

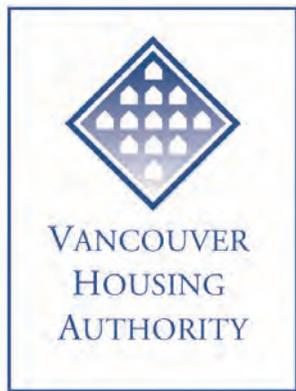


2009 Moving to Work Annual Plan

Amended August 28, 2009

VANCOUVER HOUSING AUTHORITY





MOVING TO WORK

ANNUAL PLAN

FISCAL YEAR 2009

Amended August 28, 2009

VANCOUVER HOUSING AUTHORITY

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VHA 2009 MOVING TO WORK ANNUAL PLAN

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VANCOUVER HOUSING AUTHORITY

FISCAL YEAR 2009 MOVING TO WORK ANNUAL PLAN

SECTION I. OVERVIEW OF VHA'S MOVING TO WORK GOALS AND OBJECTIVES

The Vancouver Housing Authority (VHA) is located in Clark County, Washington. Clark County has been one of the fastest growing counties in the nation during the past decade. The VHA is the only housing authority in the county and serves the unincorporated areas and small cities through intergovernmental cooperation agreements. Since 1990 the population of Clark County has increased by almost 80%. In that same time period, poverty in Clark County increased by 53.4%. Today, over 41,000 residents, more than 10% of the population, lives below the poverty line in Clark County. We have grown at a time when federal resources have diminished, resulting in long waiting lists for public housing and housing choice vouchers. We know that a place to call home is important to each of us. It is where a child goes after school, where a job holder goes after work, where an elderly person feels secure, and where a disabled person finds dignity. The VHA's challenge is to serve an increasing population with limited resources. To that end, we strive to make efficient and effective use of federal housing programs and to look for other public and private resources that can be invested in meeting the goal of providing decent, affordable housing for everyone.

Because the VHA is located in a rapidly growing part of the country, it has developed nontraditional partnerships and revenue sources for increasing the inventory of affordable housing. The VHA is currently working on a mixed income development in a high-cost area that will include units affordable to very low-income households; a senior community development that creates 172 special-needs units, including assisted living, memory care, and independent living, and is located near services; a 9% tax credit development near transportation and services to serve

homeless/formerly homeless families; purchase of a 52-unit assisted living facility for persons with disabilities, located in an historic building; and rehabilitation and addition of units to a 260-unit property with refinancing by means of 4% Low Income Housing Tax Credits (LIHTC). Additionally, VHA is exploring development of a senior and family complex in a nearby Clark County community.

What is Moving to Work?

The Vancouver Housing Authority (VHA) recognized the Moving to Work Demonstration Program (MTW) as a valuable tool for meeting the housing needs of the Vancouver/Clark County community. The VHA is one of about 30 housing authorities across the country participating in the U.S. Department of Housing and Urban Development (HUD) MTW program. Originally authorized under the Omnibus Consolidated Rescissions and Appropriations Act of 1996, the MTW program offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The program allows certain exceptions from federal rules governing the Public Housing and Section 8 Voucher programs and in some cases offers flexibility in the funding of these programs. Each year, the VHA adopts a plan that describes activities planned for the fiscal year and at the end of each year, the VHA prepares a report describing its accomplishments.

The Vancouver Housing Authority was among the original group selected to participate in MTW in 1999 and our program has been extended four times. Most recently, HUD and VHA executed an Amended and Restated Agreement on March 26, 2008. The new Agreement has an end date of 2018.

This new Agreement will allow the VHA to plan strategically over a 10-year period, to take full advantage of the flexibility inherent in the MTW program, and to make the best use of federal resources to meet the affordable housing needs of this community.

Stakeholder Involvement

The 2009 MTW Annual Plan was published on August 4, 2008, for a 30-day public comment period. A public hearing was held on September 3, 2008. The 2009 Annual Plan was posted on the VHA's website. Copies of the Plan were available at the VHA's Administrative offices and at the RISE & STARS Community Center.

Copies of the Plan were distributed by e-mail to agencies within the Clark County Continuum of Care, the Council for the Homeless, Northwest Justice Project, Columbia Legal Services, Washington Department of Social and Health Services, Clark County, and the City of Vancouver.

Notices announcing the public hearing on the Plan and the Plan's availability for public inspection were advertised in *The Columbian*, the area newspaper, on August 2, 2008; August 5, 2008; August 28, 2008; and August 29, 2008. The public hearing was listed in the *Columbian* Public Meetings section on August 31. Notices were published in the July, August, and September issues of *Neighbor to Neighbor*, the newsletter for VHA Public Housing and Section 8 residents.

The VHA formed a Moving to Work Advisory Committee to assist in developing the 2009 MTW Annual Plan and to provide ongoing input and advice as we implement this and subsequent annual plans. For the 2009 MTW Annual Plan, the committee reviewed staff recommendations, made recommendations of their own, and in general provided advice as the plan was developed. The committee, which is broadly representative of the community, proved to be an excellent vehicle for generating discussion, analysing proposals, and offering new ideas. Committee members are listed in

Appendix C. The MTW Advisory Committee met twice before the plan was written and then again after the plan was published for public comment. A subgroup of the committee developed a small pilot rental subsidy program that is included in the plan.

The VHA's Resident Advisory Board (RAB) includes both Low Rent Public Housing and Housing Choice Voucher participants. The RAB reviewed the plan on August 14th and August 26th, at which time they voted to support the plan and indicated they wanted to review the plan again in a year. The newly formed RAB held its first meeting August 7th and is proving to be an excellent vehicle for resident involvement and advice.

The VHA Board of Commissioners took action on the 2009 MTW Annual Plan at their regularly scheduled meeting on September 24, 2008.

A summary record of public comments and VHA responses is included in Section VII.

What are the Moving to Work Statutory Goals?

- Reduce cost 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.

What is in this MTW Plan?

The Annual Plan follows an outline established in the Amended and Restated MTW Agreement:

Section I: Introduction

This section includes the Table of Contents and the Executive summary, including an overview of new and ongoing activities.

Section II: General Housing Authority Information.

This section includes housing stock information, lease-up information, waiting list information.

Section III: Long Term MTW Plan

This section includes the VHA's long term vision for the duration of the MTW Agreement.

Section IV: Proposed MTW Activities: HUD Approval Required

This section includes proposed new MTW activities.

1. Pilot rental subsidy project.
2. Income will be imputed to families who terminate TANF due to non-compliance with WorkFirst requirements.
3. Assets with declared value of less than \$5000 will not be verified.
4. Asset-based initiatives.
5. Streamline disposition.
6. Simplified development process & adopting a policy for purchasing properties without prior HUD approval.
7. Design and implement a less frequent schedule of Section 8 unit HQS inspections.
8. Investing in state-permitted instruments.
9. Simplified utility schedule.
10. Elimination of utility allowance payments
11. Replacement of Medical Expense Deduction
12. Expansion of 40% maximum share to

ongoing tenancy.

13. Three-year recertification schedule.
14. Interim recertification valid for one year.
15. Simplified required recertification process.
16. Landlords restricted to annual rent increases.
17. Renter Education of applicants.
18. Self-sufficiency pilot program.

Section V: Ongoing MTW Activities: HUD Approval Previously Granted

This section includes ongoing MTW activities.

1. Single fund budget with full flexibility.
2. Biennial recertification reviews in Public Housing and Section 8 began in 2008.
3. Asset Management.
4. Maintain security in Public Housing communities.
5. Program to promote sustainable communities and energy conservation.
6. Section 8 Homeownership.
7. Unit-to-Market rent reasonableness.
8. Project-base and agency-base of Section 8 voucher.
9. Improve computer technology.
10. Family Self-Sufficiency Program.
11. Self-sufficiency programs focused on youth and young adults.
12. Self-sufficiency programs focused on adults.

Section VI: Sources and Uses of Funding

This section includes the consolidated budget for 2009, planned sources and expenditures by development, a description of changes in sources and uses from 2008, and a description of how fungibility will be used.

Section VII: Administrative

This section will include the Board resolution and documentation of public hearing and comments received during the comment period.

VHA BOARD OF COMMISSIONERS



VHA Board of Commissioners (left to right): Art Miles, Commissioner; Ronald K. Kawamoto, Chair; Stanford E. Hosman, Commissioner; Debra Conway, Resident Commissioner; Eric D. Hovee, Vice Chair; Ceci Ryan Smith, Second Vice Chair; Roy A. Johnson, Executive Director.

SECTION II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

HOUSING STOCK INFORMATION

Number of Public Housing Units Planned

The Vancouver Housing Authority has 575 units of Low Rent Public Housing, 60 of which have been converted to assisted living and one unit that is currently offline for non-residential use, leaving 515 units in the MTW program. The public housing portfolio consists of 161 one-bedroom units, 208 two-bedroom units, 179 three-bedroom units, 23 four-bedroom units, and four five-bedroom units.

Under the new Asset Management rule, these units have been divided into four Asset Management Projects (AMPs).

General Description of Planned Significant Capital Expenditures, by Development, for Public Housing

Planned capital expenditures for 2009 (*see Table 1*)

include roofing and gutter replacement for the 59 buildings at the Skyline Crest community; roof replacement at Van Vista Plaza, a ten-story high-rise for the elderly and disabled; additional attic insulation and replacement of ducts at our multi-family units; interior upgrades to multi-family units; increased exterior lighting on several areas, as noted by our recent tenant survey as being inadequate; and the purchasing of an additional grounds pick-up truck needed as we move forward with Asset Management.

VHA has been awarded funding under the American Recovery and Reinvestment Act for major improvements to Van Vista Plaza. This includes replacement of deteriorating water pipes and a new roof. In addition VHA is applying for additional funding under the Capital Fund Recovery Competition Grants for modification of 10 units at Van Vista necessary to make them accessible for persons with disabilities.

**TABLE 1
2009 CAPITAL FUND ACTIVITIES FOR VHA UNITS
LOW RENT PUBLIC HOUSING**

Community	Planned Activities	Budget	
WA 8-1 Skyline	Roof and gutter replacement	\$400,000	
Scattered Multi-Family Sites	Weatherization	\$200,000	
Low Rent Public Housing	Development Activities	\$200,000	
Low Rent Public Housing	Needs Assessment	\$50,000	
PHA Wide	Grounds vehicle	\$25,000	
PHA Wide	Capital program administration and Community Center program	\$160,000	
Total 2009 Public Housing Capital Fund Budget		\$1,035,000	
<hr/>			
2009 American Recovery and Reinvestment Act			
Low Rent Public Housing			
WA 8-2 Van Vista Plaza	Plumbing and Roof Replacement	\$1,167,376	
<hr/>			
2009 Capital Fund Recovery Competition Grant			
Low Rent Public Housing			
WA 8-2 Van Vista Plaza	10 Unit Accessibility Modifications	\$400,000	CFRCG
		\$100,000	Local

New Public Housing Units to be Added During the Year, by Development

The VHA has committed to a one-for-one replacement of any units disposed from the public housing inventory. Depending on the schedule for disposition of the units described below, some new units may be added in 2009.

Number Of Units to be Removed From the Inventory During the Year, by Development

The VHA intends to sell 89 single-family homes which because of their scattered site locations prove to be more costly to manage. Approximately ten (10) single-family units are scheduled to be sold in 2009. VHA will also assess feasibility of a Community Land Trust (CLT). A CLT model will be implemented if it is determined that it will enhance homeownership by VHA tenants.

Number of Housing Choice Voucher (HCV) Units Authorized

The VHA is managing a portfolio of 1,898 ACC vouchers, 75 Mainstream vouchers, and as of June 2008, 305 port-ins.

Number of HCV Units to be Project-Based

The VHA will project base up to 200 vouchers. An initial environmental review is being conducted at five properties: a maximum of 25 units at Maple Knoll Apartments, two units at Anthem Park, ten units at Esther Short Commons, ten units at Plum Meadows, and three units at Orchard Glen. *(See Description of Project-Based Voucher Properties, p. 7.)* The contract for Maple Knoll will be enacted in 2008. The other contract submittals are pending. The first units to be developed in this program are designated for households who meet the criteria for two existing collaborative programs designed to serve high-needs homeless families who are participating in case management and services provided by local nonprofit agencies.

VHA also plans to offer project based vouchers for private sector units in existing high-rent developments. In order to participate in the program; owners must respond to a RFP and enter into an agreement to designate units below market rate in order to permit S8 tenancy without exceeding payment standards. VHA may also utilize Section 8 project-based vouchers at new developments, including developments constructed by VHA and by local nonprofits through an RFP process.

Non-MTW Housing Units

The VHA also has a large portfolio of units that are not part of the MTW program. These properties include 203 units of Section 8 New Construction, four homeless shelters with a total of 138 beds, 2,049 units of workforce housing, and 245 units of housing for people with special needs. The VHA also manages 327 units in 10 properties for Columbia Non-Profit Housing and their affiliates. These properties are designated to house elderly and persons with disabilities.

General Description of Other Housing Planned to be Managed by the Agency

Section 8 New Construction

The VHA has two Section 8 New Construction communities, Cougar Homes and Columbia House. Five projects, known collectively as Cougar Homes, comprise 52 three- and four-bedroom single-family homes located in Vancouver and urban Clark County; these units were built in 1979.

Cougar Homes	3-BR Units	4-BR Units
Cougar Single Family	22	5
Crown 8	4	2
El Marko	6	2
Golf View	4	2
Vista Royale	3	2

Columbia House is a high rise building for the elderly, located in downtown Vancouver. The Columbia House property consists of 151 units (143 one-bedroom and 8 two-bedroom), built in 1976.

Continued on page 8.

Description of Project-Based Voucher Properties

Maple Knoll Apartments, located at 1835 NE 104th St. Loop, is a 148 unit property consisting of two-bedroom one-bath dwelling units located in 19 buildings. The bus line is located approximately one-quarter mile from the project and a transit mall is located in the project neighborhood. The Legacy Salmon Creek Hospital offers employment opportunities and numerous retail facilities located within two miles of the project neighborhood also offer multiple employment sources. A total of 25 Section 8 project-based vouchers will be used at Maple Knoll.

Plum Meadows Apartments is located at 1919 Northwest 34th St. The property consists of 17 buildings and includes 162 units consisting of 16 studio, 36 one-bedroom one-bath, 62 two-bedroom one-bath, 16 two-bedroom two-bath and 32 three-bedroom two-bath units. The property is located directly across from the Fruit Valley Elementary School and a large Regional Park. Plum Meadows is situated in an agricultural and industrial area which provides many employment opportunities. Eight Section 8 project-based vouchers may be designated at Plum Meadows.

Esther Short Apartments is located at 555 W 8th Street. The property is a one-building complex which includes four floors of 160 units consisting of 96 one-bedroom one-bath, 61 two-bedroom one-bath and 3 three-bedroom two-bath units, which are located over ground floor commercial/retail. Esther Short Park is located directly across from the property and the weekly Farmers Market has its home on the street frontage between the apartments and the park. There are restaurants, hotels, banks, and retail establishments that provide ample shopping and employment opportunities in the vicinity of the property. The elementary and high schools are located within a one-mile radius of the property. Seven Section 8 project-based vouchers may be utilized at Esther Short.

Anthem Park Apartments is a four story complex located at 127 W 25th St. The property consists of 58 units with 46 one-bedroom one-bath, 8 two-bedroom one-bath and 4 two-bedroom two-bath units, housed in one building. The property is located on a bus line and there are many retail stores located near the property providing access to shopping and employment opportunities. The elementary school and high school are located within a one-mile radius of the property. A total of three Section 8 project-based vouchers may be utilized at Anthem Park.

Springbrook Apartments is located at 11328 NE 51st Circle. The property consists of 24 buildings which include 290 units with 46 studio, 28 one-bedroom one-bath, 50 two-bedroom one-bath, 128 two-bedroom two bath townhome, 36 three-bedroom two-bath townhome and 8 four-bedroom one-bath townhome units. The property is adjacent to the YMCA and residents enjoy the benefit of free membership during their residency at Springbrook. Springbrook is located on a bus line and is less than one mile from the elementary school. The property is in close proximity to the local mall, restaurants, SEH America, and recreational areas. Seven Section 8 project-based vouchers may be used at Springbrook.

TABLE 2**SECTION 8 NEW CONSTRUCTION CAPITAL BUDGET**

Community	Planned Activities	Budget
Columbia House	Roof replacement, renovation of kitchens, bathrooms, flooring replacement and electrical upgrades	\$500,000.00
Cougar Single Family Homes	Renovate kitchens, bathrooms, flooring replacement, roof replacement, fencing replacement and electrical upgrades	\$100,000.00
Total 2009 Section 8 New Construction Capital Budget		\$600,000.00

The Columbia House capital expenditures (see Table 2) will consist of roof replacement, bathroom and kitchen renovation, and electrical upgrades. The Cougar Homes capital expenditure will consist of bathroom and kitchen remodels with flooring, roofing, fencing, concrete replacement and electrical upgrades. The funding will come from cash flow reserves.

Shelters and Other Special Needs Housing

The VHA owns four shelters: two homeless shelters, one women's domestic violence shelter, and one youth shelter. (See Table 3.) All are operated by local nonprofit service providers.

The VHA partners with other agencies and service providers to address specific housing

TABLE 3**VHA-OWNED SHELTERS & SPECIAL NEEDS HOUSING****138 BEDS, 221 UNITS**

Arbor Ridge Assisted Living	60 units	9501 NE Hazel Dell Avenue	Assisted Living
Central Park Place (VA SRO)	124 units	1900 Ft. Vancouver Way	Transitional, located on Veterans Administration campus
Pinewood Apartments <i>In partnership with Open House Ministries</i>	25 units	1603 Kauffman Avenue	Transitional
Inn at the Orchards Family Shelter <i>In partnership with Share</i>	50 beds	5609 NE 102nd Avenue	Homeless Shelter
Valley Homestead Family Shelter <i>In partnership with Share</i>	50 beds	4921 NE Hazel Dell Avenue	Homeless Shelter
SafeChoice Domestic Violence Shelter <i>In partnership with YWCA</i>	28 beds	Confidential	Shelter
Oak Bridge Youth Shelter <i>In partnership with Janus Youth Services</i>	10 beds	Confidential	Shelter
CMI Triplex <i>In partnership with Columbia River Mental Health</i>	6 units	1203 W 39th Street	Chronic Mental Disabilities
CARE HOUSE	6 units	4502 NE 62nd Avenue	Persons with Multiple Disabilities

needs in our community. These properties include assisted living facilities, a single room occupancy program located on Veterans

Administration property, apartments for those with chronic mental disabilities, and other special needs housing. *(See Table 3.)*

Capital expenditure items include replacement of commercial water heaters. The funding will come from local reserves. *(See Table 4.)*

**TABLE 4
SHELTERS CAPITAL BUDGET**

Community Shelters	Planned Activities	Budget
	Commercial Water Heaters	\$20,000.00
Total 2009 Shelter Capital Budget:		\$20,000.00

**TABLE 5
MANAGED NONPROFIT PROPERTIES 327 units**

Walnut Grove	65 units	Vancouver	Section 202	Elderly
Highland Park	55 units	Vancouver	Section 202	Elderly
Forest Ridge	46 units	Vancouver	Section 202	Elderly
Arbor Ridge	45 units	Hazel Dell	Section 202	Elderly
Englund Manor	29 units	Vancouver	Locally Funded	Elderly
St. Helens Manor	30 units	Battle Ground	Section 202	Elderly
Crown Villa	19 units	Camas	Section 202	Elderly
Fort Vancouver Apts.	20 units	Vancouver	Section 202	Disabilities
Cascade Terrace	6 units	Vancouver	Locally Funded	Disabilities
Azalea Place	12 units	Vancouver	Section 811	Disabilities

TABLE 6
MANAGED NON-PROFITS CAPITAL BUDGET

Community	Planned Activities	Budget
St. Helen's Manor	Complete plumbing pipe replacement in the entire building	\$100,000.00
	Total 2009 Managed Non-Profit Capital Budget	\$100,000.00

Managed Nonprofits

The VHA manages 327 units of housing, in ten different properties, for Columbia Non-Profit Housing (CNPH). (See Table 5, page 9.) All of these properties are for elderly or disabled clients.

Major capital work will consist of complete plumbing replacement in the entire St. Helens

Manor building. The funding will come from reserves and grants. (See Table 6.)

TABLE 7
VHA DEVELOPMENT BOND/TAX CREDIT WORKFORCE HOUSING **2,049 UNITS**

Tax Credit Workforce Housing & Community Development		
Plum Meadows	162 units	1919 W 34th Street
Esther Short Commons	160 units	555 West 8th Street
Maple Knoll	148 units	1824 NE 104th Street Loop
Orchard Glen (includes 15 transitional)	80 units	5701 NE 102nd Avenue
Anthem Park	58 units	127 W 25th Street
Mill Creek Apartments & Senior Estates	78 units	518 NW 12th Avenue
Wisteria Manor Senior Apts.	24 units	15911 SE Mill Plain Boulevard
Non-Tax Credit Workforce Housing & Community Development		
Fisher Mill	358 units	1000 SE 160th Avenue
Springbrook Village	296 units	11328 NE 51st Street
Parklane	260 units	10223 NE Notchlog Drive
Willow Creek	148 units	8500 NE Hazel Dell Avenue
Cougar Creek	72 units	8415 NE Hazel Dell Avenue
Somerview	18 units	3100 NE 78th Avenue

Planned Mixed Finance/Special Fund Projects

VHA is planning two new developments, a 76 unit assisted living community to be built next to Van Vista public Housing and construction of 172 senior units on a vacant parcel. The Van Vista Addition will include acquisition of land adjacent to Van Vista and will be primarily

financed with Low Income Housing Tax Credits and a Capital Fund loan. The senior project will be mixed finance with Capital Fund, 4% LIHTC, and CFRCG. VHA may also use sales proceeds from Public Housing Disposition and utilize project-based Housing Choice Vouchers.

**TABLE 7A
MIXED FINANCE/SPECIAL FUND PROJECTS**

Community	Planned Activities	Budget	Sources
Van Vista Extension	Construction of 76 Assisted Living Units	\$1,300,000	Bond
		\$37,000	HOME
		\$100,000	CDBG
		\$5,920,960	LIHTC
		\$2,500,000	HTF
		\$3,000,000	PH Re-invest & CGP Loan
		\$743,504	Deferred Fees
Total Budget		\$13,601,464	
Burton Ridge Apartments	Construction of 172 Senior Units	\$17,350,000	Bond
		\$100,000	HOME
		\$63,000	CDBG
		\$2,938,501	CFRCG
		\$8,999,212	LIHTC
		\$3,100,000	Deferred Fees
		\$752,000	VHA Local
Total Budget		\$33,302,713	

Description of Other Properties Owned or Managed by the Agency.

Workforce Housing

The Workforce Housing initiative is a long-term strategy to diversify the housing authority, provide a local source of funding for more deeply

subsidized housing programs, and provide a future supply of quality affordable rental housing for our growing population. Workforce Housing is helping to revitalize communities and maintain a balance of affordable housing near jobs. The VHA owns 2,049 units of workforce housing. These properties are located throughout the urban area and are financed with

TABLE 8
NUMBER AND CHARACTERISTICS OF HOUSEHOLDS SERVED/ON WAITING LIST

	Households Currently Served		Households Currently on Waiting Lists ¹	
	Public Housing	Vouchers	Public Housing	Vouchers
Total Number of Households	489	1,963	2,504	4,550
Number of Unduplicated Households on Waitlist ²			189	4,550
Distribution by Family Type				
Family	245	610	1,370	2,456
Elderly	103	518	45	732
Disabled (Under age 62)	141	835	1,089	1,362
Distribution by Bedroom Size ³				
Studio	0	0	0	0
1 Bedroom	102	944	1,601	2,347
2 Bedroom	198	530	689	1,385
3 Bedroom	167	396	147	639
4 Bedroom	18	75	45	146
5 Bedroom	4	16	12	23
6+ Bedroom	0	2	10	10
Distribution by Income Range				
Below 30% of Median	370	1,448	2,226	3,957
Between 30% and 50% of Median	109	437	242	521
Between 50% and 80% of Median	8	74	32	65
Above 80% of Median	2	4	4	7
Distribution by Race of HOH				
White	370	1,656		
Black/African American	60	191		
American Indian/Alaska Native	12	24		
Asian	37	74		
Native Hawaiian/Other Pacific Islander	10	18		
Unknown	0	0		
Distribution by Ethnicity of HOH				
Hispanic or Latino	25	71		
Not Hispanic or Latino	464	1,892		

1. The waitlist has been closed for over three years, therefore VHA does not feel this list is a reflection of actual need in the community.

2. Households may appear on more than one waitlist. Of the 4,550 households appearing on the Section 8 waitlist, 2,315 are duplicated on the Public Housing waitlist. There are 4,739 distinct households on the two waitlists.

3. Bedroom size for Public Housing is the actual size of the unit; for the Housing Choice Voucher program it is the voucher size per subsidy standard.

tax exempt mortgage revenue bonds, tax credits, and state and local grants and loans. (See Table 7, page 10.)

LEASE-UP INFORMATION

Anticipated number of public housing units planned to be leased

VHA plans to have 514 Public Housing units under lease. This number may change, depending on disposition of units described elsewhere in the plan. VHA currently has a 95% occupancy rate in Public Housing. At present, the VHA manages lease-up from a central location. With the implementation of Asset Based Management, eligibility and lease-up will be handled at each of the four Asset Management Properties (AMPs) rather than concentrated in a central location.

Anticipated Number of HCV Planned to be Leased

VHA has 1,898 ACC HCV units and 75 Mainstream vouchers. The VHA also administers a few hundred ports at any given time. Significantly more vouchers port in than port out and all port-ins cannot be absorbed. VHA chooses to administer, rather than absorb, most vouchers that port-in. VHA administers the original voucher and bills the initiating housing authority. That is a common practice, particularly among housing authorities like the VHA that have many more vouchers porting in than porting out. Each month VHA receives twenty or more vouchers porting in. If we would choose to absorb all ports we would not be able to serve households on our wait list, all of whom have been on the list for several years.

Of the ACC vouchers, up to 5 are designated for the Home Ownership Voucher program in 2009. The VHA is also in the process of designating up to 200 units as project-based vouchers. The Vancouver Housing Authority has a consistently low turn-back rate of 3% at lease-up.

Table 8 (on page 11) provides demographic information on participants in both the public housing and voucher programs.

Description of Anticipated Issues Relating to Any Potential Difficulties in Leasing Units

Public Housing – The vacancy rate for public housing is currently at 5%, although during the past year it has, at times, been higher. Under Asset Based Management, we anticipate greater efficiency in completing eligibility and background checks for applicants, leading to an ever replenishing pool of families ready to lease-up in available units. Vacancy rates will be closely monitored by the AMP Property Managers.

Housing Choice Vouchers - As the area served by Vancouver Housing Authority feels the impact of recent changes in the mortgage finance industry, more homes that were previously for sale are placed in the rental market. While this increases the number of rentals available to voucher holders, it also increases the number of families seeking housing in the local rental market.

Over 860 landlords participate in the VHA's Section 8 Housing Choice Voucher Program and the VHA has not had difficulty maintaining a pool of qualified landlords. Some landlords, however, have a negative perception and misinformation about HCV participants, which affects their willingness to participate in the program. Some landlords have a perception of burdensome paperwork and government interference, which also affects their willingness to participate in the program. Both perceptions can limit choices for families and could create challenges, particularly if funding for the Section 8 Housing Choice Voucher program does not keep pace with increases in the private sector rental market. To counter these perceptions, VHA has formed a landlord focus group and interacts with landlords through the Clark Count Rental Association.

The current environment for rental housing in Vancouver, WA is not optimal for low-income renters. The vacancy rate in Clark County is less than 4%. The crest of foreclosures is yet to be reached as the rate is increasing; the NW market was delayed in feeling the full impact of the economic crisis. The shortage of housing is worsened by the difficulty in securing bonds and Low-Income Housing Tax Credit (LIHTC) investors. It is necessary to create additional affordable housing options; yet credit is difficult to secure. In response to the increasing demand for rental assistance, VHA is assessing occupancy, payment standards, income calculations, etc., to determine the most reasonable balance of support to demand for the households currently being served, as well as those that are on the list waiting to be assisted. VHA will also offer a role to the City and County in the administration of the Neighborhood Stabilization Program (NSP). NSP properties acquired could be used in the rental market until market demand permits resale to owner-occupied.

