



# TACOMA HOUSING AUTHORITY

## RESOLUTION 2018-02-28 (2)

**Date:** February 28, 2018  
**To:** THA Board of Commissioners  
**From:** Michael Mirra  
Executive Director  
**Re:** Updating THA's Administrative Plan: Housing Opportunity Program (HOP) Changes

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*THA's Housing Opportunity Program (HOP) has a 5-year time limit for work-able families. Those time limits will begin to expire in April 2018. This resolution would confirm THA's enforcement to those limits and approve some program changes to limit or soften the effect of those limits.*

### Background and Summary Recommendations

THA's Housing Opportunity Program helps low-income families pay rent on the private market. For newly assisted households, HOP replaced the Section 8 Housing Choice Voucher Program (HCV). HOP differs from the HCV program in two main ways:

- **Fixed Subsidy**  
The HCV rental subsidy amount depends on the household income. The lower the income the more the subsidy. The greater the income, the lower the subsidy. In contrast, the HOP subsidy is fixed. It depends on family size and not family income. In most cases, HOP subsidies are lower than HCV subsidies.
- **5-Year Time Limit for Work-Able Households**  
The HCV has no time limit. It lasts as long as a household remains eligible and as long as THA's funding holds out. In contrast, HOP imposes a 5-year time limit on all households with a work-able adult. HOP offers these households supportive services to help them increase earned income. HOP extends the subsidy beyond 5 years in two situations. **First**, to meet an unexpected hardship, it offers up to 3 more months of subsidy. **Second**, it offers up to a 1-year extension if the household enrolls in a qualified program to increase earned income. The time limit does not apply to seniors or disabled participants.

THA created HOP to serve three main purposes:

- to give work-able people a greater incentive to increase their earned income and to help them do that;
- to serve more households and to give other needy families their turn at the rental assistance;
- to make the program easier to explain, understand and administer, and to make it less intrusive.

The first of the HOP 5-year time limits are expiring in April 2018. THA staff thoroughly analyzed the results of nearly 5 years of HOP. That analysis is attached. It shows that work-able households in their final year on the program have increased their earned income by 45% and drastically reduced their reliance on public assistance. In normal times, THA would celebrate these outcomes as successes. Unfortunately, Tacoma has a very different rental market than when these households were admitted to the program in 2013. Rents are rising quickly. Vacancy rates are falling. Wages are not keeping up. The majority of the households exiting the program in 2018 will pay more than 50% of their income toward rent and utilities. Yet, still others need their turn to receive our rental assistance. THA's resources throughout have remained flat.

Based on the results of the analysis, community consultation and discussion with the Board, we recommend the following be implemented immediately:

**(1) Maintain the five-year time limit**

- To serve more households and address the unmet need of the rising number of Tacomans who are waiting for assistance, THA should maintain the five-year time limit. Although most HOP households will exit the program paying more than 50% of their income toward rent, the rising rental market makes this an unfortunate reality for over 30% of all Tacomans. A 5 year time limit also gives households an incentive to strive.

**(2) Revise the hardship policy providing extensions beyond 5 years**

- Maintain the policy providing up to 90-day extension for unforeseen loss of income that causes hardship.
- Maintain the policy that provides up to a 1-year extension for households that enroll in a qualified program or activity likely to increase earned income. Ease the requirement. Remove the current requirement that the household must enroll in the activity or program 6 months prior to the expiration of the 5-year term; remove the requirement that the program or activity must be completed within one year.

(3) **Revise the policy regarding households that may transition to work-able status**

- Under present rules, the 5-year time limit begins when a work-able person joins an elderly/disabled household. Presently, in these cases, the 5-year terms is calculated retroactively to when the household first joined HOP. Change this so the 5-year time limit starts anew. This means that the time the household spent on the program without a time limit shall not count toward the new 5-year time limit.

(4) **Expand HOP's elderly/disabled criteria to include TANF recipients whom DSHS has determined are exempt from work requirements and exempt them from the HOP 5-year time limit.**

- Presently, HOP exempts from its 5-year time limit elderly persons and people who participate in a governmental program based upon their disability. We recommend that THA also exempt those whom DSHS, in its administration of the TANF program, considers unable to work. These would include an adult (55+) caretaker relative providing kinship care for a child, an adult with a documentable severe and chronic disability, an adult required in the home to care for a child with special needs, and an adult required to be in the home to care for another adult with disabilities.

(5) **Improve internal program operations and data reporting**

- Track households who will exit the program with a shelter burden <50%
- Develop a HOP communications plan to streamline and improve communications with participants and landlords
- Adopt a data driven approach to outreach to these at-risk households and households in their final year on the program
- Improve data collection from participants during review times and develop a mechanism to encourage data capture at program exit
- Monitor the impact of exiting households on voucher utilization

We further recommend that the board direct staff to study the following possible further changes and to present recommendations to the board:

(1) **Moving all elderly/disabled HOP households to an income based subsidy**

- Our HOP evaluation shows that elderly/disabled households are shelter burdened even with the HOP subsidy. Staff should evaluate the effect if we changed these elderly/disabled households to an income based subsidy. The analysis should include the annual cost to the agency in dollars and the effect such a change would have on the number of households THA can serve.

(2) **Transition the legacy HCV population to HOP**

- Examine options including a fixed subsidy for all HCV and HOP participants or just for work-able participants. The analysis should include the projected effects on the households served by household type. The analysis should also include the projected savings in dollars and additional households that THA could serve if it made this change.

## **Public Consultation**

THA consulted and offered to confer with a wide array of interested persons and community voices, including:

- HOP and HCV participants
- People on the HOP waitlists
- Participating landlords
- Housing and service providers
- Northwest Justice Project
- Public and elected officials

The hardest people to consult are those needy households who cannot even get on our waiting list. We do not know who they are. They do not know who they are. Their voices are generally absent from such discussions. Yet they have an important stake in these questions. For example, while households presently receiving assistance have an interest in keeping their vouchers beyond the 5-year time limit, these other families who would like their turn that a time limit would allow. For this reason, we sought out proxy voices for their interest. These included advocates, social service providers and elected officials.

The details of this effort and what we learned show in an attachment to this resolution. In general, most people who expressed views supported the recommendations in this resolution.

## **Recommendation**

Authorize THA's Executive Director to make program changes to the Housing Opportunity Program as outlined in resolution 2018-02-28(2). This would change THA's Administrative Plan Chapter 18.



# TACOMA HOUSING AUTHORITY

## RESOLUTION 2018-02-28 (2) (Updating THA’s Administrative Plan: HOP Changes)

**WHEREAS**, the Administrative Plan relates to the administration of the Housing Opportunity Program and is required by HUD; and

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

**WHEREAS**, Tacoma Housing Authority’s Housing Opportunity Program (HOP) has a five-year time limit for work-able households; and

**WHEREAS**, the first of these time limits will expire in April 2018; and

**WHEREAS**, staff completed a full analysis of this program; and

**WHEREAS**, staff consulted a wide array of community members,

**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, that:***

THA’s Executive Director is authorized to revise THA’s Administrative Plan Chapter 18, related to the Housing Opportunity Program in the following ways:

<b>Policy Proposal</b>	<b>Administrative Plan Section Requiring Revision</b>
<p><b>REVISE THE HARDSHIP EXTENSION POLICY</b> Housing Opportunity Program (HOP) Rental Assistance Extension Hardship Policy:</p> <p>THA will offer work-able households with extreme shelter burdens two types of limited extensions of the rental assistance. To qualify, a household must</p>	<p>18.XXII “Hardship Policy”</p>

Policy Proposal	Administrative Plan Section Requiring Revision
<p>experience a shelter burden requiring more than 50% of its income for rent and utilities once the rental assistance ends.<sup>1</sup></p> <p>Households must also meet one of the criteria below:</p> <p><b>1. Unexpected Loss of Income: 90 day Extension</b>  <i>Within three (3) months prior to the final housing assistance payment, households may request a 90 day extension by showing:</i></p> <p>1.1. an extraordinary change in circumstances resulting in an unforeseen loss of income that occurs within the three months prior to voucher expiration.</p> <p>Examples of an extraordinary change may include:</p> <ul style="list-style-type: none"> <li>• One or more household members with income have permanently left the household.</li> <li>• A household member’s medical or health condition is preventing a work-able adult from working or is causing a reduction in work hours for a currently employed adult.</li> </ul> <p><b>2. Active Participation in a Program or Activity to Increase Earnings: Up to 1 year Extension</b>  <i>Within three (3) months prior to the final housing assistance payment households may request up to a 1 year extension by showing:</i></p> <p>2.1. A member of the household must be participating in a qualifying program to increase income; and</p> <p>2.2. the household must remain participating in the qualifying program until the end of the shelter burden or the end of the extension (whichever occurs first).</p> <p><i>“Qualifying programs” are any programs or activities that must likely result in the reduction of shelter burden. Examples of qualifying programs include: degree, vocational certificate, workforce development activity and the completion of FSS.</i></p> <p>Households must be in compliance with THA policies.</p> <p>THA staff, in consultation with the household, will determine the duration of the</p>	

<sup>1</sup> This shelter burden will be calculated using the payment standard for the household’s voucher size.

