

5-Year PHA Plan, MTW Supplement, and Capital Fund Program 5-Year Action Plan











July 1, 2025 - June 30, 2026 *PUBLIC REVIEW DRAFT*



Public Comment Period

February 7, 2025, through March 24, 2025

Public Hearing:

Everett Housing Authority's Board of Commissioners will conduct a public hearing at noon on Monday, March 24, 2025. Information about joining the hearing will be posted to the Housing Authority's website (www.evha.org) by March 14.

To request interpretation and/or disability accommodation, contact Heather Stults at (425) 303-1124 or <u>heathers@evha.org</u> by March 14, 2025.

How to Provide Public Comment:

Phone: (4	425) 303-1182 or (425) 339-1006, TTY 711
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- Email: <u>sumonh@evha.org</u> or <u>mtw@evha.org</u>
- Mail: Everett Housing Authority P.O. Box 1547 Everett, WA 98206-1547

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5-Year PHA Plan
(for All PHAs)U.S. Department of Housing and Urban Development
Office of Public and Indian HousingOMB No. 2577-0226
Expires 09/30/2027

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

А.	PHA Information.					
A.1	PHA Name: Housing Authority of the City of Everett PHA Code: WA006 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025 The Five-Year Period of the Plan (i.e., 2019-2023): 2025-2029 Plan Submission Type 5-Year Plan Submission Revised 5-Year Plan Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and the main office or central office of the PHA. PHA sa re strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. How the public can access this PHA Plan: EHA's PHA Plan can be accessed on the agency website at www.evha.org, by contacting Su Mon Han at sumonh@evha.org or by calling 425-303-1182, or by coming to the EHA administrative office at 3107 Colby Avenue, Everett, WA 98201, on Tuesdays, Wednesdays, or Thursdays between 9-12 or 1-3.					
	PHA Consortia: (Check box if su		HA Plan and complete table below.)			
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in PH	Each Program HCV
В.	Plan Elements. Required fo	r all PHAs co	mpleting this form.			
B.1	next five years.	in September 20	20, is: "The Everett Housing Auth	and extremely low- income families in and extremely low- income families in a second state in the second state in the second state is a second state is a second state is a second state in the second state is a second state is a second state in the second state in the second state is a second state in the second state in th	·	
B.2	extremely low-income families for th 1. Create 1,500 EHA-owned or -su where children and adults flourish	ne next five years. pported housing 3. Foster a work	units by 2030 2. Direct our resour place where every employee is pro	le the PHA to serve the needs of low- ces towards creating diverse, health bud of their contribution to EHA's n ams or their potential within the org	y communities o hission 4. An ind	f opportunity
B.3	During the prior 5-year period, EF	IA has made sigr	nificant progress toward accomplis	and objectives described in the previo shing the goals in its 10-year strategi ion of the goals and progress is attac	c plan, the goals	of which were
B.4	Violence Against Women Act (VAW serve the needs of child and adult vio			tivities objectives, policies, or program	ns that will enabl	e the PHA to

HUD-50075-5YR

	Pursuant to the requirements of the Violence Against Women Reauthorization Act of 2022 or successor laws, Everett Housing Authority (EHA) will remain attentive to the needs of applicants, program participants, and their respective family members who are victimized by all forms of domestic violence, including stalking and dating violence. The Section 8 Housing Choice Voucher and Project-Based Voucher programs have enacted policies that protect the rights of both applicants and participants affected by domestic violence. When it can be shown that criminal activity or lease violations are related to domestic violence perpetrated against victims and their families, such individuals will not be disqualified for admission or have their assistance terminated. EHA refers victims of domestic violence to appropriate legal and social service agencies, including but not limited to: the police department, the court system (for restraining orders), Northwest Justice Project (offers legal aid for low income individuals), Domestic Violence Services of Snohomish County, Pathways for Women. EHA operates Pivotal Point Apartments, a 20-unit Project-Based Voucher development for victims of domestic violence, in partnership with DVS of Snohomish County
C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. A significant amendment or modification to the 5-Year Plan is any addition to or deletion of EHA's Five Year Goals and Objectives.
C.2	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the 5-Year PHA Plan? Y N ✓ (b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations
С.3	Certification by State or Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Required Submission for HUD FO Review. (a) Did the public challenge any elements of the Plan? Y N Y N (b) If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.) Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Form identification: WA006-Housing Authority of the City of Everett form HUD-50075-5Y (Form ID - 2295) printed by Janinna Attick in HUD Secure Systems/Public Housing Portal at 01/27/2025 05:45PM EST

