



TACOMA HOUSING AUTHORITY

Date: August 26, 2015
To: THA Board of Commissioners
From: Michael Mirra, Executive Director
Re: Rental Assistance Demonstration Moving to Work Plan Amendment

RESOLUTION 2015-08-26 (2)

Background

This resolution would amend THA's Moving to Work (MTW) Plan to allow THA to submit it to HUD as part of the submissions HUD requires for THA's conversion of its public housing portfolio under HUD's Rental Assistance Demonstration Program (RAD).

HUD designed RAD to help address the underfunding of public housing capital needs. It does this by allowing housing authorities to trade in their public housing dollars for project based section 8 dollars. It also allows housing authorities to fix up the properties using private debt and tax credit equity. THA has applied to HUD to do this. It is presently preparing submissions to HUD of the various documents and approval HUD will require. One of those submissions must be a revised THA MTW plan.

Every year, THA submits a Moving to Work (MTW) plan to HUD detailing the agency's use of MTW flexibility and any other operational changes during the fiscal year. THA needs to amend its 2015 MTW Plan to include the required RAD information. THA has expedited the submission of this amendment to comply with an approaching deadline imposed by the RAD office, which requires the agency to submit all documents associated with the RAD property financing plans by September 18th. This MTW Plan amendment is one piece of that submission.

MTW Plan Amendment

This amendment to THA's 2015 MTW Plan states that upon conversion to Project Based Vouchers the agency will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. Furthermore, the amendment addresses THA's planned use of Capital Funds, Replacement Housing Factor Funds, and Operating Reserves to support the RAD Conversion. The amendment also details the MTW flexibilities the agency will use in the RAD Project Based Voucher (PBV) units.

In general, this amendment certifies that RAD households will have some different rights than THA's current project-based voucher households. These rights include:

- The right to receive a tenant based voucher after one year of occupancy in a RAD unit (often referred to as "an exit voucher");

- The right to an expanded grievance procedures that are more similar to Public Housing rights than Project-Based Voucher rights;
- The right to remain in the RAD unit regardless of changes in financing;
- The ability to return to the RAD unit if relocation is necessary for rehabilitation; and
- The right to full relocation benefits for temporary and short term relocation.

The amendment does not preclude THA from using its MTW authority to modify rent calculation, calculation of Family Self-Sufficiency (FSS) escrow accounts, or to waive the HUD Earned Income Disallowance (EID) calculation. For example, the amendment does not restrict THA’s ability to provide a HOP voucher as the exit voucher.

The draft amendment and associated attachment can be found on THA’s website at: <http://www.tacomahousing.net/content/moving-work-0> and selecting the links titled “2015 Moving to Work Plan – RAD Attachment” and “2015 Moving to Work Plan – Attachment 1.”

Public Comments

Notice of public comment and draft revisions to THA’s Moving to Work plan were posted on THA’s website on July 24th for the HUD required 30-day public comment period. Program participants and any interested parties were invited to learn more about the RAD amendment and to submit feedback on the changes during a public hearing on August 10th. Zak de Gorgue and Sheryl Stansell facilitated the public hearing and received the following comments/questions.

Table 1: Public Comments Received August 10, 2015

Source of Comment	Question/Comment	THA Response
Public Housing Resident	Will we have more inspections moving forward with RAD?	There will be special inspections while we prepare to convert to RAD but there will be the same amount after we convert.
Public Housing Resident	Will THA still be the manager?	Yes, THA will still be the manager, just like at Salishan and Bay Terrace.
Public Housing Resident	Will THA have more of a presence on site?	There have been some staff departures in the Senior/Disabled portfolio, so we hope to have more of a presence there in the future.
Public Housing Resident	Will this impact the resident meetings such as S.A.F.E?	No. RAD will not impact resident’s right to organize and participate in groups.
Public Housing Resident	Will RAD separate seniors and disabled populations?	No. THA is looking into exploring this in the future, though.

Recommendation

Approve Resolution 2015-08-26 (2) authorizing THA’s Executive Director to submit an Amendment to the Housing Authority of the City of Tacoma’s Fiscal Year 2015 Moving to Work Plan.



TACOMA HOUSING AUTHORITY

RESOLUTION 2015-08-26 (2)

Rental Assistance Demonstration Moving to Work Plan Amendment

WHEREAS, HUD requires THA to amend its Moving to Work (MTW) Plan to include provisions that HUD requires as part of THA's conversion of its public housing portfolio to project based section 8 units under HUD's Rental Assistance Demonstration (RAD) program;

WHEREAS, THA's Board of Commissioners must approve changes to the MTW Plan;

Resolved by the Board of Commissioners of the Housing Authority of the City Of Tacoma, Washington, that:

Authorizes THA to submit and seek HUD approval of an amendment to its 2015 Moving to Work plan as described in the accompanying memo.

Approved: August 26, 2015


Stanley Rumbaugh, Chair