Policy Proposal	Administrative Plan Section Requiring Revision
<p>extension but in no case shall it last longer than 1 year beyond the expiration of the 5 year time period.</p> <p>Any adult member of the household may be participating in the qualifying program or activity. This is not restricted to the head of household(s).</p> <p>THA will eliminate the need for households to present their justification for their request to a review committee. Instead, we will use a simplified process to protect the dignity of the participant households and save THA staff time.</p> <p>If an extension request is denied, the household may request an appeal. THA will have up to 20 business days to review the request and make a determination.</p>	
<p><b>REVISE THE POLICY REGARDING HOUSEHOLDS THAT MAY TRANSITION TO WORK-ABLE</b></p> <p>A household can switch over the course of the program from non-work-able to work-able and from work-able to non-work-able.</p> <p>A non-workable household may only transition to work-able once and the household may receive only one 5-year term.</p> <p>The date the non-work-able household transitions to work-able will be the date used to calculate the five-year time limit. On the date the work-able individual joins the household, the five-year time limit will apply to the entire household.</p> <p>If the work-able household member(s) exit the household, the household may transition back to non-workable.</p>	18.IV. "Overview of Participant Criteria"
<p><b>EXPAND HOP'S ELDERLY/DISABLED CRITERIA</b></p> <p>THA recommends expanding the HOP's definition of disability to include those exempt from the TANF work requirement listed in WAC 388-301-0350.2 The approved exemptions are further defined in the WAC and include: an adult (55+) caretaker relative providing kinship care for a child, an adult with a documentable severe and chronic disability, an adult required in the home to care for a child with special needs and an adult required to be in the home to care for another adult with disabilities.</p>	18.IV. "Overview of Participant Criteria"

Approved: February 28, 2018

  
 Janis Flauding, Chair

<sup>2</sup> *WorkFirst – Other Exemptions From Mandatory Participation*. Washington State Legislature. WAC 388-310-0350. <http://app.leg.wa.gov/wac/default.aspx?cite=388-310-0350>.



# TACOMA HOUSING AUTHORITY

THA's Utilization Rate  
&  
Changes to THA's Rental Assistance Programs

**RECORD OF THA's  
PUBLIC CONSULTATION**

February 22, 2018

## BACKGROUND

The Tacoma Housing Authority (THA) sought comments and suggestions about changes it is considering to its housing programs. **The main change** would help THA with its continuing and increasingly hard struggle to serve the same number of needy households at rising rental costs in one of the hardest rental markets in the nation and to do so with flat funding from HUD.

As Tacoma's rental market increases, THA has tried to keep up by increasing what it pays in rent on behalf of families in its rental assistance programs. THA has increased the total amount it pays in rental subsidies by an accumulating additional \$600,000 per year for the past three years. THA judges that these costs will continue to increase for the foreseeable future. This increase is not sustainable. The arithmetic does not allow us to serve the same number of families at increasing costs with the same amount of funding.

**The other changes** would apply to the THA's two main rental assistance programs. One is its Section 8 Housing Choice Voucher (HCV). Nearly five years ago, THA ended this program for households newly receiving rental assistance. These new households instead joined the Housing Opportunity Program (HOP). Both programs help low-income families pay rent on the private market. HOP differs from the HCV program in two main ways:

- **Fixed Subsidy**  
The HCV rental subsidy amount depends on the household income. The lower the income the more the subsidy. The greater the income, the lower the subsidy. In contrast, the HOP subsidy is fixed. It depends on family size and not family income. In most cases, HOP subsidies are lower than HCV subsidies.
- **5-Year Time Limit for Work-Able Households**  
The HCV subsidy has no time limit. It lasts as long as a household remains eligible and as long as THA's funding holds out. In contrast, HOP imposes a 5-year time limit on all households with a work-able adult. HOP offers these households supportive services to help them increase earned income. HOP extends the subsidy beyond 5 years in two situations. **First**, to meet an unexpected hardship, it offers up to 3 more months of subsidy. **Second**, it offers up to a 1-year extension if the household enrolls in a qualified program to increase earned income. The time limit does not apply to seniors or disabled participants.

THA completed a thorough review of the agency's options to continue to serve the same number of households at rising rental costs. THA also completed an analysis of HOP. The HOP analysis and possible program changes can be found here [www.tacomahousing.org/programchanges](http://www.tacomahousing.org/programchanges).

THA consulted widely through its community to seek advice and views on these possible changes. The purpose of this memo is to provide describe this consultation effort and to report on what we heard.

## POSSIBLE PROGRAM CHANGES

THA presented the following possible program changes to voucher holders, landlords, THA staff, community leaders and partners:

### THA Is Considering Changes to its Housing Opportunity Program (HOP): It Seeks Advice

THA seeks advice. Tacoma's rents are rising. The number of households who need THA's help is growing. Serving them is costing THA more. Yet, THA's funding is flat. In response, THA is considering changes to its programs. THA has written full and summary reports on what we are considering. See them at [www.tacomahousing.net/programchanges](http://www.tacomahousing.net/programchanges). A shorter summary shows below. We welcome your advice. If you have some for us, we need it by **February 15, 2018**. When deciding how you would advise us, please consider at least the following four facts:

1. THA can serve only a small fraction of those in need; 20,000 needy Tacoma households need a turn at the assistance.
2. The present lowered HOP subsidy allows THA to serve 20% more households; the 5-year time limit gives others a turn.
3. In 4 years, HOP work-able households increased their earned income by 45%, but this is not enough to keep up with Tacoma's rising rental market; 68% of them set to exit HOP in 2018 will have a severe shelter burden (>50%).
4. THA's funding for rental assistance has been flat and will likely remain so. Yet Tacoma's rising rental market is costing THA \$600,000 more each year to serve the same number of households. This is not sustainable for THA.

Here is a color clue to the general effect of the proposals that show below

<b>Green</b>	The proposal will maintain or increase the number of households served but the service will be somewhat less.
<b>Blue</b>	The proposal will decrease the number of households served but the service will be more or will last longer.

<b>IN TACOMA'S NEW RISING RENTAL MARKET, THA'S RENTAL ASSISTANCE PROGRAMS CANNOT SERVE THE SAME NUMBER OF FAMILIES AT SUCH INCREASING COSTS BECAUSE THA'S FUNDING REMAINS FLAT. WHAT SHOULD THA DO?</b>	
<b>1.</b>	Reduce the value of the rental subsidy further to serve more households.
<b>2.</b>	Redirect vouchers to higher income households who cost less to serve, and so serve more of them.
<b>3.</b>	Redirect money from other programs to pay for rental assistance ( <i>e.g., reduce building or buying properties, maintaining the portfolio, supportive services, Education Project, Rapid Rehousing, and administrative services</i> )
<b>4.</b>	Maintain rental subsidy levels but serve fewer households ( <i>from 100% to 95%</i> ). (THA is presently at 95%).

POSSIBLE CHANGES TO THE HOUSING OPPORTUNITY PROGRAM (HOP)	
1.	<p><b>The Fixed Subsidy (THA pays 50% of the payment standard based on bedroom size).</b>                      The HOP subsidy is fixed based upon household size, not income. This fixed subsidy generally lowers the amount of the rental subsidy. This usually means households pay more in rent; yet it gives them an incentive to increase income because they keep all of any increase in wages; and doing this allows THA to serve 20% more households.</p>
	<ul style="list-style-type: none"> <li>• Keep the fixed subsidy and serve more households.</li> </ul>
	<ul style="list-style-type: none"> <li>• Remove it for elderly/disabled households since they cannot increase their income; they would receive an income-based subsidy; work-able households would keep the fixed subsidy.</li> </ul>
	<ul style="list-style-type: none"> <li>• Remove it for all households who would then receive a subsidy based on household income.</li> </ul>
	<ul style="list-style-type: none"> <li>• Offer struggling work-able households a THA apartment, if available, whose rent is based upon income.</li> </ul>
2.	<p><b>The Five-Year Time Limit for Work-Able Households, with Extensions</b>                      A 5-year time limit gives households a reason to strive; it gives other needy households a turn.</p>
	<ul style="list-style-type: none"> <li>• Keep the time limit and keep the present extensions of up to 3 months for hardship and up to one year if a family engages in a qualified job training or education programs.</li> </ul>
	<ul style="list-style-type: none"> <li>• Remove the time limit.</li> </ul>
	<ul style="list-style-type: none"> <li>• Shorten it (<i>e.g, 3 years</i>).</li> </ul>
	<ul style="list-style-type: none"> <li>• Keep the time limit but offer more generous extensions for hardship (<i>e.g, up to another 3 years if rent burdened &amp; engaged with support services</i>).</li> </ul>
POSSIBLE CHANGES TO THE HOUSING OPPORTUNITY PROGRAM (HOP) (continued)	
3.	<p><b>Expand Definition of Disability to Exempt More Households From the 5-Year Time Limit</b>                      Presently THA exempts from the 5 year time limit only seniors and persons receiving benefits from a program that has determined they are disabled, i.e. Social Security, SSI.</p>
	<ul style="list-style-type: none"> <li>• Expand this exemption to those whom DSHS excuses from the TANF work requirement. These would include an adult (55+) caretaker relative providing care for a child, an adult required in the home to care for a child with special needs, and an adult required to be in the home to care for another adult with disabilities. Doing this will increase the number of people without a time limit; that will mean fewer chances for others to have a turn.</li> </ul>
4.	<p><b>More Aggressively Encourage or Require Work-Able Households to Engage in Supportive Services to Increase Their Earned Income.</b>                      THA presently offers these services to all work-able households. Few accept them. Encouraging or requiring them to do so means THA will have to provide or find these services in Tacoma and find the money for staff to provide or monitor the services. That will mean less money to pay rent.</p>
	<ul style="list-style-type: none"> <li>• Improve THA’s identification of struggling households and more aggressively encourage their participation in supportive services.</li> </ul>
	<ul style="list-style-type: none"> <li>• Require all work-able households to engage in supportive services.</li> </ul>