Progress Meeting Previous 5-Year Plan Goals and Objectives

2020-2024

Goal 1: Create 1,500 EHA-owned or supported housing units by 2030 primarily through new development.

Objectives	Progress
 Implement highly innovative and increasingly cost-effective development strategies. These may include: Nontraditional development models, for example, designbuild versus design-bid-build; Energy-efficient and sustainable modular housing; Innovative building materials such as cross-laminated timber (CLT). 	In March 2022, EHA completed the acquisition of the 381-unit Huntington Park Apartments, which is located in an amenity- rich neighborhood with access to transit, services, and jobs. In April 2023, EHA completed conversions of 9 HUD Section 202 for the Elderly properties to Project-Based Voucher assistance via the Rental Assistance Demonstration (RAD), ensuring the long-term viability of these properties.
 EHA's development activities will generate increased annual net cash flow to support EHA's mission through: Maximizing income from developer fees; Generating net cash flow from operations of new properties; Creating a sustainable pipeline of tax credit syndications and re-syndications; Continuing existing and pursue additional strategic dispositions to increase affordable housing stock. EHA's development activities will address the effects of institutional racism by championing diversity, equity and inclusion. These activities will include: Developing housing primarily in communities of opportunity, especially those where subsidized housing has been excluded; 	 EHA has initiated multiple development projects during the prior 5-year period: Master planning for the Park District project on the site of the former Baker Heights development. When a proposed plan to sell the property to Washington State University did not move forward, EHA pivoted to a plan to redevelop the site with up to 1,500 units. Site acquisition of three parcels on Rucker Avenue, and design work, for development of the future Ben Young Senior Housing, which will include a portion of units subsidized with project-based vouchers. Site acquisition of a parcel in South Everett, in partnership with the Sno-Isle Libraries, for construction of a future

•	Investing in neighborhoods where housing has deteriorated	library/community space combined with affordable housing
	due to market forces and public policy;	(Mariner Community Campus)
•	Significantly increasing housing for families with children;	
٠	Engaging with all neighborhoods to advocate for acceptance	In addition, EHA completed construction and lease-up of the
	of multifamily nonmarket housing to address our	105-unit Madrona Square Apartments, the first phase of
	communities' needs.	redevelopment on the former Baker Heights property. 67 of
		the units receive project-based voucher assistance and are
EHA's development activities will target populations whose		targeted to serving families with children in Everett Public
needs have either been neglected or will grow substantially in		Schools experiencing homelessness.
the next decade. These will include, but not be limited to:		
•	Households with children, especially homeless families;	
•	Elderly households and individuals.	

Goal 2: Direct our resources towards creating diverse, healthy communities of opportunity where children and adults flourish.

Objective	Progress
Transform existing properties into communities of opportunity.	During the five-year period, EHA continued to provide high-
Use community health survey data and other sources of	quality service coordination to residents of all EHA properties.
community and resident input to identify priority needs for	
individual communities—families with children, elderly,	EHA created a Housing Locator position, which provides
mixed populations.	navigation and lease-up assistance to voucher households.
 Align existing staff and other resources with programs and 	
strategies that address identified priorities.	In Fiscal Year 2024-2025, EHA implemented Small Area Fair
• Expand the Family Self-Sufficiency Program (FSS) and related	Market Rent-based payment standards for the Housing Choice
self-sufficiency programs to increase participant income-	Voucher program, which over time will enable families to
earning potential and asset building.	afford units in communities of higher opportunity.
Leverage EHA resources to substantially increase access to	
existing and future opportunities available in the community	In Fiscal Year 2024-2025, EHA authorized the use of Housing
	Choice Voucher Administrative fees to assist clients with

(e.g., Everett Community College and new Washington State University campus).

