



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

DEC 27 2012

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

Re: VHA FY 2013 Annual MTW Plan Approval

Dear Mr. Johnson:

The U.S. Department of Housing and Urban Development has reviewed the Vancouver Housing Authority's (VHA) Annual Moving to Work (MTW) Plan for Fiscal Year 2013, initially submitted on September 28, 2012, with revisions submitted on December 19, 2012. I am pleased to inform you that VHA's FY 2013 Annual MTW Plan, as submitted on December 19, 2012, is approved.

Additionally, while HUD is supportive of VHA's efforts, this approval does not necessarily constitute an endorsement of any particular policies described in the Plan. In providing assistance to families under programs covered by these Plan, VHA must comply with the rules, standards and policies established in the Plan, and documents relying upon the approved Plan (e.g. Administrative Plans, Admission and Continued Occupancy Plans, etc.) should be updated to reflect those policies. In addition, the accepted Plan and all required attachments and documents should be available for review and inspection at VHA's principal office during normal business hours.

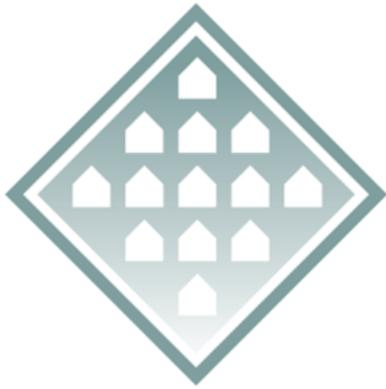
If you have any questions, please contact Laurel Davis, your MTW Coordinator, at (202) 402- 5759.

Sincerely,

A handwritten signature in black ink, appearing to read "Ivan M. Pour", with the word "FOR" written in blue ink to the right of the signature.

Ivan M. Pour
Program Director
Moving to Work Demonstration Program
Office of Public Housing Investments

cc:
Joy McCray, HUD Portland Program Center Coordinator



VANCOUVER
HOUSING
AUTHORITY

▶ Moving to Work Annual Plan

Fiscal Year 2013

▶ December 19, 2012 ▶ Resubmitted for HUD Approval

Moving to Work Annual Plan

Fiscal Year 2013

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Section I. Moving To Work Goals and Objectives

The Vancouver Housing Authority

The VHA provides affordable rental housing and housing assistance for more than 12,000 residents of Clark County, Washington. In addition to affordable housing, the VHA's community development activities also shape the lives of the people and neighborhoods we serve.

Our mission 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.

The VHA was established in 1942 for the purpose of housing an influx of employees to the aluminum and shipyard industries during World War II. During that time, the VHA built 1,000 permanent homes and 11,396 temporary units capable of housing 50,000 people. When the war was over the temporary units were sold to buyers who agreed to dismantle and remove them. The land was then re-developed into some of Vancouver's best-planned neighborhoods.

In the 1960s the VHA assumed the primary role we still hold today, providing subsidized housing for low-income families, elderly, and disabled people. As a low-income housing provider, we have partnered with various community groups along the way, resulting in the creation of Columbia Non-Profit Housing in 1981, the Council for the Homeless in 1989, and Vancouver Affordable Housing in 2008.

In the early 1990s the VHA became a diversified housing authority by purchasing our first Workforce Housing property. As we continue to serve extremely low-income families, elderly, and disabled people in our traditional subsidized programs, investing in workforce housing and community development allows the VHA to provide additional affordable housing to low-income

families. In addition this diversified housing portfolio reduces our dependence on federal funding sources and meets local policy goals.

The Moving to Work Demonstration

The VHA was among the original group selected to participate in Moving to Work (MTW) in 1999. More recently, the Department of Housing and Urban Development (HUD) and VHA executed an Amended and Restated Agreement on March 26, 2008. The new Agreement has a term of ten years and will end in 2018.

The Moving to Work Statutory Objectives:

- *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*
- *Increase housing choices for low-income families*

The MTW demonstration offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The program has three statutory objectives and in order to meet these objectives 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.

VHA recognizes that the MTW demonstration is a valuable tool for meeting the housing needs of Vancouver and Clark County and that the statutory objectives align with VHA's goals of promoting resident empowerment and self-sufficiency, maximizing the use of federally subsidized housing and rent assistance, and providing opportunities to people who experience barriers to housing because of income, disability or special needs.

The Moving to Work Plan and Report

As a MTW agency, the VHA is required to adopt an Annual MTW Plan that describes the activities planned for the next fiscal year. At the end of the year the VHA prepares an Annual MTW Report that compares the activities of the completed fiscal year with what was originally planned for that year. The required format and content of these plans and reports are outlined in an attachment to the MTW Agreement. This MTW Annual Plan is for the VHA's 2013 fiscal year that will begin on January 1, 2013.

Moving to Work Activities for 2013

Initiatives developed and approved under the MTW demonstration that require authorization under the terms of the MTW Agreement are known as MTW Activities. In addition to previously approved MTW Activities that will be continuing from previous years, the VHA is seeking approval for one new activity for 2013.

VHA is proposing a rent reform activity that incorporates a minimum income into the calculation of tenant rent and housing assistance

amounts. This proposal was developed by a VHA staffed working group that was formed during the development of last year's Annual Plan. Details about the rent reform proposal are found in Section V as well as in an appendix containing an impact analysis, transition plan and hardship policy.

VHA Initiatives Outside of MTW

VHA will continue to seek ways to better utilize our Public Housing stock in 2013. This includes a disposition plan pending HUD approval for the sale of 84 units in small scattered sites, the demolition and replacement of the community center, the conversion or disposition of the 150 unit Skyline Crest site, and a planned application under the Rental Assistance Demonstration to convert up to 152 Public Housing units to a form on Section 8 assistance.

New work-force properties under development include 1st Street and Burton Ridge.

Stakeholder Involvement

VHA's 2013 MTW Annual Plan was developed with input from both a group of community partners known as the MTW Advisory Committee as well as our Resident Advisory Board (RAB).

VHA will continue to use the flexibility provided by the MTW Demonstration to work with community partners to bring new housing opportunities to very-low income residents of Clark County. We will also continue to seek input and advice from our Moving to Work Advisory Committee and the RAB as we develop and implement new activities for the MTW Demonstration.

Section II. General Housing Authority Operating Information

Housing Stock Information

Number of Public Housing Units at Beginning of Plan Year

VHA has 575 Public Housing units under contract with HUD. 189 of these units are not currently part of the inventory as they were removed under completed disposition plans and may be replaced in future developments. The 386 physical units are currently divided among two Asset Management Properties (AMPS).

Planned Significant Capital Expenditures

Planned capital expenditures for 2013 are subject to change depending on the outcome of pending and planned demolition, disposition, conversion and RAD applications.

Figure 1: 2013 Planned MTW Capital Fund Activities

| Community | Planned Activities | Budget |
|----------------------------|--|------------------|
| AMP 1 (Skyline Crest) | Additional Smoke/carbon monoxide detectors, plumbing scoping, entry and patio door replacement | \$735,000 |
| AMP 2 (Scattered Sites) | Tree removal, heater upgrades, mailbox upgrades and concrete/brick repair | \$70,000 |
| Total | | \$805,000 |

New Public Housing Units Planned for 2013

VHA is continuing to seek development opportunities that would allow for replacement Public Housing units. Also under consideration is placement of Public Housing units in existing unsubsidized units owned by VHA, newly purchased properties, or in existing or newly developed properties owned by local non-profits or Low Income Housing Tax Credit (LIHTC) partnerships.

Public Housing Units to be removed from Inventory

VHA currently has one disposition, one demolition and one conversion plan under review by HUD.

The disposition plan is for 84 units in locations with 10 or fewer units, mostly duplexes and triplexes, scattered throughout Clark County. The broad distribution of these units creates inefficiencies in management and maintenance and the units are in need of improvements that cannot be met with current capital funding. The plan is to sell these units and to provide residents with tenant-based Housing Choice Vouchers.

The demolition plan is for the community center and previous administrative building at Skyline Crest. The building is old and not suited to its current use and will be replaced with a new building suitable for the current community needs.

The conversion plan is for the 150 units at Skyline Crest. The plan is to convert this property to Project-Based Vouchers. This change will allow the VHA to address a number of issues, primarily the unmet capital needs that will require conventional financing, but will not require households to be relocated. VHA will continue the commitment to the residents made under the previous disposition plan that any new lease will retain the same grievance policy and requirement that the VHA show cause when giving notice that is contained in the current Public Housing lease.

VHA is also assessing the feasibility of a voluntary conversion under the Rental Asset Demonstration (RAD) program for 152 additional units of Public Housing. These units also have capital needs that cannot be met without the option of conventional financing that will be available once converted.

Number of MTW Housing Choice Vouchers Authorized

VHA currently has 2086 Housing Choice Vouchers (HCV) funded under the MTW Annual Contributions Contract (ACC)

Number of non-MTW Housing Choice Vouchers Authorized

VHA is authorized for 225 special purpose vouchers that are not part of the MTW demonstration. These include 75 Mainstream vouchers designated for persons with disabilities, 70 Veteran’s Affairs Supportive Housing (VASH) tenant-based vouchers for homeless veterans, 50 Family Unification Program (FUP) vouchers, and 30 VASH project-based vouchers. In some cases VHA is utilizing MTW activities with these vouchers as agreed to with HUD and Veteran’s Affairs.

In addition to the vouchers funded directly to the VHA from HUD, VHA administers about 400 vouchers that ported to Clark County from other jurisdictions and where VHA bills the initial Housing Authority. MTW activities are utilized with these vouchers.

Number of Housing Choice Vouchers to be Project-Based

VHA currently has 280 Project-Based Vouchers under contract in 11 properties. This includes 98 PBV awarded as part of a Public Housing disposition action and 30 new VASH PBV. This number is well below the normally allowed ceiling of 20% of the HCV program, which in VHA’s case is 462 units. VHA will consider making additional vouchers available in 2013 for project-basing under a competitive process and where self-sufficiency supportive services are provided.

Figure 2: Project-Based Properties

| Property Name | PBV Units | Total Units | Detail |
|--------------------|-----------|-------------|---------------------------|
| Anthem Park | 3 | 58 | PBV Tied to Services |
| Esther Short | 7 | 160 | PBV Tied to Services |
| Maple Knoll | 25 | 148 | PBV Tied to Services |
| The Mews | 6 | 51 | PBV Tied to Services |
| Park Lane | 8 | 260 | PBV Tied to Services |
| Plum Meadows | 8 | 162 | PBV Tied to Services |
| Spring Brook | 8 | 290 | PBV Tied to Services |
| Camus Ridge | 8 | 51 | Mixed Income Development |
| Van Vista Plaza | 98 | 98 | Previously Public Housing |
| Vista Court | 79 | 79 | New Elderly Project |
| Central Park Place | 30 | 124 | VASH PBV |

Planned Leasing Information

Anticipated Number of MTW Public Housing Units to be Leased

VHA expects to have 385 Public Housing units leased at the beginning of the year, but anticipates that one or more disposition plan approvals will reduce that number by the end of 2013.

Anticipated Number of Non-MTW Public Housing Units to be leased

All of VHA’s Public Housing stock is part of the MTW demonstration.

Anticipated Number of MTW Housing Choice Vouchers to be leased

VHA is planning for a lease-up rate of about 97%, or about 2023 vouchers during the 2013 fiscal year. Currently the rate is over 99% which is not sustained by current funding.

Anticipated Number of Non-MTW Housing Choice Vouchers to be leased

About 220 Non-MTW vouchers are expected to under lease each month for a utilization rate of 98%. That breaks down to approximately 74 Mainstream, 98 VASH and 49 FUP vouchers leased per month.

Anticipated Issues Relating to Leasing

No significant issues related to leasing are anticipated for 2013.

Number of Project-Based Vouchers In-use

VHA anticipates a lease rate of 98% or better for the 280 PBV currently under contract (This includes the 30 VASH PBV not part of the MTW ACC).

Waiting List Information

Anticipated Changes in Waiting lists

Changes to VHA waiting lists will include a new list for the Shared Voucher Program approved in the 2012 Plan Amendment and possible additional lists and/or the merging of current lists to accommodate any approved disposition, conversion, or RAD applications.

Anticipated Changes in the Number of Families on the Waiting Lists

The Public Housing program opened their list for certain bedroom sizes in 2012 and the list continues to be open for all bedroom sizes except for one-bedroom units. Depending on the number of applications received, the list may close prior to or during 2013. The tenant-based list for the HCV program currently has 1730 applicants so it is unlikely that list will be opened in 2013.

Section III. Non-MTW Related Housing Authority Information

Planned Sources and Uses of other HUD or other Federal Funds

Detail on anticipated HUD and other Federal funds received by VHA but are not part of the MTW demonstration are detailed in the following table. Fund sources include Section 8 New Construction projects and their rental income, a Shelter Plus Care program, grants for ROSS and FSS Service Coordinators, and non-MTW vouchers.

Figure 3: Planned Sources and Uses of other Federal Funds

| Sources | |
|--|------------------|
| Rental Income | 588,706 |
| HUD and Other Grants | 3,123,321 |
| Other Revenue | 845,882 |
| Investment Income | 38,850 |
| Total | 4,596,759 |
| Uses | |
| Administrative Expenses | 2,160,916 |
| Maintenance | 170,550 |
| Utilities | 163,860 |
| Insurance and other Expenses | 48,097 |
| Housing Assistance Payments | 1,384,840 |
| Interest Expense | 55,112 |
| Capital Expenditures | 254,500 |
| Less Principle & Reserve Contributions | 417,338 |
| Transfers To (From) Reserves | (254,500) |
| Total | 4,400,713 |
| Net Income (Deficit) | 196,046 |

Non-MTW Activities Proposed by the Housing Authority

VHA recently won approval for Housing Works: A Regional Workforce-Housing Alliance. This project includes the Housing Authorities and Workforce Development Boards from four metro area counties working together to support 480 PHA housing residents gain the life and employment skills necessary to attain self-sufficiency. VHA plans on

110 residents participating from our Public Housing and HCV programs. This intensive effort will interconnect will our self-sufficiency efforts under MTW, particularly the newly proposed rent reform activity in this plan.

Planned renovations to existing properties include major improvements to Van Vista Plaza. This property includes 60 units of assisted living and requires improvements to kitchen and dining facilities as well as other areas. Construction should begin in 2013 and be completed in 2014.

VHA received a CDBG/HOME grant from the City of Vancouver for improvements to Pinewood, a transitional housing facility owned by VHA. Construction should run from January to June 2013.

A new community center for Skyline Crest will be completed in 2013 should that demolition application be improved.

New housing projects under development that may break ground in 2013 include First Street and Burton Ridge. Note that VHA was approved in 2012 to use MTW funds in new developments. The First Street project may also utilize PBV and/or replacement Public Housing units, including utilizing the use of minimum income or rent as approved under MTW activity 2011-01.

Begun in 2012 and continuing into 2013, VHA has facilitated the development of a transit coordinator for seniors living in low-income developments in the downtown Vancouver area. The goal of this collaboration is to improve access to community resources for seniors.

Section IV. Long-Term Moving to Work Plan

Our Mission

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 where warranted by need.

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 maintaining 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 work-able 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 180 former MTW program participants have purchased homes since the beginning of the demonstration. Program participants seeking home ownership will receive one-on-one counseling, attend pre-purchase home ownership classes offered by a local nonprofit, and participate in post purchase follow up. Program participants may receive financial assistance from their Section 8 Housing Choice Voucher.

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 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, and 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 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 will result 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

Since its beginning in 1942, 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 forum for dialog. Creation of a Moving to Work Advisory Committee allows for greater participation from community stakeholders.

Section V. Proposed MTW Activities: HUD Approval Requested

Activity 2013-01: Minimum Income Rent Reform

Description

This proposed activity is to use a minimum income when calculating rent for any HCV or Public Housing household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum income will be \$9000 annually for each work-able family member. For example a household with one work-able member would have a minimum income of \$9000; a household with two workable members would have minimum income of \$18,000, and so on. If the household's actual annual income as determined under the program regulations falls below the minimum, tenant rent and housing assistance will be calculated using the minimum. If the household's actual income is greater than the minimum, the actual income will be used and the minimum income will not be a factor.

A household subject to the minimum would still have any deductions they might be eligible for under HUD regulations (as modified by VHA MTW policy) deducted from the minimum income as part of the rent calculation. For example a family of three with two dependents and one work-able member who was subject to the minimum would have assistance calculated based on an annual income of \$9000, less a dependent deduction of \$960 ($\480×2). The resulting annual income of \$8040 would be divided by 12 to determine monthly income and the household's tenant rent or assistance would be based on 30% of the monthly adjusted income, in this case \$201. In Public Housing the utility allowance would be subtracted from \$201 to determine the tenant rent. Under the HCV program the \$201 would be subtracted from

the applicable payment standard or gross rent to determine housing assistance.