<b>5. Expand HOP to the Current Housing Choice Voucher (HCV) Program</b>	Expanding HOP would allow THA to serve 20% more households because the rental subsidy is lower; the rent burden will be higher for most households unless they increase their income; the fixed-subsidy and the time limit will give them an incentive to do that; the time limit will also give more needy households a turn.
	<ul style="list-style-type: none"> <li>Transition all (~2,000) HCV households at once; their time on the HCV program <b>would not</b> count toward the 5-year time limit for work-able households, who would then have another 5 years of assistance.</li> </ul>
	<ul style="list-style-type: none"> <li>Transition all HCV households; their time on the HCV program <b>would count</b> toward the 5-year time limit. Workable households above the time limit will lose their subsidy after reasonable notice.</li> </ul>
	<ul style="list-style-type: none"> <li>Transition all HCV households and if this change would result in severe rent burden stagger the transition over time or allow for a hardship exception for a limited period of time.</li> </ul>
	<ul style="list-style-type: none"> <li>Transition only work-able HCV households to HOP.</li> </ul>
	<ul style="list-style-type: none"> <li>Do not transition HCV households to HOP. At the current rate of natural transition it will take 10 years for all households to be in the HOP program.</li> </ul>
<b>6. When a Work-Able Adult Joins a Senior/Disabled Household</b>	Presently, when this happens, the 5-year time limit applies retroactively. When a child turns 18 years of age present rules consider this to be a work-able adult joining the household.
	<ul style="list-style-type: none"> <li>Start the 5-year time limit anew.</li> </ul>
	<ul style="list-style-type: none"> <li>Keep the existing policy: the 5-year time limit applies retroactively</li> </ul>
<b>7. Limit a Household’s Ability to Reapply for HOP</b>	Presently a household leaving the program after its 5-year time limits expires may reapply.
	<ul style="list-style-type: none"> <li>Disqualify households who leave the program after the expiration of its 5-year term.</li> </ul>
<b>8. Prepare Wait List Households to be “Ready to Rent”</b>	
	<ul style="list-style-type: none"> <li>Offer tenants financial assistance to pay application fees, security deposits or utility deposits. This will redirect dollars presently available to pay the rent.</li> </ul>
	<ul style="list-style-type: none"> <li>Provide meaningful training on how to be a good tenant.</li> </ul>
<b>9. Strengthen the Program’s Relationship with Landlords</b>	
	<ul style="list-style-type: none"> <li>Improve marketing to landlords.</li> </ul>
	<ul style="list-style-type: none"> <li>Offer limited damage guarantees.</li> </ul>

## **PUBLIC CONSULTATION**

THA consulted widely about these proposed changes. The people we consulted and what we heard shows below.

### **1. HOP PARTICIPANTS PUBLIC HEARING**

In February of 2018, THA held two public hearings for HOP participants, one during the day and one in the evening. THA mailed postcard invitations to all 500 HOP households; 20 households attended. In addition to the meetings, three households provided comments via mail or e-mail. HOP participants recommended:

#### **1.1 Serve more households**

HOP participants were eager to hear what options would allow THA to serve more households. 44% of participants recommended that THA should further reduce the value of a voucher to serve more households. 28% recommended adopting a 95% utilization rate. 22% suggested redirecting money from other areas to pay for rental assistance.

#### **1.2 Keep the fixed subsidy**

67% of HOP participants recommended that THA keep the fixed subsidy and serve more households. 27% recommended that it remain in place for work-able households only (elderly/disabled households would receive an income-based subsidy). HOP participants asked where the funding would come from if they chose an option that was more expensive. Participants also wanted to know what the costs were in terms of number of people served for each possible option.

#### **1.3 Keep the five year time limit**

Nearly 80% of participants recommended that THA keep the five year time limit. Only 20% recommended THA offer more generous extensions. When asked about easing the requirements of the current hardship policy for households engaged in an activity or program likely to increase income, 80% were in favor of doing so. One participant thought that the 90 day unforeseen loss of income hardship extension was too short of a time period if someone lost a job. Zero HOP participants recommended removing the time limit.

#### **1.4 Expand the definition of disability**

HOP households were nearly split on the issue of expanding the definition of disability with 53% supporting the proposed change. Participants questioned if other resources were available for this population.

#### **1.5 Require supportive services**

73% of HOP participants recommended that THA require supportive services because it motivates work-able households to increase their earned income. One participant suggested that THA require households to participate but have consequences other than termination for noncompliance.

**1.6 Transition HCV households to HOP**

84% of HOP participants recommended that THA transition the legacy HCV population to the HOP. One participant questioned how HCV participants would feel going from no time limits to time limited. Another participant suggested that the transition time to HOP should be based on the individual family's needs.

**1.7 Start the time limit anew when a work-able adult joins an elderly/disabled household**

80% of HOP participants recommended that the time limit should start anew when a work-able person joins an elderly/disabled household and that it should be removed if they exit.

**1.8 Allow HOP participants to reapply after they exit the program**

85% of HOP participants recommended that HOP participants be permitted to reapply for the program after they exit. The group cited the wait time and the slim odds of being readmitted to the program as their reason for supporting this option.

**1.9 Do not spend resources preparing households to be ready to rent**

86% of HOP participants recommended that THA should not spend resources providing funding for application fees, security deposits assistance etc. They favored using the funding to provide more rental assistance.

**1.10 THA should take action to improve relationships with landlords**

58% of HOP participants recommended that THA should improve its marketing to landlords and offer limited damage guarantees. 42% recommended that THA not spend these resources and favored using the funding to provide more rental assistance.

**2. 2015 HOP AND HCV SURVEY**

In January of 2015, THA conducted a live telephone survey of active HOP and HCV participants. The survey asked similar questions as those we posed in 2018.

**2.1 Serve more households**

87% of HOP participants recommended that THA should make cuts to the program to serve more households. 65% of HCV households recommended cuts.

**2.2 Differing views on time limits**

53% of HOP participants supported time limits, but only 33% of HCV participants supported them. Both HOP and HCV participants recommended that time limits should not apply to seniors or people with disabilities.

**2.3 Require supportive services**

75% of HOP participants recommended that THA require participants to engage in supportive services; this aligns with the findings from 2018. 80% of HCV households supported mandatory supportive services.

**2.4 Differing views on subsidy type**

The telephone survey asked participants if rental assistance should be based on income or family size. 67% of HOP households recommended a subsidy based on family size, but only 18% of HCV households made that recommendation. 82% of HCV households preferred an income based subsidy.

### **3. THA PARTICIPATING LANDLORDS**

In February of 2018, THA's landlord advisory committee met to advise THA on the possible program changes. THA invited over 500 landlords to this meeting and 12 landlords attended. In addition to the meeting, two landlords provided comments via email. Landlords recommended:

#### **3.1 Serve more households**

50% of landlords recommended that THA adopt a 95% utilization rate. The remaining landlords were evenly split among the options to reduce the value of voucher further, redirect money from other areas, and redirect vouchers to higher income households. Landlords provided THA with recommendations about improving or cutting operations that might save money. These ideas included: bi-annual inspections, self-certifying repairs, eliminating supportive services, eliminating staff and permitting random compliance checks. One landlord mentioned raising the payment standard to 110% of FMRs to reflect 2018 rents.

#### **3.2 Keep the fixed subsidy, but remove it for elderly/disabled households**

75% of landlords recommended that THA keep the fixed subsidy but remove it for elderly/disabled households. The remaining 25% recommended keeping the fixed subsidy as it stands today for all households. One landlord suggested that the fixed subsidy should be stepped meaning that the tenant should increase their portion of the rent each year.

#### **3.3 Shorten the five year time limit**

67% of landlords recommended that THA shorten the time limit and 33% recommended keeping it and offering more generous extensions. A number of landlords recommended offering hardship extensions if THA were to shorten the time limit. One landlord recommended a 3 year time limit with extensions for households who increase their earned income. 57% of landlords recommended easing the hardship extension requirements for households participating in a program or activity that will likely increase income.

#### **3.4 Expand the definition of disability**

60% of landlords recommended that THA should expand the definition of disability and so exempt more households from the time limit.

#### **3.5 Do not require supportive services**

75% of landlords recommended that THA improve its identification of struggling households and encourage, but not require, households to participate in supportive services. 17% were in favor of requiring households to participate. One landlord recommended eliminating supportive services; another recommended extending THA's hours to accommodate working families.

#### **3.6 Transition HCV households to HOP**

55% of landlords recommended transitioning the legacy HCV population to HOP and 33% of those in favor of the transition recommended a hardship policy for households

that may be extremely rent burdened as a result. 44% of landlords were opposed to the transition. One landlord indicated that it is not fair to change the rules about a program with families already on the program, "families and landlords should have what they signed up for."

**3.7 Start the time limit anew when a work-able adult joins an elderly/disabled household**

100% of landlords recommended that the time limit should start anew when a work-able person joins an elderly/disabled household and that it should be removed if they exit.

