



TACOMA HOUSING AUTHORITY

RESOLUTION 2013-9-25 (1)

DATE: September 25, 2013
TO: Board of Commissioners
FROM: Michael Mirra, Executive Director
RE: Approval of THA's 2014 Moving to Work Plan

Background:

This resolution would approve the submission to HUD for THA's Moving to Work plan for 2014. It proposes activities that will be familiar to the board from previous discussions and approvals. Some were included in the 2013 MTW plan and need HUD approval of some further details. These proposals were also the subject of the Board's study session on September 13th and a memo to the board of September 13th. I attach a copy of that memo. This resolution would allow me to submit the proposals for HUD's approval. Because this separate approval is necessary for HUD purposes, we must use HUD's form for this resolution. That is why the format of the resolution appears as it does.

MTW activities are intended to meet the statutory goals of the MTW program:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

The attached September 13th memo to the board describes the five (5) proposed activities in more detail. It also described the robust community and staff consultation process that has led to this proposal. Here are the highlights of the proposal.

1. Amend the Housing Opportunity Program (HOP) to allow THA to:
 - house HOP applicants in nontraditional units (shared housing and or in units owned by relatives)
 - end the participation of a household if they reach 80% AMI or higher

- change forms as needed (policy approved authorization needs to be included)
 - change the rule on port outs (policy approved authorization needs to be included)
 - change the duration of Housing Opportunity Program Payment (HOPP) contract
 - streamline the re-exam process
2. Create a security deposit program to assist THA applicants and program participants.
 3. Create a Local Asset Building Activity that will allow THA to pay cash contributions to students in the Scholars Incentive Program.
 4. Work with the Tacoma Community College to create a special voucher program to house homeless students.
 5. THA would no longer include excess student aid in the rent calculations.

The draft plan can be found at this link: [THA Draft 2014 MTW Plan](#)

Community and Staff Consultation

THA has spent much of the year planning for and preparing the annual 2014 Moving to Work (MTW) plan. During the planning process, THA consulted widely:

- Meeting with Northwest Justice on August 1st.
- Meeting with the landlord advisory committee on August 8th.
- Meeting with the Tacoma Community College on multiple occasions.
- Direct mailings to all THA residents about the plan and the public hearings.
- Public hearings at all senior/disabled sites on August 19, 20, and 21st.
- Public hearings for residents and all interested parties on August 26th.
- Public hearings for residents and all interested parties on August 27th.
- Met with SAFE president on July 31st.
- Spoke with Tacoma area Coalition on the Homeless at the September meeting

Feedback from staff, program participants, and advocates has been mostly supportive of the five proposed activities. A full list of public comments is included in the draft plan on THA's website and in the attached September 13th memo to the board.

Recommendation

Approve Resolution 2013-9-25 (1) authorizing the Executive Director to submit the Housing Authority of the City of Tacoma's Fiscal Year 2014 Moving to Work (MTW) Plan.

RESOLUTION 2013-09-25 (1)

Annual Moving to Work Plan Certifications of Compliance

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan Amendment

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan Amendment for the PHA fiscal year beginning 1/1/2014, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan Amendment;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.

13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of Tacoma
PHA Name

WA005
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Areg Mowat
Name of Authorized Official

Chair
Title



TACOMA HOUSING AUTHORITY

To: THA Board of Commissioners
From: April Black, Director of Real Estate Management and Housing Services
Date: September 13, 2013
Re: Proposed Moving to Work Plan 2014

THA has been preparing the annual 2014 Moving to Work (MTW) plan. During the planning process, there has been a wide range of community and staff input. THA reached out to staff on several occasions and conducted staff brainstorming sessions to gather ideas for activities. After those meetings, five activities were agreed upon. After receiving approval from the cabinet to go through the public hearing process, THA has taken the following actions to receive feedback:

- Meeting with Northwest Justice Project on August 1st 2013.
- Met with the landlord advisory committee on August 8th 2013.
- Meeting with the Tacoma Community College on multiple occasions.
- Direct mailings to all THA residents informing them of the plan and the public hearings.
- Public Hearing at all senior/disabled sites on August 19, 20, and 21st of 2013.
- Public Hearings for current residents and all interested parties on August 26th 2013.
- Public Hearings for current residents and all interested parties on August 27^h 2013.
- Met with SAFE president on July 31st 2013.
- Spoke with Tacoma area Coalition on the Homeless at the September meeting.

Attached is a summary of the feedback we received. It was positive with the exception of one proposed activity, which we have withdrawn as a result of the concerns about it from Northwest Justice Project. THA proposed a local affordable housing rent formula for the new Hillside Terrace development. It would have used the tax credit ceiling rents that the Washington State Housing Finance Commission uses. These are set as a percentage of the community's median income without regard to the family's actual income. (E.g, rent would be 30% of the monthly income a family would have whose income was at 50% of Tacoma's Area Median Income. A family would pay this even if its income was at 25% of the Area Median Income.) While those rents would still be affordable in comparison with the market, they exceed what a household would pay underneath an income based program. Northwest Justice Project was concerned because it would make it difficult for extremely low income families to lease up in those units. THA is also going through the process of applying for the Rental Assistance Demonstration (RAD) program. Because of the requirements involved in the RAD application, there is not enough time to focus on the creation of a new rent structure. Once the RAD process is finished, THA will reevaluate the concept of a new affordable housing rent structure. THA will continue to engage its partners and Northwest Justice in this conversation.