The amount of the minimum income will be reviewed annually and possibly modified if warranted. Any proposed change in the amount will be included in the Annual Plan and the public comment process. Currently, the amount is less than the earnings a person would receive if they worked 20 hours per week at the Washington State minimum wage. Households impacted by this MTW activity would be eligible to request an exemption under the terms of the VHA hardship policy.

VHA will provide both referrals and in-house services for participants seeking assistance with a job search. These resources include the Housing Works program, a partnership with Work Source Vancouver that includes two employment specialists located at the VHA office providing coaching and workshops. VHA also plans to expand the job referral services already offered in the community service and Section 3 programs.

Two existing rent reform activities will be impacted by this new minimum income. Activity 2009-02, imputed TANF, will be discontinued as any family impacted will also be impacted by the proposed minimum income. Activity 2009-09, No UAP after six months, will experience a drop in impacted families as many, but not all, will be impacted by the minimum income to the extent that they will not be eligible for a UAP. At the end of 2013 this activity will be reevaluated to see if the remaining families justify continuation.

Relation to Statutory Objectives

This proposed activity will provide incentives to families with children to obtain employment and become economically self-sufficient. In addition the activity will also reduce costs through lower

HAP expense due to the minimum income and through higher household incomes.

Impact on Statutory Objectives

VHA anticipates an increase in the number of work-able households with earned income and an increase in the average amount of earned income. This increase in household income, along with the direct effect of the minimum income on the calculation of assistance, will result in cost savings through a reduction in HAP expense.

Metrics and Data Collection

Data will be collected from periodic reports from the VHA housing programs database. Metrics will include the following:

- The average HUD funded housing assistance expense for work-able households. Baseline is \$665 and the benchmarks will be a reduction to \$650 by December 2013 and to \$600 by December 2014.
- The percentage of work-able households with earned income. The baseline is 49.37% and the benchmark will be an increase to 51% by December 2013.
- The average amount of earned income in work-able households with earned income. The baseline is \$15,653 and the benchmark is \$16,000 by December 2014.
- The cost savings imputed from the total amount of minimum income being applied to work-able households. The baseline is zero and

the benchmark is \$100,000 by December 2013 and \$500,000 by December 2014.

- The number of evictions/terminations for non-payment of rent. The baseline is 13.4 (five-year average of both HCV and PH) and the benchmark will be 18. If the benchmark is exceeded in any year the VHA will reevaluate the activity and the hardship policy in consultation with our advisory committee and the RAB.
- The success rate of new vouchers and the time required to lease. The baselines are 91% and 47 days. The benchmark will be no significant change in these numbers that can be attributed to this activity.

Authorizations

This activity is authorized under Sections C. 11. and D. 2.a. of Attachment C of the Amended and Restated Agreement.

Additional Information for Rent Reform Activities

The VHA Board approval of this policy and the documentation of the public hearing is the same as for the Annual Plan and may be found in Section VIII. An impact analysis of this proposal, that includes the transition plan and the hardship policy, is included as an appendix to this Plan. An annual reevaluation of this activity will be performed as part of the MTW Annual Report.

Section VI. Ongoing MTW Activities: HUD Approval Previously Granted

The following MTW activities are ongoing from previous years. The VHA is not currently planning to have any outside evaluations of ongoing activities in 2013.

Activity 2012-01: Multi-Disciplinary Team Pilot Project - CSSR

Community Supported Self Reliance (CSSR) is a pilot project where housing assistance along with intensive wrap around services are made available through partnering agencies to very-low income clients with multiple barriers to self-reliance. The 16 participants initially selected for the pilot project are provided a Housing Choice Voucher with a time-limit of five and a half years (66 months). In addition to the regular HCV program obligations, participants are required to actively participate in their approved self-reliance plans developed with their assigned case manager from a partnering agency; failure to do so results in expulsion from the program. Participants facing expulsion may file a grievance with the project's Review Board. If the expulsion is upheld by the Review Board, the participant will be considered to be in violation of their HCV family obligations and will be terminated from the HCV program. Participants facing termination of housing assistance will have an opportunity for an HCV informal hearing.

In addition to access to a housing voucher participants in this program, and their case managers, will have access to the expertise and resources provided by members of the Project Team and the Review Board. Participants will also participate in a VHA sponsored Self-Sufficiency program.

Plan Year First Identified and Implemented

This activity was proposed and approved for the 2012 VHA fiscal year. Implementation began in January 2012.

Update on Status of Activity

The four partnering agencies have been selected and nine participants have been selected by the Review Board and are under lease. The remaining seven slots are expected to be filled within the next six months.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for this activity for 2013.

Activity 2012-02: Commitment of MTW Funds for Leveraging in the Creation of Affordable Housing

VHA is committing up to \$2,000,000 in MTW funds for the development of additional affordable housing in Clark County Washington. The re-programmed funds will be used to leverage additional investment funds in amounts far greater than the MTW funds. Development activities may include site acquisition, substantial rehabilitation of existing housing, and the development of new units.

The first use of this activity will be in the development of the as yet unnamed but currently known as the First Street property. This is a planned 120 unit or larger mixed income project located in a rapidly growing area of Vancouver.

Plan Year First Identified and Implemented

This activity was first proposed in an amendment to the VHA 2012 MTW Annual Plan. Implementation is planned for fall 2012.

Update on Status of Activity

HUD approval for the plan amendment that contained this activity was received on July 27, 2012. The financing proposal for the first street proposal, which includes funds authorized under this activity, has been approved by the VHA Board.

Anticipated Changes, Modifications, or Additions

There are no changes planned for this activity for 2013.

Activity 2012-03: Home-Sharing in Housing Choice Voucher Program

Home-Sharing is a variation on the shared housing option permitted under special housing types under the regulations for the HCV program. However in this case the vouchers are set aside and designated for use in shared housing only. Currently 21 vouchers are set aside for this activity. Applicants issued a Home-Sharing Voucher (HSV) will only be able to use their voucher for shared housing. A separate waiting list with no local preferences is utilized for Home-Sharing.

Income eligibility at intake is set at 30% of Area Median Income (AMI). In addition to the standard HCV briefing, new participants are provided information about roommate matching services and other resources applicable to locating shared housing. Home-Sharing Vouchers are tenant-based so participants will be allowed to move with continued assistance to another shared housing unit provided they are in compliance with their lease and family obligations.

The HSV payment standard is set at 33% of the HCV three bedroom payment standard regardless of the actual number of bedrooms in the property within which the HSV participants unit is located and any prorated amount of the contract rent if applicable. This policy allows participants to rent units being offered by homeowners and others for a fixed amount, and equips participants with the knowledge of their subsidy amount prior to their housing search. In addition portability is not allowed in the HSV program.

Inspection standards are the same as other MTW vouchers except as modified by Shared Housing standards under 24 CFR § 982.618.

Plan Year First Identified and Implemented

This activity was first proposed in an amendment to the VHA 2012 MTW Annual Plan. Implementation is planned for fall 2012.

Update on Status of Activity

HUD approval for the plan amendment that contained this activity was received on July 27, 2012. VHA is currently in the process of setting up the waiting list. Notification and offer of placement on the list have been sent to applicants on existing HCV lists.

Anticipated Changes, Modifications, or Additions

There are no changes planned for this activity for 2013.

Activity 2012-04: Short-Term Rental Assistance

This activity utilizes MTW funds to provide a rental subsidy to a third party entity (a partnering agency) who will manage intake and administration of the program. VHA plans an initial funding amount of up to \$200,000 for this activity. VHA will seek Board approval before increasing this amount and for annual renewal.

The intent of this project is to provide families in Clark County the opportunity to manage short-term budget shortfalls by assisting them with time-limited housing assistance administered through partner agencies. VHA plans to partner with up to four local agencies. These agencies will be selected based on their experience administering short-term rental assistance like HUDs Homeless Prevention and Rapid Re-Housing Program, or similar efforts, and their ability to provide matching funds for the program.

For the purpose of this project short-term rental assistance will be considered assistance that lasts less than 18 months. This includes temporary assistance with rent payments, and eviction prevention assistance in order to obtain or remain

in housing, including up to six months of arrears. Partners have the discretion to determine how to structure the rental subsidy so that rental assistance may be used to cover all or just a portion of a program participant's monthly rent.

Partner agencies will be required to match funds provided by the VHA on a 1:1 basis. Match could include funds used to staff or administer the program, and funds used for short-term rental assistance. Eight percent of VHA funds will be allowable for program administrative costs.

The target population is residents of Clark County who are either very recently experiencing homelessness or are at imminent risk of homelessness will qualify for assistance. Rental assistance must be utilized within Clark County. Households must be at or below 50 percent of AMI and be in need of temporary assistance to end or prevent homelessness, but who have the capacity to maintain stable housing upon the conclusion of the assistance. To be considered at imminent risk of homelessness, the following conditions must be met: eviction, or utility termination is imminent; the household has an inability to make required payments due to a sudden reduction in income; the assistance is necessary to avoid eviction or termination of services; and there is a reasonable prospect that the family will be able to resume payment within a reasonable period of time.

Plan Year First Identified and Implemented

This activity was first proposed in an amendment to the VHA 2012 MTW Annual Plan. Implementation was planned for fall 2012.

Update on Status of Activity

HUD approval for the plan amendment that contained this activity was received on July 27, 2012. Implementation is now planned for January 2013. The partnering agencies will be receiving a grant to cover the matching fund requirement at that time.

Anticipated Changes, Modifications, or Additions

There are no changes planned for this activity for 2013.

Activity 2011-01: Minimum Rent and/or Income Limits for New Public Housing Units

VHA will be continuing to seek opportunities to replace Public Housing units that were previously removed under a disposition plan. When developing replacement Public Housing units VHA plans to set a minimum rent and/or a minimum income limit for applicants to the new project. The minimum rent would be higher than the one currently allowed under regulation. The minimum income would still be well below the very-low income limit at 50% of Area Median Income (AMI). The actual minimum rent and/or income limit will depend on the requirements of any new project.

Plan Year First Identified and Implemented

This activity was approved for the 2011 Plan year.

Update on Status of Activity

This has not been implemented to date as there have not been any opportunities for replacement Public Housing units.

Anticipated Changes, Modifications, or Additions

There are no changes to this activity planned for 2013.

Activity 2011-03: Floating Units in PBV Programs

This activity allows the subsidized units to “float” or change in a project under contract in the PBV program when, for example, a new tenant needs a different size unit or when a tenant no longer requires the subsidy but wants to remain in-place.

Plan Year First Identified and Implemented

This activity was approved and implemented in 2011.

Update on Status of Activity

All PBV projects are now authorized to move the subsidy from one unit in the project to another when appropriate without a contract amendment.

Anticipated Changes, Modifications, or Additions

There are no changes anticipated to be made to this activity in 2013.

Activity 2011-04: Up to 50% of Units in a Project may be PBV Units

This activity allows the VHA to designate up to 50% of the units in a project to be PBV units. This would apply only in those projects not already exempt from the 25% cap such as projects designated for the elderly and/or disabled. In addition VHA will allow up to 100% of the units to be PBV units in former Public Housing projects disposed of under approved disposition plans.

Plan Year First Identified and Implemented

The activity was proposed and approved in the 2011 MTW Annual Plan.

Update on Status of Activity

To date this authority has not been used.

Anticipated Changes, Modifications, or Additions

There are no changes anticipated to be made to this activity in 2013.

Activity 2011-05: VHA Staff to Perform HQS and Rent Reasonableness on VHA Owned Properties.

This MTW activity allows the VHA to have Section 8 HCV department staff perform HQS inspections and determine rent reasonableness for units owned by the VHA or owned by an entity substantially controlled by the VHA such as a tax credit property. This authority creates substantial savings compared

to what the VHA was being charged by contracted inspectors.

Plan Year First Identified and Implemented

This activity was approved and implemented in 2011.

Update on Status of Activity

This activity is fully implemented and will be ongoing throughout the 2013 plan year.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes, modifications, or additions planned for 2013.

Activity 2010-01: Community Involvement and Educational Opportunity Initiative

This activity requires that work-able adults in the Housing Choice Voucher program perform community service or self-sufficiency activities if they are not working at least 25 hours per week or already enrolled in a self-sufficiency program. Together with the existing requirement for Public Housing residents, this provides an opportunity for new experience, personal growth and self-enrichment for all recipients of subsidized housing through VHA who are able to, but not currently, working.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and implementation began being phased in as participants had their annual eligibility reviews in 2010.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2013.

Activity 2010-02: Skyline Crest Campus of Learners

The Skyline Crest Campus of Learners is a partnership between VHA and the residents of Skyline Crest; VHA's largest Public Housing Property. VHA provides children and young adults' resources and activities through the community center and families develop and commit to success plans centered on their child's school attendance and community involvement.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and was implemented beginning that year.

Update on Status of Activity

The transition of Skyline Crest to the Campus of Learners was completed in 2011. The activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2013. There is currently a pending conversion application for Skyline and a demolition application for the community center located there. These activities, if approved, will enhance this activity through the resulting improvement in both units and the community space.

Activity 2010-04: Waiting List Preference for Applicants without Housing Subsidy

This activity creates a local preference in the VHA Housing Choice Voucher and Public Housing waiting lists for applicants not already receiving subsidized housing. As a MTW activity it waives the requirement that a local waiting list preference in the Housing Choice Voucher program not be denied for a Public Housing resident.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and was implemented at the beginning of 2010

Update on Status of Activity

Currently the local preference is in place and the waiting lists are ranked accordingly.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-02: Imputed TANF Income for Voluntary Grant Closures

VHA imputes a full TANF grant for participants who voluntarily close their grants rather than face sanction due their failure to comply with the work activities program or fraud. This extends the current HUD policy on imputing TANF income and closes a loophole where participants were able to get a lower rent after violating the requirements of an agency working in close partnership with the VHA.

Plan Year First Identified and Implemented

This activity was identified in the VHA FY 2009 Annual Plan and was implemented beginning January 1, 2009.

Update on Status of Activity

This policy continues in place, although the number of cases where it is utilized is very low.

Anticipated Changes, Modifications, or Additions

VHA plans to drop this activity if our proposed minimum income rent reform policy is approved as families who would be impacted by this imputed income would also have a minimum income under the new activity rendering this activity redundant.

Activity 2009-03: No Verification of Assets Less Than \$5000

VHA does not obtain a verification of a reported asset if the reported value is less than \$5000. This MTW activity saves VHA significant administrative

funds by eliminating verifications on the vast majority of assets and any income from those assets that has little or no effect on housing subsidy and/or tenant rent.

Plan Year First Identified and Implemented

This activity was identified in the VHA FY 2009 Annual Plan and was implemented beginning January 1, 2009.

Update on Status of Activity

This activity will be ongoing in 2013 and will continue to reduce administrative costs.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-06: Alternate Required HQS Inspection Schedule

VHA performs a Housing Quality Inspection (HQS) inspection prior to approving a new lease in the Housing Choice Voucher program and then performs subsequent inspections every-other-year unless one is requested by the owner or tenant.

Plan Year First Identified and Implemented

Although VHA first identified a proposed alternate inspection schedule for the HCV program in the FY 2007 it was not implemented that year and was redesigned and identified again in an amendment to the FY 2009 Plan. The activity was implemented on January 1, 2010.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2013.

Activity 2009-08: Simplified Utility Allowance Schedule

VHA utilizes a simplified utility allowance schedule in the Housing Choice Voucher program that simplifies rent calculations, particularly for participants prior to leasing, and encourages reduced energy consumption.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 24, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-09: Limited Utility Allowance Payments

For both Public Housing and the Voucher program, tenants whose rent calculation results in a negative rent (also known as a Utility Allowance Payment or UAP) are only allowed to receive the payment for six months unless a hardship exception is granted.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning October 1, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

The number of families who may receive a UAP will go down under the proposed minimum income rent reform. However there will still be a number of families exempt from the minimum income who will still be eligible for a UAP and even a few that,

due to a large number of dependent and/or other deductions will have a negative rent even using a minimum income. Because of this VHA will continue with this activity and conduct an evaluation at the end of 2013 to see if it merits continuation at that time.