**3.8 Do not allow HOP participants to reapply after they exit the program:**

100% of landlords recommended that THA prevent HOP participants from reapplying for the program after they exit. One landlord suggested that THA might allow a household to reapply much later in life when they are elderly or disabled.

**3.9 Do not spend resources helping households pay fees or deposits**

86% of landlords recommended that THA should not spend resources providing funding for application fees, security deposits assistance etc. They favored using the funding to provide more rental assistance.

**3.10 THA should take action to improve relationships with landlords**

100% of landlord recommended that THA should offer limited damage guarantees. Landlords commented that offering damage guarantees could help attract landlords. Other landlords suggested providing landlord/tenant matching and improving the screening process. A number of landlords suggested that if THA offers security deposit funds they should stay with the unit as it transitions from one tenant to the next.

#### **4. HOUSEHOLDS ON THE WAITLIST**

THA held one public hearing for households currently on THA's waitlists. THA sent e-mail invitations to 100 random waitlisted households and one household attended the hearing. The household member is disabled, currently homeless, and has been waiting for housing since 2013. The household is on the waitlist for THA's elderly/disabled properties but "would take the HOP voucher if given the opportunity."

##### **4.1 Serve more households**

The waitlisted household was supportive of THA serving 95% of its baseline even if it means waitlisted households will wait longer.

##### **4.2 Keep the fixed subsidy**

The household recommended that the fixed subsidy remain in place for work-able households only (elderly/disabled households would receive an income-based subsidy). They noted that elderly/disabled households have fixed incomes.

##### **4.3 Shorten the five year time limit**

The household recommended shortening the time limit to three years and offering an additional two years to households who have increased their earned income or those who are enrolled in a program or activity to increase their earned income. "If a household is still working at Wendy's after three years, another family should be given a chance." The household recommended that THA remove the hardship extension policy requiring a household member to complete their activity or program within one year in order to qualify for an extension. The household would like THA to keep the requirement that households must be enrolled 6 months prior to exit. "You can't just sign up for a program at the end of your time on the program and expect more time."

##### **4.4 Expand the definition of disability**

The household was very supportive of expanding the definition of disability to include those who are exempt from TANF work requirements.

##### **4.5 Require supportive services**

Similar to most program participants, the waitlisted household was very supportive of requiring supportive services for work-able households.

##### **4.6 Transition HCV households to HOP**

The household was supportive of transitioning work-able HCV households to HOP.

##### **4.7 Start the time limit anew when a work-able adult joins an elderly/disabled household**

The household recommended that the time limit should start anew when a work-able person joins an elderly/disabled household and that it should be removed if they exit.

##### **4.8 Allow HOP participants to reapply after they exit the program**

The household recommended that HOP participants be permitted to reapply for the program after they exit.

**4.9 Do spend resources helping households pay fees**

The household was supportive of THA helping households prepare to be ready to rent. They remarked that they will need assistance with a security deposit and that it is hard for families to come up with that money.

**4.10 THA should take action to improve relationships with landlords**

The household recommended that THA provide damage guarantees to landlords because Section 8 and HOP have a bad reputation.

## 5. THA STAFF

THA's Policy, Innovation & Evaluation team will host an all-staff meeting to discuss the possible program changes on February 21, 2018. PIE staff conferred with THA's Cabinet to seek their recommendations.

### 5.1 All Staff Meeting

- **Serve more households:** The majority of staff (88%) recommended adopting a lower utilization rate to serve more households. 70% recommended adopting 95%. Adopting 90% was an alternative idea presented by a staff member and this idea gained the support of 18% of staff.
- **Keep the fixed subsidy, but remove it for elderly/disabled households.** 44% of staff recommended keeping the fixed subsidy. 16% of staff recommended further reducing the value of a voucher except for elderly/disabled households. Another 16% recommended removing the fixed subsidy for all households.
- **Shorten the time limit to 3 years but offer generous extensions** if households will have a shelter burden greater than 50% upon exit. These extensions could be 3 to 4 years.
- **Do not expand the definition of disability:** 62% of staff recommended not expanding the definition of disability. The primary reason for this was the potential administrative burden falling on staff to obtain the verification paperwork to indicate a household is exempt from TANF work requirements.
- **Do not assume a one size fits all approach with supportive services.** Staff recommended a hybrid idea, suggesting that THA require services for some but not all. The determination could be based on where the household falls on the Bridge Assessment.
- **Transition HCV households to HOP, only if they are work-able.** 76% of staff were supportive of transitioning work-able households to HOP. Staff recommended beginning the transition at annual review time.
- **Start the time limit anew when a minor becomes 18 in an elderly/disabled household or redefine work-able to exclude minors attending school up to 24 or 26 years old.** Staff recommended that the time limit should start anew when a minor becomes 18 in an elderly/disabled household. Staff also recommended redefining the definition of work-able to consider youth attending school.
- **Allow HOP participants to reapply after they exit the program.** Staff recommended that HOP participants be permitted to reapply for the program after they exit.

- **Do not spend resources helping households pay fees.** 38% of staff recommended that THA should not spending resources to pay for application fees, security deposits etc. 29% recommended THA offering some sort of assistance that requires repayment to keep resources replenished. 21% of staff recommended reaching out to households on the waitlist to train them to be prepared for renting.
- **THA should take action to improve relationships with landlords.** Staff recommended that THA should improve marking to landlords but also educate renters to be ready to rent. The ready to rent training could include a certificate indicating that the household completed training. Some staff suggested requiring households to complete the training prior to leasing up and again if they relocate.
- **Staff recommended easing the current hardship policy.** Remove the stipulation that the program or activity (likely to increase income) must be completed in 1 year. Remove the requirement that households must be enrolled 6 months in advance of exit.

## 5.2 THA's Sub-Cabinet favors the following options:

- **Keep the fixed subsidy but consider and study the impacts of transitioning elderly/disabled households to an income-based subsidy.**
- **Keep the time limit but offer generous extensions** because most households will experience a shelter burden greater than 50% upon exit.
- **Expand the definition of disability** to include those exempt from TANF work requirements.
- **Encourage, but do not mandate supportive services.**
- **Transition work-able HCV households to HOP after a long notice period.** The time limits should begin after the notice period. One sub-cabinet member suggested staggering the transition based on when the household joined the HCV program. Another sub-cabinet member suggested transitioning households at review time to reduce administrative burden.
- Sub-cabinet recommended conducting a financial analysis to study the HOP transition and the fixed subsidy generally. THA should study the impacts of different subsidy amounts such as 50% for work-able households and an array of subsidy amounts for elderly/disabled households (including an income-based subsidy).

- **Start the five-year time limit anew when an elderly/disabled household adds a work-able household member.** Sub-cabinet recommended monitoring this closely for abuse.
- **Permit HOP households to reapply** to the program after an exit.
- **THA should provide some measure of good tenant or ready to rent training** for households nearing the top of the waitlist. The sub-cabinet did not support financial assistance to pay application fees etc.
- THA should wait for the decision on the State level about source of income discrimination prior to enacting any sort of damage mitigation fund. Sub-cabinet also noted that THA is in the process of hiring a Landlord Liaison to guide some of this work.
- **Revise the current hardship policy** to change the stipulation that the program or activity (likely to increase income) must be completed in 1 year to completion within 3 years. This would align with an up to 3 year hardship extension. Sub-cabinet recommended shortening the amount of time a household must be enrolled in the program prior to exit to be eligible for an extension from 6 months to 3 months.

**6. BROADER COMMUNITY CONSULTATION**

THA met with more than 50 community organizations, community partners and elected officials to seek advice and views. Tacoma community leaders and THA partners fully support THA's adoption of a 95% utilization rate as the best way forward to serve more households. These community members were willing to provide letters of support to help THA explain and defend its decision. The letters are attached.

Regarding possible changes to the HOP, community members were supportive of program policies that permit THA to serve more households. For this purpose, on the whole, they supported maintaining the time limits and the fixed subsidy. A number of community members were supportive of expanding the income-based subsidy to the elderly/disabled HOP households. They also expressed support for THA to transition the legacy HCV population to HOP. They advised that this transition must be well thought out and clearly communicated. There were differing views regarding mandating supportive services and revising the hardship policy. Most were predicated on questions about how those choices would impact THA's ability to serve more households.

Comments from the meetings are on the pages that follow.