Significantly increase access to communities of opportunity through the Housing Choice Voucher Program.

- Identify residential areas with low poverty, good public schools, and access to transportation, employment opportunities, and other amenities where families with children can flourish.
- Explore and implement alternative payment standards to increase access to such "communities of opportunity."
- Pursue resources like the Mobility Demonstration funded by Congress in 2019 and 2020 budgets to fund activities under this objective.
- Direct resources to assist voucher holders with their housing choices, for example, housing search assistance.
- Use potential flexibilities through the Moving to Work Demonstration Program (or other demonstration opportunities) and/or waivers to design programs and policies that align with this objective.

Develop new housing opportunities primarily in communities of opportunity (See Strategic Objective #1).

deposit assistance, utility deposit assistance, holding fees, and for owner incentive and/or retention payments, which will assist our families with leasing units that may better suit their needs.

Goal 3: A workplace where every employee is proud of their contribution to EHA's mission.

Objective	Progress
EHA will create a culture of inclusion by maximizing the use of	In 2021, EHA was admitted to the Moving to Work (MTW)
staff ideas and talents to pursue this objective and EHA's	demonstration as part of the cohort studying Tiered Rents. In
mission as a whole, by:	addition to the cohort-specific rent policy, as an MTW agency,
 Using qualitative and quantitative means (e.g., Staff Advisory Group, focus groups, surveys) to gather staff input in developing EHA's plans and initiatives related to this objective; Tailoring extent of staff outreach to the type and significance of impacts of policy, plan or program changes; Ensuring that all staff who volunteer their thoughts and ideas represent a maximum of diversity—race, gender, orientation, and so on. 	 EHA has the ability to implement other waivers. In May 2024, numerous EHA staff participated in Supervision and Management training offered by a third-party trainer. EHA conducts an annual Employee Engagement and Satisfaction Survey. Results are used by the Executive Director and leadership team to identify areas for increased focus and training.
 EHA will create a culture where all staff personally and corporately embrace excellence, by: Establishing stretch goals and high standards for individuals, teams, departments and agency-wide; Acknowledging and rewarding organizational, team and personal achievement; Continuing high performer status under HUD assessment programs; Continuous improvement in operations outcomes; Local, state and national recognition for agency achievement; Pursuing access to achievement-based demonstration programs, e.g., Moving to Work Demonstration. 	EHA's annual budget includes budgeted amounts for each department to provide ongoing training and development to employees. In 2024, EHA conducted a compensation study, which was used as the basis for implementing a new compensation structure, which will increase competitiveness of EHA positions in the market, as well as increase the predictability of salaries for existing EHA staff. EHA regularly creates staff work groups for review and implementation of policy and procedure updates, to ensure staff consultation in planning processes, as well as providing leadership opportunities, building cross-department relationships, and identifying areas for increased efficiency in
EHA will establish a culture of appreciation by:	agency operations.

- Ensuring that all staff and teams have clearly defined goals and objectives and the means to monitor progress towards those goals and objectives;
- Regularly recognizing the achievement of individual and team accomplishments through a variety of means and media;
- Developing a consistent performance evaluation process that is used as the basis for compensation adjustments.

EHA will foster a culture of growth through opportunities for staff development.

- All supervisors are committed to the career growth of every assigned staff.
- All employees have opportunities for training and education to enhance their opportunities for advancement whether with EHA or not.

Goal 4: The race—as well as other physical or social or characteristics or sexual orientation—of any client or staff will have no impact on how they fare in EHA's programs or their potential in the organization.