ACTIVITIES FOR THE 2014 PLAN

Based on the outcome of public hearings and stakeholder meeting, THA proposes that the following activities be included in the final 2014 MTW Plan.

1. Re-propose the Housing Opportunity Program (HOP) activity:

This activity was approved in the 2013 MTW plan. After receiving MTW approval, THA wrote a new chapter for the Administrative Plan and went through the public process to have those policy details included. THA is re-proposing this activity because several MTW authorizations need to be included in the activity. The authorizations would allow THA to:

- House HOP applicants in nontraditional units (shared housing and or in units owned by relatives). Currently, voucher holders may not lease up in units owned by relatives.
- End the participation of a household if they reach 80% AMI or higher. Currently a household may stay on the program until their income based rent reaches the point where they are paying the full rent.
- Change forms as needed (policy approved authorization needs to be included)
- Change the rule on port outs (policy approved authorization needs to be included). The standard HUD rule allows households to port out.
- Change the duration of Housing Opportunity Program Payment (HOPP) contract. THA will allow for longer HOPP contracts so households have longer to look if needed. Currently there is a 90 day limit with the chance of one extension.
- Change the Re-exam process-streamline it for administrative efficiency. Currently THA verifies all income sources and asks for a lot of personal information. The HOP program rules make it unnecessary to ask for all of this information. THA believes we can reduce the time and money spent on the process by over 50%.

2. Create a local security deposit program:

The program would be for approved THA applicants and program participants. THA would not require the security deposit to be paid back however; THA would pay no more than 50% of any applicant or participants total security deposit. The activity would meet two important goals:

- Ensure that approved applicants in need of affordable housing are not turned away because they cannot come up with the security deposit.
- Help cut back on the number of unit turn downs THA receives because a client cannot come up with the security deposit.
- The program would be open for Public Housing and voucher applicants and residents. THA would initially contribute \$20,000 to the program.

3. Exclude excess financial aid income from students in the rent calculation process:

To further encourage self-sufficiency among participants and streamline administrative processes, THA proposes to modify the administration of the full-time student deduction by excluding 100 percent of a student's financial aid. This activity would encourage students to go to college or finish college without worrying about excess student aid being counted in their income calculations.

COMMENTS FROM COMMUNITY PARTNERS

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
SAFE	7/31/13	RAD	What will this do to seniors?	At this point, THA does not foresee the proposed RAD changes affecting rents for the properties. We do not see any major rule changes. THA will come back to all properties/resident with more details in the near future.
SAFE	7/31/13	Local Asset Building	No questions	
SAFE	7/31/13	Learn to Succeed	No questions	
SAFE	7/31/13	Security Deposit Activity	Would this be for seniors too?	If approved and implemented, it would be available for seniors.
SAFE	7/31/13	Ignore student financial aid	This will be good for the younger students. They will be motivated to finish school.	THA also believes the activity will be good for any student regardless of age.
SAFE	7/31/13	HOP	Can someone rent from relatives	Right now only with an approved RA. We would offer this up to more people if approved. However; THA would not grant this without a manager examining the situation first.

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
SAFE	7/31/13	HOP	Why do you have to designate someone senior?	There are rules about what ages is considered senior in HUD programs. THA is changing the age from 62 to 57 for the HOP program because of the 5 year time limit.
SAFE	7/31/13	Alternative Rent Structure at former Hillside	How much would someone need to make to rent the unit?	Everyone would need to income qualify 80% AMI or below.
Northwest Justice Legal Advocates NWJ	8/1/13	RAD	What type of subsidy will households get for an exit voucher?	At this point, THA would offer a HOP voucher.
NWJ	8/1/13	Match student asset building	Where does the money go? Make sure there are checks for fraud.	The money will go into a savings account. THA will look into every aspect of the savings accounts to prevent fraud.
NWJ	8/1/13	Learn to Succeed	Who will choose the students and when would it start.	-Will start in January, -TCC will choose the students.
NWJ	8/1/13	Learn to Succeed	This is a good program.	THA is excited about this program.
NWJ	8/1/13	HOP	How does it change the term limit?	The time limit has not changed.
NWJ	8/1/13	HOP	Leases need to be at least a year to provide security (Bremerton HA).	More landlords may participate with shorter terms. THA is not going to actively push short leases but use them in the cases where they could help a client find a unit.