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Organization(s)	Questions / Comments	THA Response
<p>Coalition for Homeless Youth</p>	<p>Questions:</p> <ul style="list-style-type: none"> <li>• Is THA attempting to access other funding sources to fill gaps?</li> <li>• Is THA considering redirecting our funds to help people purchase instead of rent?</li> <li>• What types of services did people have access to?</li> <li>• What programs did you have in place to incentivize people to increase their earned income or disincentive people from staying on housing subsidies?</li> </ul>	<p>THA is always looking for funding and resources to fill gaps. We rely on foundations and philanthropic resources to support work that is not funded, or underfunded, by HUD. There are very limited resources outside of HUD funding that will fund housing assistance or case management. Typically foundation and philanthropic resources are interested in specific projects or programs. This is especially true for any sustainable funding gaps. They usually only want to fund a project or program just once.</p> <p>THA is not currently considering redirecting our funds to help people purchase instead of rent.</p> <p>HOP families have access to THA caseworkers who work to connect participating households with an array of services. Households may participate in an assessment to examine a family’s economic stability in five areas including family stability, well-being, education and training, financial management, and employment and career management. This assessment leads to a connection with services provided by THA and/or its partners including:</p> <ul style="list-style-type: none"> <li>• Participation in the Family Self-Sufficiency Program</li> <li>• Employment Supports through partnerships with Goodwill, Workforce Central, The Center For Strong Families, Sound Outreach</li> <li>• Employment supports include but are not limited to: financial literacy credit counseling</li> </ul>

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Organization(s)	Questions / Comments	THA Response
<p>City of Tacoma – Mayor Victoria Woodards</p>	<p>Comments:</p> <ul style="list-style-type: none"> <li>• THA should persist with both the time limit and the fixed subsidy</li> <li>• THA should require HOP work-able families to engage with supportive services as a condition of receiving rental assistance.</li> <li>• THA should expand the definition of elderly/disabled to include parents who cannot work for a good reason that may not include a diagnosis</li> <li>• THA should permit generous extensions, especially the extra year if the household is not ready for the private rental market and the household commits to job training or education</li> </ul>	
<p>Tacoma Pierce County Affordable Housing Consortium</p>	<p>Questions:</p> <ul style="list-style-type: none"> <li>• Are other Housing Authorities not meeting their HUD imposed baseline?</li> <li>• How close are HUD’s Fair Market Rents (FMRs) to current rents?</li> <li>• Why are households not engaging with supportive services?</li> <li>• Has THA found evidence that mandating supportive services will improve client outcomes?</li> <li>• Could THA explore incentivizing supportive services (for example increasing voucher HAP amounts for households who engage)?</li> </ul> <p>Comments:</p> <ul style="list-style-type: none"> <li>• Households should find time for supportive services. THA should not fear that they do not have time to engage. THA should not fear sanctioning households for noncompliance.</li> <li>• Maybe THA could learn from Habitat’s “sweat equity” requirements.</li> <li>• THA should give young adults who turn 18 years old (in elderly/disabled households) time before they are considered work-able.</li> <li>• Perhaps THA should consider cutting back from other places for example the investment in Rapid Rehousing (RRH).</li> </ul> <p>Group Consensus:</p> <ul style="list-style-type: none"> <li>• Group consensus (minus 1 person, see above comment regarding cutting RRH): Support adopting a lower utilization rate as the best way forward.</li> <li>• Group consensus: Continue with the time limits.</li> <li>• Group consensus: Expand the definition of disabled.</li> <li>• Group consensus: Expand HOP to HCV participants. All elderly/disabled households (including HOP) should have an income based subsidy.</li> <li>• Group consensus: The transition of HCV to HOP must be phased in very carefully.</li> </ul>	<ul style="list-style-type: none"> <li>• THA is currently conferring with other Housing Authorities to learn more, other HA’s facing similar rental markets may have more favorable MTW contracts. Vancouver HA received approval from HUD to adopt a 90% utilization rate and the Housing Authority of the County of San Mateo has completed two corrective action plans for not meeting their baseline.</li> <li>• Tacoma’s FMRs are in line with THA’s market analysis. They are regularly reviewed.</li> <li>• THA cannot say for certain why households do not engage with services, but the vast majority of work-able HOP families are working and have children.</li> <li>• THA has not found evidence that mandating supportive services increases self-sufficiency outcomes. Other Housing Authorities have experimented with mandates, but the results have been mixed.</li> <li>• THA’s Family Self Sufficiency Program rewards households for each milestone they achieve with a financial incentive that is place in an escrow account for the household.</li> </ul>

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Organization(s)	Questions / Comments	THA Response
<p>Greater Tacoma Community Foundation (GTCF) and others</p>	<p>GTCF convened 40 community leaders including - Metro Parks, Pierce County Council, Pierce County Executive, Goodwill, Sequoia and Forest Foundations, Metropolitan Development Council, United Way, Habitat for Humanity, Asia Pacific Cultural Center, Bamford Foundation, Health Department, Korean Women’s Association, Hope Sparks, Forterra, Gordon Thomas Honeywell, Sound Outreach, University of Washington, Amara, Mayor of Tacoma, City of Tacoma, YWCA, Shared Housing Services, Reach Tacoma, Safe Street Campaign, Oasis Youth Center, Pierce County Human Services, Degrees of Change, Pierce County ACH</p> <p>Questions:</p> <ul style="list-style-type: none"> <li>• Have you conferred with other Housing Authorities facing similar utilization issues?</li> <li>• Is there a waiver THA can receive from HUD to be under 100% utilization</li> <li>• What are the penalties for not meeting 100% utilization?</li> </ul> <p>Comments</p> <ul style="list-style-type: none"> <li>• THA needs the support of this group if HUD seeks to punish them</li> <li>• There are big costing to shifting people around from one program to another, the larger issue is a lack of affordable housing</li> </ul> <p>The GTCF audience was as a whole supportive of THA adopting a utilization rate of 95%. Although some had mixed views on the time limit and fixed subsidy, most were supportive if it means THA can serve more households.</p>	<ul style="list-style-type: none"> <li>• THA is currently conferring with other Housing Authorities to learn more, other HA’s facing similar rental markets may have more favorable MTW contracts. Vancouver HA received approval from HUD to adopt a 90% utilization rate and the Housing Authority of the County of San Mateo has completed two corrective action plans for not meeting their baseline.</li> <li>• THA is exploring the options taken by Vancouver HA.</li> <li>• THA is uncertain what the penalties are for falling below 100% utilization.</li> </ul>
<p>City of Tacoma Councilmember Chris Beale</p>	<p>Councilmember Beale expressed support for the 5 year time limit and the fixed subsidy. He also favored expanding HOP to the rest of the voucher program to allow THA to serve more people.</p>	
<p>City of Tacoma Councilmember Catherine Ushka</p>	<p>Councilmember Ushka readily understood the problem THA faces with overwhelming need in the rising rental market, yet with flat funding. She was prepared to be supportive of THA's choices. She liked that we were consulting widely.</p>	

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Organization(s)	Questions / Comments	THA Response
Sound Outreach	<p>Jeff Klein, the Executive Director of Sound Outreach, supports the following options:</p> <p>THA should serve 95% of its baseline. Jeff does not recommend any of the other options especially removing funding from the Education Project.</p> <p>Stick with the fixed subsidy for work-able households and do more to provide a strong nudge for supportive services. Jeff does not support mandated services. He would like us to consider requiring or softly requiring the Bridge assessment if we believe it is a useful tool (perhaps test this with a pilot group). Those shown to be better prepared to receive the services offered by the Center For Strong Families should be immediately referred. Jeff thinks the co-locating of services offered through the CSF may help improve engagement with supportive services. THA must consider when to target households for engagement with services.</p> <p>Jeff supports THA expanding HOP to the legacy HCV population (carefully)</p> <p>Jeff favors an income-based subsidy for all elderly/disabled households (he may get back to us with more comments on this)</p> <p>Jeff is prepared with a letter of support.</p>	
Northwest Justice Project	<ul style="list-style-type: none"> <li>• <b>95% Utilization rate</b> - NJP supports this as the best option for THA to face Tacoma's rising rents without cutting folks off the program in the future. NJP does not think we should further reduce the value of our vouchers, nor do they think we should cut from other areas including supportive services. They also do not think we should redirect assistance to higher income households.</li> <li>• <b>Fixed Subsidy</b> - NJP supports keeping the fixed subsidy for work-able households. They support an income-based subsidy for elderly/disabled households who cannot increase their earned income.</li> </ul>	

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Organization(s)	Questions / Comments	THA Response
	<ul style="list-style-type: none"> <li>• <b>Existing Hardship Policy</b> - NJP likes this as is. They do not think we should remove the rule that mandates enrollment in an income earning activity or program at least 6 months prior to exit. They remarked that THA has made an investment in the household. The household should not be automatically entitled to an extension without showing some effort. They were in favor of permitting a 1 year extension for households engaged in an activity that would last longer than 1 year.</li> <li>• <b>Time limit</b> - NJP indicated that they believe three years to be too short. They were initially split on whether to keep the 5 year limit as is or keep it and offer generous extensions. After consideration for those on the waitlist, NJP recommended keeping the 5 year time limit as is.</li> <li>• <b>Expansion of the definition of disability</b> - NJP likes this proposal. They want us to be aware that the DSHS status may change, so households may become work-able. NJP would like us to consider including those who receive state disability benefits. THA will conduct further research on this matter. NJP followed up with an email and encouraged us to look into folks who are receiving ABD cash benefits.</li> <li>• <b>For elderly/disabled households who may become work-able</b> either by adding a member or by having a child in the household who turns 18 - NJP favors permitting the time limit to start at the time the work-able person joins the household. They urge us to not apply the time limit retroactively.</li> <li>• NJP supports THA <b>transitioning the HCV population to HOP</b> because it will allow THA to serve more households and it will prevent THA from cutting households off the program due to rising costs. NJP recommended a tiered decrease in subsidy to prevent immediate hardship. After a discussion about administering this, they decided it may be better and easier to just have a long notice period of the transition.</li> <li>• NJP recognizes that THA may not have the capacity to <b>require supportive services</b>. They questioned if we could partner with an agency that could help us better engage families in these services. However, they were not supportive of a "mandate" of supportive services</li> </ul>	<ul style="list-style-type: none"> <li>• THA presently accepts the State designations of disability and omits ABD recipients from the time limit.</li> <li>• THA explained our partnership with the Center For Strong Families.</li> </ul>

