## **RESOLUTION 2022-04-27 (3)**

Date:

April 27, 2022

To:

THA Board of Commissioners

From:

April Black

**Executive Director** 

Re:

Approval of Revision to THA's Administrative Plan: Local Preferences

This resolution would authorize Tacoma Housing Authority (THA) to update its Administrative Plan to receive referrals from Pierce County's Coordinated Entry system to fill vacant units set aside for homeless families within THA's portfolio.

### **Background**

On January 24, 2022, THA issues a Request for Proposals (RFP) for up to 25 project-based vouchers. THA received one response to the RFP. The proposal was scored based on:

Across its Portfolio THA has 102 units that must be filled by homeless families. These units are set aside for households with incomes ranging from 30-60% of AMI. 62 units are set aside for specific populations and are filled through THA's partners (Arlington & The Rise). For the remaining 40 units, THA queries its waitlist for families that meet the unit eligibility criteria. Because THA's waitlist is long, and homelessness status changes, the process of trying to fill units can result in providing false hope for families who end up ineligible. The leasing team especially struggles to identify larger families who meet the 30% AMI requirement.

In the past, THA filled these units by taking referrals from the Families In Transition program. THA's Administrative Plan details a waitlist preference to do so. This program no longer exists. Considering these units that are intended to serve people experiencing homelessness and HUD's support of PHAs developing homeless set-aside policies (Notice PIH 2013-HA), our aim is to revise current procedures so THA can be more efficiently connected with households experiencing homelessness in real-time.

Property Management, Client Support and Empowerment and Rental Assistance recommend reinstating our waitlist preference policy for families in the County's Coordinated Entry System. Providing a preference for these families would provide another avenue for THA to serve homeless families with more immediacy. We also understand that serving vulnerable households referred through CE may mean additional services are needed to stabilize the household, so our proposal aims to solidify partnerships with service providers.



# Recommendation

Approve Resolution 2022-04-27 (3) authorizing revisions to THA's Administrative Plan (Chapter 4 section III.C.) to create a waitlist preference policy for families in Pierce County's Coordinated Entry System.

# RESOLUTION 2022-04-27 (3) (Approval of Revision to THA's Administrative Plan: Local Preferences)

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

WHEREAS, the Administrative Plan relates to the administration of THA's voucher programs 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, THA seeks to fill units set aside for homeless households in its portfolio with referrals from Pierce County's Coordinated Entry System; and

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

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

THA's Executive Director is authorized to revise THA's Administrative Plan adding the following chapter for the administration of the local preferences:

#### 4-III.C. SELECTION METHOD

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

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

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

#### THA Policy

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

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

Emergency Transfer Reasonable Accommodation Over-housed Under-housed

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

When conducting a waitlist pull to fill units that are set-aside for specific populations (such as homeless families, families with children, senior and/or disabled families etc.) THA may contact each family to determine if they qualify for the unit based on their household composition prior to conducting a waitlist pull. If the family does not meet the specified set aside for the vacant unit or does not respond within 10 business days, THA may skip over the family. This process prevents THA from selecting applicants from the waitlist who are not eligible for the available unit(s).

THA will provide a special programs preference. This preference is given to applicants who have been approved to participate in a program for which THA has received a special allocation of vouchers.

When the waitlist is suspended or closed, applications from households who are being referred for these targeted or special assistance programs will continue to be accepted and placed on the waitlist. **This includes filling units that are set-aside for specific populations.** These applications will be processed in the order the referral was received from the partner agencies.

These targeted or special assistance programs are as follows:

#### **Veterans Administration – Supportive Housing (VASH)**

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

#### Youth & Family Special Programs

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

#### **College Housing Assistance Program**

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

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

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

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

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

determined by agency need.

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

# 3) Applicants referred by:

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

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

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

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

Approved: April 27, 2022