Activity 2009-10: Replacement of Medical Expense Deduction

Under this activity the VHA has eliminated individual calculation and verification of medical expenses for Elderly and Disabled designated families, replacing the deduction with a Elderly/Disabled deduction increase to \$700.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning November 5, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-11: 40% Maximum Family Share Expanded to Ongoing Tenancy

VHA has taken the 40% maximum family share normally applied at contract approval in the Housing Choice Voucher program and expanded it to subsequent reexaminations as well. If, at a reexamination, the rent calculation results in a family share greater than 40% of the family's adjusted monthly income, the family is required to reduce their share to less than 40% through an increase in income or a move to a less expensive unit within one year, or they may receive an exemption through participation in a self-sufficiency program or the hardship policy.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-13: Next Required Reexamination 12 Months after Interim

This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled to at least 12 months after the effective date of an interim reexamination. This policy reduces the overall number of reexaminations required each year.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning October 1, 2009.

Update on Status of Activity

The activity is ongoing for both Public Housing and Housing Choice Voucher programs.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-15: Owners Restricted to Annual Rent Increases

Under this MTW policy owners in the Housing Choice Voucher program are restricted to a single rent increase each year.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-16: Renter Education Required for Applicants

Under this activity new applicants for Public Housing and the Housing Choice Voucher program must complete a rent education course prior to being offered a unit or voucher when they reach the top of the waiting list. Exemptions can be made for disability related or other issues. The course covers topics including money management and credit, landlord/tenant rights and responsibilities, how to be a good renter, and how to find landlords that will rent to you. Applicants who complete the course receive a certificate of completion that is recognized by many landlords in the community and can substitute for good credit and references in tenant screening policies.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 2009-19: No Waiting List for Assisted Living Facility

This MTW activity allows for tenant selection to be made by the assisted living administration rather than utilizing a waiting list. This allows for the unique needs of the assisted living population and their need for services.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning August 25, 2009. It was later modified in 2011 when the facility was disposed under Public Housing and converted to Project-Based Vouchers.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no changes planned for 2013.

Activity 2008-01: Project-Based Vouchers Tied to Services

The VHA's MTW Section 8 Project Based Program partners with other community organizations in order to provide housing assistance tied to case management and other services. The activity also waives the bidding process for VHA owned units, enabling VHA to offer rental units along with the needed subsidy to the partnering agency. Tenant selection may be done by the partner so that appropriate clients they have already identified can be readily served. The partnering agency may also place time limits on assistance and the availability of a tenant based voucher after one-year is also eliminated.

Plan Year First Identified and Implemented

This activity was first identified in the VHA FY 2008 Annual Plan and implemented on May 28, 2008.

Update on Status of Activity

This activity is ongoing.

Anticipated Changes, Modifications, or Additions

There are no changes planned for 2013.

Activity 2007-02: Alternate Required Reexamination Schedule

In 2010 moved from a biennial schedule for required reexaminations in Public Housing and the HCV program to one where families on fixed income have a reexamination of eligibility every three years and other families return to the annual schedule. The families on the three year schedule will have rent and assistance recalculated using the current payment standard and utility allowance schedules as applicable and the COLA published by the Social Security Administration (if any) during years that they do not have a full reexamination.

Plan Year First Identified and Implemented

This activity was identified in the FY 2007 Annual Plan and implemented on January 1, 2008. The schedule was modified and described in an amendment to the FY 2009 Plan and the new schedule of triennial reexamination for fixed income families and annual reexaminations for all others was implemented on January 1, 2010.

Update on Status of Activity

This activity will be ongoing in 2013.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for 2013.

Activity 1999-08: No Flat Rent Option in Public Housing

VHA used authority under the MTW demonstration to not implement the flat rent option in Public Housing. The option of a flat rent rather than the income based one benefits higher income tenants, allowing them to use a resource that VHA believes should remain available for the lowest income applicants. VHA uses a ceiling rent and restricts tenants to the ceiling rent for one year. In this way

the higher income tenant move on to other housing available in the community making the Public Housing unit with its deep subsidy available to new applicants.

Plan Year First Identified and Implemented

VHA's rent policy for the MTW demonstration was first identified in the 1999 agreement, implemented that year, and did not contain a flat rent policy.

Update on Status of Activity

This activity will be ongoing in 2013.

Anticipated Changes, Modifications, or Additions

VHA is not planning any changes to this policy next year.

Activity 1999-09: No Earned Income Disallowance in Public Housing

VHA has opted to not offer an Earned Income Disallowance (EID) in Public Housing. Under an earlier MTW activity all families were given an escrow account when they had increased earnings; escrow accounts are still available under the FSS program. VHA has concluded that building an asset is preferred to a temporary rent reduction and continues to not offer an EID to encourage participation in FSS and to eliminate the administrative burden of tracking various disallowance periods.

Plan Year First Identified and Implemented

VHA's rent policy for the MTW demonstration was first identified in the 1999 agreement, implemented that year, and did not contain an earned income disallowance.

Update on Status of Activity

This policy will continue to be in place for the coming year.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for this activity.

Summary of MTW activities for 2013

Figure 4: Summary of MTW activities for 2013

Activities designed to reduce cost and achieve greater cost effectiveness

| Number | Activity | Plan Year Identified | Current Status |
|---------|--|----------------------|----------------|
| 2011-05 | VHA staff to perform HQS and rent reasonable on VHA owned properties | FY 2011 Annual Plan | Ongoing |
| 2011-03 | Units allowed to “float” in certain Project-Based Voucher projects | FY 2011 Annual Plan | Ongoing |
| 2010-04 | Waiting list preference for applicants without subsidized housing | FY 2010 Annual Plan | Ongoing |
| 2009-03 | Verification of assets limited to those declared greater than \$5000 | FY 2009 Annual Plan | Ongoing |
| 2009-06 | Alternate required inspection schedule in HCV program | FY 2009 Annual Plan | Ongoing |
| 2009-10 | Replacement of medical expense deduction | FY 2009 Annual Plan | Ongoing |
| 2009-13 | Reset of required reexamination schedule after interim review | FY 2009 Annual Plan | Ongoing |
| 2009-15 | Limit contract rent increases in the HCV program to one per year | FY 2009 Annual Plan | Ongoing |
| 2007-02 | Alternate required reexamination schedule | FY 2007 Annual Plan | Ongoing |
| 1999-08 | Public Housing rent income based only, no flat rent option | 1999 MTW Agreement | Ongoing |
| 1999-09 | No earned income disallowance in Public Housing | 1999 MTW Agreement | Ongoing |

Activities designed to provide incentive toward self-sufficiency

| Number | Activity | Plan Year Identified | Current Status |
|---------|--|----------------------|------------------|
| 2013-01 | Minimum Income Rent Reform | FY 2013 Annual Plan | Pending Approval |
| 2012-01 | Community Supported Self Reliance | FY 2012 Annual Plan | Ongoing |
| 2010-01 | Community involvement and educational Opportunity initiative | FY 2010 Annual Plan | Ongoing |
| 2010-02 | Skyline Crest Campus of Learners | FY 2010 Annual Plan | Ongoing |
| 2009-02 | Imputed TANF income for voluntary grant closures | FY 2009 Annual Plan | Ongoing |
| 2009-09 | Limited utility allowance payments | FY 2009 Annual Plan | Ongoing |
| 2009-11 | 40% maximum family share for ongoing tenancy in HCV program | FY 2009 Annual Plan | Ongoing |
| 2009-16 | Renter education program required for applicants | FY 2009 Annual Plan | Ongoing |

Activities designed to increase housing choice

| Number | Activity | Plan Year Identified | Current Status |
|---------|---|----------------------|------------------------|
| 2012-04 | Short Term Rental Assistance | FY 2012 Annual Plan | Pending Implementation |
| 2012-03 | Home-Sharing Program | FY 2012 Annual Plan | Pending Implementation |
| 2012-02 | Use of Funds for Creation of Affordable Housing | FY 2012 Annual Plan | Pending Implementation |
| 2011-01 | Minimum rent and/or income limits for new Public Housing units | FY 2011 Annual Plan | Pending Implementation |
| 2011-04 | Allow up to 50% of units in a project to be Project-Based Voucher | FY 2011 Annual Plan | Pending Implementation |
| 2009-08 | Simplified utility allowance schedule in HCV program | FY 2009 Annual Plan | Ongoing |
| 2009-19 | Special waiting list for assisted living program | FY 2009 Annual Plan | Ongoing |
| 2008-01 | Project-Based Vouchers tied to services | FY 2008 Annual Plan | Ongoing |

Section VII. Sources and Uses of MTW Funds

Planned Sources and Uses of MTW Funds

Figure 4 contains the detail of anticipated sources and uses of the funds received for MTW programs.

Figure 5: Sources and Uses of MTW Funds

| | Low Rent Public Housing | Capital Fund Program | Housing Choice Vouchers | Total MTW Funds |
|--|----------------------------|-------------------------|----------------------------|--------------------|
| Sources | | | | |
| Rental Income | 823,578 | - | - | 823,578 |
| HUD and Other Grants | 1,494,006 | 572,949 | 12,460,930 | 14,527,885 |
| Other Revenue | 13,700 | 63,661 | 3,613,130 | 3,690,491 |
| Investment Income | 15,400 | - | 15,000 | 30,400 |
| Total | 2,346,684 | 636,610 | 16,089,060 | 19,072,354 |
| Uses | | | | |
| Administrative Expenses | 1,609,006 | 132,800 | 2,354,939 | 4,096,745 |
| Maintenance | 334,030 | - | 6,800 | 340,830 |
| Utilities | 319,170 | - | - | 319,170 |
| Insurance and other Expenses | 78,081 | - | 4,037 | 82,118 |
| Housing Assistance Payments | - | - | 15,060,930 | 15,060,930 |
| Interest Expense | 200 | - | - | 200 |
| Capital Expenditures | - | 503,599 | - | 503,599 |
| Less Principle & Reserve Contributions | - | - | - | - |
| Transfers To (From) Reserves | (100,000) | - | (1,337,275) | (1,437,275) |
| Total | 2,240,487 | 636,399 | 16,089,431 | 18,966,317 |
| Net Income (Deficit) | 106,197 | 211 | (371) | 106,037 |

Planned Sources and Uses of State & Local Funds

Figure 5 contains detail of the planned sources and uses of State and local funds.

Figure 6: Sources and Uses of State or Local Funds

| | |
|--|-------------------|
| Sources | |
| Rental Income | 16,601,835 |
| HUD and Other Grants | 49,884 |
| Other Revenue | 2,452,438 |
| Investment Income | 2,928,225 |
| Total | 22,032,382 |
| Uses | |
| Administrative Expenses | 6,800,103 |
| Maintenance | 1,715,847 |
| Utilities | 1,695,617 |
| Insurance and other Expenses | 887,129 |
| Housing Assistance Payments | - |
| Interest Expense | 8,228,482 |
| Capital Expenditures | 541,110 |
| Less Principle & Reserve Contributions | 2,715,998 |
| Transfers To (From) Reserves | (721,110) |
| Total | 21,863,176 |
| Net Income (Deficit) | 169,206 |

Planned Sources and Uses of the COCC

VHA utilizes the State and local fund, detailed in the previous table, as permitted under Asset Management in the Public Housing program for the Central Office Cost Center.

Cost Allocation or Fee-for-Service

VHA began using a fee-for-service approach in 2011 to pay for indirect administrative expenses. Administrative fees are established by HUD for Low Rent Public Housing, Housing Choice Vouchers and Capital Fund programs. Where such fees are not present, VHA has established rates in compliance with OMB Circular A-87 and the 1937 Act.

Planned Use of Single-Fund Flexibility

VHA will continue to use single-fund flexibility amongst all three Federal programs of Housing Choice Voucher (HCV), Capital Fund Program and

Low Rent Public Housing. This use will include support of the VHA's Work Opportunity Program, the Rise and Stars Community Center, and other MTW related programs such as the rent education classes and community service programs.

Single fund flexibility will also be used to fund recently proposed MTW activities allowing for use of funds outside of Section 8 and Section 9 of the

1937 Housing Act. These include the use of fund for leveraging funding for new development, the Home-Sharing program, and for Short-Term Rental assistance.

Section VIII. Administrative

Resolution Adopting the Annual Plan Certification of Compliance

Copies of the Resolution and the Certification of Compliance are included in Appendix A.

Agency Directed Evaluations

No agency directed evaluations other than the annual evaluation of metrics and benchmarks for individual MTW activities are planned for 2012.

Appendix A. Board Resolution and Certification

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 2975

**RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN
FOR FISCAL YEAR 2013**

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 Agreement with the Department of Housing and Urban Development requires the submission of a Annual MTW Plan; and

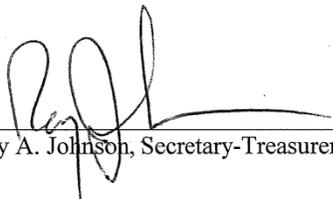
WHEREAS, the Annual Plan for Fiscal Year 2013 has been prepared and made available for public comment for thirty days and a public hearing was held on September 10, 2012.

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

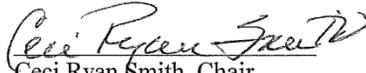
1. The Board of Commissioners approves the 2012 Moving to Work Annual Plan and authorizes the Executive Director to complete the Plan documents and submit the Plan to the Department of Housing and Urban Development, and to revise VHA policy to reflect the proposals in the Plan once HUD approval is obtained.
2. The Board of Commissioners certifies that the Public Hearing Requirement has been met and authorized the Chair of the Board to execute the attached Certifications of Compliance.

ADOPTED by the majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 26th day of September, 2012.

ATTEST:



Roy A. Johnson, Secretary-Treasurer



Ceci Ryan Smith, Chair

OMB Control Number: 2577-0216
Expiration Date: 12/31/2011

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 Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1, 2013, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

Attachment B

1

OMB Control Number: 2577-0216
Expiration Date: 12/31/2011

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

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

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

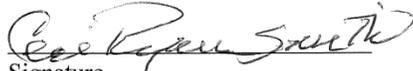
Vancouver Housing Authority
PHA Name

WA008
PHA Number/HA Code

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

Ceci Ryan Smith
Name of Authorized Official

Chair
Title


Signature

9/26/12
Date

Attachment B
2

Appendix B. Rent Reform Impact Analysis

Minimum Income Requirement for all Work-Able Participants

Description

The Vancouver Housing Authority (VHA) is proposing to change the way housing assistance and tenant rent is calculated in the Housing Choice Voucher (HCV) and Public Housing programs. This proposal is authorized under the terms of the Moving to Work (MTW) agreement between VHA and the Department of Housing and Urban Development (HUD). This change in the regulations, considered rent reform under MTW, is intended to further the statutory objectives of the MTW program; specifically reduce cost and achieve greater cost effectiveness, and give incentives to families to obtain employment and become economically self-sufficient.

The proposal is to require a minimum income for any household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, a dependent, or a full-time caretaker for a disabled household member. The minimum income will be \$9000 annually for each work-able family member. For example a household with one work-able member would have a minimum income of \$9000; a household with two workable members would have minimum income of \$18,000, and so on. If the household's actual annual income as determined under the program regulations falls below the minimum, tenant rent and housing assistance will be calculated using the minimum. If the household's actual income is greater than the minimum, the actual income will be used and the minimum income will not be a factor.

A household subject to the minimum would still have any deductions they might be eligible for under HUD regulations (as modified by VHA MTW policy) deducted from the minimum income as part of the rent calculation. For example a family of three with two dependents and one work-able member who was subject to the minimum would have assistance calculated based on an annual income of \$9000, less a dependent deduction of \$960 ($\480×2). The resulting annual income of \$8040 would be divided by 12 to determine monthly income and the household's tenant rent or assistance would be based on 30% of the monthly adjusted income, in this case \$201. In Public Housing the utility allowance would be subtracted from \$201 to determine the tenant rent. Under the HCV program the \$201 would be subtracted from the applicable payment standard or gross rent to determine housing assistance.

The amount of the minimum income would be reviewed annually and possibly modified if warranted. Currently, the amount is less than the earnings a person would receive if they worked 20 hours per week at the Washington State minimum wage. Households impacted by this MTW activity would be eligible to request an exemption under the terms of the VHA hardship policy.

This proposal will meet the objectives of the MTW program by providing an incentive to families to obtain earned income in order to pay rent. This also effectively removes the current disincentive that occurs when a participant loses income (whether intentionally or not) and is able to get their rent reduced or eliminated altogether. In addition there will be considerable cost savings both from the reduction in assistance resulting from increased tenant rent, but also as a result of participants obtaining new employment. It is likely than many participants who do seek and obtain employment will actually end up paying a higher share of their rent that they would with the minimum income alone since the minimum income is based on minimum wage and

low hours. The cost savings are anticipated to be enough to fund current and future VHA services and programs designed to assist participant progress toward employment and economic self-sufficiency.