The VHA's payment standards are currently equal to the local Fair Market Rents (FMR). The payment standard will be reviewed annually and any changes will be effective on December 1st of each year. Payment standards may be changed to reflect local market conditions, changes to the FMR, and the level of HUD funding.

In 2009 VHA intends to take a step toward reducing rent burden by discontinuing the practice (undertaken originally in the VHA's first MTW plan, which was pre-QHWRA) of allowing families to pay up to 45% of gross income for their share of the rent at initial lease-up. We plan to return to using a standard maximum initial rent burden of 40% of adjusted monthly income. VHA will further define rent burden and adjustments to income in its dialogue with the locally established MTW taskforce that is currently discussing rent reform. VHA will closely monitor voucher turnback rates to see if the lesser rent burden causes participants difficulty in finding a unit. Overall, the VHA enjoys a positive relationship

with participating landlords and voucher-holders are often sought-after tenants; we anticipate little change in our lease-up rates.

WAITING LIST INFORMATION

The VHA maintains waiting lists for public housing and Section 8 Housing Choice Vouchers (*see Table 8, page 11*). The VHA also maintains waiting lists for the nonprofit-owned properties managed by the VHA.

Description of Anticipated Changes in Waiting Lists

Under Asset Based Management, VHA will retain a community-based waitlist for Public Housing except for certain properties where a site based list is appropriate. These include senior-designated units at Van Vista, Fruit Valley Commons, and the Assisted Living designated units at Van Vista, provided HUD approves as an MTW Initiative. Public Housing waitlists will be centrally maintained with eligibility and lease-up activities performed by the Property Managers in each AMP. Separate lists are maintained for Public Housing, the Housing Choice Voucher program, and each of the properties managed for local nonprofits.

Vancouver Housing Authority has adopted several local preferences in the Section 8 HCV program and may design and implement others in this coming year.

NEW Local Preferences

VHA will offer local preferences to households that possess characteristics that have been locally determined to have needs that take precedence over the general wait list. These local preferences are intended to expand housing choice and to further community goals related to providing housing and services to designated populations. Preference number 4 will require HUD approval as an MTW activity and is also included in Section IV.

The following local preferences will be enacted:

1. In the Section 8 HCV program, VHA will implement a preference for Public Housing tenants who are eligible to participate in

the Home Ownership Voucher program. Up to 5 families per year may receive this preference.

2. Graduates from an approved two-year transitional or housing-first supportive housing program operated by an agency that has an MOU with the VHA. Examples of such programs include Bridges to Housing, Washington Families Fund, and New Dreams. This preference is limited to 25 vouchers per year
3. Applicant households displaced by VHA disposition or condemnation actions. This will ensure that low income families in the community that would be affected by such actions retain housing choice.
4. Families/households where the head, spouse/co-head, or sole member agrees to participate in the Family Self Sufficiency, SmartChoices or other programs developed by the VHA and designed to assist residents in gaining employment and achieving economic self sufficiency. Up to 50 households per year may receive this preference. Preference 2-4 will also be enacted in the Public Housing program.

Description of Anticipated Changes in the Number of Families on the Waiting List(s) and/or Opening and Closing of the Waiting Lists

The waitlist for Public Housing has 2,504 applicant households and is currently closed with the exception of Van Vista, an elderly high-rise with 39 subsidized units. (*See Table 8, page 11.*) This subsection of the waitlist may also close if the units are disposed of as described elsewhere in the plan. There are 1,601 applicants on the list for 1-bedrooms, 689 for 2-bedrooms, 147 for 3-bedrooms, 45 for four-bedrooms, and 22 requiring more than four bedrooms.

The waitlist for Section 8 vouchers has 4,550 households. Families who applied in October 2003 are currently being offered vouchers. The waitlist is currently closed due to the excessive wait.

Date the waiting List was Purged

The entire waitlists for Public Housing and Section 8 were purged about 5 years ago. When the waitlists were closed, VHA adopted the practice of purging the top of the wait list each time applicants were invited to lease-up orientation meetings. VHA plans to conduct a purge of the entire Public Housing and Section 8 HCV waitlists in 2009. We anticipate the purge will reduce the number of families on the waitlist and will determine the need for future opening of the waitlist.



One of the VHA's earlier developments, Columbia House (left), was built in the 1970s. Mill Creek Apartments (above), built in 2007, is the VHA's latest.



SECTION III. LONG-TERM MTW PLAN

The mission of the Vancouver Housing Authority (VHA) is to provide opportunities to people who experience barriers to housing because of income, disability or special needs in an environment which preserves personal dignity and in a manner which maintains the public trust. In carrying out its mission, the Vancouver Housing Authority is committed to: Vital neighborhoods; Respect for VHA clients and employees; Excellence in management and operations; Cooperative and respectful working relationships with the public, neighborhood and community organizations, and other units of local government; and Dispersal of assisted housing throughout Clark County.

VHA's long-term MTW vision integrates the mission of the agency with the purposes of the MTW statute. The flexibility provided by the MTW Agreement will help the VHA realize its long-term vision and maximize the use of federally subsidized housing and rental assistance programs to meet the needs of the Vancouver/Clark County community.

ALIGNING WITH OTHER COMMUNITY HOUSING AND SERVICE PLANS

The VHA's vision includes aligning its MTW plan with other community housing and service plans to ensure that community resources are used effectively and efficiently—to leverage resources in the most effective and efficient manner.

HIGH PERFORMER STATUS

The VHA is committed to maintaining its High Performer status in its Public Housing and Section 8 Housing Choice Voucher programs. VHA intends to use its MTW flexibility to focus its resources and adopt policies that support a high quality of service to its residents and to the community at large

EXCELLENCE IN MANAGEMENT AND OPERATIONS

VHA intends to maximize efficient and effective delivery of its programs and will maintain its properties at or above community standards and demonstrate good stewardship of its properties, preserving them for future generations.

The VHA is committed to simplifying and streamlining program operations, eliminating unnecessary paperwork, and focusing its resources on providing direct service to residents in property management and promoting successful tenancy.

PROMOTING RESIDENT EMPOWERMENT AND SELF SUFFICIENCY

VHA will target resources and utilize MTW flexibility to address the statutory requirement of providing “incentives to families with children whose heads of households are either working, seeking work or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.”

Priority will be given to policies and procedures that will assist residents in achieving self-sufficiency, including developing asset building initiatives, expanding resources and programs that promote self-sufficiency, and creating a Resident Advisory Board that provides a vehicle for resident input.

VHA is committed to enhancing opportunities for its residents and using its MTW status to create pathways that lead to self-sufficiency through targeted employment programs and opportunities for homeownership.

VHA sees self-sufficiency as a goal for all its residents—promoting employment and training opportunities for single adults, creating and

enhancing programs to allow elderly residents to remain in their homes and be self-sufficient in daily living activities, and assisting youth in breaking the cycle of poverty.

PROMOTING HOME OWNERSHIP

Over 160 MTW program participants have purchased homes. During 2009 we expect up to ten households to participate in the Section 8 Homeownership program. Program participants seeking home ownership will receive one-on-one counseling, attend pre-purchase home ownership classes offered by a local nonprofit, receive financial assistance from their Section 8 Housing Choice Voucher subsidy, be referred to local programs for down payment assistance, and participate in post purchase follow up.

MAXIMIZE THE USE OF FEDERALLY SUBSIDIZED HOUSING AND RENT ASSISTANCE

The Vancouver/Clark County community has grown rapidly in the past decade and the demand for decent, affordable housing far surpasses the supply. The VHA is working with community partners to maximize the public housing and housing choice voucher resources by targeting resources and combining project based vouchers with service-enriched housing.

The VHA's MTW status allows it to make the best use of its Section 8 Housing Choice Voucher program to establish programs and create partnerships that serve the most vulnerable and expand opportunities for those seeking to break the cycle of poverty.

BUILDING COMMUNITY

For more than sixty years, the VHA has been engaged in building a healthy Vancouver/Clark County community and ensuring that there is a place for everyone, including low income and vulnerable populations. We have learned that affordable housing, like roads, is part of the infrastructure of a healthy community. We have made some policy decisions that will impact all of our future developments.

- Future developments will include workforce as well as service-rich housing for special populations.
- Developments will serve to address one of the following: create affordable housing opportunities in high-cost areas, address a revitalization need of the community, provide housing for special needs populations near services, provide affordable housing in growth areas and along transportation routes.
- Replacement of units disposed will be planned in individual projects or accounted for in the overall housing portfolio. The housing portfolio will be reviewed for diversification needs, in that special needs programs requiring financial support will be adequately offset by market/near-market rate developments.
- Future project and program planning will be more inclusive of City and County comprehensive plans. Developments will respond to noted types of populations with housing needs and geographic areas in which affordable housing opportunities are inadequate.

ADOPTING SUSTAINABLE PRACTICES

The VHA's vision includes being a good steward of the resources within its control. We will put into practice decision-making that results in actions that, in the words of the World Commission on Environment and Development, "meet the needs of the present without compromising the ability of future generations to meet their own needs." The decisions we make today, in operations and in development, will achieve current objectives and also serve to sustain the agency and the community over time. We will practice energy conservation, reduce environmental impacts, increase the durability of building components, reduce solid waste, achieve operational savings, and use sustainable building practices in affordable housing design. We will use the Evergreen Sustainable Development Criteria,

developed by the state of Washington, in our new housing development. We will support other governmental, nonprofit, and for-profit entities in building a more sustainable Vancouver/Clark County community.

COMMUNITY PARTNERSHIPS

For all of its 66 years, the VHA has actively partnered with other community agencies and governmental entities to meet the housing needs of the community. The VHA works in partnership with a variety of local agencies that provide services for residents, and throughout this plan there are references to these partnerships. MTW is a vehicle through which these partnerships can be enhanced.

Residents, program participants, and key community constituencies are at the root of VHA's long term planning. The agency's rich history of partnerships has resulted in innovations that have served the specific needs of residents and the establishment of programs and services, such as the Learn and Play program for the very young and Assisted Living for the frail elderly. Creation of a Resident Advisory Board provides a vehicle for resident empowerment and a vehicle for dialog. Creation of a Moving to Work Advisory Committee allows for greater participation from community stakeholders.



Residents of the Arbor Ridge Assisted Living facility.

SECTION IV. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

The following items are proposed Moving to Work activities for which VHA is seeking HUD approval. Please see Table 9, beginning on page 21, for full measurement and impact details.

PILOT RENTAL SUBSIDY PROJECT

A subcommittee of the MTW Advisory Committee was charged with the task of developing a small (10-12 units) program that would target employable, eligible households and incentivize employment, leading to self-sufficiency.

The subcommittee noted that though there is little quantitative evidence to show that there are large numbers of households within the Section 8 Voucher system that are 'stuck' in the system, there are many stories and other qualitative evidence that suggests this is likely true. The basic assumption that will hold steadfast in the development of the pilot is that all participants have a desire to live independently, and that with the right incentives, may be able to achieve independent living.

The intent of the project is to give incentives so that participants see that at the end of the project term, the household will have a dramatic increase in available income and that all expense increases are timely, and not based on income, to give the household the opportunity to budget for changes.

This project is a reallocation and the 'marrying' of existing resources. No new resources will be sought for this project. Existing resources that will be targeted include MTW Rental Assistance, Individualized Development Accounts (IDA), workforce development programs, and/or programs for homeless families with case management and employment support.

This project is focused at a specific demographic. Participants must be capable of working

fulltime; able to increase income and maintain fulltime employment; willing to enter into a participant agreement that includes developing a housing plan with a time-limited rental subsidy, establishing employment goals, and developing a savings or asset building plan. If a family does not fulfill its obligations under the program, agency IDA funds will be returned to the VHA MTW account and will be used for future MTW activities. The program is not designed to address the needs of all MTW recipients, nor does the project design team expect that this project will be capable of being generalized and mandated to the general population of MTW.

The rental assistance will be in the form of new rental subsidy vouchers. Participation will be voluntary. The tenants portion of the rent will graduate (incrementally increase) over a three-year period. The exact formula for increasing the rent is being developed. The goal is to increase the tenants rent payment, increase savings, and increase earnings over the three-year period of the pilot.

The pilot rental subsidy project meets the statutory goals of providing incentives for self-sufficiency and increasing housing choice.

IMPUTED INCOME

In Section 8 and Public Housing, VHA will impute income if a family voluntarily terminates a TANF grant while in WorkFirst sanction or after being notified by DSHS that they are not in compliance with their WorkFirst plan. Participants' WorkFirst status (whether they are in compliance or sanction) will be determined by and verified through DSHS.

The imputed income will be equal to the amount of the TANF grant that was being received at the time of sanction or voluntary termination. Income will only be imputed to families who were not satisfactorily participating in WorkFirst at the time they closed their

grant. Families who were in compliance with WorkFirst when they closed their grants will not have income imputed.

Under current policy, a family does not receive an increase in rental subsidy if their TANF grant is reduced, by a sanction, for not participating in WorkFirst, but does receive an increase in subsidy if they voluntarily close their grant to avoid sanction. Current policy offers a disincentive to clients to participate in WorkFirst activities that can lead to greater self-sufficiency. This MTW initiative will increase the incentive for families to comply with WorkFirst requirements.

Because data has not been previously collected on the number of VHA clients who close a grant while in sanction, the baseline will be established in the first six months by counting the number of families to whom income is imputed. In subsequent years measurement will be made of the percentage decrease in the number of families to whom income is imputed.

VERIFICATION PROCEDURES

In Public Housing and the Section 8 Housing Choice Voucher program, VHA will adopt an alternative verification requirement for assets. When the tenant or participant self-declares that the value of a particular asset is less than \$5,000, the VHA will not further verify that asset. Most VHA clients have verified assets of less than \$5000, income from these assets is minimal and staff finds that tenants rarely underreport these amounts. Staff sends hundreds of verifications a month for checking and savings accounts with most resulting in no income for the family and no effect on HAP.

Currently, the VHA attempts verification of all assets through a third party. Rarely does this verification find that assets differ from the tenant declaration in amounts great enough to affect the Total Tenant Payment. The VHA believes that we can simplify our administrative process and free staff to work on other agency tasks without any resulting overpayment of assistance. The initiative's impact will be measured by the number of asset verifications

prepared by staff. We will further track the number of assets declared at less than \$5,000 to ensure that the initiative does not encourage under reporting.

ASSET-BASED INITIATIVES

Building assets is an important element in achieving self-sufficiency. Participants in the Housing Choice Voucher Family Self-Sufficiency (FSS) Program at the VHA are currently able to build escrow accounts. The VHA is working with other community partners to explore and create other Asset-Based Initiatives including but not limited to Individual Development Accounts and Individual Savings Accounts. Once developed, the new initiatives may be offered as an alternative to escrow accounts for FSS participants in addition to being available for participants in other self-sufficiency programs made available by the VHA. This activity will contribute to resident self-sufficiency and ultimately housing choice.

SIMPLIFIED DEVELOPMENT PROCESS

VHA 's Flexible Development Initiative will allow the agency to respond to development opportunities in a timely manner. On occasion, properties become available or opportunities arise that have critical windows that require more immediate action than is available under current policies. VHA's initiative is designed in a manner that will allow VHA to respond to and take advantage of opportunities as they arise.

VHA will utilize the authorizations under MTW related to the streamlined demolition and disposition procedures, acquisition, new construction, and moderate or substantial rehabilitation of housing, subject to the required HUD approvals for incremental public housing units, pursuant to Section 9(g)3 of the 1937 Act, to respond to development opportunities that serve the mission and asset management policies adopted by the agency. This initiative will increase housing opportunities for families on our waiting list, will reduce costs and create efficiencies as the agency responds to

development opportunities.

HQS INSPECTIONS

In the Section 8 Housing Choice Voucher program, VHA will conduct less frequent HQS inspections. Physical inspections will be required before contract execution, at 24 months from the initial inspection and every 24 months thereafter. At annual anniversaries of the initial contract where a physical inspection is not completed a self-certification by the landlord and tenant will be required. A self-certification that repairs have been completed will also be required when a unit fails the physical inspection for minor items.

VHA will ensure that units assisted under the HCV program continue to meet HQS standards while reducing administrative costs. A limited number of self-certifications will be selected for a quality control inspection to verify the landlord/tenant self-certification. VHA will reserve the right to identify units requiring more frequent inspections based on the history of performance by landlord or tenant. Education and outreach efforts will be made with tenants and landlords to insure that tenants report problems with their units to their landlords in a timely manner and to make sure tenants know they may request a special inspection from the VHA if landlords are not responsive. Monthly reports will be prepared on the number of inspections completed, number of units that fail at first inspection and number of requests for special inspections.

INVESTING IN STATE-PERMITTED INSTRUMENTS

The new MTW Agreement waives certain federal restrictions on investment options as long as the investments comply with state law. We are carefully researching permitted state investments to diversify VHA's portfolio.

After devising a prudent and safe strategy, we will revise the investment policy to include new state-permitted instruments. This initiative will have the potential of increasing investment options and generate additional revenue.

SIMPLIFIED UTILITY SCHEDULE

For the Section 8 Housing Choice Voucher program the VHA will adopt a single utility allowance schedule utilizing estimated utility cost for a new or weatherized unit regardless of the actual building type or age of the unit selected by the tenant. The schedule will also be based on the estimated cost for a multiplex for studios through three bedrooms and for single family for four and five bedroom units. The use of a single utility schedule will give participants specific knowledge of whether a prospective unit would exceed their maximum family share. The VHA will be able to provide a participant with a specific maximum amount to look for in their search for a rental. This will greatly reduce rejection of Requests for Tenancy Approval and eliminate frustration among both participants and landlords. In addition the knowledge that the housing assistance will always be based on units with lower utility costs will encourage participants to choose more energy efficient rentals.

ELIMINATION OF UTILITY ALLOWANCE PAYMENTS

For both the Public Housing and Housing Choice Voucher program, VHA will stop issuing a Utility Allowance Payment (UAP) after 6 months unless the family can demonstrate a hardship or agrees to participate in an approved self-sufficiency program. Families will be encouraged to increase financial self-sufficiency and to fully utilize benefits and services they may be eligible for.

REPLACEMENT OF MEDICAL EXPENSE DEDUCTION

For both the Public Housing and Housing Choice Voucher program, VHA will eliminate the deduction for medical expenses and will increase the standard elderly/disabled family deduction from \$400 to \$700. This will greatly reduce the number of verifications required for recertifications, simplify the process, and allow for the three-year recertification schedule detailed below. Families who face a significant

rent increase due to this policy will have access to the hardship policy.

EXPANSION OF THE 40% MAXIMUM FAMILY SHARE TO ONGOING TENANCY

As noted on page 13 of this Plan, VHA adopted the standard 40% maximum family share at initial occupancy last year after many years of utilizing a higher rate. As a result of allowing participants to choose units where their share of the rent and utilities exceeded 40% of their adjusted income, a large percentage of the Housing Choice Voucher population can be considered rent burdened. This initiative will expand the maximum family share to ongoing occupancy. If, at a recertification, the participant's share exceeds 40%, the participant will have several options: they may relocate to a less expensive unit, they may opt to participate in an approved self-sufficiency program, or they may remain in the unit up to 12 months in order to increase their income sufficiently to reduce their family share below 40%. Participants who are in the rent burdened category at the inception of the policy will be exempt from the rule as long as they remain in the same assisted unit.

HARDSHIP POLICY FOR RENT REFORM INITIATIVES

The VHA has expanded its existing hardship policy to incorporate rent reform initiatives under MTW. In addition to the HUD defined criteria (for minimum rent hardships) VHA will consider other hardships caused by tenant rent increases, higher utility costs, or moving expenses due to MTW policies. Participating families may apply for a hardship exemption and will receive a suspension of the policy causing the hardship while the hardship panel evaluates the request. The panel will consist of the Executive Director and the two Deputy Directors of the VHA. The panel may require additional verification of the hardship from the participant, or set conditions the participant must meet such as participation in self-

sufficiency programs or requiring the participant to work with the Housing Resolution Specialist. The panel will determine if a hardship exists, the expected duration of the hardship, and any exemption to be granted. Exemptions may include, but are not limited to a temporary suspension of, or a phased in, rent increase; a waiver of the relocation requirement, or waiver or the rent reform policy for as long as the hardship exists.

THREE YEAR RECERTIFICATION SCHEDULE

Previously the VHA utilized MTW authority to implement a biennial recertification schedule for both the Public Housing and Housing Choice Voucher Programs. Although the policy successfully resulted in significant reductions in staff time, it was criticized because it did not allow for updated payment standards during alternate years. VHA is replacing the policy with one that retains the savings in staffing but allows for annual updates. Recertification will be required every three years for elderly and disabled households on fixed incomes such as Social Security, Supplemental Security Income, and pensions. During years where recertification is not required the VHA will revise rent and housing assistance by applying any revised payment standards or utility allowance, and by applying the annual adjustment factor published by the Social Security Administration on household income. For households not considered elderly or disabled, or those that contain a work-able member in addition to the elderly or disabled member/s, recertification will take place annually.

INTERIM RECERTIFICATION VALID FOR ONE YEAR

In both Public Housing and the HCV Programs, households on annual schedule for recertification will have their next required recertification scheduled 12 months after the most recently completed annual or interim recertification. This will result in a staff time savings for the VHA as well as provide a longer

period for households until their rent may increase after experiencing a loss of income and then a subsequent income increase.

SIMPLIFIED REQUIRED RECERTIFICATION PROCESS

For the Public Housing and the SC8 HCV Program, VHA will adopt a simplified annual recertification form. The form will be used annually for non-fixed income households and every three years for fixed income households. The form will list all household members, income amounts, assets and expenses as currently shown on the family's 50058. Households will certify that there have or have not been any changes. For non-fixed-income households, if the family certifies that there have been no changes; staff will only verify household income, assets, and deductions every other year. EIV reports will be viewed at every annual recertification and any discrepancies with the current 50058 will be investigated and verified. If households certify that there has been a change full verification of family circumstances will be completed. For fixed-income families with recertifications occurring every three years full verifications will be completed at the recertification, regardless of whether or not the family indicates changes have occurred.

LANDLORDS RESTRICTED TO ANNUAL RENT INCREASES

After the initial lease period, landlords in the Housing Choice Voucher program will be restricted to rent increases to no more frequently than once per year. This will provide a small amount of reduced staffing expense and benefit some households.

RENTER EDUCATION FOR APPLICANTS

Households on the Section 8 and Public Housing Wait lists will be required to complete VHA sponsored or approved renter education program unless otherwise excused. Households will be contacted approximately 180 days prior to their anticipated call-in

date of voucher issuance. Household will be informed of educational requirement as well as registration instructions. In the event that the household has not completed the education or was not otherwise excused by VHA, a voucher will not be issued and the household's name will be dropped to the bottom of the list. On subsequent call-in date, the name will be removed from the list as ineligible if the education requirement has not been satisfied. Applicants with Limited English Proficiency (LEP) or disability issues will be excused if the agency presenting the training cannot accommodate them.

Applicants will have increased knowledge of roles and responsibilities of tenants and landlords, increased understanding of personal budgets, the rental market, and an improved ability to locate a rental unit that meets their needs. As a result, applicants will make improved choices in selection of units leading to fewer unit turnovers and landlord/tenant disputes. Current participants will not be affected.

SELF-SUFFICIENCY PILOT PROGRAM

Yes We Can (YWC) will be a pilot program for Public Housing and Housing Choice Voucher residents that have at least one adult member with the ability to work full-time. The initial pilot will require mandatory participation of 48 eligible households as they are housed from the waiting lists. The 48 households will be divided into 6 groups of 8 members each based on their income level. An additional group of 8 members will be households already being assisted by the VHA who volunteer for the program. The premise behind dividing the groups by income level is that the needs of participants will differ based on income and as participants attain incremental goals toward becoming financially self-sufficient. The primary components of the program will be 1) development of Individual Development Plans (IDP), 2) services provided by the VHA and local social service and educational institutions,

3) a 50% of earned income disallowance for participants attending a minimum of 6 credit hours per semester, 4) development of peer support groups comprised of the 8 participants in a particular income band and a facilitator, and 5) provision of large group seminars. Program development will be as a result of collaborative efforts of various community partners that will also be represented on a steering committee, including but not limited to Washington State University, Clark College, Workforce Investment Board, and VHA.

LOCAL PREFERENCE FOR PARTICIPATION IN SELF-SUFFICIENCY PROGRAM

VHA will create a local preference for the waiting lists for the HCV and Public Housing programs. The preference will be for families who agree to, and are eligible for, self-sufficiency programs offered by the VHA including FSS and the ROSS funded Smart Choices program. MTW authority is required because regulations governing the FSS program normally would prevent such a preference.

SEPARATE WAITING LIST FOR ASSISTED LIVING PROJECT IN PUBLIC HOUSING

VHA will also create a site based list for applicants requiring assisted living services to be offered at specific units within a Public Housing property. The separate waiting list will enable the VHA to house only those needing services at the location where the services are offered, allowing for the assisted living program and providing housing assistance to a population not normally able to be served by Public Housing.

TABLE 9 Section IV. Proposed Moving to Work Activities – HUD Approval Requested

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
Pilot Rental Subsidy Project	Promote family self-sufficiency/ increase housing choice.	Participants will have incentives to increase earned income leading to self sufficiency and possible home ownership.	Income at program entry. Savings at program entry.	Increased earned income by end of first year. The number of households who maintain steady employment. Increased savings.	The dollar amount of household income and assets. The number of employed household.	Program data on income, job stability, savings.	Attachment C, Section B. 1. Single fund budget with full flexibility. Attachment C, E. Authorizations related to self sufficiency.	Not Applicable
In Section 8 and Public Housing, VHA will impute income when a family voluntarily closes a TANF grant while in sanction or while not in compliance with WorkFirst	Promote family self-sufficiency	Families will have incentive to participate in WorkFirst, giving them resources for developing earnings and self-sufficiency.	The exact number of families who close their TANF grant due to being out of compliance with WorkFirst requirements is unknown. VHA will establish a baseline in 2009 by measuring the number of TANF families to whom income is imputed in the first six months of the demonstration.	Within one year of implementing the policy to impute TANF amounts the number of families to whom income is imputed due to closed TANF grants will be reduced by 75%. The number of families to whom income is imputed due to closed TANF grants will continue to reduce annually thereafter until it is zero.	The number of families with imputed TANF due to voluntary grants closure.	Program data.	Attachment C, Section D.2. Rent Policies and Term Limits.	PH tenants have access to the Grievance Procedure, S8 HVC participants may request and informal review of rent changes.