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Organization(s)	Questions / Comments	THA Response
	<ul style="list-style-type: none"> <li>• <b>Regarding a household's ability to reapply.</b> NJP thought it may support a rule preventing a household from receiving assistance through the next upcoming waitlist opening. This would give at least 2-3 years if the household was lucky enough to win the lottery again. NJP does not like the idea of a lifetime ban.</li> </ul>	
<p>Comprehensive Life Resources – Homeless Outreach Team Member</p>	<p><b>(Via e-mail)</b>            “Although you made the point that THA does not plan to implement the second option [favoring higher income households] you laid out in the document, I believe this to be the best option at the present time. I am humbled that THA's mission statement is to serve the neediest individuals, but I think pursuing this mission is an ideal that cannot be obtained at this time. I know it is difficult to make a decision that seems so against THA's mission statement, but allow me to offer my perspective—a perspective which you may not have considered.</p> <p>“When I am working with homeless individuals one-on-one, I have noticed a troubling situation continuously occurring. People who are on the verge of homelessness, or have less need than other individuals, are not getting their needs met because they are not the 'target population'. I can refer them to resources which may help, but these resources are generally, like THA, focused on the neediest individuals. As such, there is an overwhelming amount of neglect for the at-risk population, who eventually become the most at risk population. Typically, months go by and they will seek out our services again, now being in a dire situation like many of the homeless individuals we serve. I think it is worth considering that all of the neediest individuals once started from a place of less need.</p> <p>Why I am ultimately encouraging you to proceed with the second option, is for the prevention of homeless situations worsening. It is far easier to help these individuals when they are still in a stable environment, or at least have some sort of stability (whether it be work, home, etc.)—not to mention they have yet to be betrayed by the system. In my opinion, you would still be keeping in accordance with your mission statement, but are taking more of a preventive role, which I believe in time, will show a greater efficacy in combatting Tacoma's homeless situation.</p> <p>Touching upon the other handout we received, I think the burden of rent should fall on both THA and the individual receiving those services. To</p>	<p><b>(Michael Mirra’s Response)</b></p> <p>1. I readily see and appreciate the benefit you describe in redirecting dollars to the higher income families in need as a way to prevent their descent into crisis, and thereby saving money in the long term by the lesser cost of prevention. I believe you are right to note that the risk of homelessness can extend pretty far upward in the income ranges. However, we do not know of a way to determine which of such families would become homeless without assistance and which would not. That is hard to determine even with the lower income families. It would be harder still with the higher income families. One way we try to make our dollars relevant to such families at risk might be through the money we give to the county’s Rapid Rehousing Program, and its diversion efforts. The main way we do this, however, is through our mainline programs of hard units and vouchers which serves families well before they become homeless and keeps them stable.</p> <p>2. I very much like your ethic that families need to share the burden of their own assistance. I think the fixed subsidy we implemented for the HOP program does that. It has the benefit you describe. It also, by costing us less, allows us to serve 20% more households. The 5 year time limit serves a similar purpose. It gives people a reason to strive. It also allows us to serve more people by giving them a turn.</p>

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Organization(s)	Questions / Comments	THA Response
	<p>clarify, I am not advocating a 50/50 split, but rather, that the person being given assistance should work towards self-sufficiency and empower themselves. I believe they should be expected to pay what they can—what is deemed 'reasonable' by whatever standards that are created—so they have a sense of ownership of their life and well-being.</p> <p>I have recently become certified as a peer counselor, and our goal is to empower the people we serve to reach their full potential. A great way we achieve this is by having our clients identify attributes about themselves, and how those attributes can positively or negatively impact their environment and life. "The burden of life" if you will, is placed upon the client. A mantra which helps me remember this philosophy is: "I will do nothing for you, but I will help you with everything". I think if THA adopts that mantra, it would be beneficial to your organization, as well as your clients.</p> <p>I hope this information is useful to you. If you have any questions, need to clarify anything I spoke of, or want to talk to me, please use my contact information below, and I will be more than happy to do what I can to help THA create a better community. Additionally, thank you for being open to my feedback, it means a lot to me that I work in a field where my opinion is both valued and seen as necessary. Whether or not my perspective can be utilized, I am appreciative you sought my opinion.</p>	

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Organization(s)	Questions / Comments	THA Response
<p>United Way of Pierce County</p>	<p>THA consulted with Corey Mosesly. He is the Manager of Family Stability Initiatives for United Way of Pierce County. He has led THA through the planning for the Center for Strong Families that THA will host. Corey has studied and thought extensively about what it takes to help poor families prosper. He is very familiar with THA and its work. Over a 2-1/2 hour discussion about that work, covering many topics, Corey offered the following views in response to my questions:</p> <p>THA should target a utilization rate of 95%. He did not favor any of the alternatives: reducing the value of the vouchers further, redirecting them to higher income families or redirecting spending from other services and capacities.</p> <p>He did not see THA being able to sustain even 95% in Tacoma's rental market unless we retained the fixed subsidy and extended it to the Section 8 legal population. He likes that a fixed subsidy removes the disincentive to work.</p> <p>He favored the 5 year time limit. He likes that a time limit gives families another reason to increase their earned income. He also favors it because it gives other people a turn at the assistance.</p> <p>He favored conditioning assistance on a family's engagement with the Centers for Strong Families. He thinks this would require careful training of staff to make that engagement a positive experience for the families. He thinks that is possible. Corey also thinks it is possible to arrangement this such that THA need only consult the Centers for a defensible yes or no answer on whether a family is fulfilling such a requirement.</p> <p>Corey recounted how when he was in graduate school at Evergreen several years ago he did a research paper that had him survey HOP families. He will send me a copy. He remembered that the respondents to the survey favored the 5 year time limit.</p>	

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Organization(s)	Questions / Comments	THA Response
<p>The REACH Center</p>	<p>Nick Bayard, Director of the REACH Center provided these comments via email following the GTCF convening.</p> <p>Hi Michael and Jeff,</p> <p>I wanted to boil down the essence of what I was trying to say yesterday morning. The most important influence on client behavior in our program has been the way we communicate about timelines. Communicating that we could provide two years of rental subsidy led to many client failures because it did not incentivize a rapid course of action toward employment and education. The end of two years would sneak up on people. When we started setting a three-month timeline for a review and mobilizing around job placement goals aimed at supporting successful graduation after three months, it sparked greater action on finding gainful full-time employment. We could still extend program time, but overall this changed the behavior dynamics in our program.</p> <p>Given that experience, and in a world of options ranging from bad to worse, it seems to me that more households served with shorter timelines and clear communication about timelines would be a smart choice. If there are ways to emphasize very short-term emergency assistance (3-6 months) for folks who are work-ready, I can see those being effective, too.</p>	
<p>Tacoma News Tribune (TNT)</p>	<p>Matt Driscoll from the TNT interviewed THA’s Executive Director and staff. TNT published an article detailing the challenges THA faces. “This is not sustainable. With skyrocketing rents, Tacoma Housing Authority is forced to adjust”</p> <p><a href="http://www.thenewstribune.com/news/local/news-columns-blogs/matt-driscoll/article199406144.html">http://www.thenewstribune.com/news/local/news-columns-blogs/matt-driscoll/article199406144.html</a></p>	
<p>City of Tacoma – City Council</p>	<p>THA presented to the Mayor and City Council on 2/20/2018. The Mayor offered a letter of support.</p>	

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Organization(s)	Questions / Comments	THA Response
<p>Tacoma's Congressional Delegation Offices: Senator Patty Murray</p> <p>Senator Maria Cantwell</p> <p>Congressman Derek Kilmer</p> <p>Congressman Denny Heck</p> <p>Congressman Adam Smith: Offices of</p>	<p>THA consulted with the staff of all its Congressional delegation. We explained the choices we faced including the difficulty in meeting HUD's baseline number of families served when rent costs are rising and THA's funding remains flat. We outlined the choices pertaining to the fixed subsidy and the 5 year time limit.</p> <p>All the offices expressed confidence in THA and support. They invited THA to let them know if we needed assistance in explaining these choices to HUD.</p>	
<p>HUD Staff</p>	<p>THA's executive director consulted informally with HUD senior staff about the challenge of meeting HUD's baseline with Tacoma's rising rental market and with flat funding. He expressed his concern that failing to hit that baseline would get THA into difficulty with HUD. HUD staff was reassuring. They advised THA to mainly to work with HUD staff and to show our thought process and analysis.</p>	
<p>HUD – Regional Director Jeff McMorris</p>	<p>THA's executive and deputy executive director fully briefed the HUD Regional Director about the hard choices facing THA concerning the utilization rate and changes to the rental assistance programs.</p>	
<p>Hilltop Business Association</p>	<p>THA presented to 16 people on 2/1/2018.</p>	
<p>Tacoma Pierce County Black Collective</p>	<p>THA presented to the group on 11/25/2017.</p>	
<p>Human Services Coalition</p>	<p><b>TBD – Consultation to be scheduled.</b></p>	

## **LETTERS OF SUPPORT**

THA received letters of support following the public consultation process. The letters are included on the following pages.