Tracking and Documenting Impact

VHA will utilize reporting from our housing database to track the number of households affected by this activity and the resulting financial impact. In addition the number of program exits and the reasons for those exits will be monitored as well as the number of hardship requests. A reevaluation of the rent reform will be completed each year and included in the annual MTW report.

Impact Analysis

In order to analyze the impact on participants a report was created that shows data for participants including demographics, income and rent. The report was exported to a spreadsheet and trial calculations were made to show the result on tenant rent if the minimum income requirement was implemented today. Of course this analysis is just an estimate as participant income is dynamic and is probably a “worst case” scenario because it does not take into account any participants obtaining exemptions through the hardship policy. This report identified 1270 households that contain one or more work-able members. 641 of these would see no impact as their current income is higher than the new minimum. The following table details the potential impact on tenant rent for the other 629 households. Note that any increases greater than \$225 are due to multiple work-able members in the household. 365 households contain two or more work-able members and these households are more likely to impacted and in greater amounts than households with one work-able member.

| All MTW Households with One or More WorkAble Members | | | | | | |
|--|----------------------|---------|-----------------------|---------|---------------------------------|---------|
| *Impact on Tenant Rent | | | | | | |
| | One Work-able Member | | Two Work-able Members | | Three or more Work-able Members | |
| | Number | Percent | Number | Percent | Number | Percent |
| No Change | 491 | 54.25% | 139 | 44.69% | 11 | 20.37% |
| \$1 to \$50 Increase | 108 | 11.93% | 17 | 5.47% | 4 | 7.41% |
| \$51 to \$100 Increase | 110 | 12.15% | 16 | 5.14% | 8 | 14.81% |
| \$101 to \$150 Increase | 108 | 11.93% | 24 | 7.72% | 2 | 3.70% |
| \$151 to \$200 Increase | 85 | 9.39% | 21 | 6.75% | 3 | 5.56% |
| \$201 to \$250 Increase | 3 | 0.33% | 28 | 9.00% | 4 | 7.41% |
| \$251 to \$300 Increase | 0 | 0.00% | 22 | 7.07% | 5 | 9.26% |
| \$301 to \$350 Increase | 0 | 0.00% | 11 | 3.54% | 1 | 1.85% |
| \$351 to \$400 Increase | 0 | 0.00% | 30 | 9.65% | 3 | 5.56% |
| Over \$400 Increase | 0 | 0.00% | 3 | 0.96% | 13 | 24.07% |

*Projection assuming a \$9000 minimum annual income and no hardship exemption, household considered impacted if minimum income increases tenant share by \$1.00 or more

The next table shows a comparison of households with work-able members potentially impacted by the minimum income to those not impacted. Included are comparisons by a number of protected classes tracked by the VHA including sex, familial status, race and ethnicity. By comparing the percentage impacted against the percentage not impacted and the total it appears that there would be no unintended discriminatory effects as a result of this proposal.

| All MTW Households with One or More Work-Able Members | | | | | | |
|---|------------|---------------|--------------|---------------|-------------|-------------|
| Category | *Impacted | | Not Impacted | | Total | |
| | Number | Percent | Number | Percent | Number | Percent |
| HOH is Elderly | 14 | 2.22% | 39 | 6.07% | 53 | 4.16% |
| HOH is under age 62 and Disabled | 66 | 10.48% | 114 | 17.73% | 180 | 14.14% |
| HOH is female | 520 | 82.54% | 523 | 81.34% | 1043 | 81.93% |
| HOH is only adult in household | 364 | 57.78% | 357 | 55.52% | 721 | 56.64% |
| Households with children | 506 | 80.32% | 542 | 84.29% | 1048 | 82.33% |
| HOH is White | 481 | 76.35% | 480 | 74.65% | 961 | 75.49% |
| HOH is Black | 93 | 14.76% | 106 | 16.49% | 199 | 15.63% |
| HOH is American Indian/Alaska Native | 12 | 1.90% | 8 | 1.24% | 20 | 1.57% |
| HOH is Asian | 10 | 1.59% | 23 | 3.58% | 33 | 2.59% |
| HOH is Native Hawaiian/Pacific Islander | 34 | 5.40% | 26 | 4.04% | 60 | 4.71% |
| HOH is Hispanic or Latino | 49 | 7.78% | 45 | 7.00% | 94 | 7.38% |
| **Total Work-Able Households | 630 | 49.49% | 643 | 50.51% | 1273 | 100% |

*Projection assuming a \$9000 minimum annual income and no hardship exemption, household considered impacted if minimum income increases tenant share by \$1.00 or more.

**Note that Work-Able households may appear in multiple categories.

Note that in the above chart the households where the head is Elderly or Disabled contain one or more additional household members that meet the work-able definition. This type of household is often not considered when identifying households that could potentially become self-sufficient.

A potentially negative impact of this policy is that more households may lose their assistance through eviction for non-payment. In order to prevent this impact effort should be made to assure households receive adequate notice of their right to request a hardship exemption.

Metrics

In order to measure the impact of this activity on the MTW objective of increasing economic self-sufficiency we will track the number of households with earned income and the average amount of that income. We will also track the number and percentage of impacted households to see if they diminish over time due to increased income.

The impact on cost will be measured by tracking the total amount of minimum income used in calculation of rental assistance and the savings that amount would imply. In addition we will track the average HAP payment in the HCV program both overall and for impacted households.

Other metrics will include the number of hardship requests and the results of those requests as well as program exit numbers and reasons, particularly successful exits and non-payment evictions.

Transition Plan

Assuming this activity is approved for 2013, notice will go out to potentially impacted households beginning in January 2013. The notice will include information on the hardship policy including a form for participants to

complete if they wish to use all or part of their exemption months (see hardship policy below) right away to extend their transition. The notice will contain an estimate of the households rent increase and will provide at least four months notice to allow the household to plan and prepare for the change. Information will also be Published in the tenant newsletter and posted on the VHA website. 30 to 60 days prior to the effective date (June or July 2013) of the initial rent change due to this policy, households will receive a rent change notification. Notices will contain information about the hardship policy with instructions on how to utilize the six-month exemption as well as how to request further exemption includes the information about the hardship policy as well as the right to an informal hearing or grievance.

The VHA will offer a series of voluntary sessions for the purpose of providing orientation to the rent reform change and to provide information on what referral agencies are available to assist with topics such as aptitude testing and resume writing; child support collection, expungements, DSHS & SSA programs, soft skill improvement trainings, and budget skill development. The VHA will also offer, in partnership with DSHS, a multi-disciplinary case review for participants who request additional assistance will barriers to self-sufficiency.

Impacted households will also periodically receive notification of any employment or training opportunities identified or developed by VHA's Work Opportunity program.

Hardship Policy

The existing VHA hardship policy will be modified to include this rent reform activity along with the existing MTW rent reform activities. The same criteria used for other MTW rent reform activities that result in higher tenant rent will be used, i.e., the household is facing eviction or utility shutoff due to increased housing cost resulting from this policy.

In addition to the modification to the existing hardship policy, the VHA will offer an additional hardship exemption that the household will be able to use when they determine it is needed. Each household impacted by this activity will be given a one-time six month period of exemption from the policy. To use all or part of this exemption the household will have to complete a form requesting the exemption. The form will have to be completed and turned in to the VHA office at least two weeks prior to the first of the month the household is requesting to be exempt from. The household may use all six months at once or request the exemption be for a shorter period, saving any unused months for a later date. Households not currently impacted will also receive a one-time six month exemption should they, at a later date, experience a loss of income that results in the minimum income impacting their assistance. This policy will empower households to manage their financial situation. Once the six months is exhausted, households will still be eligible to request a hardship under the standard policy.

Appendix C. Public Process and Public Comments

The 2013 VHA Annual MTW Plan was developed over the course of several months during which time the VHA Moving to Work Committee met on four occasions. The Resident Advisory Board (RAB) met at least five times in 2013. The main agenda item at these meetings was the proposed rent reform activity utilizing a minimum income for work-able household members receiving assistance under the Housing Choice Voucher (HCV) program or Public Housing. A number of refinements were made to the proposal as a result of these meetings. In addition to these standing committees a Power Point presentation of the rent reform proposal was shown to a number of other groups including the Board of Directors for the local Council for the Homeless.

The Plan was made available for public comment on August 6, 2012 and a public hearing was scheduled for September 10, 2012. Notification was placed in the *Columbian*, the local newspaper, and made available on our website. In addition information about public hearing, including detail on the proposed rent reform, was published in our tenant newsletter which is mailed to over 2900 HCV and Public Housing households. Copies of these notifications are included in this appendix.

Overview of Public Comments

During the public comment period VHA received five letters. Two of these letters were supportive of the proposed rent reform and two requested that we withdraw the proposal. The other letter expressed concern and offered a suggestion. The letters are included in this addendum. Fifteen people attended the public hearing including eight HCV or Public Housing residents.

Significant Public Comments and VHA Response

All comments received were regarding the proposed rent reform activity other than a couple of general comments about the need for more affordable housing and services for very low-income households in Clark County.

Moving to Work and VHA Objectives

Comment: One comment stated that this activity did not meet the HUD definition of self-sufficiency and referenced 24 CFR § 5.603.

Response: VHA respectfully disagrees with this comment. The activity is not dissimilar from numerous other MTW activities already implemented and approved by HUD at other MTW sites. The CFR reference is a definition from a section of the regulation regarding annual income and disallowances and is not applicable to this activity.

Comment: One comment stated that this activity will not meet VHA's stated goal of decreasing the waiting list and that it will only affect the waiting list through attrition by eviction.

Response: VHA believes that this activity will eventually create additional turnover and opportunity for those on the waiting list by motivating households to obtain employment. Once on that path some households will grow their income to the point of leaving the program making housing assistance available for others.

Comment: One comment pointed out that based on the impact analysis only 40 of the more than 1000 families affected were on zero income and suggested a policy targeting those only those who game the system instead.

Response: Although there were only 40 work-able households reporting zero income at the time the data was sampled, there are a great many more households with very little income. The proposed rent reform targets all those with income less than the minimum set at \$750 a month.

Comment: Several comments questioned whether the activity would result in any real cost savings.

Response: VHA projects little cost saving in 2013 due to the transition and anticipated use of the household controlled hardship exemption. After 2013 the cost savings will depend on the extent of exemptions granted under the hardship policy. However, even if 50% of the impacted households are made exempt the cost savings are projected to exceed \$400,000 annually after 2013. This is more than enough to offset any additional administrative costs.

Comment: One comment questioned whether this activity will remove the perceived disincentive in the current system and why the monthly income threshold of \$750 was chosen.

Response: The activity will not completely eliminate the perceived disincentives, but will go a long way toward taking away the advantages under the current system of reporting little or no income. The \$750 a month figure was chosen after modeling the effect of numerous minimum incomes. It is an amount that can be offset by the most modest of jobs and yet still is high enough to create an impact that will motivate households to obtain new income.

Employment Readiness and Availability

Comment: Several comments questioned the advisability of undertaking this activity in the current economy pointing out the current local unemployment rate and the perceived lack of jobs.

Response: The local unemployment rate and economy reflects a lack of higher wage jobs. Information provided to the VHA from the SW Workforce Development Council and other studies report that there are an abundance of low-wage and part-time jobs (see the article in the September 2, 2012 Columbian regarding the abundance of low-wage jobs in Clark County). For this reason VHA developed a rent reform policy intended to encourage modest employment and not one that required employment sufficient to move households off the program altogether.

Comment: Several comments questioned the employability of the household members who will be subject to the minimum rent.

Response: There are a number of programs both within and outside the VHA to assist people with barriers to employment. VHA will be doing outreach to households to connect people to these services. In addition individual barriers to employment can be addressed under the hardship policy.

Impact Analysis

Comment: Two comments were received regarding the impact of this activity on women and children. It was suggested that they were overrepresented among the impacted households. One commenter suggested that we include barriers to employment in our impact analysis.

Response: The households served by the VHA contain a large percentage of women and children. The VHA serves very low-income households. The commenter's statistics clearly show the relationship between poverty and women and children (although they are a little misleading regarding growth). However, what the impact analysis clearly shows is that among work-able households woman or families with children are not any more likely to be impacted by this activity. The impact analysis is primary intended to predict if the activity will have an unintended discriminatory effect on one or more protected classes. Barriers to employment could include many other categories and in any case are not tracked.

Comment: One comment questioned why Public Housing was left out of the analysis.

Response: At the time the analysis was begun it was expected that by 2013 VHA's pending disposition applications would have been approved and we would have no longer had any Public Housing, or at least the current Public Housing population would be on the HCV program. At this time the status and timeline for existing VHA Public Housing remains uncertain, however the current Public Housing population has been added to the analysis.

Comment: One comment expressed alarm at some of the projected rent increases in the analysis.

Response: The analysis does not take into account any exemptions for hardship. In that way it is a kind of "worst case scenario". When actually implemented we expect significant numbers of exemptions under the hardship policy. In addition the households with the larger projected rent increases are those with multiple work-able but no currently working members. With multiple members, these households stand a better chance of at least one or two members obtaining new income to offset the minimum rent.

Hardship Policy

Comment: One comment stated that 6 months was not a long enough hardship exemption for some people.

Response: We believe the commenter was referring to the six-month hardship that the household may utilize as they see fit without obtaining approval from the VHA. After this is exhausted the household would be eligible to apply for an additional short or long-term exemption through the regular hardship policy process.

Comment: Several comments were received that stated the hardship policy needs more clarity and was not sufficiently developed.

Response: The current hardship policy has been in place for a number of years and has not resulted in any complaints and grievances that we are aware of. VHA is aware of the concerns about the policy and for this reason added the household controlled six-month exemption to, in part, address some of the concerns. We are open to specific suggestions as to how the process can be improved.

Comment: One comment stated that a RAB member accessed the hardship policy and had concerns that the entire RAB shares.

Response: VHA staff were not present when this was discussed at a RAB meeting but have checked the records and finds that no past or current member of the RAB has been approved or denied a hardship request. It's possible that a RAB member made a request but was found to be unaffected by any rent reform activity.

Comment: Two comments were received suggesting that a tenant serve on the hardship panel.

Response: VHA is interested in this idea and may implement it if we can resolve concerns about privacy and the time commitment.

Comment: One comment suggested that the VHA advise tenants of the hardship policy at annual reexaminations.

Response: VHA already does this due to a number of rent reform activities. Every notice of a rent change includes information about the hardship policy and the right to a grievance or informal hearing. In addition we plan to mail specific notices to impacted tenants detailing how to access the hardship policy

Comment: One comment suggested that VHA consider utility and medical expenses when determining if a hardship exists.

Response: In considering hardship cases the VHA considers all expenses a household has including utilities and medical.

Other comments

Comment: One comment stated the minimum income amount is set too high. Another questioned asked what was magic about that number.

Response: The \$750 a month figure was chosen after modeling the effect of numerous minimum incomes. It is an amount that can be offset by the most modest employment (it's less than what one would earn working half-time at minimum wage) and yet still is high enough to create an impact that will motivate households to obtain new income.

Comment: Several comments suggested that the VHA employ more case management instead of rent reform.

Response: VHA does plan to expand services to households. Just recently we received a significant new grant in partnership with regional housing authorities and workforce investment boards. We also hope to utilize some of the anticipated savings from this rent reform activity to support these services. However, we believe that the minimum income is also needed to motivate households to utilize these services.

Comment: One comment expressed concern that landlords would not be willing to participate in Section 8 if they are aware of a minimum rent.

Response: Judging by the number of Requests for Tenancy Approvals that the VHA must deny for being over maximum family share, it would appear that landlords pay little attention to the affordability of the tenant portion of the rent. However, VHA has added to the rent reform activity metrics the percent successfully leasing and time required to lease to see if there is an impact on households being able to locate units.

Comment: A concern was expressed that this will be a permanent change.

Response: The VHA MTW Agreement expires in 2018. Long before that however, this activity will be reviewed every year as required in the MTW Agreement and changed or dropped if found to be ineffective.

Comment: One comment made several suggestions for data that should be tracked.

Response: Tracking how long a tenant's work search takes is probably not possible. One reason is that we usually interact with households just once per year and we are not notified when a tenant begins a job search or have any way of determining the efforts they make toward their search. Tenant work retention may be estimated by tracking the number of interim reexaminations requests for loss of income, a number we already track. Race and other demographics are already available on tenants who work and were used in the impact analysis. Likewise race and family composition are available on all households ending participation for any reason including eviction for non-payment of rent.

Comment: A comment was made that this activity will contravene the 40% rule.