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
In Public Housing and the Section 8 Housing Choice Voucher programs, assets valued at less than \$5,000 will not be verified.	Reduce costs and achieve greater cost effectiveness.	Reduces the amount of time staff will spend verifying assets whose value is unlikely to affect the total tenant payment.	1,048 asset verifications generated by staff in 2008. In 2007/2008 ninety-eight percent (98%) of HCV families had verified assets less than \$5000. In Public Housing ninety-nine percent (99%) had verified assets less than \$5000.	90% reduction in the number of asset verifications required. 5% or less increase in the number of families reporting assets valued at less than \$5000.	The number of asset verifications generated by staff and an imputed savings in FTEs.	Staff counts of verifications generated. Program data.	Attachment C, Section C.4. Initial, Annual and Interim Income Review Process and Section D.3.b.	Not Applicable
Asset Based Initiatives	Promote Family Self-Sufficiency	Increase family assets which will enhance the likelihood of achieving self-sufficiency.	Assets at program entry.	Number enrolled with IDA, ISA, or escrow accounts.	Dollar value of participant assets.	Growth in assets.	Attachment C, B. 1. Single fund budget with full flexibility, E. Authorizations related to self sufficiency.	Not Applicable

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
Simplified development process & adopting a policy for purchasing properties without prior HUD approval	Cost efficiencies.	Permits VHA to respond to opportunities that are most financially advantageous for replacement of disposed PH units.	VHA will develop simplified development process for the purpose of creating 1:1 replacement of disposed public housing units. Baseline: 1) Approval of the plan by Board of Commissioners. 2) Approval of the Plan by HUD. 3) Identification of sites for potential development of 50% of the PH units disposed.	Creation of Development and Acquisition Plan that is approved by the Board of Directors and HUD. Resolution of approval of the plan by Board of Commissioners. Identification of site for development purposes.	The time and expense to develop replacement PH units.	Completion of plan that simplifies the development process for replacement of 1:1 for disposed ph units. Verification of approval from HUD . Number of units submitted for development.	Attachment C, Section C.7. Simplification of the Redevelopment and Process for Public Housing. Attachment C, Section C.13. Site Acquisition.	Not Applicable
Design and implement a less frequent schedule of Section 8 unit HQS inspections	Reduce cost and achieves greater cost effectiveness.	Allows Section 8 HCV inspectors to conduct fewer annual HQS inspections, reducing staffing expenses.	2,020 Section 8 HCV assisted units are now inspected at least annually. 584 units fail at first annual inspection. 39 requests for special inspections per year.	Inspect fewer Section 8 Tenant Based Voucher assisted units annually. No more than 585 units fail at first inspection. No more than 40 requests for special inspections.	The number of inspections performed and an imputed savings in FTEs.	Measure number of inspections each month to gauge progress.	Attachment C, Section D.5. Ability to Certify Housing Quality Standards.	Not Applicable
Investing in state permitted instruments	Reduces cost and achieves greater cost effectiveness.	Will update investment policy in 2008 to reflect any additional instruments available within Washington State law and increase interest income.	2008 Interest Income.	To demonstrate how using non-traditional investment instruments could increase income by 1% or more.	The percent of interest earned.	Effective rate of return on 2009 investments given changes in market place.	Attachment C, Section B.5.	Not Applicable

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
Simplified utility schedule in the HCV Program.	Promote self-sufficiency among assisted families. Increase housing choice for low-income households.	Households will choose more energy efficient units leading to cost savings for families. Households will be better informed leading to smarter housing choices.	Percent of households currently renting units in a multiplex versus a single family and percent renting units built after 1980 or weatherized.	After 2 years a 5 point increase in the percent of households in multiplexes and a 5 point increase in the percent renting units built after 1980 or weatherized.	The percent of households in each building type and age.	Reports will be run periodically from the VHA housing database on structure type, age, and weatherization.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section D.2. and 24 CFR 982.517.	Hardship policy will allow for a phased-in rent increase or a rent cap for those families who experience a hardship due to this policy.
Elimination of Utility Allowance Payments(UAP) in HCV and Public Housing programs.	Promote self-sufficiency among assisted families. Achieve programmatic efficiency and reduce costs.	An increase in participation in self-sufficiency programs among this population. Cost savings due the number of suspended UAP's and/or reduction in number of households eligible for a UAP.	The number of households with income so low they are eligible for a UAP participating in self-sufficiency programs. The number of households receiving a UAP.	After 1 year at least 5 additional current or former UAP recipients participating in self-sufficiency. After one year a 25% reduction in the number of households receiving a UAP.	The number of households receiving a UAP and the number of UAP recipients in self-sufficiency programs.	Reports from the VHA housing database and from Service Coordinators of VHA self-sufficiency programs.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Sections C.11. and D.2.	Hardship policy will allow an extension of the time a family can receive a UAP if they can show adequate justification.
Replacement of Medical Expense Deduction in HCV and Public Housing programs.	Achieve programmatic efficiency and reduce costs.	A significant reduction in staff time is anticipated due to reductions in required verifications and calculations.	The number of verifications for medical expenses required for recertifications.	At least 300 fewer verifications required after one year.	The number of medical verifications generated by staff and an imputed savings in FTEs.	Reports from eligibility staff on verifications performed and an estimate of equivalent staff time.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Sections C.11. and D.2.	Hardship policy will allow for a phased-in rent increase or a rent cap for those families who experience a hardship due to this policy.

WAITING LIST INITIATIVES	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
Three Year Recertification Schedule	Achieve programmatic efficiency and reduce costs	Staff time savings due to fewer recertifications will be retained while providing benefit of annual adjustments.	The number of recertifications performed under the biennial schedule and the previous annual schedule.	The reduction in the number of recertifications under the biennial schedule will be retained.	The number of recertifications performed and a imputed savings in FTEs.	Reports from VHA housing database on the number of recertifications performed.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section D.2.	Not applicable.
Interim Recertification Valid for One Year	Achieve programmatic efficiency and reduce costs.	Savings in staff time through fewer recertifications.	The number of recertifications performed prior to the policy.	A reduction of 200 recertifications annually.	The number of recertifications performed and a imputed savings in FTEs.	Reports from VHA housing database on the number and type of recertifications performed.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Sections C.4. and D.1.c.	Not applicable.
Simplified Required Recertification Process	Achieve programmatic efficiency and reduce costs.	Savings in staff time due to fewer verifications.	The number of verifications performed prior to policy change.	A 30% reduction in the number of verification requests generated by staff.	The number of recertifications performed and a imputed savings in FTEs.	Reports from eligibility staff on verifications performed and an estimate of equivalent staff time.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section C.4. and Sections D.1.c. and D.3.b.	Not applicable.
In the HCV program Landlords Restricted to Annual Rent Increases.	Achieve programmatic efficiency and reduce costs.	A reduction in staff time to fewer rent increases and the associated processing time.	The number of 50058 actions completed solely for contract rent increases.	A 10% reduction in the number of 50058 actions completed solely for contract rent increases.	The number of actions solely due to rent increases.	Reports from VHA housing database and staff reports on owner rent increases.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section D.2.b.	Not applicable.
Renter Education for Applicants.	Promote self-sufficiency among assisted families. Increase housing choice for low-income households.	New Households will make improved choices resulting in fewer negative program exits such as eviction, fraud, and criminal activity.	The number and ratio of negative program exits prior to policy.	25% fewer negative program exits among the new population having taken the renter education course.	The number of negative program exits.	Reports from the VHA housing database on program exits.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Sections C.2. and D.4.	Not applicable.
Self-Sufficiency Pilot Program.	Promote self-sufficiency among assisted families.	Increased level of self-sufficiency amount program participants.	Income and asset amounts of participants at program inception.	25% of program participants increase income sufficient to move up to the next income band.	Participant Income and assets.	Data collection to be carried out by staff responsible for the program.	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section E.	Not applicable.

WAITING LIST INITIATIVES	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics	Measurement	Authorization	Hardship Exception
Local Preference for participation in self-sufficiency program	Promote self-sufficiency among assisted families	Increased level of participation in self-sufficiency programs and in successful program exits	The number of self-sufficiency program participants prior to preference being offered and the number of successful exits	A 25% increase in program participation and a 10% increase in the number of successful exits	The number of program participants and the number of type of program exits.	Reports will be periodically prepared by Service Coordinators and compared with 2007/2008 data	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Sections C.2. & D.4.	Not applicable
Separate Waiting List for Assisted Living Project in Public Housing	Increase housing choice for low-income households	Current tenants will be able to age in place and new tenants will have new housing opportunity	The number of assisted living clients waiting for Public Housing (currently zero)	A functioning waiting list and 60 clients being served after one year	Number on waiting list and under lease.	Reports from VHA housing database will be periodically run by Property Manager	Amended and Restated Moving to Work Agreement, Attachment C, Statement of Authorizations, Section C.1.	Not applicable

SECTION V. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

The following items are previously approved Moving to Work activities that will continue in 2009. Please see Table 10, beginning on page 30, for measurement and impact details.

SINGLE FUND BUDGET WITH FULL FLEXIBILITY

In 2008 HUD approved a new Attachment A authorizing VHA to implement MTW flexible block grant funding. By utilizing the flexibility provided in the MTW Agreement, VHA is able to strategically target resources and maximize the use of federally subsidized housing and rental assistance programs to meet the needs of the Vancouver/Clark County community.

BIENNIAL RECERTIFICATION REVIEWS

Biennial reviews were implemented in both the Section 8 Tenant Based Voucher and Public Housing programs in 2008. This initiative aims to reduce cost, as well as provide incentives for economic self-sufficiency. 50% of families receive a full review each year, the remaining 50% receive a *simplified* review in which the tenant declares income, assets, expenses and household composition but no change is made to assistance unless household composition has changed. The family is contacted by phone to verify information provided on their declaration. The family may request an interim review at anytime if their net household income has decreased.

The initiative's success will be measured by the percentage change in the number of families who have increased income at their biennial review. We are currently counting families with increased income at their full annual review; a comparison will be made for those families at their next full review in 2010.

We will also measure any change in the number of families requesting an interim review in the year they do not receive a full review. Through assesment of these indicators, VHA may make changes in recertification reviews.

ASSET MANAGEMENT IMPLEMENTATION

VHA's 514-unit Public Housing portfolio was divided into four AMP's in accordance with HUD recommendations in 2007. During 2008 we created four property manager and four assistant positions and began decentralizing Public Housing. Several nonprofit and Section 8 New Construction projects will also be included in the portfolio of each manager. Since the four chosen Public Housing AMP's did not represent a logical geographic split amongst properties, we sent a request to HUD before June 30, 2008, to redistribute them. The Portland HUD office approved this new distribution on July 18, 2008.

Adherence to Asset Management regulations remains unclear, specifically for MTW agencies. HUD is currently negotiating with a representative group of MTW agencies to write specific guidelines. VHA intends to follow these agreed-upon rules as soon as they are official. In the meantime, VHA's operations and management strategies will remain consistent with OMB Circular A-87 and other pertinent GAAP and federal regulations.

PUBLIC HOUSING COMMUNITY SAFETY

In 2008 we used MTW funding flexibility to hire a resident manager at our Fruit Valley property. This was in response to resident concerns, increased police activity, and difficulty filling vacancies. The resident manager began in February 2008. We will measure the effectiveness of having a resident manager at this property by decreased concerns and police

activity, a vacancy rate no greater than the local average and turn around days no greater than the average for other Public Housing units owned by the VHA.

ENERGY CONSERVATION/ SAVINGS PLAN

An energy audit was completed by an independent contractor in 2005. This audit recommended that the following energy conservation measures be implemented: additional attic insulation, low-flow water closets, low-flow water aerators and shower heads, energy efficient lighting, energy efficient refrigerators, and temperature controls. For the past three years, the VHA's maintenance practice has been to replace any worn building components with energy efficient products. During 2008, in conjunction with the annual unit inspection, VHA maintenance staff has identified, by unit, the energy savings measures that should be implemented. In addition to those recommended in the energy audit, new vent pipes for all exhaust fans will be replaced to eliminate condensation that can cause moisture and mold problems. VHA has allocated \$200,000 of its 2009 Capital Fund and \$200,000 of the 2010 Capital Fund to complete this work.

The VHA also works with other governmental entities in the Vancouver/Clark County community to promote more sustainable initiatives in affordable residential development.

HOME OWNERSHIP VOUCHER PROGRAM

In 2009 The VHA will continue its work to design and implement a Home Ownership Voucher (HOV) program utilizing as many as 50 Section 8 Tenant-Based Vouchers over time, with a maximum of ten vouchers used in 2009. Working with Columbia Non-Profit's First Time Home Loan program and the Community Housing Resource Center, the HOV program will provide an incentive to families receiving

Tenant-Based Voucher assistance to increase their earning potential and self-sufficiency as they move toward expanded housing choices through home ownership.

Home Ownership Voucher assistance will be offered for a maximum of ten years from the date of home purchase and will use Fair Market Rents to establish levels of mortgage assistance. Success of the initiative will be measured by the number of families who choose to participate, the number of participating families who increase the portion of their mortgage that is tenant-paid each year, and by the number of participating families who maintain home ownership from year to year.

UNIT TO MARKET RENT REASONABLENESS

VHA will continue the practice it began in 2006 of using Unit-to-Market comparisons rather than unit-to-unit comparisons. The Housing Authority will collect and maintain data on market rents in the VHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

The rent for a unit proposed for HCV assistance will be compared to the average rents for similar units based on number of bedrooms and type. Consideration will be given to amenities, services and utilities of the proposed unit compared to the average.

The Housing Authority will notify the unit owner of the rent the VHA can approve, based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The VHA

will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 5 business days of the VHA's request for information or the owner's request to submit information.

This initiative allows the Housing Authority to make more effective use of staff time by reducing the amount of staff time spent locating a comparable unit.

PROJECT-BASE AND AGENCY-BASE OF SECTION 8 VOUCHERS

The VHA is in the process of implementing a plan to project-base up to 200 vouchers. Implementation will occur over time as vouchers become available. The VHA will also develop agency-based vouchers for a yet to be determined number of these vouchers. The initial environmental review is currently underway for project-base at several VHA properties. The contract for project-basing 25 units at Maple Knoll Apartments is being implemented. The first units to be developed in this program are designated for households who meet the criteria for two local programs designed to serve high-needs homeless families who are participating in case management and support services. Project-base households will be required to participate in FSS or an IDA program. By combining project-based rental assistance with case management and services provided by other agencies, we are able to use community resources to the best advantage to assist families in achieving self sufficiency. This initiative will increase housing choice and self-sufficiency.

IMPROVING COMPUTER TECHNOLOGY

The last major computer system upgrade of our main housing and financial software was in 1998. Although the current systems are reliable, technology has evolved and we must take advantage of these improvements. VHA is about to launch a major system upgrade during

the latter part of 2008. We will be migrating to a more standardized SQL Server platform resulting in a more user-friendly and intuitive interface. We will also be replacing personal computers that will increase efficiency and allow them to function on the new platform.

The system will be upgraded in two phases, first with housing and occupancy modules and second with financial modules. We expect Phase I to be completed by March 2009; Phase II will be completed by September 2009.

RESIDENT INITIATIVES PROGRAMS

During 2009 the VHA will aggressively pursue additional funding for Resident Programs, including, but not limited to, funding for Family Self-Sufficiency Coordinators, Service Coordinators, and Resident Opportunities for Self-Sufficiency (ROSS). VHA will also seek to identify public and private grant funds that may be available for promoting positive outcomes for teens and young adults. Where possible, we will develop programs that can serve residents of public housing, as well as other low income members of the larger community.

One example is the Work Opportunities project, beginning in the fall of 2008. It is a one-year endeavor to optimize our resident self-sufficiency programs. VHA has hired a consultant to lead the process of researching and developing a more comprehensive approach to promoting VHA resident self-sufficiency through employment. Our consultant will develop and recommend implementation strategies for an agency-wide self-sufficiency program that complements and enhances our current internal self-sufficiency activities, fully utilizes existing community resources, and fills gaps with necessary services not currently provided.

FAMILY SELF-SUFFICIENCY PROGRAM

The Family Self-Sufficiency (FSS) program currently has 27 active participants; with nine

successful graduates since July 2007. The average of escrow for those with active escrow accounts is \$4,314. VHA anticipates program growth over the next year as new voucher holders enter the program and outreach activities increase. The VHA has submitted applications for funding for FSS Coordinators in both the Section 8 Housing Choice Voucher Program and the Low Rent Public Housing Program. Steps toward an FSS program for public housing began in 2008 with the approval of its Action Plan. Implementation of the program will continue in 2009.

SELF-SUFFICIENCY PROGRAMS FOCUSED ON YOUTH AND YOUNG ADULTS

A number of programs offered through the RISE & STARS Community Center were created to help youth and adults gain the skills necessary for self-sufficiency. These programs use MTW funds combined with grant funding to carry out activities and programs that support self-sufficiency. Community Center programs include:

SmartChoices I, for Public Housing youth and young adults, ages 12-24, focuses on helping participants make successful transitions from middle school to high school, and from high school to post-secondary training; SmartChoices provides these individuals with the tools and opportunities necessary to build a life of self-sufficiency. SmartChoices I is funded with ROSS grants from FY2005 and FY2007, combined with some MTW funds.

After School and Summer Program, which promotes positive behaviors, helps youth enjoy success in their schoolwork, and discourages youth involvement in risky activities. Youth receive a healthy snack, get help with homework, work with computers, and participate in recreational activities. The goal of the after school program is to help youth living in subsidized housing recognize options for a

positive, hopeful future. These programs are funded primarily with MTW funds.

STARS Mentoring Program matches middle school youth one-on-one with caring adult volunteers who spend time with them every week, helping them manage the transition to adolescence. The program promotes strong relationships between youth and adults in order to build resilience, provide positive, effective role models, and encourage future success. The mentoring program also includes group mentoring that is skills and employment based. These programs are funded with a combination of ROSS and MTW funds and a grant from Clark County.

Family Support Program, providing free or low-cost opportunities for families to spend time together and build relationships with their neighbors through family nights and an annual street party. The Community Center also provides adults with several educational and social activities, one of those being a computer lab for job search, assisting children with homework, and building computer skills. A child care program offered at the Community Center gives priority to VHA residents.

Learn and Play groups, engaging parents and their 0-5 year olds in developmentally appropriate activities to promote healthy brain development, parent-child bonding, early literacy, and school readiness.

The Family Support and Learn and Play programs are funded through a combination of MTW and other local grant funding.

SELF SUFFICIENCY PROGRAMS FOCUSED ON ADULTS

Some programs offered through the RISE & STARS Community Center were created to provide residents with opportunities for self-sufficiency. These programs use MTW funds to provide counseling, training and facilitation of activities. MTW funds are also used for food and incentives that encourage resident participation.

SmartChoices II, funded primarily with a ROSS grant and available to Public Housing adults, focuses on helping residents discover job training, undertake job search preparation, participate in job searches, and provide support for those who are just starting new jobs. The program also includes financial literacy and pre-purchase homeownership courses to promote homeownership and housing choice. Our goal in the program is to provide training and support so that individuals can work toward or achieve living-wage jobs and self-sufficiency.

On-site Child Care is provided at Learning Avenues' McCoy Center located in the RISE & STARS Community Center. Residents of VHA housing are prioritized for slots in this center so they can receive the child-care they need to be able to work or take part in job training that will lead them to self-sufficiency.

Mental Health Training/Consulting, utilizing funding from two ROSS grants and supplemented by MTW funding, provides mental health support for residents.

OTHER ACTIVITIES

Meeting the Housing Needs of Vancouver and Clark County

The VHA is located in the City of Vancouver in Clark County in the state of Washington. We are a rapidly growing community and a rapidly urbanizing community. Although our population is increasing at a rapid rate, the poverty rate is increasing even faster. This community also finds itself growing at a time when public funding for all kinds of infrastructure, including funding for affordable housing, is declining. Over 22,000 or 48% of the renter households in Clark County spend more than 30% of their income for housing costs. Being located in a rapidly growing part of the country has led the VHA to develop nontraditional partnerships and revenue sources for increasing the inventory of affordable housing. VHA has a number of development projects in the pipeline.

- A mixed income development, currently in the planning stages, will utilize Section 8 project-based vouchers for up to 20% of the units,

SmartChoices II participants meet regularly with their service coordinator to go over employment goals.



providing affordable units in high-cost area of Camas, WA.

- A senior community development is currently in the planning stage. Located in the Four Seasons area of Vancouver, the development will be near services and will provide mixed-income units, including independent living, and special need units subsidized with Medicaid.
- A development utilizing 9% Low Income Housing Tax Credits (LIHTC) to serve homeless/formerly homeless families is being planned in an area near transportation and services.
- VHA is currently in negotiations to purchase a 52-unit historic assisted living facility for disabled persons, located in an area of downtown Vancouver marked for rehabilitation.

- The VHA is also planning to rehabilitate/add additional units to a 260-unit project and refinance with 4% LIHTC to preserve affordability of units.

Additional projects in development are intended to provide affordable housing options in growing and high-rent demand areas.

As the VHA undertakes these developments it will place an emphasis on sustainability and affordability. The VHA may utilize Section 8 project-based vouchers in combination with other sources of funding such as Low Income Housing Tax Credits (LIHTC) and the Capital Grant Program.



Fall colors at the Skyline Crest Low Rent Public Housing development.

TABLE 10 Section V. Ongoing Moving to Work Activities – HUD Approval Previously Granted

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Measurement	Authorization	Hardship Exception
1. Single Fund Budget with Full Flexibility	Addresses all three statutory objectives.	Will use fungibility to reduce costs and achieve greater cost effectiveness, pay for self sufficiency services and increase housing choices.	Current level of fungibility amongst current areas of HCV, Public Housing and Capital Fund.	Redirect up to 20% of each program budget towards new initiatives and fund activities outside existing programs.	Demonstrate successes gained by utilizing fungibility, e.g. cost efficiencies, resident economic empowerment and increased housing choice.	MTW Agreement Attachment C, Section B.1.	Not Applicable
2. Biennial Recertification Reviews in Public Housing and Section 8 Began in 2008.	Reduce costs. Promote family self-sufficiency.	Reduces staff time and cost in preparing annual reviews. Allows families who increase their income to retain the increase for up to two years as an incentive to increased incomes.	Prior to 2008 100% of families had a recertification review at least annually. 947 families received an interim review in 2007. 326 families had increased income at annual recertification in 2007.	50% of families will have a full recertification annually. The percentage of families receiving an interim review will not increase by more than 25%. The percentage of families who have increased income at the time of their biennial recertification review will increase by at least 25% .	Program data submissions. Annual income recertification data.	Attachment C, Section D.8. Home Ownership Program.	Not Applicable
3. Asset Management	Cost efficiencies.	Financial analysis of each amp separately will determine expenses, project tenant rent, and amount of subsidy per unit needed. Improved financial control of overall capital through individualized site accounting that ties to overall Agency single budget fund for subsidized programs.	VHA will implement asset management at PH sites utilizing locally developed assignment of revenue and expenses to AMPs. Baseline: Creation of four (4) AMPs that will have expense/revenue attributed according to locally developed fiscal plan.	Developed budget for each AMP utilizing single-fund budget with individualized subsidy amount per AMP and cost assignment of staff that provide service to multiple AMPs.	Monthly AMP financials that demonstrate all 4 AMPs are fiscally self sufficient.		Not Applicable

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Measurement	Authorization	Hardship Exception
4. Maintain Security in Public Housing Communities	Increase housing choice.	In response to resident complaints, police calls and difficulty filling vacancies, a resident manager was hired for the Fruit Valley property in February 2008. It is expected that this will make the property more desirable.	27 police calls to property in 6 months prior to hiring of resident manager. Vacancy rate property in 6 months prior to hiring of resident manager.	75% reduction in number of calls to property. Vacancy rate of no more than Clark County average. Average turn around days for vacant units no greater than average for Public Housing units.	Vancouver PD records. VHA vacancy data. County average vacancy rate.	Attachment C, Section B.1. Single Fund Budget.	Not applicable
5. Energy Conservation/ Savings Plan	Reduce cost and achieve greater cost effectiveness.	To encourage residents to conserve energy and to promote sustainable property management practice.	Current level of efforts is limited to modifying units as they are rehabbed or built new.	Build a more comprehensive effort to promote energy efficiency and sustainability including participation in City and County efforts.	Number of meetings attended on sustainability. Potential dollar saved. Number of residents contacted.	MTW Agreement Attachment C, Section B.1.	Not applicable
6. Section 8 Homeownership	Self-Sufficiency and Housing Choice	Section 8 Tenant-based Voucher residents will have opportunity to participate in homeownership training and preparation that leads to homeownership. Housing choices will be expanded to include homeownership within Clark County.	Continuation of Section 8 Homeownership Program with maximum of 50 tenant base vouchers will be available for Section 8 Homeownership with maximum 10 year utilization. Baseline: number of households that utilize tenant-base voucher for homeownership. Number of homeowners that increase tenant-paid portion of mortgage in 12 months.. Number of households that are still in home-purchased annually.	Number of families in TBA Section 8 program purchasing home. Twenty-five percent (25%) of the households will increase amount of tenant portion of payment by 30% in 1 year. One hundred percent (100%) of the households will remain in the home purchased during the plan year.	Program data submissions. Annual income recertification data. Follow-up data on households that have purchased homes.	Attachment C, Section D.8. Home Ownership Program.	Not Applicable

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Measurement	Authorization	Hardship Exception
7. Unit-to-Market Rent Reasonableness	Reduce cost.	Reduce staff time spent maintaining a rent reasonable data base and determining reasonableness for individual units.	Previously a notebook of hundreds of units was maintained and had to be researched for each assisted unit. Rent reasonableness is currently established through use of a checklist completed by an HQS inspector comparing the assisted unit to market averages. Checklist averages are updated quarterly.	Substantial reduction in staff time to collect data for comparables and in using data to determine reasonableness.	Reported staff reduction in time spent.	Attachment C, Section D.2. Rent Policies and Term Limits.	Not applicable
8. Project-base and Agency-Base of Section 8 Vouchers	Self-Sufficiency and Housing Choice.	VHA assisted families will have opportunity to receive housing while engaged in case-management with partner agencies such as transitional housing providers, etc. Project-base households will be required to participate in FSS or an IDA program. Provision of Project-Based Vouchers (PBV) provides opportunity for continuity in case management and also provides housing opportunity not otherwise available due to rental history.	Maximum of 200 vouchers will be available for a) VHA owned units for tenants with case-intensive services from approved provider. b) agency-based vouchers provided to case-management partner agencies c) home-ownership of VHA project-base sites. Baseline: a) number of households in VHA project-base units receiving case management. b) number of units allocated to agency-base programs. c) number of persons enrolled in FSS or IDA. d) number of homeowners in PBV locations.	Board approval of amendment to current PBV plan to include agency-base PBV. Number of families in each of the 3 PBV programs. Number of families that attain case-management goals. Number of families that increase tenant portion of rent by 50%.	Approved resolution from board with agency-base inclusion. Number of agency-base contracts signed. Certification from provider agency of % of goals attained for tenants jointly enrolled. Anniversary income verification. Number of FSS or IDAs established.	Attachment C, Section B.2. Partnership with For-Profit and Non-Profit Entities. Attachment C, Section D.7. Establishment of an Agency MTW section 8 project-based program. Section 0.3.b (24 CFR 982, Subpart E)	Not Applicable
9. Improve Computer Technology	Reduces cost and achieves greater cost effectiveness.	Improve information technology functionality and effectiveness for staff, applicants and residents.	2008 computer system user-friendliness and access to information.	To improve computer system speed and redundancy by 50%. To improve staff and public access to information.	Successful installation of new systems including online waiting list access. Successful migration to SQL server platform.	MTW Agreement Attachment C, Section B. 1.	

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Measurement	Authorization	Hardship Exception
10. Family Self-Sufficiency Program	Self-sufficiency	The FSS program positions families to meet FSS purpose of MTW. Homeownership focus supports housing choices beyond public housing and market rate rental.	27 participants for FY 2008.	At least 15% increase in participation. Include special incentives to encourage resident savings. Execute/monitor agreements related to resident employment.	When meetings held. When agreements are executed. Tracking /reporting system.	Attachment C, Section E.	Not Applicable
11. Self-Sufficiency Programs Focused on Youth and Young Adults	Self-sufficiency	Promote mutual support among residents. Serve as a venue to provide resource information. Provide opportunities for positive family interaction. Reinforces and promotes youths' participation in school. Provides youth with opportunities for enrichment that they might not otherwise have.	67 program participants. Approximately 10% of enrolled youth currently participate in group meetings. 95% participant satisfaction. 54% of eligible Skyline Crest youth participating.	15% participation of enrolled youth. 95% program youth enroll in high school. 85% program youth graduate from high school. 85% out-of-school program youth obtain G.E.D.	Activity rosters. Resident self report – event evaluations. Parent surveys. Youth surveys. Database.	Attachment C, Section B.1.b.iii. Fungibility	Not Applicable
12. Self-Sufficiency Programs Focused on Adults	Self-sufficiency	Supports residents in job search and skill building.	40 program participants. 90% of users report that they learned or accomplished what they came for. 100% of users report that they have learned something they will use in the future.	90% job training participants complete job training classes. 85% of participants find jobs. 85% participants remain employed for three to six months.	Job training confirmed Hiring confirmations Activity rosters Resident self report – event evaluations Parent surveys Youth surveys Database	Attachment C, Section B.1.b.iii. Fungibility	Not Applicable

SECTION VI. SOURCES AND USES OF FUNDING

This section describes the sources and amounts of funding included in the Consolidated MTW and Other Programs budgets.

CONSOLIDATED MTW BUDGET

- Public Housing, including four AMPS totaling 514 units.
 - Multi-Family 1 – 185 units
 - Multi-Family 2 – 196 units
 - Single Family – 94 units
 - High-Rise – 39 units
- Housing Choice Vouchers – 1963 ACC units, 75 Mainstream Vouchers and as of July 2008 305 ports for which we are billing other housing authorities.
- Capital Fund Program.

OTHER PROGRAMS BUDGET

- Non-MTW Federally funded programs.
 - 151 unit senior high-rise – Section 8 New Construction
 - 52 single family homes – Project-based Section 8.
 - ROSS Grant
- Other State and Local housing related grants.
- A multi-family locally-financed affordable housing portfolio of fifteen projects totaling 2,049 units.
- Five homeless shelters and other smaller locally developed projects serving extremely low-income.
- Management of nine Section 202 and 811 projects and one locally funded project owned by Columbia Non-Profit Housing and their affiliated nonprofits.