- **City of Tacoma**
- **Greater Tacoma Community Foundation**
- **Pierce County Executive**
- **Shared Housing Services**
- **Sound Outreach**
- **Tacoma Pierce County Affordable Housing Consortium**
- **The Bamford Foundation**
- **United Way of Pierce County**
- **University of Washington Tacoma**



## City of Tacoma

Mayor Victoria R. Woodards

February 21, 2018

Mr. Michael Mirra, Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael:

Thank you for presenting to the City Council in its February 20, 2018 Study Session. That presentation along with our other discussions has helped the City understand the difficult choices that the Tacoma Housing Authority (THA) faces. The City is well aware of our rising rental market. Its effects show in the public health emergency that the City declared because of the rising number of homeless persons. The effects show in the increasing rent burden placed on households and on those organizations that attempt to serve them with rental assistance. The City appreciates all of THA's efforts to address this problem.

The City understands THA's dilemma. It cannot continue to serve the same number of households at the increasing costs necessary to keep up with our rental market when your federal funding remains flat. We also understand the related choices THA faces to design its programs to account for these increasing costs but also to consider the many more people who are waiting a turn to receive your assistance. These present hard choices.

We appreciate THA's efforts to consult with a wide array of community voices to inform its choices. Of the choices that we understand THA faces we support the following:

1. THA should acknowledge that what our rental market is telling us: that THA cannot adequately serve the same number of families without additional funding. I understand this number to be a HUD assigned baseline. But THA should budget to a lower number. Your proposal to target 95% of the HUD baseline seems reasonable. I urge you to choose a number or consider other program changes that would make the new baseline reasonably stable in a way that does not require THA periodically to terminate households from its programs as our rental market continues to rise.

The City does not favor the alternatives you mentioned. It does not favor redirecting dollars from other THA's programs, such as its real estate development work, its Education Project, or its supportive services. All of these

are critical. It does not favor weakening THA's administrative capacity to manage its programs. We have full confidence that the money THA spends on its administrative capacity is both necessary and efficient. We also realize that any such redirection to these alternatives would only be a temporary solution in the face of continuing rental increases. Such a temporary solution is not worth weakening THA's other programs or its administrative capacity.

2. To make this 95% target sustainable, we recommend that THA continue with its fixed subsidy for HOP participants and that it move the legacy Section 8 Voucher population to fixed subsidies. This would serve two purposes. First, since the flat subsidy is a lower subsidy it will allow THA to serve more families. This appears to be a good companion step to the lowered baseline to make that lowered baseline more stable and sustainable. Second, we favor the fixed subsidy for the incentive it offers to a family to increase its earned income.
3. The City supports THA in its enforcement of the current 5-year time limit for work-able households. This time limit gives those households another incentive to increase their earned income. Importantly, it also gives other households a turn at receiving the assistance. For the same reason, we support transitioning the work-able households on the legacy Section 8 program to the 5-year time limit.

The City of Tacoma has full confidence in THA's work and in its judgment as it faces the difficult choices in this hard rental market. THA has the City's full support.

Cordially,



Victoria R. Woodards  
Mayor



**RECEIVED**

OCT 30 2017

**Tacoma Housing Authority**  
902 South L Street  
Tacoma, WA 98405  
[www.tacomahousing.org](http://www.tacomahousing.org)

## City of Tacoma

Mayor Marilyn Strickland

October 23, 2017

Mr. Michael Mirra, Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Mr. Mirra,

I am pleased to extend this letter of support for the New Directions Crisis Residential Center planned for the Salishan neighborhood. The center will serve one of the most vulnerable populations in Tacoma, youth aged 12 to 17 years old, who are experiencing crisis or conflicts in their home environment or have no place to stay. Family crisis is one of the top contributing factors to homelessness in Pierce County, and six percent of our homeless population is unaccompanied youth and young adults. The time is now to expand youth crisis services in our community so we can help those young people most at risk.

The planned New Directions Crisis Residential Center will be a modern, 12-bed facility operating 24 hours a day, seven days a week to provide shelter, meals, case management, counseling, education assistance, transportation, service referrals and other activities for up to 15 days. Staff will work with the youth toward family reconciliation or transfer to safe, stable housing. This facility provides an innovative service model that will be a tremendous benefit to our community.

I am proud of the outstanding work of the Tacoma Housing Authority throughout the city, but especially for the Salishan neighborhood. This housing development on the east side of Tacoma is a shining example of top quality housing that has attracted families with a wide range of incomes. This partnership between THA, the City of Tacoma and Pierce County, with support from Housing and Urban Development for the new crisis center will add a valuable service in the Salishan community that will complement the existing programs.

I look forward to further collaboration with THA and to the opening of the New Directions Crisis Residential Center.

Sincerely,

Marilyn Strickland  
Mayor, City of Tacoma

Michael Mirra  
Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405



Dear Michael:

Thank you for providing a comprehensive and fact-filled overview of Tacoma Housing Authority's upcoming decision regarding the inequity between the value of rental vouchers and the rising numbers of people needing housing assistance. We appreciate your commitment to including community voice and input.

Greater Tacoma Community Foundation supports THA in making the decision that best serves our community. We understand the challenges facing THA are complex. Your proposal to pursue a 95% utilization rate for the purposes of devising a balanced budget is reasonable and thoughtful.

Sincerely,

Kathi Littmann  
President & CEO  
Greater Tacoma Community Foundation



# Pierce County

## Office of the County Executive

930 Tacoma Avenue South, Room 737  
Tacoma, Washington 98402-2100

(253) 798-7477 • FAX (253) 798-6628  
www.piercecountywa.org

**BRUCE F. DAMMEIER**

Executive  
(253) 798-7477  
Bruce.Dammeier@co.pierce.wa.us

**CONNIE LADENBURG**

County Council  
(253) 798-7590  
Connie.Ladenburg@co.pierce.wa.us

February 26, 2018

Michael Mirra, Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael:

We appreciate the invitation to hear the presentation on the funding situation the Tacoma Housing Authority is facing. It was a comprehensive and fact-filled overview of Tacoma Housing Authority's upcoming decision regarding the inequity between the value of rental vouchers and the rising numbers of people needing housing assistance. We appreciate your commitment to including community voice and input.

As the presentation pointed out, the choices are difficult. THA can reduce the value of the rent subsidy further, they can redirect voucher to higher income households who cost less to serve, they can redirect money from other programs to pay for rental assistance (reduce development projects, supportive services, and education efforts), or they can maintain rental subsidy levels but serve fewer households. All of these will result in harm to those in need and undoubtedly will result in more families moving into homelessness.

This is a difficult decision for all involved. There is much need in our community and limited resources. We appreciate that THA is attempting to make a decision that best serves our community. We support the proposal to pursue a 95% utilization rate for the purposes of devising a balanced budget as reasonable and thoughtful.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Dammeier".

Bruce F. Dammeier,  
Pierce County Executive

A handwritten signature in blue ink, appearing to read "Connie Ladenburg".

Connie Ladenburg, Council Member  
Chair of Select Committee on Human Services



*Connecting people and fostering independence through innovative and affordable housing, because everyone needs a place to call home.*

February 12, 2018

Michael Mirra, Executive Director  
Tacoma Housing Authority  
902 South 'L' Street  
Tacoma, WA 98405

Dear Michael:

Thank you, to you and your team, for the detailed presentation at the Tacoma/Pierce County Affordable Housing Consortium's Board meeting on January 25<sup>th</sup>, 2018. The materials you provided were comprehensive, inclusive and presented in a manner that allowed us to fully comprehend what the Tacoma Housing Authority has been accomplishing, the current environment of the rental and housing market, and the challenges facing your organization. The Tacoma Housing Authority staff members who worked on gathering the extensive data and statistics for this packet should be commended for their hard work and attention to detail.

Michael, thank you for patiently taking us through the data and the scenarios facing the Tacoma Housing Authority and for providing clarification for any questions that were asked. As a small nonprofit serving low-income clients experiencing homelessness in Tacoma and Greater Pierce County, all of us at Shared Housing Services recognizes an increasing inequity between median household income and current rental prices. Adding in historically low inventories of available rental units only compounds the situation of the shrinking availability of affordable housing in our area.

This letter is to show support for the Tacoma Housing Authority's proposal to adopt a 95% utilization rate as a plan towards attaining a balanced budget. We feel the other avenues discussed at the meeting such as redirecting dollars from other programs and resources is unwise and unsustainable and will only weaken the Tacoma Housing Authority's ability to serve community members needing affordable housing in the future. We also support continuing the current 5-year time limit for workable households as well as for transitioning workable households currently receiving Section 8 vouchers to the Housing Opportunity Program's fixed-subsidy with a 5-year time limit.

Please let your Board of Commissioners know our deep level of appreciation for the commitment, innovation, and inclusiveness of community partners by the Tacoma Housing Authority in this process as well as in the organization's service to low-income households in our community.

Sincerely,

A handwritten signature in black ink that reads 'Mark Merrill'.

Mark Merrill  
Executive Director



Michael Mirra  
Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael:

Your February 14 presentation at the Greater Tacoma Community Foundation struck feels all too familiar. Rising rents and stagnant wages is the key challenge for our team at Sound Outreach, but framed in terms of flat funding from HUD for THA clients puts it into perspective in terms of scale, and how it affects our low income neighbors.

Sound Outreach provides high-quality financial counseling, employment coaching to high-wage employment pathways. We maintain a strong partnership with a CDFI credit union to connect our program participants to beneficial financial products that make it less expensive to be poor. We see our efforts to align well with housing support, and as such are proud to be strengthening our partnership with THA. We are working closely to help recipients of its rental assistance identify career pathways and find employment so that they are ready when their assistance ends after 5 years.