Response: The intent of the 40% maximum family share rule is to prevent HCV participants from selecting units that are too far above the applicable payment standard. VHA's MTW activity that extends the 40% rule is intended to either motivate participants to increase income or to locate more affordable units. VHA plans to calculate the maximum family share based on actual income without adding in any minimum income if applicable to that household. This will result in households not being affected by the new policy when it comes to the price of a rental they are considering or are already residing in.

Comment: Several comments were received that suggested we create or expand a list of categorical exemptions. Suggestions categories included persons on TANF or unemployment, full-time students, persons on the FSS program etc.

Response: VHA feels the exemptions included in the definition of work-able are adequate. Adopting additional exemptions would result in some households not being required to pay the minimum rent that could actually afford to. We believe the hardship policy will meet the needs of those who sincerely can't pay any rent increase due to the activity without adopting broad categories.

Comment: One commenter was critical of VHA not demonstrating prior success with other activities.

Response: No mention was made in the critique of the MTW Annual Report even though the commenter is sent a copy every year. This document is where one would find the result of any activity including many of the suggested metrics. VHA has already committed to the MTW advisory committee a full presentation of the 2012 Annual Report when it is completed early next year.

Comment: Several comments were made that this activity will lead to homelessness

Response: The VHA respectfully disagrees with this comment. We have no interest in increasing homelessness or causing households to be evicted because they cannot pay rent. If this activity results in significant numbers of households losing their assistance and becoming homeless then the activity will be modified or ended.

Affidavit of Publication
STATE OF WASHINGTON)

) ss:
County of Clark)

Columbian

ACCTS PAYABLE/KRIS
VANC HOUSING AUTH/DEV DEPT-L
2500 MAIN ST
VANCOUVER WA 98660

REFERENCE: 71171 NPH SEP 6
3196921 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 2013 on Thursday, September 6, 2012, 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 2013 Moving to Work Annual Plan will be available beginning August 6, 2012, 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 "News About VHA" section.
Hearing Date: Thursday, September 6, 2012
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) 694-8369
TDD: (360) 694-0842
www.vhausa.com
Equal Housing Opportunity
Aug. 3 453570

PUBLISHED ON: 08/03

TOTAL COST: 68.17
FILED ON: 08/03/12

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

Signature Sandra Burckett

Affidavit of Publication

STATE OF WASHINGTON)

) ss:

County of Clark)

Columbian

ACCTS PAYABLE/KRIS
VANC HOUSING AUTH/DEV DEPT-L
2500 MAIN ST
VANCOUVER WA 98660

REFERENCE: 71171 CHANGE OF DATE
3199243 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 -
Notice of Change of Date**
The Vancouver Housing Authority (VHA) has changed the date of the public hearing on its Moving to Work Annual Plan for 2013 to **Monday, September 10, 2012**, 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 2013 Moving to Work Annual Plan will be available, beginning August 6, 2012, 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 "News About VHA" section.
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www.vhausa.com
Equal Housing Opportunity
Aug. 17 455314

PUBLISHED ON: 08/17

TOTAL COST: 76.97
FILED ON: 08/17/12

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

Signature

Jandra Burkett

News and Notices

YOUR OPINION COUNTS!

Notice of Public Hearing on VHA's 2013 Moving to Work Plan

The VHA is requesting your comments on the 2013 Moving to Work Plan. New VHA policies being proposed in the Plan include the following:

- A new minimum income for Section 8 and Public Housing residents who are Work-Able.*
- *A *Work-Able resident is an adult who is under age 62 and is not disabled or a dependent.*
- Use of MTW funds to support a program to keep people in their homes after foreclosure.

Beginning August 6, 2012, you can see a copy of the Plan on the VHA website at www.vhausea.com and at the Rise and Stars Community Center (500 Omaha Way) or the VHA Main Street Office (2500 Main Street).

You can send written comments to David Overbay, Vancouver Housing Authority, 2500 Main Street, Vancouver, WA 98660. You can email your comments to doverbay@vhausea.com.

To comment in person and to hear others, please come to the public hearing Thursday, September 6th, 2012 at 6:00 p.m., Vancouver Housing Authority, 2500 Main Street.

LOOKING FOR A JOB? LOOKING FOR A BETTER JOB?

A waiting list is open for the next *Going Places Network (GPN)* training. The class works directly with employers in Clark County. More than half of those who have participated in this class have found jobs...You can too. The class is free of charge for VHA residents only and is open to women who are seeking employment. Through 12 weekly meetings you will learn how to present your personal "brand"

in interviews, customize your résumé for different positions, navigate LinkedIn and other social media for job leads, and much more. You will also have the chance to work one-on-one with career coaches and build your personal network in a small, supportive environment with other women.

Starting in September, meetings will be held each week at the Vancouver Housing Authority, 2500 Main Street, Vancouver, WA 98660. You must register (space is limited) for this program by calling Bridgette @ 360-993-9556 or via email to bfahnbulleh@vhausea.com.

TENANT SCREENING SERVICE

The VHA, Clark County Rental Association, and other community partners are working on solutions to help renters with the cost of searching for a place to rent. One of those costs that can add up is paying for renter's screening reports for each landlord you contact. In a trial program, many landlords who are members of the Clark County Rental Association are accepting reports from MyScreenReport.com®. If you have a Section 8 Housing Choice Voucher you can receive a discount on the screening report fee by contacting MyScreenReport through the VHA web site, at www.vhausea.com/housing/MyScreenReport_Portal.html. MyScreenReport.com® is a direct-to-consumer report, meaning you can order a report on yourself. You can then share the validated report with the landlord or landlords of your choice.

There are several advantages of using these reports. You will know what is in your report before you apply. You have the opportunity to dispute information you feel is reported in error before it impacts your search for housing. You review your report with landlords up front to determine whether you qualify—before paying the landlord an application fee or holding deposit. You avoid paying multiple screening fees before finding a landlord who will

News and Notices

NOTICE OF PUBLIC HEARING – NOTICE OF CHANGE OF DATE

The Vancouver Housing Authority (VHA) has changed the date of the public hearing on its Moving to Work Annual Plan for 2013 to Monday, September 10, 2012, 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 2013 Moving to Work Annual Plan will be available, beginning August 6, 2012, 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 "News About VHA" section.

Hearing Date: Monday, September 10, 2012

Time: 6:00 p.m.

Location: Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA

TWO PROPOSED PROGRAMS ARE PART OF VHA'S 2013 MOVING TO WORK PLAN

As mentioned in the announcement above, the Vancouver Housing Authority is preparing to send its 2013 Moving to Work Annual Plan to HUD for approval. In addition to continuing several programs started in previous years, the VHA is also planning to introduce two new programs in 2013, the Minimum Income Rent Reform and the Foreclosure Response Program.

Minimum Income Rent Reform

Under the Minimum Income Rent Reform program, a minimum income will be used when

calculating rent for any Section 8 or Public Housing household that contains one or more work-able family members. Work-able is defined as an adult under the age of 62 who is not disabled, is not a dependent, or is not a full-time caretaker for a disabled household member. The minimum income will be \$9000 annually for each work-able family member. For example if your household has one work-able member you would be considered to have a minimum income of \$9000; if you have two workable members you would have minimum income of \$18,000, and so on. If your household's actual annual income is below the minimum, your rent and housing assistance will be calculated using the minimum. If your actual income is greater than the minimum, your actual income will be used and the minimum income will not be used.

Any deductions you are entitled to will still be used to calculate your rent if the minimum rent applies to your family. For example a family of three with two dependents and one work-able member who was subject to the minimum would have assistance calculated based on an annual income of \$9000, less a deduction of \$960 for the two dependents ($\$480 \times 2$). The resulting annual income of \$8040 would be divided by 12 to determine monthly income and the household's tenant rent or assistance would be based on 30% of the monthly adjusted income, in this case \$201. In Public Housing the utility allowance would be subtracted from \$201 to determine the tenant rent. Under Section 8 the \$201 would be subtracted from the applicable payment standard or gross rent to determine housing assistance.

The amount of the minimum income will be reviewed annually and possibly modified if warranted. Currently, the amount is less than the earnings a person would receive if they worked 20 hours per week at the Washington State minimum wage. Of course, households impacted by this measure would be eligible to request an exemption under the terms of the VHA hardship policy.



Please Sign In

Vancouver Housing Authority
 Public Hearing on the 2013 MTW Annual Plan

Monday, September 10, 2012
 2500 Main Street
 Vancouver, WA 98660

| Name | Organization or Housing Program | Planning to Comment? |
|--------------------|---------------------------------|--|
| 1. Chris Pizarra | Public Hearing | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Julie Eyring | RAB | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Dan Tanner | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Sara Hitchcock | Section 8 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Barbara Stately | RAB | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 6. Jay Howard | RAB | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 7. Amy McLaughlin | NTP | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Anna Mangold | VHA | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 9. Jan Wiebeck | VHA | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 10. Aaron Scott | Special District Board | <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 11. Hugh Q 2 | VHA | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 12. Sherolynn Shaw | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |



Please Sign In

Vancouver Housing Authority Public Hearing on the 2013 MTW Annual Plan

Monday, September 10, 2012
2500 Main Street
Vancouver, WA 98660

| Name | Organization or Housing Program | Planning to Comment? |
|--------------------------|---------------------------------|---|
| 1. <i>Geetha Lyons</i> | <i>VHA</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. <i>KAREN LADAKA</i> | <i>SECOND STEP HOUSING</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. <i>Cecelia Turner</i> | <i>RAB</i> | <input type="checkbox"/> Yes <input type="checkbox"/> No ? |
| 4. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 9. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 10. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 11. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 12. | | <input type="checkbox"/> Yes <input type="checkbox"/> No |



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Board of Directors**

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Sierk Braam, Vice President
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Kathleen O'Connor
Met Life

Ralph J. Parker
Underwriters Laboratories

Beryl Robison
Community Advocate

Sharon Wylie
WA State Representative

September 10, 2012

Roy Johnson
Executive Director
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98660

Re: Rent reform initiative

Dear Mr. Johnson:

The Council for the Homeless ("CFTH") values the work of the Vancouver Housing Authority ("VHA") and appreciates VHA's goal of creating incentives for VHA's housing participants to increase their incomes. However, CFTH is concerned that VHA's proposed rent reform initiative could have unintended consequences.

Given the barriers to employment that some VHA housing participants face (low literacy, gaps in employment, child care, transportation, etc.) and the competitiveness of the local job market, CFTH is concerned that some motivated participants could face a long road to employment. Other participants may have mental or physical health conditions that make it difficult for them to work but do not acknowledge the potential disability or are not aware of how to apply for disability benefits.

A solution to these challenges would be to partner with service providers in the community to assess the individual needs of the participants who will be affected by the rent reform proposal. Once assessed, the participants could be connected to the services in the community that give them the best chance to increase their incomes. If this is done before implementation of the rent reform initiative, VHA can use the information learned from the assessments to ensure that policies and procedures are in place so that participants who are making reasonable efforts to increase their income do not experience rent increases that they cannot afford.

CFTH shares the goal of VHA to assist low and no income residents of Clark County to become economically self-sufficient. It will take interdisciplinary community partnerships to provide the services and training necessary to accomplish this goal. CFTH stand ready to do our part and we believe that other community members do as well. Together we can ensure that VHA housing participants have meaningful opportunities to increase their incomes.

Thank you for your consideration.

Sincerely,

Andy Silver
Executive Director
Council for the Homeless
360-993-9570
director@icfth.com

Vancouver Housing Authority Resident Advisory Board
Input Regarding Proposed Rent Reform

VHA's mission statement:

“Our mission 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 in a manner which maintains public trust”

The Resident Advisory Board (RAB) has the duty to VHA and its tenants to be the voice of the tenants. While it is obvious that the tenants affected would not willingly have their rents raised, we have tried to be holistically minded. We have considered self-sufficiency of tenants and community in a difficult economy. We have considered that some tenants seem to have difficulty choosing self-sufficiency in any economy. Some have shared their own struggles to help determine what the experiences of other would be likely to be under the proposed rent reform changes. We have looked at all the information given by VHA and sought our own. We have sought input from community partners and the community at large. We respectfully decline to support Rent Reform at this time for because of the following reasons and concerns:

Economy and VHA Savings

One of the reasons given for pursuing Rent Reform at this time is that HUD is asking Housing Authorities to "do more with less". If HUD has less money because of the economy it seems counter-intuitive to believe that workable tenants reporting wages less than part time minimum wage will be able to absorb a rent increase. It seems more likely that these tenants will be harmed by the proposed Rent Reform in this economic downturn.

The RAB has considered other indicators of economic feasibility. These are:

Clark County unemployment rates; national and local newspaper articles; lack of information available about people who fall off of TANF and unemployment rolls due to time limits and despite compliance with requirements to search for work; reduction of benefits and supports through community partners; reduction of unemployment benefits, increase in food bank use; reduction of Medicaid; and the personal experiences of several RAB members. We have also looked with interest at the Obama Administration's move to assist states by offering Welfare-to-Work Waivers, as this seems to indicate that in this economy the WorkFirst program is having difficulty moving people into jobs, as required. (See attached article, "Administration Proposes Welfare-To-Work Waivers")
http://www.boston.com/news/nation/washington/articles/2012/07/13/administration_proposes_welfare_to_work_waivers/

We did not include all newspaper articles referenced. However we are attaching some articles for your consideration. (See attached)

As the economy gets better Rent Reform may have increased feasibility.

VHA has not indicated it has an issue with balancing its budget. The same is not likely to be true for tenants affected by Rent Reform.

The RAB thinks the minimum annual income is too high. In this economy the amount should be lower and gradually increase.

Rent Reform's projected savings could be offset by administrative costs, especially if administration of potential Hardship requests are considered.

Safety Net

Over the past 3 years, safety nets have already been reduced. TANF grants have been cut and time limits more stringently enforced. Unemployment benefits have also been cut, reducing the amount of time a person can receive benefits by 26 weeks impacting people are already being required to do more with less.

Children and Self- Sufficiency

The highest percentage population in VHA are children. (38%) Most of the tenants impacted seem to be women. (419) In the voucher program out of 733 female head of households, 467 are workable with 1 or more dependent. It would seem likely that the highest percentage populations affected are children and single parents.

Research on TANF and jobs suggests that single mothers have the unique barriers that are a result of experiencing poverty while child rearing. It is recognized that women in this situation cycle in and out of low paying jobs. In a paper titled, "One in Five Families Leaving Welfare Return" by the Urban Institute, <http://www.urban.org/url.cfm?ID=900553&renderforprint=1> (see attached paper) it was cited that certain supports are beneficial to self-sufficiency. Interestingly it was the government job search and job training programs that were specifically mentioned as showing no statistical relationship to higher self-sufficiency.

Motherhood can create unique barriers to self-sufficiency because ever changing needs within the family impact ability to secure long term, permanent work.

Because it is typical to cycle on and off of TANF, it is reasonable to conclude that work-able parents VHA may have similar cycles. The automatic 6 month Hardship Policy is probably inadequate for families that fall into this category.

A categorical exemption for parents receiving TANF and who are in compliance with WorkFirst is a good first step toward supporting families to achieve self-sufficiency and avoid inter-generational poverty.

Women are a **substantially over-represented** population affected by the proposed Rent Reform. The RAB is concerned that these women may be single mothers. In an article titled, "Poverty rises in Clark County, hits women especially hard" http://www.oregonlive.com/clark-county/index.ssf/2012/05/poverty_strikes_more_clark_cou.html by the Oregonian it was noted that poverty has risen 171 percent between 2000 and 2010 in Clark County. Rent Reform may be affecting our most vulnerable populations, women and children. According to this article they need more of a safety net, not less.

Multi -Disciplinary Case Management

Our MTW community partners expressed that they believe multi-disciplinary case management should be pursued prior to implementing Rent Reform. Barring that foundational assessment and support, intensive case management concurrent with Rent Reform would be important in preserving the safety net for tenants. VHA has indicated that it may partner with DSHS in this regard.

DSHS' WorkFirst program's success in reducing welfare rolls is unquestioned. It has been successful at that and continues to reduce rolls in a bad economy, as food stamp use continues to climb. According to LaDonna Pavetti, Ph.D., Vice President for Family Income Support Policy at the Center on Budget and Policy Priorities, in her blog post, Blog Post: Chairman Ryan's Call for "Welfare Reform, Round Two" Ignores Inconvenient Facts About Round One, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3714>, "Single mothers' employment rose during the early years of welfare reform, but it started losing ground in 2000 and now, nearly all of those gains have been lost." (See attached paper) If one looks closely at WorkFirst's claims of success, it has never claimed to reduce poverty.