CONSOLIDATED BUDGET STATEMENT

Table 11 (*page 40*) shows the Consolidated MTW programs budget for 2009, as well as other programs for the same period. These two

amounts are totaled in the third column and compared to 2008.

New in this year's Plan are beginning and ending Net Assets for the entire VHA shown at the bottom of the table.

Rental income should stay strong into 2009, as more displaced homeowners from recent foreclosures in Clark County will be entering the rental market. The weak economy and tight credit markets are also not permitting many to enter homeownership which creates a demand for rentals.

As a "gainer" housing authority in the transition to Asset Management, VHA hopes that the recent reduction in Public Housing funding will have a lesser impact than other agencies experience. So far, the funding scenarios appear to be break-even at best, which still puts the VHA in a vulnerable state as our properties age. Public Housing is important to our community, as it is the only one of its kind in the county available to an extremely low-income population who could otherwise be homeless.

Cost of living and fuel costs particularly will impact the VHA in 2009. We have been able to create efficiencies and have retained the most qualified and driven staff, who have made the best use of limited funds.

TABLE 11
CONSOLIDATED BUDGET STATEMENT

	Consolidated MTW	Other Programs	Total VHA CY2009	Total VHA CY2008
Income				
Rental Income	\$ 1,044,715	\$18,882,148	\$19,926,863	\$19,346,469
HUD and Other Grants	14,367,264	2,058,614	16,425,878	15,676,960
Other Revenue	799,582	2,485,285	3,284,867	3,239,191
Investment Income	169,280	989,486	1,158,767	1,125,016
Total	16,380,841	24,415,534	40,796,374	39,387,636
Expense				
Administrative Expenses	4,048,746	9,051,922	13,100,667	12,617,229
Maintenance	303,440	1,971,951	2,275,391	2,151,183
Utilities	314,148	1,924,456	2,238,604	2,173,402
Insurance and other Expenses	146,933	1,266,108	1,373,040	1,333,049
Housing Assistance Payments	11,278,500	133,140	11,411,640	11,079,262
Depreciation	922,528	4,839,672	5,762,199	5,594,368
Interest Expense	-	6,383,236	6,383,236	6,197,316
Total	17,014,294	25,530,483	42,544,778	41,145,809
Net Assets				
Changes in Net Assets	(633,453)	(1,114,950)	(1,748,403)	(1,758,172)
Beginning Net Assets			50,449,384	52,207,556
Ending Net Assets			\$48,700,980	\$50,449,384

Planned Sources and Expenditures by Development

Table 12 shows sources and uses of each MTW program including the four Asset Management Projects (AMPs).

The 2009 budget has not substantially changed from 2008, which was the first year for Asset Management. Through May 2008 our actual

costs are in line with the budget. We will utilize fungibility between projects to transfer cash from projects with a surplus to projects with deficits.

We are in the process of redistributing Public Housing AMPs to become effective January 2009. This change allows for better management, but should not impact overall sources and uses.

**TABLE 12
PLANNED SOURCES AND EXPENDITURES BY DEVELOPMENT**

	Capital Fund	Housing Choice Vouchers	Mutli-Family 1	Mutli-Family 2	Single Family	High-rise	COCC
	Public Housing						
Sources							
Rental Income	\$ -	\$ -	\$386,285	\$331,619	\$231,243	\$95,568	\$ -
HUD and Other Grants	774,972	12,435,396	420,240	444,960	212,592	79,104	-
Other Revenue	-	303,240	41,321	45,176	21,729	9,095	379,022
Investment Income	-	133,900	12,772	13,390	6,540	2,678	-
Total	774,972	12,872,536	860,618	835,145	472,105	186,444	379,022
Uses							
Administrative Expenses	317,405	1,777,779	588,128	566,430	281,567	130,641	386,796
Maintenance	-	-	113,341	119,204	50,106	20,789	-
Utilities	-	-	177,979	84,104	8,110	43,955	-
Insurance and other Expenses	-	7,023	38,020	74,122	19,539	8,229	-
Housing Assistant Payments	-	11,278,500	-	-	-	-	-
Interest Expense	-	-	-	-	-	-	-
Capital Fund Expenditures	457,567	-	-	-	-	-	-
Less Principle & Reserve Contributions	-	-	-	1,064	-	-	-
Total	774,972	13,063,301	917,469	844,923	359,323	203,613	386,796
Net Income (Deficit)	\$ -	\$ (190,765)	\$ (56,851)	\$ (9,779)	\$ 112,782	\$ (17,169)	\$ (7,774)

Housing Choice Vouchers - This program's deficit will be funded through program reserves accumulated in prior years. Measures will be taken in 2009 to reduce administrative cost.

Public Housing - Asset Management implementation caused three Public Housing projects to experience a deficit in 2009. The Single Family project will have net income. The program as a whole will experience a gain.

Description of Changes in Sources and Uses of MTW Funding from Previously-Approved Plan.

Adjustments were made to year 2009 to allow for inflation and cost of living increases. (See Table 13.) Since the last MTW Plan was revised in March 2008, we do not expect to make substantial financial strategy changes other than what has been discussed in other parts of the Plan.

Description of How Funding Fungibility is Planned to be Used.

The VHA includes the following resources in its single MTW budget: Low Rent Public Housing operating subsidy, tenant rents and capital funds,

Section 8 HCV Housing Assistance Payments, Section 8 HCV administrative funds, and the local self-sufficiency fund created with forfeited escrow funds under a previous MTW block grant funding formula. Combining funds into a single budget allows the VHA to target these resources in the most effective manner. To date, the VHA has used this funding flexibility primarily to increase resident services that promote self-sufficiency and other programmatic areas of public housing and Section 8 voucher programs. VHA is cautiously exploring how fungibility can best be used to meet other housing needs, such as homeownership, asset disposition and acquisition, and leveraging resources with other community partners.

**TABLE 13
CHANGES IN SOURCES AND USES OF MTW FUNDING**

	MTW 2008	MTW 2009
SOURCES		
Rental Income	\$1,014,286	\$1,044,715
HUD and Other Grants	13,687,306	14,367,264
Other Revenue	826,293	799,582
Investment Income	164,350	169,280
Total	15,683,235	16,380,841
USES		
Administrative Expenses	3,828,955	4,048,746
Maintenance	294,602	303,440
Utilities	304,998	314,148
Insurance and Other Expenses	142,653	146,933
Housing Assistance Payments	10,950,000	11,278,500
Interest Expense	-	-
Capital Fund Expenditures	602,500	457,567
Less Principle & Revenue Contributions	1,033	1,064
Total	16,124,741	16,550,397
Net Income (Deficit)	\$ (441,506)	\$ (169,557)

Note: Table 13 is a summary of Table 12.



SECTION VII. ADMINISTRATIVE

A. BOARD RESOLUTION ADOPTING 50077-MTW OR EQUIVALENT FORM

The Board of Commissioners of the Vancouver Housing Authority passed resolution 2777 on September 24, 2008, approving the 2009 Moving to Work Annual Plan and adopting the PHA Certifications of Compliance with PHA Plans and Related Regulations. Copies of the resolution and certifications are attached in Appendix A.

B. PUBLIC PROCESS

The 2009 MTW Annual Plan was published on August 4, 2008 for a 30-day public comment period. A public hearing was held on September 3, 2008. The 2009 Annual Plan was posted on the VHA's website. Copies of the Plan were available at the VHA's Administrative offices and at the RISE & STARS Community Center.

Copies of the Plan were distributed by e-mail to agencies within the Clark County Continuum of Care, the Council for the Homeless, Northwest Justice Project, Columbia Legal Services, Washington Department of Social

and Health Services, Clark County, and the City of Vancouver.

Notices advertising the public hearing on the Plan and the Plan's availability for public inspection were advertised in *The Columbian*, the area newspaper, on August 2, 2008; August 5, 2008; August 28, 2008; and August 29, 2008. The public hearing was listed in the *Columbian* Public Meetings section on August 31. Notices were published in the July, August, and September issues of *Neighbor to Neighbor*, the newsletter for VHA Public Housing and Section 8 residents. Proof of advertising is attached in Appendix B.

The VHA held a public hearing on September 3, 2008, at which time it received public comment. Minutes of the public hearing are attached in Appendix B. Prior to the public hearing, the VHA met with the MTW Advisory Committee and the Resident Advisory Board to get their input on the 2009 Annual Plan.

The VHA also received written comments from three parties; their letters are attached in Appendix B. The following is a summary of the comments received and the VHA's response.

Summary Record of Public Comments & VHA Response	
Issue	Response
Use of acronyms is confusing.	As an addendum to the plan, VHA created a glossary of terms that spells out acronyms and defines terms such as "port-in" that were not familiar to everyone.
Questions about the rent based on "imputed income" activity and who would determine if a resident had terminated their TANF assistance in order to avoid sanction.	The language in this activity was clarified to state that income would be imputed only if DSHS determined that a mutual client was not in compliance with WorkFirst requirements when they voluntarily terminated their participation in TANF. If after terminating participation in TANF a resident increases their earned income, such increased income will offset any imputed income.
Concern over payment standards.	The VHA will review payment standards annually. New payment standards will take into consideration the rental market, HUD's proposed FMRs, and HUD funding.

Summary Record of Public Comments & VHA Response (Continued)	
Issue	Response
Preferences as printed in the draft plan were confusing.	VHA worked with stakeholders to clarify the four preferences for Housing Choice Vouchers and the three preferences for Public Housing that are included in the 2009 plan. Two items that were listed as preferences in the draft plan (to accommodate households where family composition had changed and to accommodate households whose unit had become uninhabitable) were removed because such households would be transferred to another unit and not be put on a preference list.
Would like to see a dashboard.	The VHA is committed to providing useful data to evaluate the effectiveness of programs. The VHA is about to undergo a computer conversion which should supply us with the technical capability of creating a dashboard and other similar tools. Attachment C to the 2007 Annual Report, published in February of 2008, includes more detailed information on baseline data and measurements.
Resident Advisory Board would like to find ways to encourage energy conservation and recycling.	VHA will work with residents to achieve these goals as part of carrying out our long-term vision for sustainability.
Concern over excessive rent burden.	During 2009, the VHA will continue to evaluate the impact of its rent policies to determine the causes for and extent of rent burden and determine if current practices should be changed. During this evaluation process we will consider input from stakeholders, particularly residents. Although the current policy of allowing tenants to spend 45% of their income for rent has been very popular, during 2009 the VHA will utilize the standard of 40% of income. We will monitor to see how this affects housing choice as well as rent burden. As we evaluate rent policies, we will particularly seek input from the Resident Advisory Board and Housing Choice Voucher participants.
Discussion about rental subsidy pilot program, ending with general agreement that it was a good idea and worth trying.	A subgroup of the MTW Advisory Committee drafted the rental subsidy pilot program. This subgroup included local service providers who work with homeless and at risk populations. The pilot program will be evaluated to assess its effectiveness and what subpopulation of those needing housing assistance would benefit from this type of subsidy program.
Concern that there will not be one-for-one replacement of public housing units that are disposed of.	The VHA commits to a one-for-one replacement. Replacement units will be in the form on a new replacement voucher or a new subsidized unit, or both. VHA will provide relocation assistance if the VHA is responsible for displacing a tenant due to demolition or conversion of a public housing unit although at this time we do not foresee displacing any tenants. When the VHA submits its disposition plan one-for-one replacement and relocation assistance will be included.
Request that Health Savings Accounts (HSA) and other provisions for those with high medical expenses be made available for residents.	When the MTW Taskforce is convened to discuss rent reform and other related topics, this suggestion will be referred to the taskforce.

Summary Record of Public Comments & VHA Response	
Issue	Response
Admission preferences for those employed.	We have clarified this preference to specify that it is for households who agree to participate in Family Self Sufficiency, Smart Choices, or successor programs that are designed to assist residents in gaining employment and achieving economic self sufficiency.
Expanding the Family Self-Sufficiency Program	The VHA is committed to expanding opportunities for residents to gain employment and achieve economic self sufficiency. We have applied for FSS Coordinator grants for both the Section 8 Housing Choice Voucher program and the Public Housing program.
Earned Income Disregard	The VHA will create a task force to evaluate a variety of policies and practices that affect rent and occupancy policies. Earned income disregard will be included in this discussion. The task force will be asked to look comprehensively at rent and occupancy policies and make recommendations that will increase efficiencies, encourage economic self sufficiency, and increase housing choice.
VHA should not move forward with rent reform	The VHA will create a task force (see previous item) to review current rent and occupancy policies and make recommendations for changes. Our goal is to be thoughtful and comprehensive in our approach resulting in policies that better support MTW statutory goals and compliment community objectives for helping families to gain employment and achieve economic self sufficiency. Proposed changes to such policies will be submitted to HUD for approval either as amendments to the 2009 MTW Annual Plan or when we submit the 2010 MTW Annual Plan. The VHA is aware of the statutory requirement to establish a reasonable rent policy that will encourage employment and self-sufficiency and is consistent with the purpose of the MTW demonstration program. We will use a deliberative process to arrive at changes to our rent and occupancy policies. To that end we met with the MTW Advisory Committee on October 29 to discuss the task force and other MTW activities. We have developed a list of potential policies to be used as a starting point for the task force and are in the process of appointing task force members. The first meeting is scheduled in November.

C. DESCRIPTION OF ANY PLANNED OR ONGOING AGENCY-DIRECTED EVALUATIONS OF THE DEMONSTRATION, IF APPLICABLE.

A dashboard-type evaluation will be available once the new housing and financial database system is in operation in 2009.

VHA is in discussion with Washington State University-Vancouver to perform a broader evaluation of the 10-12 unit pilot program the MTW Pilot Program Taskforce is developing.

SECTION VIII. REPORTING COMPLIANCE WITH STATUTORY MTW REQUIREMENTS

If the Agency has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Restated Agreement, as determined by HUD in its review of the previous fiscal year's Annual MTW Report, the Agency will provide a narrative discussion and a plan as to how it will return to compliance. If the Agency is currently in compliance, no discussion or reporting is necessary in this section.

The VHA has not been out of compliance with any of the required statutory MTW requirements.

GLOSSARY

ACC Annual Contributions Contract

ACOP Admissions and Continued Occupancy Policy for the Public Housing Program

Adjusted Income Annual income, less allowable HUD deductions.

Administrative Plan The plan that describes PHA policies for administration of the tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and included as a supporting document to the PHA Plan.

AMP Asset Management Property

Annual Contributions Contract (ACC) The written contract between HUD and a PHA under which HUD agrees to provide funding for a program under the 1937 Act, and the PHA agrees to comply with HUD requirements for the program.

Annual Income The anticipated total income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

CLT Community Land Trust

Extremely Low Income Family A family whose annual income does not exceed 30 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30 percent of median income if HUD finds such variations are necessary due to unusually high or low family incomes.

Fair Market Rent (FMR) The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities.

Family Self-Sufficiency (FSS) The program established by a PHA to promote self-sufficiency

of assisted families, including the coordination of supportive services.

FMR Fair market rent

FSS Family Self-Sufficiency

FY Fiscal year

GAAP Generally Accepted Accounting Principles

HAP Housing assistance payment

HCV Housing choice voucher, also see Voucher.

Housing Assistance Payment (HAP) The monthly assistance payment by a PHA, which includes: (1) A payment to the owner for rent to the owner under the family's lease; and (2) An additional payment to the family if the total assistance payment exceeds the rent to owner.

Housing Agency (HA) A State, county, municipality or other governmental entity or public body (or agency or instrumentality thereof) authorized to engage in or assist in the development or operation of low-income housing. ("PHA" and "HA" mean the same thing.)

Housing Choice Voucher (HCV) A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

HOV Housing Ownership Voucher

Housing Quality Standards (HQS) The HUD minimum quality standards for housing assisted under the voucher program.

HQS Housing quality standards.

HUD The Department of Housing and Urban Development.

IDA Individual Development Account

GLOSSARY, *continued*

Imputed Income An amount of annual income that is not actually received by a family as a result of a specified welfare benefit reduction, but is included in the family's annual income and therefore reflected in the family's rental contribution.

ISA Individual Savings Account

LIHTC Low Income Housing Tax Credit

Local Preference A preference used by the PHA to select among applicant families.

Low Income Family A family whose income does not exceed 80% of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80% for areas with unusually high or low incomes.

MOU Memorandum of Understanding

MTW Moving to Work

Payment Standard The maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family).

PHA Public housing agency

Portability Renting a dwelling unit with Section 8 housing choice voucher outside the jurisdiction of the initial PHA.

Port-In A household transferring to the VHA with a Section 8 voucher from another housing authority. (See *Portability*.)

Project-Based Voucher (PBV) A Section 8 voucher that is only usable at an assigned property. The voucher is assigned to the property rather than to the tenant as in a tenant-based voucher.

Public Housing Agency (PHA) Any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities, that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

QHWRA Quality Housing and Work Responsibility Act of 1998 (also known as the Public Housing Reform Act)

REAC (HUD) Real Estate Assessment Center

Recertification Sometimes called reexamination. The process of securing documentation of total family income used to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported.

TANF Temporary assistance for needy families

Tenant-Based Voucher (TBV) A Section 8 Housing Choice Voucher. The voucher is assigned to a tenant who may use the voucher toward rent payment of any rental housing meeting Section 8 guidelines.

Very Low Income Family A low-income family whose annual income does not exceed 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50% of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the housing choice voucher program.

Voucher A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

APPENDIX A

**BOARD RESOLUTION APPROVING THE 2009 MTW PLAN
AND
PHA CERTIFICATIONS OF COMPLIANCE**

**HOUSING AUTHORITY OF THE CITY OF VANCOUVER
CLARK COUNTY, WASHINGTON**

RESOLUTION NO. 2777

**RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN FOR
FISCAL YEAR 2009**

WHEREAS, the Housing Authority of the City of Vancouver has entered into various contracts with the United States of America pertaining to the Housing Act of 1937, as amended;

AND WHEREAS the Department of Housing and Urban Development and the Housing Authority of the City of Vancouver have entered into Annual Contributions Contracts for Low Rent Public Housing and the Housing Choice Voucher Programs;

AND WHEREAS the Department of Housing and Urban Development and the Housing Authority of the City of Vancouver have entered into a Moving To Work Demonstration Agreement dated April 21, 1999, as amended and restated March 26, 2008;

AND WHEREAS the Moving To Work Agreement with the Department of Housing and Urban Development requires the submission of an Annual MTW Plan;

AND WHEREAS the Annual Plan for Fiscal Year 2009 has been prepared and made available for public comment for thirty days and a public hearing was held on September 3, 2008;

NOW THEREFORE BE IT RESOLVED by the Housing Authority of the City of Vancouver that:

Section 1: The Board of Commissioners approves the 2009 Moving to Work Annual Plan and authorizes the Executive Director to complete the Plan documents and submit the Plan to HUD.

Section 2: The Board of Commissioners certifies that the Public Hearing Requirement has been met and authorizes the Chair of the Board to execute the attached HUD Certification of Compliance with MTW Plan Requirements and Related Regulations.

DATED: September 24, 2008

ATTEST:



Roy A. Johnson, Secretary-Treasurer



Ronald K. Kawamoto, Chair

**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**

Acting on behalf of the Board of Commissioners of the Housing Authority of the City of Vancouver (VHA), as its Chairman, I approve the submission of the Annual Moving to Work Plan for the VHA fiscal year beginning 2009, 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 VHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 30 days before the public hearing, published a notice that a hearing would be held 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;
3. The VHA 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 VHA 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 VHA's involvement and maintain records reflecting these analyses and actions.
5. The VHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The VHA 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 VHA 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 135.
8. The VHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The VHA 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 VHA 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 VHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The VHA 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.

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13. With respect to public housing the VHA 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 VHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
 15. The VHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
 16. The VHA 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 VHA 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 VHA and at all other times and locations identified by the VHA in its Plan and will continue to be made available at least at the primary business office of the VHA, at 2500 Main Street, Vancouver, WA 98660.

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)

Ronald K. Kawamoto
Name of Authorized Official


Signature

Chair, Board of Commissioners
Title

September 24, 2008
Date

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 2812

APPROVING AMENDMENTS TO THE 2009 VHA MOVE-TO-WORK PLAN

WHEREAS, the VHA previously submitted the 2009 MTW plan to HUD and the plan was subsequently approved; and

WHEREAS, the VHA has a desire to amend the plan to incorporate changes that increase efficiency of service provision and encourage self-sufficiency programs; and

WHEREAS, HUD has provided VHA with a First Amendment to the Move to Work Agreement; and

WHEREAS, a public review of the proposed plan was completed and comments were received and considered resulting in changes to the proposed amendments; and

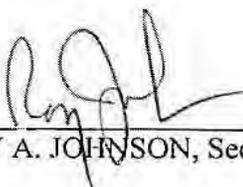
WHEREAS, the Board of Commissioners must approve the proposed 2009 Plan Amendments prior to submittal to HUD for final approval.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Vancouver Housing Authority as follows:

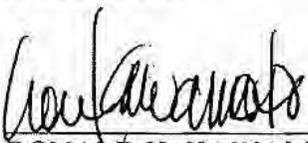
1. The Board of Commissioners approves the proposed amendments to the 2009 MTW Plan and instructs VHA staff to submit the changes to HUD for final approval.
2. The Board of Commissioners directs VHA staff to make necessary changes to the VHA Section 8 Administrative Policy and Public Housing Occupancy Plan following HUD approval of components or the amendments in its entirety if so approved by HUD.
3. The Board of Commissioners approves the First Amendment to the Move To Work Agreement and authorizes the Executive Director to provide necessary signatures.

ADOPTED by a majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 25th Day of March, 2009.

CERTIFIED BY:



ROY A. JOHNSON, Secretary-Treasurer



RONALD K. KAWAMOTO, Chair

HOUSING AUTHORITY OF THE CITY OF VANCOUVER
CLARK COUNTY WASHINGTON
RESOLUTION NO. 2829

APPROVING AMENDMENTS TO THE 2009 MOVING TO WORK ANNUAL PLAN

WHEREAS, the Housing Authority of the City of Vancouver has entered into various contracts with the United States of America pertaining to the Housing Act of 1937, as amended; and

WHEREAS, the Department of Housing and Urban Development and the Housing Authority of the City of Vancouver have entered into a Moving to Work Demonstration Agreement as amended and restated March 26, 2008: and

WHEREAS, the Moving to Work Annual Plan for 2009 was submitted and subsequently approved by the Department of Housing and Urban Development; and

WHEREAS, the VHA desires to amend the plan to incorporate changes that are required by the Department of Housing and Urban Development and/or increase the efficiency and efficacy in the delivery of services; and

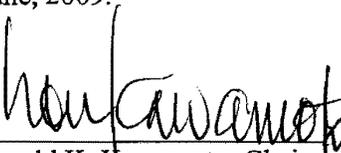
WHEREAS, the amendments were made available for public comment for thirty days and a public hearing was held on June 4, 2009.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Vancouver Housing Authority that:

1. The Board of Commissioners approves the proposed amendments to the 2009 Moving to Work Annual Plan and authorized the Executive Director to submit the amendment to the Department of Housing and Urban Development.
2. The Board of Commissioners authorizes submittals of ARRA capital applications and grants Executive Director authority to sign necessary application materials.
3. The Board of Commissioners direct VHA staff to make necessary changes to the Section 8 Administrative Plan and the Public Housing Admission and Continued Occupancy Policy (ACOP) following HUD approval of the amendments of components of the amendments.

ADOPTED by the majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 24th day of June, 2009.

ATTEST:


Ronald K. Kawamoto, Chair

APPENDIX B

**PROOF OF PUBLIC PROCESS
&
LETTERS OF PUBLIC COMMENT**

Public Hearing Minutes

September 3, 2008

Regarding 2009 Moving to Work Annual Plan

Those in Attendance:

Public:

Nancy Ramey
Yvonne Broders
Michael Ralston
Chris Pazen
Greg Provenzano, Columbia Legal Services
Craig Lyons, Council for the Homeless

VHA Employees:

Roy A. Johnson, Executive Director
LaVon C. Holden, Deputy Director
Saeed Hajarizadeh, Deputy Director
Mike McGuire, Director of Housing and Maintenance
Sasha Nichelson, Housing Department Compliance Specialist
Steven Towell, Community Relations Specialist; secretary for the hearing

Hearing was opened by Vancouver Housing Authority Executive Director Roy A. Johnson at 6:06 p.m.

Introductory Comments

Mr. Johnson made introductory comments, citing that in addition to this hearing, comments on the Moving to Work (MTW Plan) have been received from several other sources, including the Resident Advisory Board, and the Moving to Work Advisory Committee.

Mr. Johnson brought two items to the attention of the parties attending the hearing:

- 1) Imputed Income. VHA will clarify the paragraphs on imputed income to read:

In Section 8 and Public Housing VHA will impute income only if a family voluntarily terminates a TANF grant while in WorkFirst sanction or after being notified by DSHS that they are not in compliance with their WorkFirst plan. Participants' WorkFirst status (whether they are in compliance or sanction) will be determined by and verified through DSHS.

The imputed income will be equal to the amount of the TANF grant that was being received at the time of sanction or voluntary termination. Income will only be imputed to families who were not satisfactorily participating in WorkFirst at the time they closed

their grant. Families who were in compliance with WorkFirst when they closed their grants will not have income imputed.

Under current policy, a family does not receive an increase in rental subsidy if their TANF grant is reduced, by a sanction, for not participating in WorkFirst, but does receive an increase in subsidy if they voluntarily close their grant to avoid sanction. Current policy offers a disincentive to clients to participate in WorkFirst activities that can lead to greater self-sufficiency. This MTW initiative will increase the incentive for families to comply with WorkFirst requirements.

The clarification is to ensure that people who volunteer to quit the DSHS WorkFirst program for legitimate reasons will not have income imputed.

- 2) Local Preferences. The local preferences listed in the MTW Plan do not require the VHA's MTW authority. Preferences 1, 2, and 3 have been removed from the plan; these are transfers that are handled internally and not part of the preference process. The section on preferences will be changed to the following:

Although these local preferences do not require MTW authority, they are included in the MTW plan and will be made effective in 2009:

VHA will offer local preferences to households that possess characteristics that have been locally determined to have needs that take precedence over the general wait list. These local preferences are intended to expand housing choice and to further community goals related to providing housing and services to designated populations.

The following local preferences will be enacted:

- In the Section 8 HCV program, VHA will implement a preference for Public Housing tenants who are eligible to participate in the Home Ownership Voucher program. Up to 5 families per year may receive this preference.*
- Graduates from an approved two-year transitional or housing-first supportive housing program operated by an agency that has an MOU with the VHA. Examples of such programs include Bridges to Housing, Washington Families Fund, and New Dreams. This preference is limited to 25 vouchers per year*

-
- *Applicant households displaced by VHA disposition or condemnation actions. This will ensure that low income families in the community that would be affected by such actions retain housing choice.*
 - *Families/households where the head, spouse/co-head, or sole member agrees to participate in the Family Self Sufficiency, Smart Choices or successor programs offered by the VHA and designed to assist residents in gaining employment and achieving economic self sufficiency. Up to 50 households per year may receive this preference.*

Preference 2-4 will be enacted in the Public Housing program.

LaVon Holden, VHA Deputy Director added that on the advice of the MTW Advisory Committee, the VHA is adding a glossary of terms to the MTW Plan and that a dashboard-type evaluation will be included in the Evaluation section, once the new database system is in operation.

Comments from the Public

Mr. Michael Ralston – Are Section 8 people affected by this plan? Mr. Johnson responded that both Public Housing and Section 8 households are affected by the Plan. The return to a 40% rent burden will limit the amount a Section 8 household will pay in rent. Also, under the 2009 Plan, additional programs may become available to residents, but there is no other affect on Section 8 households.

Mr. Michael Ralston – Inquired about the homeownership program. How much must you make to afford a home under the homeownership program? Are residents limited to homes the VHA will offer for sale? Mr. Johnson responded that to be eligible a household must have sufficient income to make mortgage payments, go through a homebuyer counseling program, and qualify for a loan on a home you can afford; based on a \$160,000 mortgage, a household would need to have income of about \$26,000 per year. Residents are not limited to homes the VHA may offer for sale under its disposition plans.

