will work with the education partners to inform current voucher holders of these proposed changes. Students will be encouraged to provide feedback within the public comment period.

Tacoma Housing Authority

Executive Director
Michael Mirra

Board of Commissioners
Derek Young, Chair | Stanley Rumbaugh, Vice Chair
Dr. Minh-Anh Hodge | Dr. Arthur C. Banks | Shennetta Smith

Appendix A: Public Consultation Scorecard

Tacoma Housing Authority (THA) seeks advice about its College Housing Assistance Program (CHAP). This program houses or pays to house homeless or near homeless college students. THA provides the housing dollar. The post-secondary2 partner operates the program, provides resource navigation for participants, may provide help with security deposits, monitors for compliance, and shares data with THA.

THA wants to align program requirements across the two subsidy models. Tenant based voucher holders must meet the program requirements outlined in Chapter 19 of THA's Administrative Plan. Students using property based subsidies meet different program requirements. These program requirements are more flexible than the requirements for tenant based subsidies. However, these requirements have not yet been implemented at all properties.

THA has a more detailed report about the program changes that we are considering. See the report at www.thaxxxxxx.org.

We welcome your advice. If you have some for us, we need it by **August 2, 2020**. Please send your advice to jthompson@tacomahousing.org. A summary of the proposed changes is below. We would like your input on the two questions that follow.

Proposed changes are underlined in red.

Enrollment & Academic Requirements	
Current	**Proposed**
Enrolled in credited developmental and college level classes. Summer quarter students must participate in an approved community service activity or in an internship. Students must be enrolled in 12 credits after two quarters on the program.	Maintain at least part-time enrollment of 6 credits or more at a participating institution.
After two quarters on the program, maintain a cumulative 2.0 (GPA) or higher for each quarter on the program. If the student's cumulative GPA drops below a 2.0, the participant would be granted a one (1) quarter grace period.	Make satisfactory academic progress towards a degree or certificate program. If the student's cumulative GPA drops below a 2.0, the participant must be responsive to recommendations and referrals to academic support services.

2 After high school

Other Requirements	
Current	**Proposed**
Have attempted to access FAFSA and if eligible, maintain an active FAFSA.	Have attempted to access FAFSA and if eligible, maintain an active FAFSA.
Provide full cooperation with the college program staff assigned to the student.	Provide full cooperation with the college program staff assigned to the student.
Participate in a Financial Literacy workshop before the end of their second quarter of enrollment in this program.	**Remove:** Participate in a Financial Literacy workshop before the end of their second quarter of enrollment in this program.
In compliance with FERPA, allow THA, TCC, UW Tacoma, and TPS to share individually identifiable information about the participants and their household to assist with referrals and potential success.	In compliance with FERPA, allow THA, TCC, UW Tacoma, and TPS to share individually identifiable information about the participants and their household to assist with referrals and potential success.
	Comply with all lease terms, including paying their share of the rent on time and in full, being a good neighbor and taking care of the apartment.
Comply with other conditions in Chapter 12 of THA's Administrative Plan.	Comply with other conditions in Chapter 12 of THA's Administrative Plan.

Exceptions	
Current	**Proposed**
A student may be enrolled in less than 12 credits if they have submitted an education degree completion plan signed by their Advisor and it shows that the required classes needed are less than full time. This plan will be honored as appropriate participation upon review of the college program staff.	Participants may disenroll or withdraw from classes for one term. A participant may request to extend their leave for an additional term as long as they meet regularly with program staff to ensure they will be able to re-enroll the following term.

End of Assistance	
Current	**Proposed**

In addition to the reasons offered in Chapter 12 of THA's Administrative Plan, the college and THA will have the authority to terminate a College Housing Assistance Program household for reasons listed in the administration plan, the participant statement and the following:
 	
  d) Failing to fulfill program requirements outlined in section 19.IV. of THA's Administrative Plan;
 	
  e) Sixty (60) months of rental assistance;
 	
  f) Twelve (12) months of rental assistance following graduation with an AA or BA degree.
	In addition to the reasons offered in Chapter 12 of THA's Administrative Plan, the college and THA will have the authority to terminate a College Housing Assistance Program household for reasons listed in the administration plan, the participant statement and the following:
	
	  d) Failing to fulfill program requirements outlined in section 19.IV. of THA's Administrative Plan;
	
	  e) Sixty (60) months of rental assistance;
	
	  f) Twelve (12) months of rental assistance following graduation with an AA or BA degree, *completion of an Associate's or Bachelor's degree, a certificate program, or transfer to a non-participating college/university or apprenticeship program.*

Questions for the Community	
1. Make CHAP program requirements the same across the program.	
Presently, students using tenant based vouchers are held to different program requirements than students using property based subsidies. In the chart above, the left column shows the current tenant-based subsidy requirements and the right column shows the property-based subsidy requirements. Should THA make CHAP program requirements the same, regardless of the type of subsidy?	
Yes	Apply the proposed program requirements to both subsidy models.
No	Keep separate and different program requirements for each subsidy model.
2. Waive Requirements During Natural Disaster or Pandemic	
Should the education partners be able to temporarily waive/suspend some program requirements in cases where the college or instruction is impacted by a natural disaster or pandemic?	
Yes	Allow the colleges to temporarily suspend some program requirements in times of a natural disaster or pandemic.
No	Maintain program requirements in times of a natural disaster or pandemic. Only allow THA to issue an Emergency Act to suspend requirements.