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
NWJ	8/1/13	HOP	Is shared housing part of the equation? Will it help them get leased up? Possibility of fraud?	THA already has some shared housing. THA will monitor the program for any fraud.
NWJ	8/1/13	Alternative Rent Structure at Former Hillside Terrace	Concerning the >50% AMI bracket, why are we moving away from helping people with greater need?	THA has taken this activity off the table for the plan year.
NWJ	8/1/13	Alternative Rent Structure at Former Hillside Terrace	We do not agree with this rent structure. Where will the extremely poor live if THA keeps cutting subsidy.	THA has taken this activity off of the table.
Landlord Advisory Committee(LAC)	8/8/13	HOP	How do you justify forcing someone out because of increasing family size?	THA will still subsidize a family but only at the size of initial determination.
LAC	8/8/13	Non MTW	HQS is inspected by city code levels. It's making landlords consider leaving the program.	THA needs to inspect to city levels because of code enforcement. If THA does not inspect to city levels, it risks passing a unit only to have the city come in and fail it later.
LAC	8/8/13	Non MTW	Inspections are going beyond HQS requirements.	Section 8 managers will meet with committee.
LAC	8/8/13	Non MTW	Landlords were not given notice about tenant rent change.	We can copy landlords on anything regarding the lease or review issues.

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
LAC	8/8/13	Rent Reform	There are more minimum rent households than necessary, and the programs are not appealing.	THA has increased the minimum rents over the last three years. There is a hardship program but very few families have used it.
LAC	8/8/13	Scholar incentive program (local asset building) (LAC)	Is the scholar incentive program open for everyone?	We can open up scholarship information to landlords.
LAC	8/8/13	Security Deposit Activity	Security deposits should be allowed for Section 8, THA should keep it fair across the two programs.	THA will open up security deposits for all programs
LAC	8/8/13	HOP	Landlords should not be subjected to stricter policies than public housing.	THA is looking at changes that will work best in all of its housing programs. While some of the policies have differed between programs, the lease up rates have been good for the HOP program and there have been no landlord complaints outside of the LAC.
Resident G Street	8/20	N/A	<i>I thought this was about working? I need a job.</i>	We gave this resident information about our services department
Resident G Street	8/20	Security Deposit	I am happy we can get help with security deposits.	THA would implement this in 2014 if approved.
Resident G Street	8/20	RAD	Will we get a HOP voucher right away?	Vouchers would be issued by availability and date requested.
Resident K Street	8/19/13	N/A	The front side of the building is too hot.	I directed the resident to the property manager

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
Resident K Street	8-19-13	Asset Building	I am happy you are working with the Gates foundation.	THA is happy about the partnership
Resident K Street	8-19-13	RAD	I would not want a HOP voucher. Public housing is a better program	THA would not force you to move out of your unit with a RAD conversion. The HOP voucher would be an option.
Resident- K Street	8-19-13	RAD	When is RAD going to happen?	THA is going to put the application in to HUD in October.
Resident-K Street	8-19-13	RAD	Is our rent going to go up?	The rent would not increase with the RAD conversion.
Resident- 6 th Ave	8-19-13	Security Deposit	<i>Will you pay for our utilities?</i>	No, THA would pay for the costs of the deposit of utilities being turned on.
Resident -6 th Ave	9-19-13	RAD	I am excited if THA will improve the building	THA is going through a process to determine what upgrades need to happen within our portfolio.
Resident- Fawcett	8-20-13	HOP	I never heard of a HOP program. Is it going to affect me?	Because you are in public housing, the HOP program rules do not apply to you. If you apply and join the HOP program at any time, the program rules would apply to you.

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
Resident Fawcett	8/20/13	HOP	Are there any other housing authorities doing HOP?	No. Because THA is in a demonstration program, we have the authority to try new ideas. This is a new program that only THA is running right now. There are a few similar programs in the U.S. but not many.
Resident Fawcett	8/20/13	HOP/RAD	If I get a HOP voucher through RAD, can I port it out.	Not unless you have a reasonable accommodation or there is a DV situation.
Resident Fawcett	8/20/13	RAD	If THA gets RAD, when can I get a HOP voucher? Is the one year retroactive? I have lived here for seven years.	HOP vouchers would be available depending on funding and attrition rates. The mobility option would not be retroactive and you would need to be in your unit for one year after THA received approval before requesting to be put on the HOP waitlist.
Resident M Street	8/20/13	MTW	I thought this meeting was about helping me get a job. This has nothing to do with that. This is boring policy mumbo jumbo.	THA apologizes for any misunderstanding when we hold Moving to Work public meetings and hearings. THA directed this tenant to our services department.
Resident M Street	8/20/13	Security Deposit	Can I get a security deposit if I move out of here?	If you are moving to a THA property or using the voucher program, you may qualify.

SOURCE OF COMMENT	DATE	2014 MTW Activity	Question/Comment	Our Response
Resident M Street	8/20/13	RAD	Would I get a HOP voucher right away?	No, you would need to stay in the unit one year after RAD conversion and then ask to be put on the waitlist. Your name would go towards the top depending on who else asked to be put on the waitlist and when they did so.
Phone Call from Resident	8/21/13	Rent Reform	I received your newsletter, do I get annual reviews anymore?	This client was informed we will only review her every three years.
Phone call from resident- 6 th Ave	8/21/13	RAD	I would like to get on the HOP waitlist now.	We need to have RAD approved first. If RAD is approved, then you can request to have your name on the HOP waitlist. You must stay in your unit for at least one year.