It's claims to get TANF recipients into jobs is mitigated by the cycling in and out of jobs, and then on and off of TANF.

Like our community partners the RAB believes it to be prudent to seek assessment of barriers and case management that moves tenants past barriers prior to implementing Rent Reform. The plan to rely on DSHS for case management is uncomfortable given that it has not achieved poverty reduction or self-sufficiency within its own program. In this economy less families in poverty are being served by DSHS now, than in the years prior to the 1996 Welfare Reform.

We need to be careful to not emulate the dubious "success" of Welfare Reform. Too many families are already without safety nets.

The Wait List

The Rent Reform program may help the wait list through the unintended consequence of tenants being evicted for non-payment of rent and removed from the program. The voucher of the evicted tenant could be given to someone on the wait list. Rent Reform may also create funds to issue more vouchers for those on the wait list. However the first option merely takes away housing from one family to give it to another. Clearly this is not ideal and does little to reduce poverty. VHA has not committed to the 2nd option.

It does not seem clearly guaranteed that Rent Reform would positively impact the wait list.

Potential Negative Effect of Loss of Assistance Through Eviction

According to VHA, "A potentially negative impact of this policy is that more households may lose their assistance through eviction for non-payment. In order to prevent this impact effort will be made to assure households receive adequate notice of their right to request a hardship exemption and to offer support to increase their employability."

This potentially negative effect is devastating to tenants, some of whom may be children. We believe it to be too risky. Especially when other options, like case management, are available to achieve a similar result to Rent Reform without this potentially negative effect.

Tenants Who Are "Working the System"

The RAB believes that good case management will allow VHA to assess, identify and assist unmotivated tenants. After assessment of barriers, case managers can create a plan to help motivate tenants on a case by case basis. The RAB believes this will minimize unintended consequences to tenants who are doing everything they can to become self-sufficient yet continue to struggling to achieve that goal.

We need to answer the question, "Why aren't they working?" before we can adequately consider how to help tenants create and achieve goals that lead out of poverty.

It is reported that 40 households report \$0 (zero) income. It would seem most of the 500 tenants impacted have some amount of income. This would seem to indicate they may also have some willingness to work that can be built on with programs that reward continues strides toward more income.

One of the ongoing concerns in our society is the the idea of " creating a disincentive to work". If there is a disincentive to work, the causes are apt to be complex. Individualized case management may restore a tenant's motivation to move toward self-sufficiency.

Landlords and Standards for Rent to Income Ratios

Landlords and tenants have been led to believe that a benefit of the program is that tenant rent is not more than the standard 30% of income. The standard has long been the formula that is considered when renting to a tenant and it has been advocated by those who seek to help low income people have a realistic and sustainable budget to help them towards financial well being.

This deviation from the standard could have a negative affect on landlords who participate in the Section 8 program and who are forced to evict for non-payment of a small amount of rent.

There are already many landlords who do not allow Section 8 tenants to even put in an application of their rentals. It is possible Rent Reform will reduce the number of perspective landlords willing to rent to tenants with vouchers. It is already discouraging as the point of vouchers was to give tenants more housing options and thereby prevent pooling or ghettos of low income tenants.

Rent Reform may have the unintended consequence of re-enforcing stereotypes that Section 8 tenants are undesirable. This would further limit housing options.

Job Creation and Education

The typical tenant affected has been described as showing "little to no income for at least 5yrs." A population of this description is likely to have difficulty competing against those with more recent job history.

Barriers to income increases can be complex. Rent Reform may be an overly simplistic approach to

motivating tenants. 6 months of hardship may not be enough of a safety net for some tenants. The Hardship Policy needs more clarity before it can be relied upon to continue a safety net beyond 6 months.

The RAB suggests that creating community partnerships to create jobs and trainings specifically for VHA residents with a certain amount of guaranteed job placement would be beneficial to the targeted population.

Education has long been recognized as an effective way to help people escape poverty.

Categorical Exemptions

Tenants that are in the TANF or Unemployment Programs and who are in compliance with the work requirements in those programs should be categorically exempt.

Tenants who are moving through the process of obtaining Social Security or Disability should also be categorically exempt.

Community Emergency Resources

Rent Reform may increase the number of tenants who seek help from community partners. In this instance, VHA tenants will compete against non-VHA residents for community emergency resources. Many community partners have less emergency resources available already, as the economy has intensified need within the community. Rent Reform could further widen the gap between community need and available resources.

Hardship Policy

The hardship policy is difficult to access, and given that Rent Reform would be a wide-spread permanent change affecting both current and future tenants, it should have some form of outside accountability. As part of that accountability, it should have an appeal process. In some cases the hardship policy will determine a family's continued access to housing. There needs to be an option to reconsider clarification or new evidence. The tenant making the hardship request should be present at the hearing in order to clarify information.

Because Rent Reform has the potential for housing and assistance loss, the criteria for receiving a temporary or permanent hardship exemption should be clear. Yet at the same time, some flexibility is necessary, as each tenants circumstances will be unique.

VHA seeks to be fair with the Hardship Policy, yet it is unclear what that means for tenants. Clarity about the process and criteria used to determine denial or approval of hardship policy request is crucial to assess fairness.

A RAB member who has recently accessed the Hardship Policy had concerns they was willing to share. Having heard their concerns the RAB in its entirety agrees that the Hardship Policy requires review prior to pursuit of Rent Reform.

The RAB believes client representation on the Hardship Panel is important. Having representation of the tenant's point of view will strengthen the safety net provided by the Hardship Policy.

Notice of the existence of the Hardship Policy needs to be strengthened. There were RAB members that were not aware that we currently have a hardship policy. Most of us did not know how to access it or what benefits it might hold for us. Tenants should be advised about the Hardship Policy during their Annual Review.

Utility allowances and medical expenses should be considered.

The timeline for the final decision could be shorter. And the timeline to request a hearing could be increased to at least 14 days (currently 10 days).

Homelessness and the Hardship Policy

Loss of housing can result in homelessness, which can be hard to escape.

Children who experience homelessness are severely disadvantaged as they lack the most basic source of safety and stability. Research has been shown that children without housing suffer in areas of social, emotional, physical well-being, as well as reduced academic success. Many homeless children find it difficult to attend school.

The Colombian reports that there are 162 known homeless students in Battle Ground schools as of April 13th, 2012. There were 58 in 2008. (see attached article, "B.G.: 162 homeless students counted") <http://www.columbian.com/news/2012/apr/25/bg-162-homeless-students-counted/>

Homeless adults finding it difficult to get work will have an even harder time finding employment. With this in mind, the RAB would like to work with VHA to ensure the Hardship Policy is easy to access, is understandable, and increases the safety net, rather than reducing it.

While Clark County seems to have fewer homeless, one of the issues is that determining a true count is impossible given the nature of the population being difficult to track. Other factors such as the increase in homeless students and overflow shelter use indicate there may be more homeless than we can accurately track. (see attached article, "Overflow homeless shelter fill up on first night") <http://www.columbian.com/news/2011/nov/07/overflow-homeless-shelters-fill-first-night/> Should we have additional uncounted homeless, Clark County could be negatively impacted by the reduced funding that resulted from a count showing less homeless. (see attached article, "Clark County has fewer homeless; less funding expected") <http://www.columbian.com/news/2011/dec/14/clark-county-fewer-homeless-less-funding/>

In light of uncertainty if Clark County is experiencing more or less homelessness, the RAB recommends proceeding cautiously with any measures that could result in loss of housing. Collaboration is important. Intentions should be put in writing to further collaborative efforts.

Unintended Discriminatory Effects

While according to data presented by VHA, it is thought that there will be no unintended discriminatory effects. The RAB respectfully postulates that it would be difficult to determine this without determining barriers.

It seems unfair to possibly be comparing tenants who became employable during the economic boon to

those seeking employment now. Or to compare those who are both work-able and highly employable to those who are considered work-able, but not currently employable.

Tenants who are work-able but not employable may experience a wide range of barriers such as: lack of a driver's license; meth mouth/dental presentation; criminal record; childcare availability; lack of skills; lack of work history; and lack of a wide range of hard and soft skills necessary to be competitive in today's marketplace.

Rent Reform as a Permanent Change

It is worth noting that Rent Reform would be likely to be a permanent change. It runs the risk of cycling tenants onto housing assistance and then just a quickly off. Housing is the core of stability. Short term housing stability is often not enough to help those in need of housing assistance. Programs that provide that kind of assistance usually partner with a program that offers long term housing assistance.

Self-sufficiency is a complex process. Measures meant to move tenants forward in that journey need to do so while strengthening safety net.

Tracking

Tracking is important, in the effect that Rent Reform is implemented. The RAB would like tracking regarding:

How long it takes tenants to find part time, minimum wage work or something comparable
Tenant work retention

Racial and familial composition of tenants that find work and that are terminated from VHA because of non-payment of rent eviction

MTW Committee

Our MTW Committee shares some of our concerns. We feel we are being fairly objective given that non-tenants see similar issues.

It is our hope that we can collaborate with the MTW committee and VHA to create a Rent Reform proposal that is a win-win-win for tenants, VHA and the community. We believe that there is tremendous strength in partnerships.

Conclusion

The RAB respectfully opposes the proposed Rent Reform. We do not believe it will accomplish its objectives. We believe it is likely to harm tenants in this economy. Rent Reform would affect not only 500 tenants, but every work-able tenant that VHA has in the future. The measure needs to be able to support tenants, the community and VHA in all times, good and bad. It needs to allow VHA to continue to be a safety net for tenants and for our community. We do not think, as it is currently written, the Rent Reform proposal will succeed.

We would like to continue to work on Rent Reform with VHA and the MTW Committee to make the

proposal a viable option for submission at this time next year, September 2013.

Referenced Newspaper Articles and Research

This is an incomplete list of articles and research considered as we sought an educated opinion regarding the Rent Reform proposal. We thought it would be helpful to submit the following:

Information from Researchers on Poverty

"One in Five Families Leaving Welfare Return" by the Urban Institute
<http://www.urban.org/url.cfm?ID=900553&renderforprint=1>

"Chairman Ryan's Call for 'Welfare Reform, Round Two' Ignores Inconvenient Facts About Round One" by LaDonna Pavetti, Ph.D., Vice President for Family Income Support Policy at the Center on Budget and Policy Priorities
<http://www.cbpp.org/cms/index.cfm?fa=view&id=3714>

Articles from the Colombian

"B.G.: 162 homeless students counted"
<http://www.columbian.com/news/2012/apr/25/bg-162-homeless-students-counted/>

"Overflow homeless shelter fill up on first night"
<http://www.columbian.com/news/2011/nov/07/overflow-homeless-shelters-fill-first-night/>

"Clark County has fewer homeless; less funding expected"
<http://www.columbian.com/news/2011/dec/14/clark-county-fewer-homeless-less-funding/>

"Regional food bank reports record demand"
<http://www.columbian.com/news/2011/sep/30/regional-food-bank-reports-record-demand/>

"Temporary assistance program faces more cuts"
<http://www.columbian.com/news/2011/dec/05/temporary-assistance-effort-faces-more-cuts/>

"Medicaid change concerns local physicians"
<http://www.columbian.com/news/2012/feb/15/medicaid-change-concerns-local-physicians/>

State unemployment benefits will be reduced
<http://www.columbian.com/news/2012/apr/03/unemployment-benefits-will-be-shortened/>

Articles from Oregonlive.com/The Oregonian

"Poverty rises in Clark County, hits women especially hard"
http://www.oregonlive.com/clark-county/index.ssf/2012/05/poverty_strikes_more_clark_cou.html

Seattle Times

“Washington state to cut another 1,266 jobs

http://seattletimes.com/html/localnews/2018021609_apwastatejobs1stldwritethru.html

New York Times

“Welfare Limits Left Poor Adrift as Recession Hit”

<http://www.nytimes.com/2012/04/08/us/welfare-limits-left-poor-adrift-as-recession-hit.html?pagewanted=all>

Associated Press Article

“Administration Proposes Welfare-To-Work Waivers”

http://www.boston.com/news/nation/washington/articles/2012/07/13/administration_proposes_welfare_to_work_waivers/



2500 Main Street, Suite 120, Vancouver, WA 98660 • MAIN: 360-993-5301 • FAX: 360-993-5304
www.secondstephousing.org

August 26, 2011

Mr. Roy Johnson
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98660

Dear Roy,

Second Step Housing is in support of the rent reform proposal that would charge rent to subsidized housing residents who are able to work. We know housing is a basic need that simply put *must* be met but it is also our belief that when provided with the necessary resources, education and skills adults that are able to work feel empowered when they can provide for their families and themselves. There are many families and individuals that are not able to get the help they need because the wait list is closed.

When we can work with families to help them become self-sufficient and move from subsidized housing we can then help others in our community in need.

As the director of Second Step Housing I know the positive impact Vancouver Housing Authority has in the community as they are the largest provider of affordable housing. This proposal fits very well with our goals of helping families become self-sufficient.

Best,

A handwritten signature in black ink, appearing to read "Debby Dover", written in a cursive style.

Debby Dover, Executive Director
Second Step Housing



Northwest Justice Project

500 W. 8th Street, Suite 275
Vancouver, WA 98660
Tel. (360) 693-6130
Fax (360) 693-6352

Toll Free 1-888-201-1020
www.nwjustice.org

César E. Torres
Executive Director

September 10, 2012

VIA EMAIL AND FIRST CLASS MAIL

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

Re: Moving To Work Annual Plan, Fiscal Year 2013

Dear Mr. Johnson:

I am writing on behalf of our clients and as a member of VHA's Moving to Work ("MTW") Advisory Committee to urge VHA to withdraw the rent reform initiative outlined in its proposed MTW Annual Plan for Fiscal Year 2013 ("Annual Plan"). Please share these comments with your Board of Commissioners ("Board") before the Board is asked to approve the Annual Plan.

As will be explained below, we believe that the Board should not approve VHA's proposed Rent Reform Initiative because the initiative is misguided, will force hundreds of poor families deeper into poverty, and will further stress already strained community resources. Alternatively, the Board should approve the initiative only if VHA first substantially revises it to address the critical flaws described herein and re-submits it to VHA's Resident Advisory Board ("RAB"), MTW Advisory Committee, and the general public for further review and comment.

COMMENTS

I. More Information is Needed to Assess the True Magnitude of the Initiative's Impact on Our Community.

First, the proposed initiative states that it will apply to both the Voucher and Public Housing programs, yet none of the documents made available for review¹ contain any information about the potential impact on Public Housing households. VHA's presentations regarding

¹ May 31, 2012 draft of the initiative; VHA Rent Reform power point presentation, dated June 19, 2012, and draft MTW Annual Plan available on VHA's website. Just prior to the deadline for submission of these comments, I received an email from David Overbay containing data on Public Housing residents. I have not yet had an opportunity to review it.



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its impact analysis give the impression that only 506 families are expected to face a rent increase and potential loss of housing as a result of this initiative, but the charts in its impact analysis section, Appendix I of the Annual Plan (pps. 32-33), shows that those 506 families are just the Voucher families.

How many Public Housing families and Section 8 wait list applicants will be impacted and to what degree? What analysis, if any, has VHA conducted regarding the severity of rent burdens on these households.² Without the critical impact analysis, community stakeholders—particularly existing and prospective Section 8 residents—cannot begin to assess the magnitude of the proposed initiative.

Additionally, a number of the initiative’s critical components, e.g., hardship policy and procedure, evaluation timeline and methodology, are insufficiently described. When a policy’s critical components are described only in vague terms, community stakeholders are deprived of a meaningful opportunity to assess the value of the initiative as a whole. Disappointingly, despite our numerous requests over the years for full transparency, VHA continues to provide policy documents lacking material information for review and comment.

To meet its obligation of full transparency, VHA should revise and re-issue its Annual Plan to include this data, along with a more in-depth description of plan details, and reschedule its public hearing to provide at least 30 days for public review and comment.

II. The Initiative is Fundamentally Flawed and Threatens to Further Weaken an Already Frayed Safety Net.

According to Appendix I, VHA predicts that 1036 of 2453 current Voucher households are work-able and thus will be impacted by the initiative. Of these work-able families, five hundred-six (506) families face a rent increase; four hundred (400) of these families face a rent spike of **at least \$100 per month to more than \$400 per month**. VHA’s prediction of impact likely underestimates the impact as it does not account for current Public Housing households, and for obvious reasons, families who may prospectively lose income and those who will move from its wait list onto housing assistance. As explained directly below, as a result of this initiative, hundreds of families likely will be so grossly rent-burdened that evictions for non-payment of rent and/or utilities are all but a foregone conclusion. Our community can ill-afford such a catastrophic and avoidable outcome.