I really appreciate the effort THA is taking to consult widely in the community and to seek advice on the choices it faces. The scope of your consultation was evident in the meeting. Present were the Tacoma Mayor, the Pierce County Executive, a Pierce County Councilmember, senior directors and managers of the area's major service providers, philanthropic organizations, educational institutions, and other leading voices. We also appreciate the close study THA has made of the many factors in this complicated situation and your willingness to open up and share your approach and thinking. It was illuminating to sit with you and Aley personally to go through the challenges you are facing.

Of the choices that we understand THA faces we support the following:

1. THA should plan on serving 95% of its baseline number of households. We do not favor redirecting dollars from other vital purposes to try and increase this number. As we see it, any increase from such a redirection would only be temporary until the rising rental market overwhelmed it. Such a temporary increase is not worth weakening THA's other services or capacities. We think this 95% target is a reasonable acknowledgement of your basic problem: THA cannot serve the same number of families at increasing cost with flat funding.
2. We think the next question is how THA can maintain even the 95% utilization level. To allow for this THA should continue with its fixed subsidy for HOP participants and should transition the legacy Section 8 Voucher population to fixed subsidies. We support this for two main reasons. First, the flat subsidy is a lower subsidy and will allow THA to serve more families. This seems a necessary step if THA is to have a plausible chance to maintain the 95% utilization level. Second, we favor the fixed

subsidy because it provides an incentive to a family to increase its earned income. It does this by removing the disincentive built into the income based subsidy of the regular Section 8 program.

At the same time, we ask THA to carefully consider keeping elderly and disabled persons on the income based subsidy or at least a fixed subsidy level that recognizes that they will not be able to increase their earned income.

3. We support THA enforcing its current 5-year time limit for work-able households. This time limit gives those households another incentive to increase their earned income. It also gives other households a turn at receiving the assistance. For the same reason, we support transitioning the work-able households on the legacy Section 8 program to the 5-year time limit. Sound Outreach is ready to assist with employment coaching and Financial Counseling to help as many of these clients to be able to succeed beyond the life-span of their vouchers.

It is clear THA enjoys widespread community support. It has a track record of innovative approaches to disrupting poverty and must maintain funding for these approaches. It is lean and effective in its use of limited resources and there is pretty clearly nowhere else to cut. We have confidence in its expertise and values, and desire that THA always serve the client demographic that aligns with your mission.

These are difficult choices facing the THA Board. Please let your Commissioners know that THA has a strong partner in Sound Outreach, and that we are committed to seeing your clients grow their financial assets to move from stability to prosperity.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Klein", with a long horizontal flourish extending to the right.

Jeff Klein, Executive Director



TACOMA / PIERCE COUNTY  
**AFFORDABLE  
HOUSING  
CONSORTIUM**

621 Tacoma Ave. S. #313  
Tacoma, WA 98402  
253-627-0949

January 30, 2018

mmirra@tacomahousing.org

Michael Mirra  
Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

RE: THA's Budget and Policy Choices

Dear Michael:

Thank you for your presentation on January 25<sup>th</sup> to the Board of the Tacoma-Pierce County Affordable Housing Consortium. We understand the difficult choices that THA faces in trying to manage Tacoma's increasing rental market with flat funding. We also understand that the situation and the available choices challenge THA to find a reasonable balance among competing interests and values.

I write to express the Board's preference and support for some of the choices you explained. In stating our preferences, we also wish to express our confidence in THA and its Board of Commissioners. We are confident that you know this community well. We appreciate your focus on the needs of not only the people you serve but the needs of the much greater number you are not able to serve. Consortium members see those people every day in our own work. We are also confident in the competence and efficiency of your administration. But most importantly, we are confident in THA's commitment to its social justice mission.

With that confidence, we favor the following approaches for THA:

- We favor THA's adoption of a 95% utilization rate. We do not support trying to serve more families by further lowering the value of your rental subsidy, redirecting your assistance to higher income families, or redirecting dollars from your other valuable programs. We also have confidence that THA is prudent and efficient in its administration.
- We support THA continuing with its fixed subsidy of its Housing Opportunity Program but only for work-able households. We favor the fixed subsidy because, while it offers a somewhat lower subsidy, doing this allows THA to serve more families. We think of this as spreading the limited dollars more widely while still providing a valuable rental assistance. We also like how a fixed subsidy removes the disincentive to work. We do favor switching elderly and disabled households back to the income based rent because those households cannot work.

- We support THA's continuing with its 5 year time limits for work-able households. We recognize that most households may not be ready to return to the unsubsidized rental market. But a 5-year time limit serves the two purposes THA sought to serve when it instituted them: The 5-year limit gives these families an incentive to increase their earned income. The main value, however, that we see in a 5-year time limit is that it gives other families a turn to receive your assistance. That is only fair.

- We ask THA to examine how it can provide more effective supportive services to these families to help them increase their earned income. You may wish to require them to engage in such services.

- We also favor THA shifting the households on the old Section 8 Voucher program to your HOP program. The main value for doing this is that it will increase the number of families THA can serve.

We understand that these choices are difficult. We very much appreciate that you would share the burden of the choice with us by asking for our advice. If you need further help explaining your choices to HUD or to others, please call on us.

Respectfully,

TACOMA PIERCE COUNTY AFFORDABLE HOUSING  
CONSORTIUM



LUA PRITCHARD  
Board Chair

# The Bamford Foundation

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February 21, 2018

Attn: Michael Mirra, Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael,

Thank you for sharing with community members the situation that Tacoma Housing Authority is facing that requires you to make a difficult decision regarding the inequity between the value of rental housing vouchers and the rising number of people needing rental assistance. A number of systemic issues are contributing to an environment that negatively impacts a great number of people living in our city, and we appreciate THA reaching out to the larger community to seek input on a decision that THA is taking very seriously.

On behalf of the Bamford Foundation, a family foundation who lends support to local organizations – including Tacoma Housing Authority education programs - and initiatives who use the power of education to help individuals and families transform their lives and contribute to the quality of life in Tacoma, I am writing to offer our support to Tacoma Housing Authority in making the decision they feel best serves the needs of our community, knowing that they are truly dedicated to supporting individuals, families and communities impacted by poverty in our city. The proposed option to pursue a 95% utilization rate in order to maintain a balanced budget for the organization is reasonable and is based on thoughtful planning.

It is our hope that despite the very challenging conditions of our current housing and rental market, that Tacoma Housing Authority and all of its community partners can continue to build support for sustainable and effective change and access to high quality housing, education and living wage employment for people and families in our community.

Thank you,

Holly Bamford Hunt  
Bamford Foundation

*The purpose of the Bamford Foundation is to improve the quality of life of individuals and to strengthen their communities, primarily in Tacoma, Washington and the South Puget Sound area of the Pacific Northwest.*

**P.O. Box 2274, Tacoma WA 98401-2274 253-620-4743 [info@bamfordfoundation.org](mailto:info@bamfordfoundation.org)**



1501 Pacific Avenue  
Suite 400  
Tacoma, WA 98402

(253) 272-4263  
[www.uwpc.org](http://www.uwpc.org)  
Dial 2-1-1 for help

February 23, 2018  
Michael Mirra  
Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael:

Thank you for providing a comprehensive overview of the Tacoma Housing Authority's upcoming decision regarding inequity between the value of rental vouchers and the rising number of people that need housing assistance. It helped me and every one present to better understand the difficult choices that the Tacoma Housing Authority (THA) faces.

United Way of Pierce County's focus is on efforts to lift more families out of poverty and move to financial stability. We know that a home is the foundation of financial stability, but the cost of renting is a financial burden to so many households. Especially, ALICE households. ALICE stands for Asset Limited, Income Constrained, Employed. These families are getting up every day and working one or two jobs and still can't make ends meet. In Pierce County, 36% of the 302,000 households are ALICE.

At THA, I know that you and your team are doing everything to provide families housing and other supportive services they need. I also know how tough it is to make decisions that, at the end of the day, may negatively impact some families in our community.

That said, United Way of Pierce County supports THA making the decision that best serves our community. We understand the challenges facing THA are complex and we support your proposal to pursue 95 percent utilization rate in order to balance your budget.

Sincerely,

Dona Ponepinto  
President and CEO



RECEIVED

February 22, 2018

FEB 26 2018

Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405  
[www.tacomahousing.org](http://www.tacomahousing.org)

Michael Mirra  
Executive Director  
Tacoma Housing Authority  
902 South L Street  
Tacoma, WA 98405

Dear Michael:

Thank you for providing such a thoughtful, clear, and comprehensive overview of Tacoma Housing Authority's upcoming decision regarding the inequity between the value of rental vouchers and the rising numbers of people needing housing assistance. I think the entire audience in attendance was sympathetic to the tough choices that lie before you and your agency. We, as a community, are firmly behind your thinking and possible strategies moving forward. I wanted to document my personal support for your work in our community and ensure you that UW Tacoma will also be pleased to continue to partner with you in this important effort. We appreciate your willingness to involve the community by gathering input for these important decision points approaching.

The proposal you outlined that would pursue a 95% utilization rate for the purposes of balancing the annual budget seemed both reasonable and thoughtful.

Sincerely,

Mark A. Pagano  
Chancellor