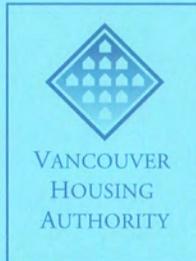
Mr. Greg Provenzano, Columbia Legal Services – Stated that his main concern is with the Section 8 program. 1) Allowing household rent payments of up to 45% creates excessive burdens; pleased to see the move to a 40% cap. 2) The VHA hasn't adjusted the payment standard annually and he requests they do so. 3) Has concerns that the biennial review will leave some families without an adjustment to subsidy for a long period of time. It is suggested that VHA determine if it would be feasible to perform

limited reviews so people will not wait for years for an adjustment. 4) Encourages the use of a dashboard evaluation so members of the community can view VHA performance on the various programs. 5) Concerned about guaranteeing one-for-one replacement on units in dispositions plan and that the replacements be of a suitable size and in suitable locations.

Ms. Nancy Ramey – Are flat rents are part of the MTW Plan? Mr. Johnson responded that flat rents are not part of the 2009 MTW Plan. LaVon Holden responded that Rent Reform Taskforce is looking at several options for the future.

There were no other questions or comments from the public.

The hearing was closed by Executive Director Roy Johnson at 6:27 p.m.



2009
MTW Public
Hearing

VANCOUVER HOUSING AUTHORITY
MEETING ATTENDANCE RECORD
DATE: 9/3/08

NAME	REPRESENTING	<u>REQUEST TO SPEAK</u>
Nancy Ramey	myself	
Aquino Praders	self	
Michael Glatton	myself	
Chino Patra	myself	✓
Greg Poverzon	Columbia Legal S	✓
CRAIG LYONS	CFTH	

Client:	41115	VANCOUVER HOUSING (RENTAL/	Phone:	(360) 694-2501
Class.:	2500 MAIN ST			
	suite 200			VANCOUVER, WA 98660-2697
Ad #	288392	Requested By:	Fax:	
Sales Rep.:	P111	Erin Alston	Phone:	(360) 735-4570
		erin.alston@columbian.com	Fax:	(360) 735-4493
Class.:	0174	Special Notices		
Start Date:	08/02/2008	End Date:	08/02/2008	Nb. of In- 1
Publications:	Columbian			
Paid Amount:	\$0.00	Balance:	\$150.94	
Total Price:		\$150.94		Page 1 of 1

NOTICE OF PUBLIC HEARING

The Vancouver Housing Authority (VHA) will hold a public hearing on its Moving to Work Annual Plan for 2009 on Wednesday, September 3, 2008, at 6:00 p.m., in the VHA Community Room, 2500 Main Street. Comments from the public regarding the plan are welcome. Copies of the VHA 2009 Moving to Work Annual Plan will be available, beginning August 4, 2008, at the RISE & STARS Community Center, 500 Omaha Way, or at the VHA Main Street offices, 2500 Main Street. Copies will also be available on the VHA's web site, www.vhawsa.com, in the 'What's New' section. Vancouver Housing Authority, 2500 Main Street, Suite 200, Vancouver, WA 98660-2697, (360) 694-2501 or (503) 288-5585. Fax: (360) 993-9594. TDD: (360) 694-0842. www.vhawsa.com

Equal Housing Opportunity

Publication
(WASHINGTON)
) ss:
y of Clark)
Columbian

ACCTS PAYABLE
VANC HOUSING AUTHORITY-L
2500 MAIN ST
VANCOUVER WA 98660-2697

REFERENCE: 70861 SEPT 3 MTG.
2940097 Notice of Public Hea

I, the undersigned say,
That I am over the age of eighteen and not interested in the above entitled matter; that I am now, and at all time embraced in the publication herein mentioned, was, the principal clerk of the printer of The Columbian, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of the County of Clark, State of Washington, under Proceeding No. 802006715; that the advertisement, of which the annexed is a true printed copy, was published in the above-named newspaper on the following dates, to wit:

Notice of Public Hearing
The Vancouver Housing Authority (VHA) will hold a public hearing on its Moving to Work Annual Plan for 2009 on Wednesday, September 3, 2008, at 6:00 p.m., in the VHA Community Room, 2500 Main Street. Comments from the public regarding the plan are welcome. Copies of the VHA 2009 Moving to Work Annual Plan will be available, beginning August 4, 2008, at the RISE & STARS Community Center, 500 Omaha Way, or at the VHA Main Street offices, 2500 Main Street. Copies will also be available on the VHA's web site, www.vhausa.com, in the "What's New" section.
Hearing Date:
Wednesday,
September 3, 2008
Time: 6:00 p.m.
Location:
Community Room of the VHA
Administration Office,
2500 Main Street,
Vancouver, WA
Vancouver Housing Authority
2500 Main Street, Suite 200
Vancouver, WA 98660-2697
Telephone:
(360) 694-2501 or
(503) 289-5593
Fax: (360) 983-9594
TDD: (360) 694-0842
www.vhausa.com
Equal Housing Opportunity
Aug. 5 288021

PUBLISHED ON: 08/05

TOTAL COST: 67.65 AD SPACE: 41 LINE
FILED ON: 08/05/08

I Certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature Judy Moody

Affidavit of Publication
STATE OF WASHINGTON
) ss:
County of Clark)

Columbian

STEVE TOWELL
VANC HOUSING AUTHORITY-L
2500 MAIN ST
VANCOUVER WA 98660-2697

REFERENCE: 70861 NPH-SEPT 3 MTG
2945123 Notice of Public Hea

I, the undersigned say,

That I am over the age of eighteen and not interested in the above entitled matter; that I am now, and at all time embraced in the publication herein mentioned, was, the principal clerk of the printer of The Columbian, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of the County of Clark, State of Washington, under Proceeding No. 802006715; that the advertisement, of which the annexed is a true printed copy, was published in the above-named newspaper on the following dates, to wit:

PUBLISHED ON: 08/28 08/29

TOTAL COST: 128.70 AD SPACE: 39 LINE
FILED ON: 08/29/08

I Certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature

Judy Moody

Notice of Public Hearing
The Vancouver Housing Authority (VHA) will hold a public hearing on the Moving to Work Annual Plan for 2009 on Wednesday, September 3, 2008, at 5:00 p.m., in the VHA Community Room, 2500 Main Street, Vancouver, WA. Copies of the plan are available for review at the VHA Community Center, 301 Drexler Way, or at the VHA Main Street Office, 2500 Main Street. Copies will also be available on the VHA web site, www.vhausa.com, in the "What's New" section.
Meeting Date: Wednesday, September 3, 2008
Time: 5:00 p.m.
Location: Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA
Vancouver Housing Authority
2500 Main Street, Suite 250
Vancouver, WA 98660-2697
Telephone: (360) 584-2221 or (509) 255-0222
Fax: (360) 584-2504
TDD: (360) 584-2642
www.vhausa.com
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Public meetings

Columbian, The (Vancouver , WA) - August 31, 2008

Monday

Labor Day

Tuesday

Clark County commissioners , sixth floor of county Public Service Center, 1300 Franklin St.: 9:45 a.m., retirement in hearing room of Risk Manager Mark Wilsdon; 10 a.m., commissioners' hearings in hearing room, deal with WSUV to evaluate meth-tax spending, plat amendments for March Estates Homeowners Association and Summer Hills Homeowners Association, removal of wetland designation from Baker Estates, quality assurance project plan for county clean water program, residential lease agreement for 7612 N.E. 259th St., bond level boost for county treasurer and clerk, contracts for children's justice center, medical examiner services for Klickitat and Skamania counties; 10:30 a.m., executive session on pending litigation in conference room B.

Skamania County commissioners , 10 a.m., Skamania County Courthouse, Stevenson: approve resolutions and contracts; extend interim zoning controls for Swift area for another six months and set public hearing on the extension for Sept. 30; update on food bank.

Southwest Washington Regional Transportation Council , 4 p.m., Clark County Public Service Center, sixth floor Training Room, 1300 Franklin St.: Amend Metropolitan Transportation Improvement Program for interchange replacement at Interstate 5 and state Highway 501; amend Unified Planning Work Program; 2010 Transportation Improvement Board project endorsement; Clark County household activity and travel survey; Clark County freight study; and update on Washington Department of Transportation construction and partnership projects.

Port of Camas-Washougal , 4 p.m., port headquarters, 24 South A St.: Action items: Sending port representatives to Pacific Coast Congress of Harbormasters & Port Managers Conference in Seattle; materials purchase for breakwater repair; Columbia River Crossing Coalition membership; Sixth Street demo completion; marina rate change; Chinookan Memorial. New business and discussion: Port account transfer to Bank of America; summer camp report; wetland mitigation presentation.

La Center Planning Commission , 6 p.m., 214 East 4th St., La Center: telephone conference with Angelo Economics on economy development segments, sign code, future agenda.

Battle Ground City Council , 7 p.m., city council chambers, 109 S.W. First St., Battle Ground: Property taxes presentation, tentative skate park partners presentation, information on the development of the future comprehensive park and recreation system.

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Clark County Fire District 6 board of commissioners , 7:30 p.m., Station 61, 8800 N.E. Hazel Dell Ave.: General business.

Wednesday

Clark County commissioners , 9 a.m., work session on Washington counties risk pool in training room; 10 a.m., work session on regional real-estate excise tax in training room; 11 a.m., work session on equal employment opportunity and diversity plans in training room; 1 p.m., public meeting on Whispering Pines Subdivision appeals in hearing room; approximately 3:30 p.m., board time in conference room B.

Ridgefield Planning Commission , 6 p.m., Ridgefield Community Center, 210 N. Main, Ridgefield: Abrams Park master plan status, lighting standards, community development department staffing status.

Vancouver Housing Authority , 6 p.m., VHA community room, 2500 Main St., **Vancouver** : public hearing on Moving to Work Annual Plan for 2009.

Port of Ridgefield , 6 p.m., 111 W. Division St., Ridgefield: general business.

Thursday

Southwest Clean Air Agency, 3 p.m., 11815 N.E. 99th St.: Control officer's report includes the following items: update on air quality strategy for Columbia River Gorge; Montreal protocol governments accelerate phase-out of chemical used in freezing, which depletes ozone layer and contributes to global warming; Environmental Protection Agency releases online tool for estimating carbon dioxide emissions for buildings; group calls for state agencies to take lead role in carbon sequestration projects; BP agrees to pay \$50 million for criminal violation of Clean Air Act.

Port of Woodland , 4 p.m., port office, 141 Davidson Ave.: Special meeting for commission to select a qualified bidder for Lot 4 project.

Friday

Port of Ridgefield , 10 a.m., Pac Mar Marina, 3501 NE Marine Drive, Portland: Four-hour waterfront development tour.

Lower Columbia Fish Recovery Board , 1 p.m., **Vancouver** City Hall, 210 East 13th St.: Amend two watershed planning grant contracts with the state Department of Ecology; negotiate and enter into contract with HDR Inc. for the intensively monitored watershed treatment plan development on Abernathy and Germany creeks in Cowlitz County; approve ranked list of projects for the Salmon Recovery Funding Board's ninth round. vials 1 Public Meetings

Public meetings

Section: Clark County

Page: C3

Record Number: MERLIN_2637480

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MTW plan available for review

The Vancouver Housing Authority's 2009 Moving to Work Annual Plan is available for public review and comment beginning Monday, August 4, 2008. Copies of the plan are available at the VHA offices at 2500 Main Street, Vancouver, and the RISE & STARS Community Center at 500 Omaha Way, Vancouver, and on our web site www.vhausea.com/about/whatsnew.html.

A public hearing on the Annual Plan is scheduled for Wed. Sept. 3, 2008, at 6:00 p.m. in the Community Room of the VHA offices at 2500 Main Street, Vancouver, WA. Members of the public are invited to submit written comments on the plan during the review period and/or attend the public hearing.

The VHA Board of Commissioners will approve the plan at their September 24, 2008, meeting and the plan will be submitted to the U.S. Dept. of Housing and Urban Development by early October for their approval. The plan will go into effect on January 1, 2009.

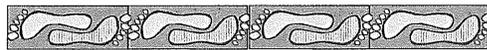
VHA Board Of Commissioners Meeting
Wednesday, September 24th, 2008 at 10:00 AM
2500 Main Street, Vancouver
Meetings are open to the public

Take a Walk!

Get your copy of the FREE Clark County Walkaround Guide!
Ten safe, easy walks in Clark County at your fingertips in one handy little book.

The *Clark County Walkaround Guide* is designed to make our walking trails easier to experience. Take your pick from many different walks that showcase regional parks, local lakes and rivers, wildlife refuges and urban settings. On foot, you can explore wetlands, the shoreline and other environmentally sensitive areas that can be reached in no other way. Some trails bring you face-to-face with local history. Whichever walk you choose, the guide provides directions to get you there and details about fees, hours and special considerations. There is a lot to explore and you will feel great for the experience.

Guides are available from the RISE & STARS Community Center. Call 737-2950 to reserve your copy today.



Are you registered to vote?
Voter registration forms are available at the
VHA office, 2500 Main St. or RISE & STARS
Community Center, 500 Omaha Way.

Get your 2007 Stimulus Payment

Beginning in May, the IRS sent one-time economic stimulus payments to more than 130 million households across America. Most people who are eligible for a stimulus payment will receive it automatically, provided they file a 2007 federal income tax return. **If you haven't yet filed a tax return to get your stimulus payment, you still have time to do so.** But you must file by October 15th to get your payment this year.

If you don't usually have to file a federal tax return, you may qualify for a stimulus payment: if you have at least \$3,000 in income from any combination of earned income, Social Security retirement or disability benefits, certain veterans' or railroad retirement benefits, file Form 1040A or 1040 with the IRS to get your Stimulus Payment. It's a short form – quick and easy! Visit www.irs.gov for details.



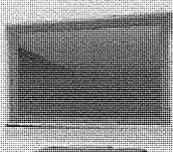
...It's that time of year!

Continued from Page 1

Watch for details about upcoming RISE & STARS Community Center events, classes, and training opportunities sponsored by the SmartChoices programs.

Please Note: The SmartChoices Program is for residents in low-rent public housing. Section 8 residents are not eligible for the individual services. However, they may attend group events and classes. **Please call Carol Van Atta at 360.992.0228 to learn more about this program and obtain a program Intake Form.**

Do You Need a Converter Box for Your Television?



You've probably heard the news about television stations switching over to "digital" broadcasting on February 17, 2009. Many residents have been wondering if their televisions will continue to work after that date. Others have heard they will need a "converter box" for their TVs. Here are some quick answers:

- *If all of your TVs are hooked up to cable or satellite, you will continue to get your TV after February 17, 2009. Just check with your cable or satellite company to be sure.*
- *If you have a digital TV with an ATSC (Advanced Television Systems Committee) tuner, you are ready to receive the digital signals through your antenna. If your TV is more than 10 years old it probably is not digital. If it is less than 10 years old, ask the manufacturer if your TV is "analog-only."*
- *If you have an "analog-only" TV with a roof top antenna or "rabbit ears," you will not be able to watch most TV stations after February 17, 2009. You will need a converter box.*

The converter box will attach to your TV and let you continue getting free TV through your antenna. The antenna you have should work with the box. You can buy a converter box at a retail store for about \$40 to \$70. The US Government will help you pay for up to two converter boxes per household. (One \$40 coupon per box only.) For information about converters boxes and coupons, call 1-888-388-2009 (voice) or 1-877-530-2634 (TTY), or go to: www.dtv2009.gov.

Free Summer Lunch Program

The Vancouver-Clark Parks and Recreation Department will again sponsor the Summer Food Service Program for children. Meals will be available at no charge to children less than 19 years of age. Meals will be provided at the following sites.

All meals are available without regard to race, color, national origin, sex, age, or disability.

For details, please contact Teresa Williamson at 360-487-7059.

Columbia River High School
800 NW 99th Street

Discovery Middle School
800 E 40th Street

Fruit Valley Elementary School
3410 NW Fruit Valley Road

Hough Elementary School
1900 Daniels Street

Image Elementary School
4400 NE 122nd Ave.

Minnehaha Elementary School
2800 NE 54th Street

Sarah J Anderson Elementary School

2215 NE 104th Street

**Vancouver Housing Authority
RISE & STARS Community Ctr.**
500 Omaha Way

Washington Elementary School
2908 S Street

Walnut Grove Elementary School
6103 NE 72nd Ave.

West Side Youth Day Camp
1009 E McLoughlin Blvd.

MTW plan available for review

The Vancouver Housing Authority's 2009 Moving to Work Annual Plan will be available for public review and comment beginning Monday, August 4, 2008. Copies of the plan will be available at the VHA offices at 2500 Main Street, Vancouver, and the RISE & STARS Community Center at 500 Omaha Way, Vancouver, and on our web site www.vhausa.com/about/whatsnew.html.

A public hearing on the Annual Plan is scheduled for Wed. Sept. 3, 2008, at 6:00 p.m. in the Community Room of the VHA offices at 2500 Main Street, Vancouver, WA. Members of the public are invited to submit written comments on the plan during the review period and/or attend the public hearing.

The VHA Board of Commissioners will approve the plan at their September 24, 2008, meeting and the plan will be submitted to the U.S. Dept. of Housing and Urban Development by early October for their approval. The plan will go into effect on January 1, 2009.

Free Tuition

- Are you a working parent?*
- Do you want to take a class without paying tuition?*
- Would child care assistance help you go to college?*
- Do you want to upgrade your skills for job advancement?*

Working parents who meet certain income requirements can qualify for a special tuition assistance program through Clark College. If you are interested in computer classes, building vocational skills, or need help with basic skills, call Becky Merritt at Clark College at 992-2321 or visit Gaiser Hall, room 127 at Clark College.

Notice of Public Hearing

The Vancouver Housing Authority (VHA) will hold a public hearing on a proposed amendment to the VHA Moving to Work Annual Plan for 2008 with the U.S. Department of Housing and Urban Development. The proposed amendment indicates that VHA will submit disposition plans to HUD for single-family public housing units and Van Vista Apartments. We will welcome your comments and suggestions. Copies of these documents are available for review prior to the hearing at the RISE & STARS Community Center (500 Omaha Way) or at VHA. Copies are also available on VHA's website (www.vhausea.com).
 Hearing Date: Monday, August 25, 2008
 Time: 6:00 p.m.
 Location: Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA
 Telephone: (360) 694.2501

Resident voices needed!!

There is still time to apply for the Resident Advisory Board (RAB). The RAB provides input to the Housing Authority on policies and procedures that affect residents. It is made up of people who live in Public Housing and Section 8. It will meet regularly at a time that is convenient to the members. If needed, the VHA will provide transportation assistance and child care.

We are looking for 12-15 people who broadly represent the population of the VHA. Contact Connie at 992-0207 or csherrard@vhausea.com or go to the website: www.vhausea.com for more information.

Free Summer Lunch Program

The Vancouver-Clark Parks and Recreation Department will again sponsor the Summer Food Service Program for children. Meals will be available at no charge to children less than 19 years of age. Meals will be provided at the following sites.

All meals are available without regard to race, color, national origin, sex, age, or disability.

For details, please contact Teresa Williamson at 360-487-7059.

Columbia River High School 800 NW 99th Street	Sarah J Anderson Elementary School 2215 NE 104 th Street
Discovery Middle School 800 E 40 th Street	Vancouver Housing Authority RISE & STARS Community Ctr. 500 Omaha Way
Fruit Valley Elementary School 3410 NW Fruit Valley Road	Washington Elementary School 2908 S Street
Hough Elementary School 1900 Daniels Street	Walnut Grove Elementary School 6103 NE 72nd Ave.
Image Elementary School 4400 NE 122 nd Ave.	West Side Youth Day Camp 1009 E McLoughlin Blvd.
Minnehaha Elementary School 2800 NE 54 th Street	

Planning for fireworks?

Be Prepared...before you light fireworks

- Use legal fireworks, available at licensed outlets.
- Read and follow all warnings.
- Store fireworks out of children's reach.
- Keep pets safe indoors.
- Always keep water handy.

Be Safe...when lighting fireworks

- Only adults should light fireworks.
- Use outdoors only. Keep fireworks at least 25 feet away from vegetated areas or areas with combustibles.
- Do not throw fireworks or hold in your hand.
- Protect your eyes.
- Light one fireworks at a time and move away quickly.
- Never relight a "dud". Allow them to stand for several minutes, discard in a pail of water.

Be Responsible...after you finish

- Soak used fireworks in water.
- Be considerate-clean up used fireworks.
- Keep matches and lighters away from children.

*Information from
Washington State
Patrol and Van-
couver Fire
Department.*

MTW Annual Plan for review

The 2009 Moving to Work Annual Plan will be available for review on August 4, 2008. Copies of the plan are available at Vancouver Housing Authority (2500 Main Street), RISE & STARS Community (500 Omaha Way), and on the web site (www.vhausea.com). A public hearing will be held on September 3, 2008 at 6:00 PM at 2500 Main Street, Vancouver.

From: Jacinta and Rick cox [mailto:jacinta_rick@hotmail.com]
Sent: Thursday, September 04, 2008 2:42 PM
To: Connie Sherrard
Subject: RE: agenda and minutes

Didn't make it to the meeting my head cold moved into a really bad cough and I didn't want to make others sick. I will submit a couple a ideas at a time I have over the next few days and you can send them to Roy.

Congress says HUD is suppose to accommodate medical expenses and quit frankly I think some of the changes HUD has made over the past few years are in violation of that mandate. At some point I will go more into that at large, but in the meantime I have a couple of suggestions that HUD should have an easier time agreeing to.

Suggestions:

1)

What about making monthly contribution to an HSA a deduction? (HSA=Health Savings Account...it's kind of like an IRA except for medical and you can withdraw from it tax free anytime as long as it for medical expense) A HSA has the EXACT same IRS code medical guidelines that HUD follows. Of course regardless of how much is saved it shouldn't be counted as an assets as long as money withdrawn is used for medical expenses. At the recertification documentation of the monthly deposits and withdraws for medical expenses must be provided and any money unaccounted for or withdrawn for anything other than medical expenses will be counted as income. Hopefully no one would be stupid enough to try to withdraw for anything other than medical expenses because HSA withdraws for anything else carries fees and 40% taxation if you do, plus then would be counted as income in the HUD recertification. An example of where this will come in handy is not all specialist take Medicaid or Medicare especially if they are in private practice and often those who don't require cash payment UP FRONT. By the way these doctors are not as much as jerks as they sound Medicare and Medicaid only reimburse 10%-50% of cost, the doctors can write off the loss but if they are in private practice they may not have enough profit to benefit from the write off. Since most of these doctors require cash up front it requires a lot of Medicare patients to take out personal loans of some sort to cover them, which HUD in turn says "if you used a loan to pay for a medical expenses then payments on that loan do not count as a medical expense but rather a personal debt". This will also help people who have surprise medical expenses or irregular but significant medical expenses throughout the year. Medical expenses are the #1 cause of bankruptcy in America, not accepting that fact and helping people prepare for that will be counterproductive to any attempt to help move people to place of any independence from housing assistance. A good Health Savings Account can help prevent a families progress to self significantly from being wiped out over night in your Move to Work program avoiding the waste of years and thousands of dollars invested to get the family on their feet. I know there are some "newer" upper management types on the highest level of HUD who believe HUD should not have to accommodate medical expenses as they feel that is making them responsible for an inadequate medical system, however part of the intent in the creation of HUD was to prevent people from having to choose between medical care they need and the roof over their heads. Second there will ALWAYS be an inadequate medical system to some extent. Medicare is a Federal program and is a perfect example of how as a FEDERAL program falls short in keeping up with the newest cutting edge medical treatments and medicines. It takes literally 10-20 years for Medicare to catch up with the latest treatments and medications and most people's medical conditions can't wait 10-20 years. It is impossible for Medicare to keep up with all of the medical advancements and that is often another place people on HUD end of with

medical expenses. If there is a medical treatment or medicine that could potential increase some disabled person functionality and allow them to return to work full time or even part time then that should be at the utmost importance to any Move To Work program.

2)

My husband who is on Medicare sees an MD specialist who is the ONLY one with his qualifications this side of the WHOLE COUNTRY and he doesn't take medicare and requires cash up front, HUD in turn won't deduct the medical expense because I have to take out a personal loan to cover it. HUD won't deduct the medical expenses even with proof of receipts for every month because they say a loan isn't counted as income therefore they won't deduct the medical expense the loan pays for and in turn they won't deduct out payments on the loan for the medical expenses even with receipts because "it's a personal debt". Needless to say I think this is not what Congress representing the AMERICAN PEOPLE meant when they said to accommodate medical expenses, and I believe that is a gross violation of the intent of this mandate. There should be some way of allowing monthly payments to lines of credit used EXCLUSIVELY for medical expenses. Of course an HSA should be the encourage preference as the advantage of any savings is to get interest instead of paying it.

I have some other ideas on medical expenses, etc but I will have to do it tomorrow. I have to do MORE paperwork for Pat Muary for my 4th recertification this year.



September 11, 2008

VIA EMAIL AND FIRST CLASS MAIL

Roy A. Johnson
Executive Director
Vancouver Housing Authority
2500 Main Street
Vancouver, Washington 98660

Re: Draft 2009 Moving to Work Annual Plan

Dear Mr. Johnson:

INTRODUCTION

As you know, I represent some Clark County residents who participate in the Vancouver Housing Authority's Section 8 Voucher Program. I am writing on their behalf to suggest several changes to the draft 2009 Moving to Work Annual Plan which we believe will strengthen the plan. These changes should also benefit those now participating in your Section 8 Voucher program. I ask that you include this letter in the record of the public hearing and share it with your Board of Commissioners and staff. I also ask that the Board take our comments, concerns, and recommendations into consideration before approving a final plan for FY 2009.

As we have discussed, I and my clients have few concerns about the MTW activities that VHA proposes to undertake in FY 2009 or those matters actually addressed by the draft plan. We are more concerned about what we consider to be important omissions in the plan. The two most important matters which we hoped would be addressed are: 1.) the excessive rent burdens that now exist in the Section 8 Voucher program; and 2.) the importance of VHA regularly making available HUD funding and performance measurement information through a web based "dashboard" or other reporting device. I first raised these issues with you in our March 10, 2008 comments on the Revised Annual MTW Plan for 2008. I also discussed them at length when I testified before the Board of Commissioners on March 26, 2008. As I explained when we spoke by phone on August 15, 2008, I would like to see VHA take concrete steps in the coming calendar year to address these two issues.

This letter will explain why the above matters should be addressed in the MTW Annual Plan for FY 2009. It will also briefly set forth a few other areas of concern that I mentioned



Roy A. Johnson
Draft 2009 Moving to Work Plan
September 11, 2008
Page 2

during our August 15, 2008 conversation or during the public hearing on September 3, 2008. If you have any questions, please feel free to contact me.

Before proceeding further, I did want to acknowledge that I and my clients are pleased that VHA has for the time being, chosen not to move forward with flat rents or other rent simplification efforts. I believe that my clients and the community at large are better served by VHA using its MTW authority to (1) project based Section 8 Vouchers; (2) implement a Section 8 Homeownership program, and (3) in disposing of its scattered Public Housings in a manner that will ensure that any units sold are replaced with public housing operating subsidies used elsewhere.

We are also pleased that VHA is taking steps to create a Resident Advisory Board and invited various stakeholders to join its MTW Advisory Committee. We realize that getting residents, stakeholders and the community at large involved in the agency's decision making process is not easy. We hope that VHA will continue in these efforts, despite the fact that few residents or other community members attended the September 3, 2008 public hearing. Involving residents and other stakeholders in designing and evaluating MTW programs requires time and a significant commitment of resources. In the end, however, it will result in MTW programs that we believe best meet the needs of our community.

COMMENTS ON DRAFT 2009 MOVING TO WORK PLAN

1. The Plan Should Do More to Address the Excessive Rent Burdens in the Section 8 Voucher Program.

As you know, the tenant data that was made available to Columbia Legal Services when we were evaluating your flat subsidy proposal showed that there were a large number and percentage of Section 8 Voucher participants who were excessively rent burdened. I summarized this data in my March 10, 2008 letter and in my testimony at the March 26, 2008 board meeting. I will not repeat it here.

There are three reasons why so many of VHA's Section 8 families are excessively rent burdened:

1. VHA previously used its MTW authority to waive the 40% rent burden cap set forth in 24 C.F.R. §982.508;
2. VHA failed to regularly adjust its Section 8 Voucher payment standards from January 1, 2005 through July 31, 2007; and
3. VHA moved to biennial rent reviews, failing to realize that this meant that half of its Section 8 families would not benefit from the adjustments to the Section 8 payment standards that were made in August 2007 and January 2008 until they went through a full rent review.