A. The Proposed Initiative Contravenes HUD’s & VHA’s Forty Percent Rule

To prevent poor families who participate in subsidized housing from being excessively rent-burdened, HUD prohibits approval of unit leases, if, at initial lease-up, the share of the rent to be paid by a family would exceed forty percent (40%) of the family’s monthly adjusted income. 24 CFR 982.305(a); *VHA Administrative Plan* (“Admin Plan”), revised March 21,

² Traditionally, HUD has required a rent impact analysis, transition plan, and hardship policies for rent reform initiatives.

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2012, at 9-1. Using its MTW authority, VHA went a step further and adopted a policy that prohibits families from paying more than 40% of their income even after initial lease-up. *See Admin Plan*, at 11-13. In the event that after leasing a unit, a family's share of rent increases to more than 40% of the family's income, VHA's policy goes so far as to force the family to either move, grow its income to afford the increase in rent, or join a Family Self Sufficiency program.³ *Id.*

The proposed initiative, however, exposes hundreds of Voucher families to excessive rent burdens. From the data made available to us, it appears that imposition of imputed minimum income will result in approximately 378 current Voucher families paying more than 40% of their income for rent. Of these 378 families, 233 will have to pay between 41% to 99% of their income for rent; one family will have to pay 100% of its income; and the **remaining 174 families will be obligated to pay well in excess of 100% of their income for rent.**⁴ VHA has evidenced no plausible rationale for, nor should its Board accept, such a radical and unsustainable outcome.

Worse yet, the figures above are limited to Voucher families whose current income is less than \$750 a month. How many more families will be similarly and egregiously rent-burdened? Certainly, any family that loses income prospectively likely will be. Similarly, any family moving from the wait list into subsidized housing before the imposition of the initiative and whose income is below the imputed minimum income may face a rent increase within four to six months of lease-up that places them in the excessively rent-burdened category.

Yet another unintended consequence of the initiative is that wait list families who receive a Voucher after the effective date of the initiative may not be able to find a suitable unit that does not run afoul of the 40% rule, thereby losing the opportunity to avail themselves of long-awaited housing assistance.

VHA's initiative offers no legitimate need for contravening federal rules or its Administrative Plan. Nor does VHA offer any route around this conflict; and its hardship policy likely will do little to alleviate the situation. The Board should therefore not approve this initiative. *See King County Housing Authority v. Saylor*, 19 Wn. App. 871, 875; 578 P.2d 76 (1978) (housing authorities are obligated to abide by their administrative plans).

B. Concerns Regarding VHA's Disparate Impact Analysis.

We are concerned about the potential disparate impact of the initiative on women and families with children. As you know, federal and state fair housing laws prohibit unlawful discrimination against protected classes, such as women and families with children. A

³ VHA has not published any details about the potential efficacy of its 40% rule, except to note in its 2012 Annual Plan that it anticipates some impact as a result of the loss of and/or lack of exemption from the rule for existing and new participants. *See MTW Annual Plan, FY 2012*, at 21. Notably, VHA's 2013 Annual Plan makes no mention of the anticipated impact or actual impact. Just how many families have been impacted by this rule is unknown.

⁴ Calculations based on Voucher program data set provided by VHA.

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facially neutral policy may nonetheless be discriminatory in its application. To avoid this potential outcome, VHA must conduct a comprehensive disparate impact analysis of its proposed MTW initiatives.

Unfortunately, VHA's disparate impact analysis, provided in the second chart in Appendix I, is incomplete and misleading, albeit unintentionally. First, the data is limited to current Voucher households who are work-able. Second, the comparison data appears to be limited to heads of household, leaving a question as to how many women or other minorities are members of households in which they are not the head of household. Missing are statistics or analyses of all Section 8 participants, including Public Housing, work-able and exempted, wait list applicants, and the larger Clark County population. Without knowing the household composition of its Section 8 participants and wait list applicants, it is impossible to properly assess the potential discriminatory impact of the initiative. Next, the chart contains some overlapping categories, making it difficult to ascertain the true numbers and resulting impact. For instance, women could fall into several categories contained in the chart.

Additionally, VHA's inquiry appears to be limited to a comparison of Voucher households who will be impacted to households who will not. We question the validity of VHA's analysis, particularly as it did not compare households with children to households without children or female households to male household and the potential impact on each. In our opinion, VHA must not proceed with the rent reform initiative without first conducting a more comprehensive disparate impact analysis and making that analysis available for public review.

What VHA's analysis does make disturbing clear, however, is that its initiative predominantly affects women and families with children. Of the predicted impacted households, nearly eighty-three percent (83%) are headed by women, and nearly eighty percent (80%) are families with children. These numbers are likely underestimates as they do not take into account females who are not heads of household. Even if the initiative's impact on women and children does not rise to the level of unlawful discrimination, the sheer number of potentially affected women and children is seriously troubling in light of the sharp rise in poverty among women and children in Clark County. VHA has not yet offered any compelling or legitimate reason for such a disproportionate impact. We therefore ask that VHA reconsider other alternatives to achieving its stated objectives.

C. The Validity of the Initiative's Varied Purposes.

What VHA seeks to achieve through this initiative, in terms of meeting its MTW objectives, is not entirely clear. VHA has offered various, and at times somewhat internally inconsistent, statements regarding the purpose of the initiative. For instance, VHA contends that the initiative will meet the MTW objective of encouraging self-sufficiency, yet also insists that this is not a self-sufficiency initiative. VHA also offers the initiative as a means to encourage employment, but also asserts that it is not an employment activity.

VHA's power-point presentation provides the following justifications and/or objectives:

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1. “Give incentives to families to obtain employment and become economically self-sufficient...It will motivate participants to find work and encourage them to join our self-sufficiency programs...”
2. “Increase participant self-sufficiency”
3. “reduces cost and creates more opportunity for those on the waiting list.”
4. Reduce cost and achieve greater cost effectiveness.

VHA Power-Point Presentation, dated Jun. 19, 2012.

i. Is it Self-Sufficiency?

HUD defines an economic self-sufficiency program as:

Any program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work for such families. These programs include programs for job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant for work (including a substance abuse or mental health treatment program), or other work activities.

24 C.F.R. §5.603. The proposed initiative does not appear to comport with HUD’s definition. By this statutory objective, Congress intended for MTW agencies to provide financial incentives that would assist households in working or gaining the skills needed to work. Congress did not intend for MTW agencies to motivate participants by penalizing them, limiting their housing choice, or excessively burdening them with rent costs.

ii. Moving People Off the Wait List.

Whether or not the initiative is an actual self-sufficiency measure, as designed it will not meet VHA’s stated objective to encourage employment and self-sufficiency or decrease its wait list. If, for example, a work-able household grows its income just enough to exceed the minimum income threshold, it may remain on housing indefinitely (coasting rather than continuing to grow its income) and the wait list will not be affected. The only foreseeable way this initiative will affect the wait list is through attrition by eviction of the families who cannot meet the demands of the initiative and are ineligible for a hardship exemption.

iii. The Perceived Problem of Zero Income.

During its initial presentation to the Advisory Committee, VHA management expressed that a primary factor driving this initiative is that too many families report zero income for extended periods of time. VHA has not demonstrated that lack of reported income is a rampant problem or that it can only be combatted through implementation of a large-scale plan that drastically threatens the economic and housing stability of those families with reported income. In fact, VHA’s own data shows that of the more than one thousand households affected, **fewer than forty (40) have zero reported income.** Indeed, a bulk of

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the affected families has income stemming from wages, TANF, child support, and unemployment.⁵

Assuming, *arguendo*, that lack of income is a persistent problem demanding action by the housing authority, VHA has other effective and less drastic remedies at its disposal. For instance, VHA may investigate and terminate assistance for fraud if it believes a family is under reporting income. And VHA could simply design a policy that targets the perceived bad behavior, rather than implementing a wide-sweeping policy that punishes families who, although poor and presently under- or unemployed, are not gaming the system.

iv. Will There be any Real Cost Savings, and at What Cost to Residents?

VHA's claimed need to save money that could be used for other needy families rings hollow. First, to our knowledge, VHA is not facing a funding shortfall compelling it to shrink existing subsidies to keep families across the Section 8 program housed. Second, and importantly, VHA has not committed to using any costs savings it may realize to assist more families. Third, its prediction of costs savings appear to be exaggerated given the predictable outcomes of the initiative. Fourth, through recently HUD approved initiatives, VHA diverted MTW funds to non-MTW purposes, suggesting it already had surplus funds that could have been used to assist more needy families without drawing resources away from impacted needy families. In any event, VHA should weigh any anticipated costs savings against the potential harm to program participants. Here, the potential harm to participants clearly outweighs any modest anticipated savings.

v. Removing "Disincentives" to Working.

VHA also expressed a desire to remove a perceived "disincentive" to working or "contributing more" inherent in actual income-based subsidy methodology. Assuming, without conceding, the existence of a structural disincentive, VHA still has not shown how this initiative will remove this disincentive and in a way that fosters sustained employment and family and community stability. We can conceive of no rational basis for the proposition that extremely poor families should pay more than 30% of their actual income towards rent. And what makes monthly income of \$750 the magical threshold between disincentive and incentive and contributing a fair share of one's income to housing costs? Are we to believe that families with monthly incomes less than \$750 are less motivated and incentivized than families with monthly incomes that exceed \$750?

D. The Proposed Initiative is Not Feasible in This Economy.

i. The Economic Realities of Clark County: Where are the Jobs?

Noticeably absent from VHA's initiative is any discussion of the current and projected economic realities of Clark County, including employment rates, availability of entry-level, part-time or self-sufficiency jobs, poverty among women, children and other minorities, or the seemingly never-ending increase in the costs of essential needs. Consideration of these

⁵ Calculations based on data sheet provided by VHA.

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various factors is critical to answering the question: Will the families impacted by this initiative be able to find employment or otherwise grow their income within the short time allotted to them under the initiative's parameters? The unfortunate answer: unlikely.

Clark County ranked sixth highest in numbers of people living below poverty in Washington in 2010. *Poverty in Clark County, April 2012, Clark County Department of Community Services Community Action Program*, at 24. According to Clark County's Department of Community Services, poverty in Clark County has risen sharply since our nation's economic downturn: "48,225 people, or 11.5% of the county's population, lived below the poverty level compared to 11% in 2000." <http://www.clark.wa.gov/news/news-release.asp?pkNewsSeq=2493>, Apr. 17, 2012.

Poverty among women and children has grown at an especially alarming rate:

A recently released report on poverty in Clark County reveals that female householders with no husband present and with children under age 18 rose an alarming 171 percent from 2000-2010. The number rose from 3,006 in 2000 to 8,132 in 2010.

For those female householders with no husband present living with no related children under 18, the rate rose 1,968 percent.

"The results are very disconcerting," said Vanessa Gaston, Director, Department of Community Services. "The rate of poverty, especially among women with children, continues to grow faster than the rate of population in Clark County. And it has big implications on our community and demand for services."

Id. Additionally, Clark County's poverty population is predominated by minorities: "[t]wenty seven percent of those identifying themselves as Hispanic were below the poverty limits followed by American Indian (23%), Alaska Native (23%), and Black/African American (22%). *Id.*; see also *Poverty in Clark County, April 2012, Clark County Department of Community Services Community Action Program*, at 14.

The most recent publicly available employment reports for Clark County show that our unemployment rate is at 9%. <https://fortress.wa.gov/esd/employmentdata/>. Projections for improvements to Clark County's economic condition are not especially promising over the short-term. As Scott Bailey, Regional Economist, Washington Employment Security Department observed:

Given all the challenges in the current economy—the phasing out of fiscal and monetary stimulus, the continued weakness in the housing market, the extended fragility of financial markets, the drag from cutbacks in state and local government spending and perhaps federal spending, **the odds of a recovery within even a five-year period are not good.** It is possible, perhaps even likely, that another recession would occur before recovery from this recession is complete. On the other hand, if population grew at a slower rate, then achieving a recovery could happen more quickly.

How long will it take for Clark County to recover?, Scott Bailey, Regional Economist,

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Washington Employment Security Department, Vancouver Office, 2011 (emphasis added).

Illustratively, a search of WorkSource's website reveals the availability of 45 entry level jobs and 51 part-time jobs in Clark County and immediate vicinity; Craigslist shows 55 jobs for today, and The Columbian at Monster.com shows 20 jobs, hardly enough to meet the needs of Clark County's job seekers.

Because of this extraordinarily high unemployment rate, employers can afford to be very selective in hiring employees, in turn making it difficult for job seekers with limited education, experience and transferrable skills to be competitive in the job market. As a result, unless the economic forecast makes a sudden and dramatic upswing, VHA's proposal likely will set many families up to fail. Some tenants, despite their best efforts, will not be able to grow their income in the short time allotted them under the initiative, leading to unnecessary evictions, increased homelessness and family instability, and perpetuation of deepening poverty in our community.

ii. Overcoming Employment Barriers: Bridging the Gap Between "Work-able" and "Employable" With Supportive Services.

VHA's initiative also fails to consider that a resident deemed *work-able* is not necessarily *employable*. The distinction between these terms makes a critical difference in accurately predicting the outcomes of the initiative. VHA's initiative neither acknowledges the numerous and varied barriers Section 8 residents face in obtaining employment or self-sufficiency nor offers methods to assist these residents overcome those barriers to meet the initiative's requirements. By VHA's apparent way of thinking, if it threatens residents with rent increases so high homelessness is all but certain, residents will simply get jobs.

Employment and self-sufficiency barriers include, but are not limited to:⁶

- lack of education (including basic literacy)
- lack of transferable skills
- lack of relevant employment history
- dental and/or medical care
- transportation
- affordable child care
- suspended driver's license
- criminal record
- age
- race
- Limited English Proficiency
- physical appearance (e.g., obesity, proper attire, and missing/decaying teeth)

We believe that what is needed to bridge the vast gap between *work-able* and *employable* is identification of employment or other self-sufficiency barriers, support services designed to

⁶ To be self-sufficient, a family must have income and assets. In other words, a family must have a safety net to weather a downfall resulting from sudden and/or unanticipated expenses or reduction in income.

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assist participants overcome those barriers, sufficient time to reach set goals, and affordable housing during the process. *See, e.g., Linking Human Services & Housing Assistance for Homeless Families & Families at Risk of Homelessness*, by Abt Associates Inc, Apr. 5, 2012; *The Self-Sufficiency Standard for Washington State 2011*, by Diana M. Pearce, PhD, Oct. 2011. Dr. Pearce aptly observed:

Most individuals cannot achieve self-sufficiency through stopgap measures or in a single step, but require transitional work supports and the removal of barriers and/or guidance to help meet monthly expenses as families work towards self-sufficiency over time.

Id., at Exec. Summ. (emphasis added).

Due to the well-established link between supportive services and employment/self-sufficiency attainment, some MTW Advisory Committee members asked VHA to incorporate into the initiative supportive services designed to assist residents meet the demands of the initiative. VHA steadfastly declined these requests, asserting that its role is to provide “affordable housing”, and that it is not “staffed or funded to assume the role of multi-disciplinary case managers.” Although we appreciate that VHA did agree to offer voluntary information sessions and referrals to DSHS for further assessment, we are not convinced these are enough to make the initiative feasible.

Interestingly, VHA’s Annual Plan commits VHA to “target[ing] resources” to meeting its statutory objective of encouraging self-sufficiency and to prioritizing “policies and procedures that will assist residents in achieving self-sufficiency, including developing asset building initiatives, *expanding resources* and programs that promote self-sufficiency...” *Annual Plan*, at 12 (emphasis added). Ironically, not only does VHA provide case management services in its Family Self-Sufficiency (FSS) program, it also recently sought and obtained funding for a Housing Works grant that will require VHA to dedicate resources to collaborating with Workforce Development Council on an endeavor linking housing assistance with intensive case management services to assist low-income individuals achieve self-sufficiency. If VHA did not believe that case management services were a vital component of a viable self-sufficiency initiative, it is surprising that it would have undertaken the Housing Works project.

What is more, VHA has an established Family Self-Sufficiency (FSS) program. Given this model’s apparent success, VHA should consider building upon it, not implementing an initiative that contains none of the elements that make the FSS program successful, namely, supportive services, financial incentives, and program and participant accountability towards agreed upon benchmarks.

And somewhat ironically, VHA staff will need to target resources to implementing and monitoring the initiative and its attendant hardship exemptions through reviewing and assessing residents’ spending habits and efforts to grow their income, devising a plan for residents to conform to the hardship panel’s judgment of the proper allocation of income to meet the resident’s and her family’s needs, appropriate efforts and timeframe for the

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resident to secure a higher income, etc. VHA's resources likely would be better targeted to providing up-front and on-going supportive services.