Roy A. Johnson
Draft 2009 Moving to Work Plan
September 11, 2008
Page 3

I and my clients were pleased to see that in the draft annual plan for FY 2009, VHA has decided that it will reinstate the 40% rent burden cap. This is an important first step. The plan should clarify, however, that in the future VHA will return to the historical definition of rent burden, as set forth in 24 C.F.R. §982.508. In other words, no Section 8 family should initially spend more than forty percent of their monthly adjusted income towards their share of the gross rent (tenant rent and applicable utility allowance).

I am also pleased that you have indicated that in the future, VHA plans to regularly adjust its Section 8 payment standards as is done by other public housing agencies nationwide. We would like to see the agency either through its Annual MTW Plan or by resolution, make it clear that it will review and adjust its Voucher payment standards annually shortly after HUD publishes new Section 8 Fair Market rents. We also would like the agency to state that the Board of Commissioners will make this decision after Section 8 participants have been given notice and an opportunity to comment on the payment standards.

While the two steps above are important, however, they do not adequately address the fact that a large number of Section 8 Voucher families have not had their rent burdens reduced as a result of the August 2007 and January 2008 adjustments to the Voucher payment standards because of the biennial rent review policy. As we understand it, this was an unintended consequence of the policy. We are asking that VHA take immediate steps to provide relief to these families, by adopting a policy that would permit it to implement the most recent Voucher payment standards without going through a complete rent review process.

2. VHA Should Regularly Publish HUD Funding and Performance Measurement Information Through the Use of a “Dashboard” or Other Reporting Device.

Last March, I understood that VHA planned to monitor the Public Housing and Section 8 Voucher funding it would receive under its new MTW Agreement with HUD to ensure that the agency and Clark County would not receive less federal housing funds because of its decision to block grant its HUD funding. I also understood that VHA agreed to regularly publish performance measurement information on its website through the use of a “dashboard” or other reporting device.

Regrettably, we have seen little indication that VHA has taken steps to move forward on these two commitments. As I expressed on August 15, 2008 and at the public hearing on September 3, 2008, we would like to see VHA commit through its Annual Plan for FY 2009 to providing this information on a regular basis and involve us and other stakeholders in deciding what information should be reported or disclosed. This information should be made available within the next six (6) months, if not sooner. I previously provided a list of the items we would like to see reported in my March 10, 2008 letter. I am available to discuss this further at your convenience.

3. Other Specific Comments

a. Imputing Welfare Income

As my colleague, Amy McCullough from the Northwest Justice Project, previously discussed with LaVon, we have some concerns about this proposal as originally drafted. At a minimum, it should be rewritten to state that VHA will impute welfare income only where DSHS has notified the family in writing that it plans to reduce or terminate its welfare benefits because of fraud or because of a family member's noncompliance with the agency requirement to participate in an economic self-sufficiency program. This written notice must advise the family of their right to appeal the DSHS decision. We do not believe it is appropriate to impute welfare income where a family voluntarily closes its TANF grant prior to such written notification for two reasons. First, there is no evidence in such a situation that the family has terminated their welfare benefits in order to avoid a sanction. Second, until the family has been given written notice, they have had no opportunity to appeal the imposition of the sanction.

Where a DSHS caseworker has adequate evidence that a family is not complying with its WorkFirst requirements, there is no reason why the caseworker should not notify the family in writing of this determination. Once a family has received written notification from DSHS that they will be sanctioned, the family cannot prevent VHA from imputing income by closing their TANF case. To avoid any imputed welfare income, they must appeal the DSHS decision.

However, I do want to remind VHA that under 24 C.F.R. §5.615(c)(4), the amount of any imputed welfare income should be offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed welfare income, the imputed welfare income should be reduced to zero.

b. Admission Preferences for Those Employed

After the September 3, 2008 public hearing, I spoke with LaVon about this admission preference. I do not believe that a working or employment preference is appropriate in the "abstract" as it would likely violate our Fair Housing laws prohibiting discrimination against the disabled. Any preference should be limited to a reasonable number of families and provided in conjunction with the family receiving some sort of case management or other supportive services designed to help the family achieve self-sufficiency.

c. The Importance of a One-for-One Replacement Policy

The draft plan indicates that VHA will replace any public housing units lost through the sale of its scattered site units or the conversion of additional units at Van Vista to assisted living units on a one-for-one basis. This is absolutely critical. We need all the deep subsidy housing units that now exist; and should be looking for ways to expand this inventory. VHA should also make sure that the units replaced are suitably located within the community and of such size and

other amenities to meet the needs of our Public Housing residents, particularly those with larger families.

d. Expanding the Family Self-Sufficiency Program

Given the size of the Vancouver Housing Authority's Public and Section 8 Voucher Housing programs, we remained concerned by the relatively small size of its family self-sufficiency (FSS) program. We think FSS is a wonderful program that benefits not only those participating in the program, but those waiting for housing assistance. We need to do more to assist families acquire the income they need to rent market rate housing or to purchase their own homes, so that the housing assistance that they had been receiving can be used to help other households now on our Public Housing and Section 8 Voucher waiting lists. I understand that VHA has recently applied for HUD funding to hire another FSS coordinator. I would encourage VHA to look for other sources of funding, beyond that offered by HUD, so that we can use our scarce housing assistance funds to serve as many households as possible.

e. Implementing the Public Housing Earned Income Disregard

In the past, VHA used its MTW authority to avoid implementing the public housing earned income disregard described in 24 C.F.R. §§ 960.255, on the grounds that families who had signed mandatory MTW contracts were instead being given an opportunity to establish an FSS like rent escrow account. While I disagreed with this policy decision, I understood that it made some sense. Now, however, I see no legitimate reason why VHA should not be providing its public housing residents with this earned income disregard. I would encourage VHA to take steps to implement the public housing earned income disregard for those who now qualify.

f. VHA Should Not Move Forward At this Time with Rent Reform

As you know, Congress has yet to act on the rent simplification provisions set forth in the Section 8 Voucher Reform Act or to reauthorize or replace the Moving to Work Demonstration Program. I and my clients would encourage VHA to wait until a new administration and Congress has had an opportunity to consider these legislative proposals, before it takes any concrete steps to move forward on rent reform or simplification. In our view, VHA should not move forward on any proposals to restructure rents in its Public Housing and Section 8 Voucher programs until it has the staff and resources needed to involve residents and the community at large in the design of the program and to rigorously evaluate whatever program it ultimately decides to implement. At the present time, we believe that VHA does not have the capacity to undertake such a major change in its housing programs and still move forward on the other initiatives currently set forth in its draft MTW plan for FY 2008.

Roy A. Johnson
Draft 2009 Moving to Work Plan
September 11, 2008
Page 6

CONCLUSION

In summary, I urge the Board of Commissioners to approve the draft Annual Plan for FY 2009, provided: 1.) the plan is revised to address the excessive rent burdens that now exist in the agency's Section 8 Voucher Program; and 2.) VHA takes steps to regularly publish HUD funding and performance measurement information on its website through a "dashboard" or other reporting device. I also recommend that Board and staff consider the other comments set forth above, before finalizing its Annual Moving to Work Plan for 2009.

We are pleased to see that VHA has made significant progress towards project-basing a reasonable number of its Section 8 Vouchers to address local housing needs. We also support the efforts underway to implement a first-time home buyer program for both Public Housing and Section 8 Voucher programs. We are watching carefully, the agency's decision to dispose of its scattered site public housing units and its plan to convert Van Vista entirely to assisted living. As long as no public housing tenants are involuntarily displaced and these units are replaced on a one-for-one basis with public housing operating subsidies elsewhere, we are supportive of this plan.

During the next twelve months, we would encourage VHA to look for ways to expand its voluntary family self-sufficiency program so that all those public housing tenants and Section 8 Voucher participants who are interested may enroll in the program. Finally, I would ask that VHA reinstate the public housing earned income disregard that it previously waived when families were required to enter into mandatory MTW contracts.

Sincerely,

Columbia Legal Services



Gregory D. Provenzano
Attorney at Law



*Working to end
homelessness in
Clark County*

**Council for the Homeless
Board of Directors**

Sierk Braam, President
National City Mortgage

Sharon Wylie, Vice President
Government Relations Consultant

Gary Akizuki, Secretary/Treasurer
The Standard

Barbara Baldus
Community Volunteer

Craig Brown
Vancouver Church of Christ

Scott Firstenberg
First Independent Bank

Jennifer Gallagher
*Program Director, Support for Early
Learning and Families*

Jerry King
Retired City Attorney

Ralph J. Parker, Vice President
Underwriters Laboratories

Cheryl Pfaff
Community Advocate

Beryl Robison
Community Advocate

Beth Oliver
Currie & McLain, P.S.

Local Government

Marc Boldt
*Clark County
Board of Commissioners
Alternate: Peter Munroe or Vanessa
Gaston*

Debra Conway
*Vancouver Housing Authority
Board of Commissioners
Alternate: LaVon Holden*

Larry Smith
*Vancouver City Council
Alternate: Laura Hudson*

September 10, 2008

Roy A. Johnson
Executive Director
Vancouver Housing Authority
2500 Main Street, Suite 200
Vancouver, WA 98660-2697

Re: Annual MTW Plan for FY 2009

Dear Mr. Johnson:

The Council for the Homeless is pleased to recognize the commitment you and your staff have made to involve your residents and your stakeholders in the process of developing your FY 2009 Move to Work Plan.

First, the Council for the Homeless wants to recognize the extensive outreach the Vancouver Housing Authority (VHA) has provided to the community to comment and provide input into the Revised Plan. By providing numerous well publicized public meetings, and offering individualized meetings for those who could not attend the other options, the VHA clearly embraced the public input process.

In a letter some months back, I addressed my concern that the closed waitlist for Section 8 vouchers and a 4-year wait for those on the list does not represent a program that is moving people quickly into self-sufficiency. Your willingness to explore options with a small task force of providers who want to remedy this problem and your willingness to support a pilot project both philosophically and financially again shows your desire to act as a strong and valued community partner.

Also in the letter cited above, we expressed concern about tenants having the option to choose housing that clearly creates a rent burden beyond the family's means. We appreciate your willingness to consider this issue and your amendment to the plan that returns the allowable rent burden to 40% of the family income.

Again, thank you for the opportunity to provide input into your new Plan and participate in the MTW Advisory Committee. We have great hope that the flexibility you have built into this Plan will give all of your residents opportunities to be self-reliant.

Sincerely,

Craig Lyons
Executive Director, Council for the Homeless

Affidavit of Publication

STATE OF WASHINGTON)

) ss:

County of Clark)

Columbian

PAM
VANC HOUSING AUTH MTC/CONST-L
2500 MAIN ST
VANCOUVER WA 98660-2697

REFERENCE: 70861 NPH MARCH 9
2973843 NOTICE OF PUBLIC HEA

I, the undersigned say,

That I am over the age of eighteen and not interested in the above entitled matter; that I am now, and at all time embraced in the publication herein mentioned, was, the principal clerk of the printer of The Columbian, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of the County of Clark, State of Washington, under Proceeding No. 802006715; that the advertisement, of which the annexed is a true printed copy, was published in the above-named newspaper on the following dates, to wit:

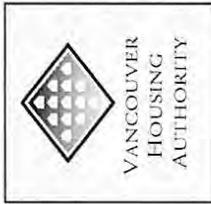
NOTICE OF PUBLIC HEARING
On Monday March 9, 2009 the Vancouver Housing Authority (VHA) will hold a public hearing on Amendments to its Moving to Work Annual Plan for 2009 and HUD's First Amendment to the Amended and Restated Agreement adopted in March 2008. The hearing will begin at 6:00 p.m. in the VHA Community Room, 2500 Main Street. The public is welcome to provide oral comments at the public hearing. Written comments will be accepted through March 9, 2009. Copies of the proposed amendments to the 2009 MTW Annual Plan and HUD's First Amendment to the Amended and Restated Agreement will be available, beginning February 5, 2009 at the RISE & STARS Community Center, 500 Omaha Way, or at the VHA Main Street offices, 2500 Main Street. Copies will also be available on the VHA's web site: www.vhaus.com, in the "What's New" section.
Hearing Date:
Monday, March 9, 2009
Time: 6:00 p.m.
Location:
Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA
Vancouver Housing Authority
2500 Main Street, Suite 200
Vancouver, WA 98660-2697
Telephone: (360) 694-2501 or (503) 283-5393
Fax: (360) 993-9594
TDD: (360) 694-0842
www.vhaus.com
Equal Housing Opportunity
Feb. 5 307383

PUBLISHED ON: 02/05

TOTAL COST: 77.55 AD SPACE: 47 LINE
FILED ON: 02/05/09

I Certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature Judy Moody



VANCOUVER
HOUSING
AUTHORITY

TOTAL ATTENDANCE: 57

VANCOUVER HOUSING AUTHORITY
MEETING ATTENDANCE RECORD

DATE: March 9, 2009

NAME	ADDRESS	Do You Want to Comment?		
		Yes	No	Maybe
1. michelle Southmayd	4201 East 4th Plain Blvd, # D-4 98101			✓
2. DON + NANCY SEHEETZ	2410 NE 138th AVE # L-110			✓
3. Mary Kellum	209N GARRISON ROAD VANCOUVER 98664			✓
4. Joyce Russell	3315 E 7th St VAN WA 98166			✓
5. CLAYTON BOMAR				
6. Gracie Proctor	Cherokee Avenue			
7. Winfield Vermillion	125 W 25th ST #315 Arthron Park			✓
8. Ray PARKS	12205 NE 74th 5 98682			✓
9. JUSTO PARKS	✓			
10. Micaela...	3011 E 9th St #4 VANCOUVER WA 98166			✓

*

1

	NAME	ADDRESS	Do You Want to Comment?		
			Yes	No	Maybe
X	11 Evelyn Maxwell	1603 Ash Street	Vanouver, WA	<input checked="" type="checkbox"/>	
	12. Fatia Wilson				
	13. Fedor Garrishen }	11301 NE 7th St. #11-1,			
	14. Larisa Gabriella }	Vare., WA-98684			
	15. Amy McCullough	NJP			<input checked="" type="checkbox"/>
	16.				
	17.				
	18.				
	19.				
	20.				
	21.				
	22.				
	23.				
	24.				
	25.				

5

NAME	ADDRESS	Do You Want to Comment?	
		Yes	No Maybe
11. Kathleen Kline	127 w 25 th street #204		✓
12. STAN SMIRKHEVSKY	4518 NE 135 AVE.		
13. RUTH CASTILLO	815 N MAIN RIDGE RD	✓	
14. Debby Jover	yw housing		
15. Dakota Palmore	1206 W 29 th St.		✓
16. Devon Palmore	1212 W 30 th St		✓
17. Amy Bradwith	1601 SE 1 st #72		✓
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			



VANCOUVER HOUSING AUTHORITY
MEETING ATTENDANCE RECORD

DATE: March 9, 2009

NAME	ADDRESS	Do You Want to Comment?		
		Yes	No	Maybe
1. Janice M. Stanton	11328 NE 51 st Circle Apt #1M 1a3			
2. Lauri Gerbracht ^{mom}	9005 E Park Crest Ave. # A-9		X	
3. Don & Anthe McColium	6400 NE 400 99C-117 Van WA 98665			X
4. Eric Aldridge	127 W. 25 th St Apt 101 Vancouver, wa. 98660			
5. Cynthe M. Scott				
6. Alpinia J. Proffer	127 N 255 th St Vanc WA 98660			
7. Marka Hauget	24707 NE 2 nd ave Ridgefield, wa 98640		X	
8. Wayne Mykura	4208 NE 152 nd St	X		
9. Wilson Heidi	3113 VAN ALMANA AVE Van. WA. 98660		X	
10. Gail Miller	3720 E 18 th St.			



VANCOUVER HOUSING AUTHORITY
MEETING ATTENDANCE RECORD

6 13

DATE: March 9, 2009

	NAME	ADDRESS	Do You Want to Comment?	
			Yes	No Maybe
1.	Carolyn Poornisa	Interpreter		
2.	Jacinta Cox	Carroll	✓	
3.	Timofey Pavlovich	12218 NE 42nd St Vancouver		
4.	Nyala Brennan	Orthen Park		
5.	LIOIYA KORSHUNOVA	5420 NE 34th St. # F VANCOUVER WA 98661		
6.	Debra Conway	3804 Koutstaun Ave Vancouver, WA 98660		✓
7.	Rajes Phillips	6515 Kansas St Vancouver WA 98661		✓
8.	Julie Emergin	514 Cornhill Bluffs Way Vanc. WA 98661	✓	
9.	[Signature]	China USA		✓
10.				

X

X

9

1

	NAME	ADDRESS	Do You Want to Comment?		
			Yes	No	Maybe
26.	Lakia Duke	12407 NE 84th St, Van Orsdy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27.					
28.					
29.					
30.					
31.					
32.					
33.					
34.					
35.					
36.					
37.					
38.					
39.					
40.					

①

	NAME	ADDRESS	Do You Want to Comment?	
			Yes	No Maybe
	<i>Sara Fitzpatrick</i>			
11.	RUTA Puzanokas	3707 E 18 th ST #47		X
12.	Bellu Reed	3708 NE 109 th Ave #1008	✓	
13.	F. Annis Isaacs	2600 NE Minnehaha St. #135	✓	
14.	Jennifer Dickson	15822 SE 2 nd St, Vanc WA 98684		?
15.	ALBERT FLETCHER	10405 NE 9 th Ave " " "		
16.	Sara Hitchcock	2914 East 29 th Street Vancouver WA 98661		?
17.	Petr Petrov	4402 Gibbons St, #2 Vancouver WA 98667		?
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NOTICE OF PROPOSED CHANGES IN PUBLIC HOUSING AND SECTION 8 PROGRAMS

The 2009 Annual Plan for VHA was effective January 1, 2009. Because Vancouver housing Authority (VHA) is a Moving to Work (MTW) Agency, our annual plan also includes all MTW activities. When the VHA makes changes to a plan, these changes are called amendments. Amendments go through the same approval process as the original annual plan, including a 30-day public comment period, a public hearing, and approval by the VHA Board of Commissioners.

VHA INTENDS TO MAKE CHANGES TO THE 2009 PLAN. These changes/plan amendments can be reviewed on VHA's website www.vhausa.com or at the VHA Omaha Way and Main Street Offices. A public hearing is scheduled for 6:00 p.m. at the VHA Main Office, 2500 Main Street, Vancouver on March 9, 2009. Any member of the public may speak at the public hearing. The VHA will also accept written public comment anytime between now and the public hearing on March 9. Public comments are welcome, both in writing and at the public hearing. The VHA Board of Commissioners will take action on the proposed amendments at their regularly scheduled board meeting, 10:00 a.m. on March 25, 2009.

Following is a summary of the changes we are proposing. As stated above the full text may be viewed on our website or at the Main Street and Omaha Way offices of the VHA

1. Prior to receiving housing, applicants on the Public Housing and Section 8 wait lists will be required to attend tenant education classes. You will be notified in writing six months prior to receiving housing assistance that it is time for you to take the classes.
2. Each year the VHA will establish a fixed amount for utility allowances for both project based Section 8 and Section 8 vouchers. Utility allowances will be based on bedroom size. You will be told your utility allowance at time of lease up and each year at your eligibility review.
3. Section 8 participants will no longer be allowed to pay more than 40% of their income for rent and utilities. If you currently pay more than 40% of your income for rent and utilities you will be required to move after a period of time or you must increase your income so that you will not be paying more than 40%.
4. VHA is adopting new occupancy and subsidy standards that will require more household members per voucher size. Some Section 8 participants may receive a smaller voucher when they move from their current rental unit.
5. Individuals and families, in both the Public Housing and Section 8 programs, who are on fixed incomes will no longer have an annual recertification of eligibility; they will have a full recertification of eligibility every three years. Housing assistance will still be adjusted annually based on changes to the payment standards and cost of living adjustments.

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6. The standard deduction for disabled and senior households will be increased from \$400 to \$700. Medical deductions will be eliminated.
 7. Eligibility for recertification for non-elderly and non-disabled households will happen every 12 months.
 8. Landlords may only increase rent one time each year.
 9. Tenants who have a total tenant payment that is less than the utility allowance will receive a check for utilities for only six months.
 10. Section 8 inspections will be completed every other year with self-certified inspections completed by the landlords on opposite years.

Additional plan amendments will include:

1. Use of project based vouchers in private sector units in high-rent developments.
2. Establishment of down payment/closing cost assistance by VHA for houses to be sold by VHA.

Also to be established in 2009:

1. Pilot program with required participation in self-sufficiency programs. Pilot program will be limited to 48 section 8 and public housing households.
2. Development of asset building programs.

Programs to be established for 2010:

1. Transition of Skyline Crest public housing to a campus of learners. New tenants will be required to participate in self-sufficiency programs.
2. Pilot program to assist head of household members to obtain part time work if they are not able to work full time.
3. Requirement of work able household members to work or to participate in self-sufficiency programs.

This notice is only a summary of the proposed amendments to the 2009 Plan; you are encouraged to read the full text of the changes on the VHA website or visit the VHA Main Street or Omaha Way Offices to get a copy of the proposed changes.

We encourage you to provide us with your comments on these proposed changes, either by providing written comments or by attending the public hearing on March 9, 2009. You can provide written comments by mailing them to Marshall Meadows, VHA, 2500 Main Street, Vancouver, WA 98660. You can also send comments by e-mail to mmeadows@vhausa.com. Verbal comments can only be made at the public hearing on March 9.

From: [REDACTED]
Sent: Saturday, February 14, 2009 3:52 PM
To: Marshall Meadows
Cc: Denisse Villanueva
Subject: 2009 Annual Plan for VHA

Dear M Meadows and D. Villanueva:

I have an exception to items 3,4,6, and 9.

First Item 3:

We were allowed a 45% participation of rent on our old vouchers; in this high rent economy, why aren't you either keeping the current 45% or raising it to 50%.

Why are you changing the fact that if a tenant wants to pay more for their apartment than housing allows, why not let the tenant do so. In my case, I'm disabled. My daughter and grandson live with me in a 3 bedroom apartment. We have lived here for 7 years; close to school, bus and hospital, doctors. I'm a heart, stroke patient and this is where I choose to live. Are you telling us we have to move just because you are changing this rule.

That's pretty discriminatory - isn't it????

Item 4:

I've had a 3 bedroom for the 3 family members living in it. Does that Item 4 mean we can't stay in a 3 bedroom since my grandson, daughter and myself live here. That's confusing.

Item 6:

This is totally wrong: How can you only give a \$700 deduction when I pay over \$2,104.80 - which includes my medicare deduction of \$97.40 off my Social Security and \$79.00 additional for my HealthNet Insurance per month. That's a whopping big difference and should be taken into account for all disabled and elderly.

Item 9:

What utility allowance are we allowed now - just electrical and phone. How about internet, cable TV etc. My utility bill is \$80.00 a month for electrical and my last Comcast Utility bill for cable, internet and Digital Voice phone was \$152.30 a month. Somewhere there should be a larger deduction for this.

Other than that most of the new plan is ok.

My daughter has filed for Social Security Disability and should hear soon - between now and May 30 about that. How does that effect us. E-mail me back Denisse, please about all of this.

Thank both of you for your continued efforts, but I don't see the changes as helping people on housing, but actually eliminating people.

If you are trying to reduce the amount Housing is paying per month, per family, per size of apt, why not just tell the participant, they will have to pay a little more - and pro rate it as usual. But don't deny a participant to live where they have lived, just because they want to pay more.

Thanks again for listening to my comments.

[REDACTED]
Vancouver, WA 98664

From: [REDACTED]
Sent: Sunday, February 15, 2009 9:15 PM
To: Marshall Meadows
Subject: 2009 VHA plan

Dear M Meadows:

Has anyone at VHA or HUD thought about asking the apartment owners/property managers to lower rent in this crisis time until things get better in the economy so that their tenants would be able to keep their apartments within the HUD guidelines.

I think that would be worth someone's time to work on for the benefit of all concerned.

Put that before the Board of Directions.

I'm positively sure that President Obama would had out some pretty sizeable grants to the VHA for putting this idea to work and for promoting same to landowners so that they could keep their apartments rented and houses rented as well.

VHA might even receive an award in person from the President.

Sincerely yours,

[REDACTED]
Vancouver, WA 98664

From: [REDACTED]
Sent: Monday, February 16, 2009 10:48 AM
To: Marshall Meadows; s.aldinger@juno.com
Subject: Proposed changes in housing

Hello, My name is [REDACTED] & I'm a section 8 housing client. I got a letter in the mail about the changes housing is proposing & your email was listed as a contact to send comments to by email. I would like to have my comments recorded by sending them in this email. I don't know if some of my comments are misunderstandings of the changes but I did go to the website & look at the changes listed in more detail, & so I'm commenting on them as I understood them to be.

Under "*New Moving to Work Initiatives to be added to the 2009 MTW Plan:*"

#2 says that Utility allowances will be based on 1980. This will be too low of a figure, & should be based on electric/utility costs for each year since electric & utility prices are skyrocketing! Also, most 1,2,& 3 bedrooms NOW have to pay water/sewer costs so there should be NO Separation between the 1,2,3 bedrooms & 4,5,6, bedrooms. Why shortchange the 1,2,3, bedrooms this way, it's totally unfair & less people means LESS money so All the sizes of units should be treated the same! You even quote that "*Those with the greatest potential impact are living in older 2 & 3 bedroom single-family dwellings*" (Of course they're in OLDER dwellings, because who can afford NEWER 2 & 3 bedrooms when prices are SKYROCKETING for these units, especially in Rentals where landlords are making a lot of money charging more because people are losing their homes & have to rent!!!) Your chart says the current utility allowance for a 2 & 3 bedroom is \$101 & \$157, & you propose to lower that to \$76 & \$91. HOW CAN YOU TAKE HEAT, ELECTRICITY & WATER AWAY FROM YOUR CLIENTS IN THIS ECONOMY! You will cause more problems, families already can't afford the prices for these basic needs & have to ask for energy assistance! Hurting your existing clients in order to take on new clients is not an acceptable practice.

#3 The new voucher size for a family of 2 will be a one bedroom. A single mom & a daughter will have to share a bedroom, what about a single mom & a son??? A single mom & a teenage son??? The new voucher size for a family of 3 is a 2 bedroom, so what about a single mom with a daughter & a son??? Do you expect males & female adults & children of opposite sexes to now share bedrooms or have no bedroom anymore???

#5 Recertification of households every 3 years. Adjustments are already a big problem when the landlord increases the rent before VHA adjusts rental help once a year. I am on a month to month basis & a new company bought my apartment complex & increased everyone's rent right away, they didn't wait for my housing yearly review. My rent increased \$150 a month & I had to pay the whole \$150 increase myself & housing wouldn't help with any of the increase until my housing YEARLY review was due, then housing readjusted my portion including the \$150 increase. Every year now the new landlords increase my rent in April but my housing yearly review isn't until June so I am stuck paying 100% of the increase until housing's yearly update's due. So if housing waits 3 years before they'll update my portion then that means that I'll be stuck paying 100% of 3 years worth of landlord rental increases!!!THIS IS A HUGE PROBLEM! This may also lead into #8 landlords can only increase section 8 rents annually. Since housing only signs a one year lease durring the 1st year on occupancy & then goes month to month until the tenant moves, if the tenant does the same therefore the tenant also is month to month after the 1st year, will the once a year increases by the lanlord be restricted to increases on the yearly anniversary date of move in? This is where the problem lies, which I explained above.

Thank you for this opportunity to comment & I hope that changes will be made before these new housing laws go into effect.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, February 17, 2009 2:28 PM
To: Marshall Meadows
Subject: 2009 Annual Plan for VHA

Dear MMeadows:

Item 4 of the 2009 plan deals with more household members. What about the people that do not have more household members such as my family. There is myself - a disabled American Veteran with multiple disabilities due to post polio syndrome; my daughter with serious back injury and my 9 year old grandson. He certainly cannot share a bed with either one of us.

So are we going to be denied the use of a bedroom just because you people and HUD are changing the rules.

That's not fair - in fact, I feel it is discriminating to us. We have a voucher for a 3 bedroom due to our disabilities and grandchild.

I hope you at VHA will take that into consideration.

[REDACTED]
Vancouver, WA 98664

PS: I realize you are trying to help more families, but in doing so don't take away the needed housing of your already VHA approved housing tenants. I realize the economy is very bad.

Why don't you and HUD talk with landowners/ property owners and the Assessor's office to reduce rents, taxes etc until this economic crisis is over with.

From: [REDACTED]
Sent: Mon 3/2/2009 8:18 PM
To: Marshall Meadows
Subject: Proposed Changes in Public Housing

To whom it may concern:

I am a disabled person confined to a wheel chair and am currently on Section 8 Housing. I live in an apartment not owned by VHA. I have lived here for approximately 13 years.

I have been reading (trying to) the proposed changes and am very confused.

From what I understand (and may be incorrect) is that if these proposals pass anyone who lives pays more than 40% of their total income in rent and utilities combines will have to move.

My issue is that I have lived here for appx. 13 yrs and have never once been late on my rent nor my utilities. I am disabled and confined to wheel chair, (as I stated). If I calculate correctly I am currently paying approximately \$15 more than the 40% proposed allowable amount. It would be nearly impossible for me to move and surely wouldn't be cost effective to save \$15 a month which with utilities raising, rent raising etc every year or even several months. The cost of me having to pay someone to pack, move, clean, rent truck, pay deposits for new place etc would be astronomical in comparison to continuing to pay the \$15 a month (more than proposed allowable). I could pay that \$15 for 10 yrs to break even for ONE move.

This whole thing seems a bit ludicrous for the amount.

Are there going to be any exception, for instance, for those who are already established and long term where they currently live with perfect rental history and never a complaint, never "called" on anything during housing inspections? It seems very unfair to have to uproot to save \$15. Who is to say any tenant wouldn't have to move EVERY YEAR due to minor changes.

Sincerely

[REDACTED]

(This isn't always available due to current computer problems. Not reliable form of communication.)

From: [REDACTED]
Sent: Monday, March 09, 2009 5:30 PM
To: Marshall Meadows
Subject: Proposed changes in Public Housing and Section 8 Programs

Dear VHA:

I would like at this time to submit comments for the proposed amendments to the 2009 Public Housing and Section 8 Programs.

First off I would like to say "Thank You" for all that you have done for me. Because of your programs I have been allowed dignity in my life despite my hardships. This brings to mind the proposed change under number 4, new occupancy standards, in the proposed changes to the 2009 moving to work plan. My comment on this would be that integrity and dignity be maintained as much as possible for every disabled, senior, and terminally ill person. All I have is my own experience to call on and I know if I had found myself in a situation where I had to share an apartment with someone and I unfortunately had to occupy the living room, I would have been devastated. Because of my illness I have dealt with many nausea issues and the thought of another person cooking and myself not being able to get away from the smell would have made me seriously sick, which I am sure I am speaking for many people dealing with cancer and other diseases. I have dealt with pain where my only relief was sleep. I could not imagine trying to sleep and rest after a chemo treatment, to be awakened by your roommate cooking and banging with no relief or escape for myself. When I am sick it is my bed I want to be in, not my roommates while he occupies the kitchen. We have to keep in mind privacy rights for these individuals.

I understand cuts have to be made, but please not at the expense of loss of integrity and dignity for the disabled, senior, and terminally ill. I ask that you have compassion for these people and reconsider this change concerning them.

This brings me to my second comment, under number 6. Medical deductions will be eliminated and allowance will increase from \$400 to \$700. You say the disabled and seniors will benefit from the increased allowance. I am one of those disabled and am looking forward to the extra benefit for myself, but I am concerned for the terminally ill and cancer, etc., patients fighting for there life. Again integrity and dignity is what I am asking for these people. My comment would be that you would reconsider this amendment and make it non-applicable to the terminally ill and patients fighting for there life.

My third comment is regarding number 3, stating that S8 participants housing expenses cannot exceed 40% of adjusted income in order to participate in the S8 Voucher Program. It goes on to say that 991 participants, or 43% of the program would be impacted, unless VHA adopted new payment standards based on 100% of the 2009 FMR and the proposed utility allowance change, then the number impacted would drop to 322 or 14% of the program. Either way I am concerned for these people that will be affected by this change. No where in the amendment does it state that there will be given a \$1500 transition allowance for forced moves which was discussed in a meeting with a VHA representative in an August/September meeting. My comment would be that this \$1500 transition allowance be written in the amendment, and promised to all that have forced moves in there future. VHA states that an appropriate amount of time will be given, either 12 or 24 months depending on ones position. Please keep in mind, again drawing on my own experience, I find it very difficult to make it from payday to payday on a very frugal disability income and would find it impossible to save for such a move myself. I am concerned if these funds are not made available for forced moves, that people will be homeless. The last time I looked for an apartment they all requested first, last and deposit.

My last comment is under number 1 of the MTW plan. All households under S8 and Public Housing waiting lists will be required to complete a renter education program. My comment would be to eliminate this program entirely and spend the money on more priority appropriate programs. I feel this information required for renter education could be printed in a manual and given upon registering for waiting lists. Thank you for your time.

Sincerely,
[REDACTED]

From: [REDACTED]
Sent: Monday, March 09, 2009 1:39 AM
To: David Overbay
Subject: RE: questions before Mondays hearing

Hey since you are the federal program policy manager can you explain to me how HUD is getting around providing medical deductions for people with disabled children? Or other people in general? My husband is disabled so it doesn't affect my household, but somebody has to fight for the families it devastates!

Can you explain to me how they were able to change the medical credits to medical deductions after 20 years? I am guessing I will understand better how they did it once I see Congressional mandate myself. I will also be able to counter their actions better I suspect too.

I still don't understand how when someone takes out a personal loan to pay for medical expenses for doctor's that require payment up front that even if they can document the medical expenses, the loan, and payment on the loan for medical expenses how HUD can get around accomodating it and call it a personal expense when they know and it's documented for medical?

According to Nasa's GDP inflation calculator \$400 in 1968 would be at \$1,901.433333 today in 2009. Which is what the disability credit should be if it kept up with inflation and the current cost of living.

According to Nasa's GDP inflation calculator \$480 would be \$2281.7279999. Which is what the dependent deduction would be if it kept up with the inflation and the current cost of living.

So needless to say adjusting the \$400 to \$700 doesn't even keep up with the current cost of living much less accommodate future changes in the cost of living or adequately accommodate medical expenses. It makes that offer sound like a shell game. Who is SEVRA by the way?

From: [REDACTED]
Sent: Monday, March 09, 2009 1:51 AM
To: David Overbay; Roy A. Johnson
Subject: Cost of living adjustments and inflation

According to Nasa's GDP inflation calculator \$400 in 1968 would be at \$1,901.433333 today in 2009. Which is what the disability credit should be if it kept up with inflation and the current cost of living.

According to Nasa's GDP inflation calculator \$480 would be \$2281.7279999. Which is what the dependent deduction would be if it kept up with the inflation and the current cost of living.

If HUD is having trouble with that math that would break down as a \$158 credit each month for disabled and elderly and \$190 per child each month.

How come HUD doesn't adjust credits with the cost of living and inflation?

[REDACTED]

From: [REDACTED]
Sent: Monday, March 09, 2009 2:23 AM
To: Roy A. Johnson; David Overbay
Subject: Hardship policy and deductions

Roy and Dave,

When it comes to deductions and this hardship policy where is anything addressing families who pay out child support? Families can pay as much as half their income in child support and the money is taken directly from their checks; they never see it. Which again if HUD can't do the math that translates into some households paying over 66% of their actual income in rent while on housing assistance. Doesn't that undermined the purpose of the program? *In addition HUD is counting the same child's income against them twice by counting it as income in both household while only one household actually has the income to spend on rent and other things. That's double dipping.*

THIS IS A SERIOUS ISSUE! You can't keep ignoring it. I have brought it up repeatedly and asked you, Roy, to put it into the amendment. You wrote it down, why hasn't it been addressed? Hud's failure to accommodate child support paid out causes families who are doing everything right to still end up paying over 30% of their actual income in rent and undermines the whole program. How is this helping families reach self sufficiency?

[REDACTED]

From: [REDACTED]
Sent: Monday, March 09, 2009 8:05 PM
To: Marshall Meadows
Cc: [REDACTED]
Subject: Proposed Changes in Public Housing and Section 8 Programs

My first response is to the voucher size re: bedrooms. I think that it will be a big mistake for the bedroom size of a 3 person home to down size to a 2 bedroom. A parent should not have to make a choice of whether to sleep in the bedroom or sleep in the living room. Grown up do things in private that children should not walk in on or be seen. Also a girl and boy should not share the same room as well. I know that this is not housing saying you have to do this but this is what is going to happen.

There is enough incest and people molesting each other as it is. This is something that really needs to be looked at. There is a certain age that children become curios and want to explore their bodies as well as other peoples body. This is not a good choice.

COMMENTS ON PROPOSED CHANGES TO SECTION 8:

The proposed rule #3

“Section 8 participants will no longer be allowed to pay more than 40% of their income for rent and utilities. If you currently pay more than 40% of your income for rent and utilities, you will be required to move after a period of time, or you must increase your income so that you will not be paying more than 40%.”

Comment:

I receive food stamps, but even counting food stamps as income, I pay ~50% for rent and utilities. Requiring me and those like me to move is a heavy burden, and increasing income/finding more work at this time when so many of my family and friends are being laid off, is even harder. I do continue to look for work that pays enough, but I have physical limitations even though I don't receive Social Security benefits for them. I implore you to vote against this 40% rule.

[REDACTED]
[REDACTED]
Vancouver WA 98682





Northwest Justice Project

500 W. 8th Street, Suite 275
Vancouver, WA 98660
(360) 693-6130 Phone
1-888-201-1020 Toll Free
(360) 693-6352 Fax
www.nwjustice.org
César E. Torres
Executive Director

March 9, 2009

Ronald K. Kawamoto, Chair
Board of Commissioners
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98660

Dear Chair Kawamoto and Board of Commissioners,

We write to express our joint comments regarding Vancouver Housing Authority's (VHA) proposed changes to its 2009 Moving to Work Plan and to ask the Board of Commissioners (Board) not to approve certain of the proposed changes as currently drafted.²

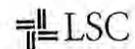
At the outset, we appreciate the strides VHA has taken in attempting to meet the ever increasing demand for affordable housing in Clark County and its MTW obligations to achieve federal cost savings, promote self-sufficiency of voucher participants who are working or seeking work, and increase housing choices for current participants. Many of VHA's proposed changes likely will further these objectives. As will be discussed below, however, we are concerned that several of the proposed changes will not further these objectives, but instead will have an adverse impact on housing choice and rent burden.

We are also concerned that we do not yet have a clear picture of the potential impact of each of the proposed changes on disabled, elderly or minority households, or families with children because VHA has not yet undertaken the impact analysis we believe is required pursuant to its duty to affirmatively further fair housing. See 42 USC §§ 3601; 3608(d)-(e); and 1437c-1(d)(16) (requiring a housing authority's annual plan contain a certification re: affirmatively furthering fair housing). VHA should consider the impact of each of its proposed changes on protected classes, i.e., race, gender, ethnicity, age, disabled, and

² As you may know, Northwest Justice Project (NJP) and Columbia Legal Services (CLS) are not-for-profit legal organizations that provide free legal services to low-income individuals and seniors in Washington. NJP's Vancouver office serves individuals throughout Clark County, and many of NJP's eligible client population are Section 8 program participants. CLS represents VHA Section 8 participants who are concerned about the impact of VHA's proposed changes.



Board of Directors: Lisa L. Atkinson • Michelle Gonzalez • Celia Guardado • Richard Harrison • Octavia Hathaway
Barbara Lindley • Christina Gerrish Nelson • Patrick J. Oshie • Roger Wynne • Claude M. Pearson, President Emeritus



families with children. We respectfully request that this Board require this type of analysis be done and made publicly available before approving any of the proposed changes.

1. Compulsory Renters Education Program for Those on VHA Waiting Lists.

We support VHA's efforts to sponsor or otherwise arrange financial literacy and renter education programs for families participating in its Public Housing and Section 8 Voucher programs. A well designed and delivered financial literacy and renter education program will benefit program participants and further the mission of the agency. These classes should also reduce VHA's administrative costs through fewer unit turnovers and a reduction in landlord/tenant disputes and increase landlord participation in the Section 8 Voucher program, creating a more favorable image of affordable housing in our neighborhoods.

Our only concern is whether participation in such programs should be mandatory, given the administrative burden of enforcing compliance. We think VHA could encourage voluntary participation by creating a local admission preference for those who complete a VHA sponsored or approved program, and avoid removing otherwise eligible applicants from its wait lists. Should VHA make participation compulsory, we request that VHA draft clear guidelines for staff and participants regarding notice requirements, requests for exemption, grievance hearings, etc. In particular, VHA should clearly define the term "otherwise excused" to avoid the potential for inconsistent and inequitable determinations of which tenants are excused from the renter education requirement and which are not.

2. Replacing its Section 8 Voucher Utility Schedules with a Single Utility Allowance Based Solely on Unit Size.

We applaud VHA's efforts to provide tenants with information necessary for them to make informed rental decisions, to encourage occupancy of energy efficient rental units, and to fulfill its obligation to annually update its utility allowances to reflect utility rate changes in the Section 8 voucher program. We ask VHA to annually update its utility allowance schedule in its Public Housing program also.

We are concerned, however, that the proposed standard may unnecessarily reduce housing choice and increase rent burden. From the information that has been made available to us, it does not appear that VHA considered all the utilities a tenant has to pay in establishing the proposed standard. 24 CFR 982.517(a) requires a housing authority to develop a utility allowance schedule that takes into consideration those utilities (except telephone) that are to be paid by a tenant, such as garbage, water, and sewer. By VHA's own estimate, at least 454 households will face an increase in rent burden as a result of this change. We are troubled by the prospect that so many families will see a decrease in utility allowance.³ How many of those would not be adversely impacted if the utility allowance included garbage, water or sewer?

³ We will be doing an analysis of the data VHA provided to us and will be sharing with VHA prior to its March 25, 2009 Board meeting.

To ensure that tenants are not excessively rent burdened, utility allowances (and payment standards) must be adequate. We question whether the proposed utility allowance is adequate. VHA's current utility allowance schedule for pre-1980 homes, (VHA uses the same rates it utilized in 2007), provides a utility allowance (taking into account electric heat, water, cooking, water, sewer, and trash collection) for a two bedroom unit of \$189; a three bedroom unit of \$235. VHA's proposed allowance for a two bedroom unit is \$76; for a three bedroom unit is \$91. This is a difference of \$113 and \$144, respectively. As a result, households renting older two and three bedroom units are going to be deeply impacted by this proposal. Given that forty percent of the rental units currently rented by Section 8 participants are pre-1980 units, a sizable number of households may be harmed by this proposal.

We also question whether there is sufficient housing stock, i.e., multiplexes built after 1980, to accommodate the relocation of hundreds of households: given that forty percent of the units currently rented by Voucher participants were built before 1980, we are doubtful. We therefore request the Board require VHA staff to develop a utility allowance in accord with 24 CFR 982.517(a).

To further the MTW objective of increasing housing choice, we believe that VHA should consider a utility allowance standard based on average utilities cost for single family homes and another for other housing types, both for pre-1980 and post-1980 construction. A two standard schedule likely will not measurably increase VHA's administrative burden, but will increase housing choice by allowing tenants to make a more informed decision about whether to rent a unit in a multiplex or a single family home. Alternatively, VHA should apply the proposed standard to current participants only when they move to a new unit. Further, VHA should not adopt the proposed schedule unless and until it confirms there is sufficient post-1980 housing stock for participants. For current participants, rather than forcing them to move, VHA should work with landlords and Clark County Community Development to ensure pre-1980 homes are weatherized (low-income weatherization programs are expected to receive a huge influx of federal economic stimulus funds).

3. Forty Percent of Monthly Adjusted Income Rent Burden Limitation.

We agree that participants should not have to spend more than forty percent of their monthly adjusted income for housing (including the tenant's share of rent and utilities). Regular adjustment of VHA's payment standard and immediate application of the most recently implemented payment standard to all households should ensure that tenants are not forced to spend more than is reasonable for housing.

As you may recall, we previously asked VHA to address what we consider to be excessive rent burdens in its Section 8 Voucher program. In our view, this problem was caused, for the most part, by three factors: 1.) VHA's decision to waive the statutory and regulatory limitation that families not be allowed to spend more than 40% of their monthly adjusted income towards their housing costs at the inception of their tenancy; 2.) VHA's failure to annually adjust its Section 8 payment standard; and 3.) VHA's previous decision to move to a biennial rent recertification policy where it would only implement payment standard

increases when a family went through a full rent review. We are pleased to see that VHA is now proposing to address this problem by reinstating the 40% rent burden limitation, annually adjusting its payment standards, and taking steps to ensure that all program participants benefit from any annual increase in the payment standard even though they may not go through a full rent review annually.

We see no reason, however, why VHA should go beyond the statutory and regulatory 40% rent burden limitation applied nationwide, by applying this limitation not only at the inception of a tenancy but annually as well. As discussed below, it is not always cost effective for a family to relocate to reduce their rent burden. In our view, once a family moves into a dwelling unit, the forty percent rent burden limitation should not apply until they decide to move to a new unit.

We support VHA's reinstatement of the forty percent rent burden limitation that prevents Section 8 applicants from renting dwelling units that cost more than forty percent of their monthly adjusted income. Along with VHA's commitment to regularly update its payment standard to keep pace with fair market rental rates, this rule will ensure that families entering the Section 8 program are not excessively rent burdened. It will also encourage new participants to shop carefully for decent, affordable housing.

We do not support, however, the imposition of this rule on current Section 8 participants except at the time they choose to move to another unit. We believe that imposition of this rule on current participants will create economic and personal hardships, discourage landlords from participating in the Section 8 program, increase VHA's administrative burden (by increasing number of moves it will have to process), and reduce housing choice.

It is imperative that VHA regularly and in a timely manner adjust its Section 8 payment standards to keep pace with average market rents throughout Clark county neighborhoods at the same time it reinstates the forty percent rent burden limitation. If not, we may see a concentration of low-income families in poverty census tract neighborhoods, running afoul of VHA's duty to affirmatively further fair housing.

We think it unfair that VHA is now proposing that families whose share of their housing costs exceeds forty percent of their adjusted monthly income to relocate or participate in a self-sufficiency program (or request a reasonable accommodation for a disability). While some may have chosen housing that they could ill afford, they did so within the program guidelines established by VHA.

For many families, consideration of all the costs involved in relocating ("costs" may include non-economic factors, such as proximity to work, a child's school, public transportation or support services and family stability, as well as economic factors, such as utility hook-up fees, tenant screening fees, security and pet deposits, moving and storage) may result in a reasoned decision to pay more than 40% of one's income to remain in their current unit. For example, an individual who relies on public transportation and lives within walking distance of the businesses and social services he relies on as well as relatives and friends, may be

able to reasonably justify paying 41% of his income in shelter costs versus expending funds to move to a less desirable location where he pays 39%.

Additionally, given our local and national economic woes, it is not hard to imagine that many families may see a reduction of income over the coming months, increasing their rent burden to more than 40% of their income. Although relocating to a less costly rental unit might appear to make financial sense, it is likely that households who are not otherwise exempt from moving will not be able to afford to relocate.

We would prefer to see VHA spend more time working with all households prior to rent up to ensure they move into affordable housing than in enforcing a mandatory relocation or self-sufficiency requirement.

4. Adjusting Occupancy Standards to Reduce a Family's Housing Subsidy.

We cannot support the proposed occupancy (subsidy) standards. While we are mindful that housing assistance funds are limited and families should not be renting units that are larger than they need, we believe that the proposed occupancy standards are too restrictive. These standards may force households to live in overcrowded and/or poorly maintained housing. By VHA's own analysis, nearly one-third (713) of existing Voucher households will face a subsidy reduction or be required to move to a smaller unit. The proposed standards may also lead to landlords refusing to rent to families who have to use living rooms as bedrooms, potentially resulting in fair housing issues. And as with the proposed forty percent of income rent cap, we are concerned that one result of this change may be the concentration of low-income families in poverty census tract neighborhoods.

The proposed occupancy or subsidy standards are the most restrictive we have seen in the State of Washington. While a number of Washington housing authorities tightened their occupancy standards in response to funding shortfalls in the Section 8 Voucher program, most, including the Seattle Housing Authority (an MTW jurisdiction), relaxed these policies once their funding stabilized.

As currently written, VHA's proposal would ignore various factors, such as age, gender, and relationship that HUD, other government agencies (e.g., DSHS), and most housing authorities, including VHA, have long recognized have a bearing on whether a dwelling unit is of an adequate size.

The proposal states that VHA will assign one bedroom for each two persons, but it will not increase the size of a voucher until the size of the household exceeds the maximum number outlined in the chart (page four of VHA's proposed changes). Given that the maximum number in each range exceeds "one bedroom for two persons", households will not actually have one bedroom for each two persons. For example, if a household initially receives a one bedroom voucher, it must have at least four people in its household before it will be granted a two bedroom voucher (leaving 3 people sharing a one bedroom unit). A household initially receiving a two bedroom voucher would need to have six people to get a three bedroom voucher (leaving 5 people sharing a two bedroom unit), and so on.

Indeed, the proposed standard goes so far as to require some households to reside in dwelling units in violation of Section 8 Housing Quality Standards (HQS). HUD's HQS rules, specifically 24 CFR 982.401(d)(2)(ii), provide:

[a] dwelling unit must have at least one bedroom or living/sleeping room for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.

24 CFR 982.401(d)(2)(ii). See also 24 CFR 982.402(b)(1) and (2) (subsidy standards must "provide for the smallest number of bedrooms needed to house a family without overcrowding"...and "be consistent with space requirements under the housing quality standards..."); 24 CFR 982.403 (requiring a housing authority to issue a new voucher when a unit is too small to meet HQS space requirements).

Moreover, the proposed standard may make it difficult for participants to rent units that comply with local housing and/or fire safety codes (Vancouver Municipal Code and International Residential and Building Codes) that typically require rooms used as sleeping rooms to have at least two means of egress, i.e. a door to the exterior and a window properly located and of adequate dimensions.

Although on its face, the proposed policy does not mandate the actual sleeping arrangements of participating households, it in effect does just that: depending on the size of a household, there will be inevitable doubling up of children of opposite sex in either a living room or a bedroom. For example, a family who initially receives a one bedroom unit would need to have at least four household members before it could receive a two bedroom voucher. This means that a family of three would be required to live in a one bedroom unit; this is especially problematic for a household of one parent and two children of different gender and years apart in age.

For families with foster children, such a situation is untenable. See WAC 388-148-0260 (prohibiting use of living rooms as bedrooms and the sharing of a bedroom by children six years or older of a different gender); WAC 388-148-0265 (child over one year of age "may not share a bedroom with an adult who is not the child's parent" unless to accommodate a medical condition; children must be given "at least fifty square feet of floor space per occupant"). See also WAC 388-148-0230.

VHA should consider whether disregarding the actual size (square footage) of a unit when determining unit size for families with children might violate local and federal fair housing laws. The proposed policy likely will have a greater adverse impact, and perhaps a disparate impact, on families with children. VHA needs to analyze the potential fair housing implications of this proposal to ensure the Board does not approve a policy that violates fair housing laws and its duty to affirmatively further fair housing.

5. Three Year Recertification Period for Participants on Fixed Income

We support this proposal. VHA must clarify, however, these households' obligation to report interim changes in income and their right to seek interim re-certifications for reductions in their income.

6. Elderly/Disabled Allowance and Elimination of Medical Expense Deductions.

We support VHA's proposed increase in the elderly/disabled allowance from \$480 to \$700 and eliminating the deduction for unreimbursed medical expenses in excess of 3% of gross income, provided VHA adopts a policy to protect those households who will be significantly harmed by the loss of the medical expense deduction. We believe this could be done by simply raising the current threshold for claiming such expenses to another level, e.g., rather than allowing unreimbursed medical expenses exceeding 3% of gross income, only allow expenses that exceed 10% or more. Alternatively, VHA could allow households to continue to claim the deduction who would otherwise experience more than a ten (10) percent increase in rent burden due to the loss of this deduction.

7. Annual Recertification in Public Housing and S8 HCV Programs.

We support this proposal with the understanding that VHA will be taking immediate steps to adjust payment standards for those households whose last recertification took place prior before the agency's adjustment of its payment standards.

8. Limiting Rent Increases to Annually in the Section 8 Voucher Program.

We support VHA's proposal to prohibit landlords from increasing rent more than once annually, presuming that the change may occur only at the anniversary date of the HAP contract. We encourage VHA to include in its Renters Education program information regarding the benefits of a tenant negotiating a term tenancy at the expiration of the initial one-year lease term, rather than holding over as a month-to-month tenant.

9. Limiting Utility Allowance Payments to Six Months.

We are concerned that stripping families with zero-income of a utility allowance payment after six months may leave a number of participants without the funds needed to pay for required utilities. This could result in terminations of utilities, damage to units (e.g. frozen pipes), evictions, and ultimately, termination from the program. It will also increase the demand on other social service agencies to provide funding for utilities. We believe that VHA should not discontinue the UAP if a family is participating in a VHA sponsored or approved self-sufficiency program and making all reasonable efforts to grow their income. VHA should support tenant efforts to obtain services, training and support needed to secure a regular source of income.

10. Section 8 HQS Inspections.

We support this proposed change.

Other Amendments to Previously Approved 2009 MTW Plan.

We encourage VHA to attempt to support its homeownership initiatives by securing additional funding from local, state, and federal sources, to reduce the need to rely on Section 8 housing assistance funds.

2009 Workbench Initiatives.

We do not oppose VHA's proposed initiatives at this time, but believe that a complete description and impact analysis of each proposed initiative should be made available to and for public comment, including VHA's Resident Advisory Board, prior to submission and approval by the Board of Commissioners.

Proposed Hardship Policy.

We appreciate VHA's expanded list of financial hardships and its proposed solutions to remedy those hardships. We believe, however, that the proposed hardship policy unfairly excludes from consideration of a hardship exemption those tenants who may, as a result of some of the proposed changes, face other types of hardships. Although some of the proposed changes are not "rent reform", VHA is not prohibited from implementing a hardship policy to address hardships of a different nature, and, in fact, should do so.

As proposed, a family who must relocate due to imposition of the utility allowance standard, occupancy reduction, and forty percent of income restriction, but is unable to amass the funds required to move within the timeframe prescribed by VHA, has no meaningful recourse to try to preserve its subsidy and avoid potential eviction following loss of that subsidy. Such a result would be absurd and against good public policy. And certainly any administrative burden associated with processing these hardship requests likely outweighs the administrative burden associated with terminating a subsidy and entering into a new HAP contract.

Furthermore, the policy lacks sufficient detail regarding the grievance process, including composition of the hardship panel or the criteria the panel must consider when reviewing hardship exemption requests to assure us that the due process rights of participants are adequately protected. Additionally, VHA should define what it means by "significant rent increase". The term, without being further defined, is overly-broad and vague. As such, it may lead to inconsistent interpretations and inequitable determinations by VHA staff and grievance panel members regarding eligibility for a hardship exemption. VHA should also explain what it means by "a family specific permanent rent cap."

Thank you in advance for your consideration of our comments.