Alternatively, if VHA cannot provide supportive services, it should consider partnering with the experienced service providers who can (as it did for Housing Works).⁷ As we mentioned above, we do are not convinced that information sessions and referrals to DSHS for further assessment are enough to make the initiative feasible.

Finally, to our knowledge, VHA has not identified any models similar to its initiative that have proven successful in moving people to work and/or self-sufficiency. Certainly, our national Welfare to Work Reform effort, a large-scale, stick only approach with a premise similar to that of this initiative has not been successful. <http://www.cbpp.org/>. The percentage of women transitioning from welfare to employment has stagnated since the economic crisis. <http://www.cbpp.org/>

We therefore renew our request that VHA incorporate up-front and on-going supportive services into the initiative if it proceeds with it.

E. Expansion of Categorical Exemptions.

The initiative categorically exempts from participation residents who are elderly, disabled, dependents, or full-time caregivers of disabled household members. We believe that individuals who are currently employed, full-time students, participate in VHA's FSS program, or who receive TANF or unemployment benefits and are in compliance with respective agency requirements for maintaining those benefits should also be exempt.

Many impacted residents likely are already making strides to improve their economic status. For instance, a single mother on TANF, who is not otherwise exempt, must participate in jobs search requirements and classes (Work First) to keep receiving TANF benefits. Likewise, a resident who receives unemployment benefits must engage in job search activities to keep receiving unemployment benefits. We are perplexed to understand how residents' demonstrated compliance with these agencies' respective requirements does not sufficiently evidence "motivation" for VHA's purposes.

Oddly, in response to our request for expansion of exemptions, VHA makes the curious and improbable claim that TANF recipients who comply with WorkFirst requirements "can likely afford the rent resulting from minimum income and may possible [sic] even have significant excluded income from their work activities.

⁷ A "collective impact" model is worth serious consideration. According to an article in the *Stanford Social Innovation Review*, "collective impact initiatives involve a centralized infrastructure, a dedicated staff, and a structured process that leads to a common agenda, shared measurement, continuous communication, and mutually reinforcing activities among all participants." *Collective Impact: Stanford Social Innovation Review*, by John Kranier and Mark Kramer, 48, Winter 2011.

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VHA makes the equally curious claim that with one exception, families who join its FSS program to avoid a rent reform activity are “not motivated” and “accomplish little”. Email from R. Johnson, dated Sept. 8, 2012. Yet, at the initial meeting of the MTW Advisory Committee meeting, VHA’s FSS Coordinator indicated that ten of the twenty residents who joined the FSS program as a result of VHA’s UAP policy found employment – presumptively exhibiting both motivation and accomplishment.

All of this begs the question: how much, by VHA’s estimation, must a single mother who is compliant with her TANF WorkFirst requirements do to keep the roof over her and her children’s heads? Must she give up TANF benefits that provide medical coverage for her children, child care assistance, and the time to secure a job with a livable wage to accept a part-time, minimum wage job that offers no such benefits and will yield less actual income from which to pay rent and other expenses? Must she be excessively rent-burdened because she cannot find a job, having to borrow from friends, family, food banks, or other community service providers to make ends meet? And if excessively rent-burdened, how much of her income should be spent on housing - 50%, 70%, 90%? According to the initiative’s design, choosing one of these unfortunate and dead-end paths is precisely what this single mother must do, unless of course, she is fortunate enough to meet the subjective criteria for a hardship exemption.

In the Scenarios VHA provides re: potential impact on families with childcare expenses, VHA posits that even with imposition of imputed income, a family’s rent obligations will be low due to the income deduction it will receive for child care costs. *See Scenario 2*. The Scenario, however, ignores certain economic realities, namely, that the family must **pay** day care costs from **actual** income, and assumes that predictable, professional child care costs less than minimum wage. In the scenario, the family’s gross monthly income is \$391 and its child care expenses are \$350. Assuming, unrealistically, no tax obligation, the difference between gross income and child care expense leaves \$41 for rent, food, medical expenses, transportation, etc. Assuming tax deductions, the family’s net income is likely less than its child care expenses. Either way, the child care deduction would be meaningless, as it would be if the Scenario was based on a 20 hour minimum-wage income. If a single mother working 20 hours at minimum wage has to pay for 20 hours of day care at minimum wage, her resulting income is less than zero.

F. VHA’s Hardship Exemption Criteria and Procedure Need Further Development.

VHA acknowledges that one “potentially negative impact of this policy is that more households may lose their assistance through eviction for non-payment.” *Appendix I, Annual Plan*, at 33. The initiative’s sole guard against this probable outcome is its hardship component. VHA’s description of the hardship’s purpose and procedures leaves us with serious doubt as to the efficacy of this safeguard against either evictions or excessive rent-burdens. Given what is potentially at stake for tenants---excessive rent burden, eviction and long-term, if not permanent, loss of housing assistance---we cannot, nor should the Board, accept VHA’s explanation for not further developing this policy.

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We appreciate that based on our meetings and correspondence with you, you have clarified some of the practical terms and more fully illuminated your position regarding the general circumstances under which a resident may establish eligibility. Many questions remain, however, regarding the policy's structure and feasibility.

Particularly troubling, from a public policy standpoint, is VHA's steadfast refusal to adopt and publish more objective hardship exemption criteria.⁸ While we can appreciate VHA's desire for some latitude in assessing individual circumstances that may not be reflected in more fully developed definition of hardship, the vast latitude it has reserved for itself may result in arbitrary and inconsistent decisions.

Regarding the circumstances establishing a hardship, as we understand them, they are limited to those in which a household can demonstrate a financial impact "significant enough as to seriously jeopardize the household's housing." Email from R. Johnson, Sept. 8, 2012. In other words, a family must be "in danger of losing housing". *Id.* We believe this is too limited to form a true safety-net and should be expanded to include those situations where a tenant faces excessive rent-burden or can demonstrate reasonable efforts to grow its income, regardless of whether it is presently "in danger of losing housing".

VHA opines that the "determination of hardship is just a matter of arithmetic." Yet, in the next breath VHA makes clear that its hardship panel will review a family's income and expenses "*with some consideration of where [these families'] priorities should be.*" Email from R. Johnson, Sept. 8, 2012 (emphasis added). The hardship panel will, in essence, substitute its judgment and set of values for that of a given family's as to the appropriate allocation of that family's income to its needs. If, as VHA suggests, it is not the role of the housing authority to provide up-front supportive services, how is it any more the role of the housing authority to make such subjective and paternalistic assessments at the back-end?

Additionally, in our opinion, VHA has not furnished sufficient details regarding the hardship and appeals process to enable us to conclude that they sufficiently comport with residents' rights of due process. For example, VHA has not supplied a sample notice of resident's rights for our review. Nor has it supplied a firm timeline for giving advance notice to residents of both the implementation of the initiative in general, its application to them individually, etc. And although VHA has indicated that residents will be afforded a hearing with an independent hearing officer, VHA has not indicated that the imposition of the initiative will be stayed pending that hearing officer's final determination of a resident's challenge of an adverse decision on hardship eligibility or, in the case of established hardship, the scope and/or conditions thereof.

The following questions remain. What objective criteria will drive the decisions of the currently proposed hardship panel? What will drive the decisions of a successor hardship panel? What constitutes grounds for a temporary exemption? For a permanent exemption?

⁸ Development of well-established criteria should: 1) discharge VHA's duty of public accountability; 2) avoid confusion among applicants and decision-makers, including hearing officers handling appeals of hardship denials; and 3) safeguard against arbitrary and/or discriminatory decisions.

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What will guide a decision maker's determination of what "actions [tenants must] take to address their stated goals"? Will these "actions" be based on measures proven to assist low-income individuals achieve self-sufficiency? Will the imposition of the initiative be stayed pending an appeal of an adverse hardship exemption decision? Will both initial hardship exemption decisions and appeals be made in a timely manner so as to avoid eviction or utility shut-off?

For these reasons, we ask that VHA revise its hardship policy to address the concerns described above and to resubmit it to the public for review and comment.

III. VHA Should Not Embark on Another MTW Initiative Without First Demonstrating the Results of its Prior MTW Initiatives and Committing to Rigorously Evaluating Initiative Outcomes.

A. VHA has Not Demonstrated the Success of Prior "Self-sufficiency" Initiatives.

Before embarking on another MTW initiative, VHA should first demonstrate whether its previous ostensibly self-sufficiency initiatives have been successful. In recent years, using its MTW authority, VHA has implemented a number of initiatives purporting to encourage self-sufficiency. Many of these initiatives have come at a significant cost to program participants. To our knowledge, VHA has not adequately tracked or evaluated the results of those initiatives.

During recent MTW Advisory Committee meetings, several Committee members asked VHA about the success and/or failure of its prior self-sufficiency initiatives, including mandatory community service requirements for Voucher participants and elimination of Utility Allowance Payments (UAP) after six months. VHA management provided only anecdotal data regarding the results of the former initiative and expressly stated that it has not tracked the individual results of its UAP initiative.⁹ How can VHA, HUD, residents and community stakeholders gauge the potential success of this initiative without knowing the outcomes of initiatives similarly designed and previously attempted? And if VHA is not equipped to track the outcomes of 60 UAP participants, how will it adequately track the outcomes of a large-scale rent reform initiative?

As for the UAP initiative, as best as we can gather, since the inception of the UAP initiative, roughly 60 households have lost their UAP payments. Of these, 20 families joined VHA's FSS program; of these, only 10 families have found employment. Other than these figures, VHA has no reliable data to suggest that the elimination of UAP payments (after six months) resulted in an increase in self-sufficiency.

VHA's total explanation of the UAP initiative's outcomes in fiscal year 2011 is: "This activity is now fully implemented and the majority of tenants and participants who previously received a payment are no longer receiving one." *MTW Annual Plan, FY 2012*,

⁹ VHA's reports of the outcomes of similar initiatives, such as its Simplified Utility Allowance Schedule and Skyline Crest Campus of Learners, suffer from the same lack of vital, empirical detail.

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at 20. Expressed outcomes for fiscal year 2012 are: “This activity is ongoing. This activity may be modified or eliminated in 2013 if the minimum income rent reform is implemented as that will eliminate most UAP except in hardship cases.” *MTW Annual Plan, FY 2013*, at 23.

In our estimation, these observations are poor substitutes for empirical data upon which to base a decision regarding continuation or cessation of an initiative or its utility as a hallmark for subsequent initiatives. Ideally, VHA should track what percentage of participants found jobs, length of job search, sustainability of employment, and any resulting changes in household income and assets.

This is especially true here as the purported premise of the proposed initiative mirrors that of the UAP initiative and, as previously discussed, Welfare Reform. Given the lack of evidence establishing either of these initiatives as an overwhelming success, we doubt that the outcomes of this initiative will be any different.

B. Lack of Rigorous Evaluation Design.

To our chagrin, VHA has again chosen not to design its MTW initiative in a way that allows for rigorous and evidence-based testing of its impact on participants and our community, and its potential for replication elsewhere. Any new MTW initiative must be designed, implemented, and funded in such a manner that an evaluation can be conducted utilizing the highest of professional standards. See, *The Importance of Integrating Rigorous Research Objectives into any Reauthorization of the “Moving to Work” Demonstration*, by Jeffrey Lubell and Jon Baron (March 2, 2007), http://www.nhc.org/pdf/pub_chp_mtw_0307.pdf.

To generate results that could be used for truly evidence-based policymaking, VHA should use a randomized controlled trial. See, *Subsidized Housing and Employment: Building Evidence About What Works to Improve Self-Sufficiency*, by James A. Riccio, Joint Center for Housing Studies, Harvard University (March 2007) which can be found at: http://www.jchs.harvard.edu/publications/rental/revisiting_rental_symposium/papers/rr07-6_riccio.pdf.

VHA’s proposed metrics and data collection inappropriately exclude changes in rent-burdens, numbers of temporary and permanent hardship exemptions, numbers of hardship denials, number of evictions for non-payment of utilities, number of Voucher turn-downs, and numbers of women, children, and peoples of color impacted by the initiative. VHA should revise its proposed evaluation to include these metrics.

IV. Conclusion

VHA’s proposal fails to demonstrate that a forced rent increase in a stagnant economy, bristling with high unemployment, stiff competition among job seekers, and burgeoning poverty among women and children, without attendant supportive services designed to marshal low-income families to their ultimate goals while providing an adequate, transitional safety-net, translates into a meaningful incentive to grow one’s income and

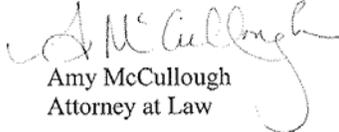
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ultimately move off housing assistance.

For the foregoing reasons, we urge VHA to withdraw, and its Board to not approve, the Rent Reform Initiative. Given the lack of urgency requiring immediate implementation of the initiative and the real and detrimental consequences attendant to its implementation, we ask that VHA continue working with the RAB and MTW Advisory Committee over the coming months to develop a plan more likely to be successful. At a minimum, the Board should not approve the initiative unless VHA incorporates the changes described herein and resubmits the initiative for review and comment.

If you have any questions or wish to discuss these concerns further, please do not hesitate to contact us. Thank you in advance for considering our comments.

Sincerely,


Amy McCullough
Attorney at Law



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
5411 E. Mill Plain Blvd, Building 1- Vancouver, Washington 98661

September 12, 2012

To whom it may concern:

I am writing to express my support for the Move To Work rent reform plan submitted by the Vancouver Housing Authority. I have been a member of the MTW Advisory Committee for several years and I believe that the current plan is the best proposal that I have seen. Considerable work and discussion including many compromises, have resulted in a fair and balanced proposal to move to a more equitable and responsible system.

I work with low income clients everyday in my position as Social Services Supervisor for the Washington Department of Social and Health Services. In my role I work with TANF families and disabled or incapacitated adults without children. Indeed, housing is a huge concern for those individuals, but when there is no incentive (positive or negative) to move forward, a change is needed.

The proposal includes a fair and reasonable plan and system for support and transition to independent housing. In addition the proposal includes some potential for intensive case management for those individuals transitioning off of subsidy. Overall the plan addresses or has contingencies for most if not all potential concerns. Those inclusions enhance my reasons for supporting it.

Consideration needs to be fully given to those in need who are not in housing too, not just those that were fortunate enough to be enrolled. This plan establishes a much more equitable base system for addressing the fact that demand far exceeds availability.

As a provider of social services in Clark County, I strongly support the MTW plan submitted by the Vancouver Housing Authority as a part of the rent reform process.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirby Juola".

Kirby Juola MBA MSW

Social Services Supervisor

Washington State Department of Social and Health Services

Appendix D. Advisory Committees

Resident Advisory Board

| | | |
|---------------------|-----------------------|------------------------------------|
| Cecelia Towner | Chair | Housing Choice Voucher Participant |
| Stacey Paggett | Vice Chair | Housing Choice Voucher Participant |
| Michael Fred Yancey | Secretary-Treasurer | Housing Choice Voucher Participant |
| Claudia Carter | | Housing Choice Voucher Participant |
| Julie Ensign | | Public Housing Resident |
| Barbarita Gately | | Housing Choice Voucher Participant |
| John Glenn | | Public Housing Resident |
| Joy Howard | | Housing Choice Voucher Participant |
| Denise Isaacs | | Housing Choice Voucher Participant |
| Maudie Jordan | Resident Commissioner | Housing Choice Voucher Participant |
| Marilyn Kincaid | | Housing Choice Voucher Participant |
| Chris Pazen | | Public Housing Resident |
| Billie Reed | | Housing Choice Voucher Participant |
| Trisha Rice | | Housing Choice Voucher Participant |

Moving to Work Advisory Committee

| | |
|-----------------|--|
| Pam Brokaw | SW Washington Partners in Careers |
| Debby Dover | Second Step Housing |
| Karen Evans | Clark County |
| Kevin Gillette | Community Housing Resource Center |
| Kirby Juhola | Washington State Dept. of Social and Health Services |
| Amy McCullough | Northwest Justice Project |
| Bridget McLeman | Children's Home Society of Washington |
| Klaus Micheel | Washington State Dept. of Social and Health Services |
| Pete Munroe | Clark County |
| Greg Provenzano | Columbia Legal Services |
| Amy Reynolds | Share |
| Trisha Rice | VHA Participant |
| Peggy Sheehan | City of Vancouver |
| Andy Silver | Council for the Homeless |
| Rebecca Timmons | Clark College |
| Cecelia Towner | VHA Participant |