Sincerely,

COLUMBIA LEGAL SERVICES


Gregory D. Provenzano
Attorney at Law

NORTHWEST JUSTICE PROJECT


Amy McCullough
Attorney at Law

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
None	Email	Child support payments should be deducted from income. HUD is counting income twice by counting it in both households.	VHA does not deduct the expenses for children inside the home. It would not be appropriate for children outside the assisted unit either. VHA will entertain allowance or credit as a component of self-sufficiency participation as these programs are developed for 2010 implementation.
None	Email	Have the VHA or HUD ask apartment owners to lower their rent.	The vast majority of landlords on the program are usually referred to as "Mom & Pop" because they own only a few units. Many are facing their own financial hardships due to the economy and therefore success may be limited. It is worth noting that in our other plan changes; we included a change to the Project Based Voucher program allowing landlords who agree to lower their rents below market to participate.
None	Hearing	Concerned about how long she had to wait from when she was notified she was selected from the waiting list until she got the Voucher.	The wait is necessary due to the need for various verifications and eligibility determinations. Applicants are notified in anticipation of filling future vacancies, a shorter period between notification and Voucher issuance would not result in being housed sooner.
None	Hearing	Will our comments be taken care of?	VHA considers all comments. That is not necessarily the same as agreeing or complying with the comments.
None	Letter	The VHA has not undertaken the impact analysis required pursuant to 42 USC 3601: 3608 (d)-(e) and 1437c-1(d) (16). VHA should consider the impact of each proposed change by race, gender, age, disability, and families with children.	VHA does not believe the regulations quoted require the analysis as described. 1437c-1(d)(16) requires the fair housing certification that VHA already completes annually. 42 USC 3601: 3608 (d)-(e) requires the HUD Secretary to collect data on protected classes, which the VHA assists with, but does not appear to require a local housing agency to perform the kind of analysis described. In addition VHA does not foresee any impact on fair housing choice by these proposals.
Other	Letter	VHA should seek other funding to reduce the need for the Section 8 homeownership program	The VHA is actively seeking and developing all available funding and initiatives in support of homeownership for families served. The change in the plan relative to the homeownership program was not pertaining to utilization of Section 8 assistance or MTW.
1. Renter Training	RAB	Make the training one chance only.	The current proposal provides that an applicant be dropped to the bottom of the waiting list if the training is not completed or excused, so it is effectively one chance.
1. Renter Training	RAB	Notification should be made by phone	Waiting list applicant phone numbers are notoriously inaccurate after the long wait on the list. Notification by mail provides for a written record of the attempt. However VHA is exploring a greater utilization of email in the future by including email addresses in the tenant records.
1. Renter Training	Email	Eliminate this program and spend the money on more priority programs.	This program will not be very expensive and should provide worthwhile benefit.
1. Renter Training	Hearing	You should eliminate renter education	VHA respectfully disagrees

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
1. Renter Training	Letter	Participation should not be mandatory; VHA should create a local admission preference instead. Should VHA make it compulsory, clear guidelines should be drafted and the term "otherwise excused" be clearly defined	A local preference would present additional issues and administrative costs. Applicants may fail to claim preference due to LEP, disability, or other issues, delaying their opportunity for voucher issuance. VHA plans to write clear policy if the amendment is adopted and classes will not be required of applicants with LEP or disability issues if the agency cannot accommodate them.
2. Single Utility	RAB	Will have a major impact on families living in expensive units	Families living in expensive units do not normally receive any benefit from a utility allowance of <i>any</i> amount under the Voucher assistance calculation. In the past VHA did not include the utility allowance at all in determining the 45% cap. Utilizing a flat utility allowance will permit tenants greater knowledge and flexibility when choosing a rental unit.
2. Single Utility	RAB	Approve of the Utility Allowance	VHA appreciates the support.
2. Single Utility	RAB	The more people living in a unit should get a higher utility allowance	This effectively does occur through varying utility allowances for different bedroom size units.
2. Single Utility	RAB	Utility Allowance should include Water/Sewer and Garbage for single families	The proposed allowance is based on including water and sewer expenses for large units. Including this expense for all sizes would increase costs and provide some families with excess assistance.
2. Single Utility	RAB	It's hard to find new efficient homes	There are a significant number of Voucher Holders in new single family dwellings. However many of them are rent burdened and all families with less than four bedrooms should consider apartments in order to keep their rent portion reasonable. Additionally, by participating in the renter education program; we are hopeful that tenants will be more cognizant of the utility expenses when they select units.
2. Single Utility	Email	The figure is based on 1980 and is too low. 1, 2, & 3 bedrooms should have water/sewer costs considered. You can't take heat, electricity & water away from your clients!	The proposed allowance is based on current utility rates, not 1980. Providing an across the board allowance for water/sewer on these units would result in a significant number of participants receiving inappropriate assistance. VHA is not proposing to take away utilities.
2. Single Utility	Email	There should be a larger deduction for internet, cable, and phone.	These services are not required for housing and should be paid for out of a participant's discretionary income. There is a program to provide low or no cost phone service to those who need it for emergencies.
2. Single Utility	Hearing	Does not want the utility allowance lowered	VHA acknowledges this comment
2. Single Utility	Hearing	40% of the units were built before 1980; proposed utility allowance would cause potential severe hardship. Does not factor in water, sewer and garbage.	Part of the intent of the policy is to inform and motivate participants to make smart choices. The data does not reflect the number of pre 1980 homes that have been weatherized.

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
2. Single Utility	Letter	24 CFR 982.517(a) requires a PHA to develop a utility allowance that takes into consideration those utilities to be paid by the tenant.	Commenter appears unaware that MTW waives certain provisions of the 1937 Housing Act and accordingly certain sections of the CFR including 982.517 as noted in the proposed amendment.
2. Single Utility	Letter	By VHA's own estimate at least 454 households will face an increase in rent burden as a result of this change	The 454 households who may face a rent increase due to the new policy will do so because their current rent "burden" is at 30% of adjusted income. The projected increase would only average \$28 dollars. An additional 245 participants should experience a rent reduction. Some change in rent is unavoidable when moving from an individually tailored allowance to a general one. In this case less than a third of the program will have a change.
2. Single Utility	Letter	To ensure tenants are not excessively rent burdened utility allowances must be adequate.	The Voucher program assistance calculation only takes into consideration a full utility allowance when the gross rent for a unit is less than the payment standard. Rent burdened tenants pay more than 30% of their adjusted income because they have chosen units with gross rents higher than the payment standard and accordingly render the amount of a utility allowance irreverent. The reason the numbers noted above constitute less than a third of the program is because the vast majority don't receive any benefit of a utility allowance. The purpose of this initiative is to help address the poorly informed choices many tenants make.
2. Single Utility	Letter	There is inadequate post 1980 housing stock	This is purely speculative. The majority of rental housing in Clark County has been built since 1980. The proposal does not require relocation, and Clark County has several thousand vacant rental units at any given time. In addition many pre 1980 units have been weatherized.
2. Single Utility	Letter	The VHA should consider a utility allowance based on single family homes versus other types and pre 1980 versus post 1980 construction.	This is effectively the same as the current allowance. It would not achieve the simplification that the VHA believes is required to encourage smart choices by participants.
3. Expand 40% Cap	RAB	Case Managers should know about and recommend reasonable accommodation	Eligibility Specialists and other VHA staff are very aware of reasonable accommodation requirements and procedures. <i>Suggesting</i> a reasonable accommodation to a participant is not usually appropriate and can often be considered discriminatory.
3. Expand 40% Cap	RAB	Families should not be forced to move	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Email	The cost of moving would be greater than the amount saved	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
3. Expand 40% Cap	Letter	Requiring me to move is a heavy burden, and increasing income/finding work is even harder.	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Email	Why aren't you keeping the 45% or raising it to 50%? Don't deny a participant to live where they have lived just because they want to pay more.	The VHA has been criticized for the old MTW policy allowing 45% and eliminated it last year.
3. Expand 40% Cap	Email	The amendment does not mention the \$1500 transition allowance; it should be written and promised to all forced moves.	No transition allowance was proposed. Commenter may have been at an earlier meeting regarding possible relocation assistance under Public Housing disposition.
3. Expand 40% Cap	Hearing	Concerned about those who may be required to move	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Hearing	\$1500 transitional allowance should be given to those who have to move.	No transition allowance was proposed. Commenter may have been at an earlier meeting regarding possible relocation assistance under Public Housing disposition.
3. Expand 40% Cap	Hearing	I pay more than 40%, it would be hard to move right now	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Hearing	Has child with behavioral problems, pays more of her income on purpose, scares her to have to move.	Additional bedroom/s could be provided as a reasonable accommodation for disability or other extenuating circumstances.
3. Expand 40% Cap	Hearing	Has several clients who are fine with paying 50 or 60% of their income for rent. We should require people spend the bulk of their income for rent.	Most housing advocates and HUD would likely disagree.
3. Expand 40% Cap	Hearing	I pay over 40%; will I be forced to move?	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Hearing	Deeply concerned requiring move would cause hardship.	In response to public comments, VHA has modified the proposal so that families over the 40% cap at policy inception will be "grandfathered in" and not be required to move.
3. Expand 40% Cap	Letter	The VHA should not go beyond the 40% rent burden limitation by applying it at inception and annually.	VHA has a large percentage of Voucher participants paying more than 40% of their adjusted income for rent. Commenter has frequently castigated VHA for the previous policy allowing greater rent burden and stated last year that the adoption of the 40% rule at inception of tenancy was only a first step. VHA believes this policy change is needed to fully move the Voucher population to a lower rent burden.

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
4. Subsidy Standard	RAB	Single mom & teenager should have own bedrooms	In response to public comment VHA has modified the Subsidy Standard so that a single parent and one child will receive a two bedroom Voucher.
4. Subsidy Standard	RAB	You should take into consideration sex and gender	VHA does not want to dictate how families configure their sleeping arrangements and wants to provide only the necessary housing subsidy.
4. Subsidy Standard	RAB	Take non-custodial children into account when setting voucher size	This does not seem to be a prudent use of funds that could be used for other children on the waiting list. Policy does allow for appeal for exceptions.
4. Subsidy Standard	RAB	Seems inappropriate	VHA respectfully disagrees
4. Subsidy Standard	Email	A single mom and teenage son should not share a bedroom.	In response to public comment VHA has modified the Subsidy Standard so that a single parent and one child will receive a two bedroom Voucher.
4. Subsidy Standard	Email	I have a 3 bedroom voucher because of my disabilities, it's not fair and it's discriminatory to make me share a bed.	Families previously approved for additional bedroom/s as a reasonable accommodation will retain them under the proposal. Families may make new reasonable accommodation requests as well.
4. Subsidy Standard	Email	Maintain integrity and dignity for every disabled, senior, and terminally ill person.	The VHA strives to maintain integrity and dignity for all participants.
4. Subsidy Standard	Email	It would be a big mistake for the bedroom size of a 3 person home to downsize to a 2 bedroom.	Families could still have the option of renting a larger unit with rent low enough so the tenant expense was less than 40% of their adjusted monthly income.
4. Subsidy Standard	Hearing	Integrity and dignity need to be maintained, do not want to occupy a living room	Additional bedroom/s could be provided as a reasonable accommodation for disability or other extenuating circumstances.
4. Subsidy Standard	Hearing	Cornell University study shows when children are over crowded they have behavioral problems, higher blood pressure, etc. She could not fit 3 beds in her small bedroom.	Study referenced was done in Poona India on households with up to 5 persons per room. VHA proposal is for no more than two persons per bedroom and considers the fact that almost all units contain at least one additional room that could be used for sleeping.
4. Subsidy Standard	Hearing	Has child with sleep apnea, needs separate bedroom. How will we address medical problems?	An additional bedroom could be provided as a reasonable accommodation for disability or other extenuating circumstances.
4. Subsidy Standard	Hearing	The proposed occupancy standards would be a HQS violation	VHA does not believe this to be true. The original proposal was in effect to provide an additional bedroom once HQS overcrowding might occur. However, policy has been modified so the standard is the same for both admission and any later addition of family members
4. Subsidy Standard	Letter	The proposed occupancy standards could cause some households to violate HQS rule 24 CFR 982.401 (d)(ii).	VHA does not believe this to be true. The original proposal was in effect to provide an additional bedroom once HQS overcrowding might occur. However, policy has been modified so the standard is the same for both admission and any later addition of family members
4. Subsidy Standard	Letter	Regulations governing foster children prevent the use of a living room as a bedroom,	There are very few foster homes on the Voucher program. In the unlikely event of a foster family finding themselves in violation of the State regulations

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
		sharing of a bedroom by children of a different gender age 6 and older, and children over the age of 1 sharing a bedroom with an adult who is not the child's parent.	regarding their home they could request an additional bedroom for extenuating circumstances under the exception policy.
4. Subsidy Standard	Letter	VHA should consider the square footage of the unit when determining unit size for a family.	This is impractical as it would require the family locate a unit before they learned their voucher size and estimated subsidy.
5. 3 Year Reviews	RAB	Why do re-certifications at all? Why not just an update?	In response to this comment VHA is proposing some changes in the eligibility review process due to new EIV regulations, the proposed elimination of medical deductions, and the features of the new housing software. The proposal will simplify the process considerably.
5. 3 Year Reviews	Email	Adjustments are already a problem with once a year. I had to pay the whole rent increase until the yearly review.	This person may have paid an unapproved rent increase or possibly the commenter did receive enough of an adjustment in the payment standard at the annual review to offset an earlier approved rent increase. VHA will investigate this situation. The proposal for 3 year reviews applies payment standards each year.
5. 3 Year Reviews	Letter	We support this proposal	VHA appreciates the support.
6. No Medical	RAB	You should consider credit for health savings account	This suggestion is not fully understood, but it appears that it would expand the medical deduction rather than reduce or eliminate it.
6. No Medical	RAB	There is no way \$700 will cover medical expenses	The current medical deduction does not, and is not intended to, cover expenses. VHA is sympathetic to the cost of medical care; however, we must consider the desire of people on the wait list to be housed; as a result, housing subsidy should not be a means to pay for medical needs.
6. No Medical	RAB	Not a fair trade-off	VHA recognizes that it is not a fair tradeoff for a few participants. However it will benefit disabled and elderly families as a whole.
6. No Medical	RAB	Give extra allowance for exceptional medical expense	Participants facing a hardship under this proposal have access to the hardship policy and may receive assistance.
6. No Medical	RAB	Consider monthly ongoing medical expense	VHA is sympathetic to the cost of medical care, but is proposing to eliminate medical deductions in part because the vast majority of participants receive assistance with medical from other agencies.
6. No Medical	Email	The \$400 deduction for disabled families and the \$480 dependent deduction should be adjusted for inflation. According to NASA's GDP calculator they should be changed to \$1901 and \$2282.	Such an adjustment would be extremely expensive for the VHA, costing several million dollars and/or causing a reduction in the number of families served by several hundred. We would also need to apply the same calculator to rent and income. VHA believes the calculation method used overstates the increase.

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
6. No Medical	Email	HUD should provide medical deductions for people with disabled children.	VHA is proposing to get out of the business of compensating participants for medical expenses. All children of households in the income range for housing assistance should be eligible for Medicaid coverage.
6. No Medical	Email	This is totally wrong	VHA respectfully disagrees
6. No Medical	Email	I would benefit from the increase from \$400 to \$700 but the amendment should be non-applicable to the terminally ill.	Participants facing a hardship over the proposed policy should utilize the appeal process under the hardship policy.
6. No Medical	Hearing	Make it not effective for the terminally ill and cancer patients	It is unlikely that these participants would not be covered under Medicare or Medicaid. The hardship policy could accommodate them if not.
6. No Medical	Hearing	Has neighbor with over \$700 in medical expenses	The neighbor may need to take advantage of the hardship policy.
6. No Medical	Hearing	Does not like that we asked him about his future medical, how does he know what it will be, does not make sense.	VHA agrees that the current policy is flawed and is proposing to eliminate it and replace it with a higher deduction for all elderly and disabled households.
6. No Medical	Hearing	Medical Expense used to be a deduction for everyone, now only for those with an elderly or disabled head or spouse.	This is correct; the medical deduction for non elderly and non disabled families was eliminated over 20 years ago. VHA is now proposing to eliminate it for all participants.
6. No Medical	Hearing	The \$400 deduction for disabled families and the \$480 dependent deduction should be adjusted for inflation. According to NASA's GDP calculator they should be changed to \$1901 and \$2282.	Such an adjustment would be extremely expensive for the VHA, costing several million dollars and/or causing a reduction in the number of families served by several hundred. We would also need to apply the same GDP calculator to rent and income. VHA believes the calculation method used overstates the increase.
6. No Medical	Letter	We support the proposal to increase the elderly/disabled deduction from \$400 to \$700 and eliminate the deduction for un-reimbursed medical expenses.	VHA appreciates the support.
7. Interim Policy	RAB	Thank you for this change	VHA appreciates the comment.
7. Interim Policy	Letter	We support this proposal provided the VHA will be taking steps to adjust payment standards for these households	The proposal changes interim exams to annual exams and accordingly would have current payment standards and utility allowances applied to the calculation of assistance.
8. Annual Increase	RAB	Have lease term be 18 months	The regulations require that a lease term be <i>at least</i> 12 months, so an 18 month lease can be accommodated. However, <i>requiring</i> one of landlords would likely reduce the number of landlords participating in the program.
8. Annual Increase	RAB	Limit rent increases to a percent	This suggestion would be considered rent control by most landlords and would likely result in a significant reduction in the number of landlords willing to participate.

Summary Record of Public Comments and VHA Response			
Initiative	Source	Comment	Response
8. Annual Increase	Letter	We support VHA proposal to restrict LL rent increases to once annually.	VHA appreciates the support.
9. No UAP	RAB	Approve of limitation	VHA appreciates the support.
9. No UAP	Letter	Stripping of the UAP from families could result in terminations of utilities, damage to units, evictions, and termination from the program.	The VHA is providing a hardship policy that will provide for individually consideration of any family's hardship caused by this proposal. In addition the family would be eligible to request an informal hearing before any termination took place.
10. Biennial Inspection	RAB	Tenant & Landlord should sign separately	VHA will consider this suggestion when designing the process for self-certification.
10. Biennial Inspection	RAB	Allow for protection of vulnerable people	VHA plans to respond to complaints and monitor and inspect any landlords where there may be an issue of non-compliance and/or intimidation.
10. Biennial Inspection	Letter	We support this proposed change	VHA appreciates the support.
Yes We CAN	RAB	The pilot program should include provisions for existing S8 & PH tenants to participate	The pilot program will be expanded to include a group of 8 tenants that volunteer to participate.
Hardship Policy	Letter	The policy should not be limited to rent reform initiatives; it should include utility allowances, occupancy reduction, and the 40% rule.	VHA is not required to adopt a hardship policy for these issues and in fact HUD regulation specifically excludes the Informal Review and/or Hearing right over utility allowances and subsidy (occupancy) standards. The 40% rule at tenancy inception is not grounds for a hearing either as non-MTW PHAs have no discretion over enforcing this law. In addition, the 40% rule has been modified for current rent burdened families.
Hardship Policy	Letter	The policy lacks sufficient detail regarding the process, panel, and criteria.	VHA welcomes suggestions for the policy before final adoption in the Admin Plan or ACOP. VHA is also willing to modify the policy should it later prove problematic. Note that the policy is based directly on the existing policy for minimum rent hardship which in turn is based on Nan McKay boilerplate used by hundreds of PHAs.
Hardship Policy	Letter	The VHA should define what it means by "significant rent increase" and "family specific rent cap".	What constitutes a "significant rent increase" will vary greatly between participants. VHA wishes to provide flexibility for the panel allowing for consideration of individual circumstance regarding both dollar amount or percentage of rent increase, and actions the family could take to mitigate the increase (such as applying for a benefit they are eligible for). A "family specific rent cap" would be an action to cap the families rent at the pre-change amount or an amount less than the increase resulting from the new policy and is affordable to the family.

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ANNOUNCEMENTS	
<p>Notice of Public Hearing The Vancouver Housing Authority (VHA) will hold a public hearing on a proposed change to the 2009 Capital Improvement Plan for public housing units. The plan will be amended to include plumbing and roof improvements at Van Vista apartments utilizing HUD capital stimulus funds. We welcome your comments and suggestions. Copies of the document are available for review prior to the hearing at the RISE & STARS Community Center (500 Omaha Way) or at the VHA offices at 2500 Main St. and online at www.vhausa.com in the "What's New" section.</p> <p>Hearing Date: Tuesday, April 21, 2009 Time: 6:00 pm Location: Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA Vancouver Housing Authority 2500 Main Street, Suite 200 Vancouver, WA 98660-2697 Telephone: (360) 694-2501 or (503) 289-5583 Fax: (360) 993-9594 TDD: (360) 694-0842 www.vhausa.com Equal Housing Opportunity April 9 315362</p>	<p>APEX Materials resir 3 Form Decor bids, 360-6</p> <p style="text-align: center;">C</p> <p>1 - 5 at exp.sic Sr D 0011 NI</p> <p>Affords in a envir Ye Ex Lois</p> <p>L will pi home.</p> <p style="text-align: right;">621</p>

None of the public appeared at the April 21, 2009 public hearing. No public comment were received during the comment period.

Please Sign In

*Vancouver Housing Authority
Public Hearing Amendment No. 2 to the 2009 MTW Annual Plan
Thursday, June 4, 2009
2500 Main Street
Vancouver, WA 98660*

	Name	Organization
1.	Amy Bradseth	
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JUNE 4, 2009 Public Meeting
TO: VHA BOARD OF COMMISSIONERS AND
EXEC. DIR. ROY JOHNSON
RE: AMENDMENT #2 TO 2009 M.T.W. PLAN
ITEM #4: CHANGES TO ADM. & CONT'D OCCUPANCY

THIS IS MY EXPANDED COMMENT FROM THE MAY
12TH RAB MEETING TO ROY JOHNSON.

PART II: UNIT OFFERS

1. 5-11.B: # OF OFFERS.

TO RESTRICT TO A "ONE OFFER PLAN", WITHOUT
ANY CONTINGENCY INCLUSION, DENOTES LACK OF
REGARD TOWARDS BARRIERS THAT WOULD CAUSE
A PERSON TO REFUSE A FIRST OFFER. A MORE
REALISTIC PHRASING WOULD BE: IN THE EVENT THAT
NONE OF THE QUALIFIED APPLICANTS TAKE A UNIT ON
THE 1ST OFFER, A 2ND OFFER WILL PROCEED.

SAME PARAGRAPH, LAST 4 WORDS, 'OF THE
APPROPRIATE SIZE'. I RECOMMEND CHANGING TO A
LESS TYRANNOUS APPROACH SUCH AS: 'WHICH MEETS
THE APPLICANT'S REASONABLE NEEDS.'

2. 5-11.C: TIME LIMIT

"WITHIN 3 BUSINESS DAYS". FOR A MAJOR LIFE
CHANGE, THIS IS AT THE VERY LEAST IS MOST
UNREALISTIC BORDERING ON DISASTEROUS, TOWARDS
ALL SENIORS, DISABLED AND SINGLE PARENTS WITH
YOUNG CHILDREN. THERE IS NO WAY ANYONE,
COULD CHECK OUT & WEIGH ALL THE POSSIBLE AFFECTS
OF A MOVE IN 3 DAYS. 7 DAYS WOULD BE A
REALISTIC TIME, TO MAKE AN INFORMED DECISION
(OVER.)

3. 5-11.D: REFUSAL OF OFFERS. EXAMPLE OF GOOD CAUSE FOR REFUSAL.

THERE IS NO MENTION OF THE REALISTIC CONSIDERATION OF LOCATION TO BUS ROUTES, FOR A PERSON'S NEED TO REACH THEIR DOCTOR, OR PHARMACY OR GROCERY, BY THE MOST DIRECT ROUTE. THIS IS CRITICAL TO THE VERY BASICS OF "WELL-BEING", FOR SENIORS, THE DISABLED AND SINGLE PARENTS WITH YOUNG CHILDREN.

I NOW QUOTE FROM THE V.H.A. BRIEFING BOOK, PAGE 2, MISSION STATEMENT:

" TO PROVIDE OPPORTUNITIES TO PEOPLE WHO EXPERIENCE BARRIERS TO HOUSING BECAUSE OF INCOME, DISABILITY, OR SPECIAL NEEDS IN AN ENVIRONMENT WHICH PRESERVES PERSONAL DIGNITY AND IN A MANNER WHICH MAINTAINS THE PUBLIC TRUST."

THIS THE V.H.A.'S PROMISE TO ALL TENNANTS EVERYTHING I'VE POINTED OUT IN MY COMMENT HERE, IS A CLEAR CONTRADICTION TO THE MISSION STATEMENT. THUSLY GENERATING THE COMMENTS OF RECOMMENDED CHANGES.

I'M A V.H.A. TENNANT AND A MEMBER OF THE RESIDENTS ADVISORY BOARD, WHERE WE STRIVE TO BE AMBASSADORS. TO IMPROVE THE "QUALITY OF LIFE" FOR ALL, AND CREATE TRUST-WORTHY COMMUNICATION BETWEEN TENNANTS AND THE V.H.A.

I'M PART OF THIS NEIGHBORHOOD,

(NEXT PAGE)

JUNE 4th 2009 Public Meeting Pg 3 of 3
RE: AMENDMENT #2 TO 2009 M.T.W. PLAN, CONT'D.

THEREFORE I'M ALSO PART OF "THE NEIGHBORHOOD WATCH - ON ALL FRONTS"; AGAINST ANY THING WHICH DETRACTS, RATHER THAN MAINTAINS OR IMPROVES, "QUALITY OF LIFE" FOR MYSELF, & FOR MY NEIGHBORS,

THIS 2ND AMENDMENT IS AS RIDDLED WITH CONTRADICTIONS TO THE V.H.A. MISSION STATEMENT, AS WAS THE 1ST AMENDMENT.

NO ONE IN GOOD CONSCIOUSNESS COULD POSSIBLY CONFIRM MOST OF THESE SUGGESTED CHANGES FROM THE V.H.A.

AS PART OF THE R.A.B., WE STRIVE FOR IMPROVEMENTS, NOT ACTS OF CLEAR, REGRESSIVE, RESTRICTIVENESS.

ONE NEVER SAVES MONEY IN THE LONG RUN WITH CHANGES NEGATIVE TO THOSE WHOM THEY HAVE BEEN CHARGED TO OVERSEE IN GOOD FAITH, WITH DUE DILIGENCE. IT CHEAPENS EVERY MOTIVE THAT FOUNDED THE HOUSING AGENCIES, THAT ENTRUSTED THEIR TENANTS TO THESE AGENCIES.

THANK YOU
CORINNE KLOSINSKI
#206 ENGLAND MANOR
R.A.B. MEMBER

**Summary Record of Public Comments and VHA Response
June 4, 2009 Public Hearing regarding Amendment #2 to 2009 MTW Annual Plan**

Initiative	Source	Comment	Response
None	Hearing	Why doesn't the VHA put up something for disabled men and women who are not senior citizens	VHA will take this under consideration and evaluate the need in the community
None	Hearing	VHA should make landlords take Section 8	This is not within the power or authority of the VHA.
# 4	Letter	The "one-offer plan" is too restrictive	VHA has modified the proposed amendment in consideration of Public comment and is only using a "one-offer plan" where required for site-based waiting lists.
# 4	Letter	The 3 business day requirement for turning down an offer should be 7 days	The 3 day requirement was not a proposed change and is existing policy. Providing more time would cause additional delays in leasing property reducing utilization of the available subsidized housing
# 4	Letter	There is no mention of consideration of bus routes as a reason for good cause for refusal	The listed reasons for good cause refusal in the policy are not limited to the examples given. The "two offer policy" now being proposed should mitigate this concern

APPENDIX C

ADVISORY COMMITTEES

VHA Resident Advisory Board Members

Sara Angelo
Amy Bradseth
John Broadbent
Yvonne Broders
Kellee Burson
Marguerite Carbone
Debbie Conway
Carol Cox
Jacinta Cox
Kay Culver
Julie Ensign
Kathy Gebhart-Boese
Catherine King
Shannon Lindberg
Caroline Meek
Michael Ralston
Nancy Ramey
Tricia Rice
Rebecca Smith
Daniel Tanner
Kim Dung The Dreong
Louise Thomas
Kaycie Tolleson
Charlene VanBuskirk
Kim White
Carlena Williams

Moving To Work Advisory Committee

Jordana Barclay	Southwest Washington Workforce Development Council, Contracts and Special Projects Coordinator
Sierk Braam	National City Mortgage, Broker; President, Council for the Homeless Board of Directors
Debra Conway	Resident Commissioner, VHA Board of Commissioners; Washington DSHS, Division of Children and Family Services, Parent Partner Lead
Karen Evans	Clark County, Community Services Department, Program Coordinator
LaVon Holden	Vancouver Housing Authority, Deputy Director
Roy Johnson	Vancouver Housing Authority, Executive Director
Kirby Juhola	Department of Social and Health Services, Family Social Work Supervisor for TANF
Craig Lyons	Council for the Homeless, Executive Director
Amy McCullough	NW Justice Project, Attorney
Bridget McLeman	Children's Home Society of Washington, Executive Director
Becky Merritt	Clark College, Eligibility Programs & Advising Support Manager
Pete Munroe	Clark County, Community Development Block Grant/HOME Manager
Debbie Dover	YW Housing, Executive Director
Sasha Nichelson	Vancouver Housing Authority, Housing Department Compliance Specialist
David Overbay	Vancouver Housing Authority, Housing Voucher Program Manager
Greg Provenzano	Columbia Legal Services, Staff Attorney
Amy Reynolds	Share Vancouver, Director of Programs
Peggy Sheehan	City of Vancouver, Community Development Manager
Sharon Wylie	Government Relations Consultant; Vice President, Council for the Homeless Board of Directors
Trina King	Columbia River Mental Health Services, Administration & Housing Manager