Objective	Progress		
EHA will effect agency-wide culture shift that normalizes and	EHA operationalized multiple improvements that further DEI		
prioritizes DEI as an organizational imperative.	and racial equity, including:		
 EHA's senior leadership will be responsible for guiding this culture shift. Their actions and behavior will demonstrate a personal dedication to diversity, equity and inclusion. 	 Requiring that all hiring panels include at least one person of color, and that all interviews include at least one question about DEI Increasing the number of languages that surveys and outreach materials are translated into, to ensure that 		

- Commitment to **ongoing growth in DEI knowledge** through self-study and other internal and external opportunities.
- They will hold themselves, each other and assigned staff **accountable** for behavior that demonstrates practices of diversity, equity and inclusion.
- All staff will demonstrate understanding of EHA's mission to undo institutional racism.
 - Staff will embody a sense of welcome and inclusion for colleagues and residents regardless of differences in physical/social/sexual orientation.
 - Staff will attend all required DEI training workshops and put learning outcomes into practice within agency work.
- Staff will hold each other accountable for behavior that demonstrated practices of diversity, equity, and inclusion.

DEI will provide the conceptual lens for all EHA program and policy development and implementation.

- Regularly updated demographic and other DEI-related data will drive the development of programs, policies and procedures.
- Human resources programs and policies will be implemented to create and sustain a racially inclusive organization.
- All operational programs and policies will be examined and become consistent with the characteristics of such an organization.

limited English proficiency households have full access to communications from EHA

- Implementing new tools for usage and tracking of language resources, to ensure all staff are aware of and able to access translation and interpretation resources
- Offering leadership-specific and agencywide DEI and racial equity training opportunities to staff on a regular basis.
- In June 2024, EHA implemented several changes to improve the agency's in-person services for participants and the public. These changes include:
 - o Expanded open hours/days
 - Hiring bilingual staff
 - Installing a new, user-friendly kiosk in its public lobby for participants without easy access to these resources could use them without charge
 - EHA additionally added staff in a new Customer Serviceoriented position that expanded voucher participants' access to in-person help with their housing authority paperwork, even without a prior appointment.

Develop and nurture community and national networks and relationships to advance diversity, equity and inclusion at all levels.

- Participate in local neighborhood associations and councils to build local relationships and counteract NIMBYism.
- Partner with and/or joining key organizations such as NAHRO, GARE, C3, and Leadership Snohomish, to amplify and enhance DEI effectiveness.
- Consult with and learn from local cultural affinity organizations about the diverse needs of Snohomish County and to ensure equity in program development and implementation.

Resident Advisory Board Meeting 5-Year PHA Plan, MTW Supplement, and Capital Fund 5-Year Action Plan January 15, 2025

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Wednesday, January 15, 2025, to receive comments and recommendations related to the development of the 2025-2029 5-Year Public Housing Agency Plan, 2025-2026 MTW Supplement, and Capital Fund 5-Year Action Plan. This meeting took place at the main administrative office (3107 Colby) and via Zoom videoconference. Residents and program participants who attended this meeting were appointed to the RAB.

EHA Staff Attending:

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Anna Todd	Deputy Director of Rental Assistance
Kristen Cane	Director of Asset Management
Su Mon Han	Policy Manag <mark>er</mark>
Heather Stults	Communications & Engagement Manager
Linda Baines	Interim Director of Housing Management
Steve Yago	Deputy Director of Development

RAB Members in Attendance:

Maureen Maland (Broadway Plaza – PBV) Joan Oxentenko (Broadway Plaza – PBV) Teresia Kios (Madrona Square – PBV) Altheana Enjene (Madrona Square – PBV)

EHA staff members gave a presentation on the agency's planned activities to further its Five-Year Goals and Objectives over the course of the 2025-29 PHA Plan period. This included a presentation of the results of a survey conducted in December 2024 asking program participants, EHA staff members, and other stakeholders in the community what they felt were the greatest housing-related needs and challenges facing the local area. EHA staff also explained EHA's status as a Moving to Work ("MTW") agency and explained the status of previously proposed MTW waivers submitted to HUD, and concluded by announcing no new MTW waivers were being proposed by EHA this year. Finally, EHA staff described the plan for the Capital Fund program funding that EHA continues to receive.

RAB members provided comments during and after this presentation. The RAB's comments and EHA's preliminary response specific to each are provided in the section below.

EHA will include this preliminary response to the RAB's comments, and other public comments received during the public review period, for EHA's Board of Commissioners to consider at the March 24, 2025, public hearing on the Annual Plan and MTW Supplement. The Board may amend or revise one or more of these preliminary responses prior to adopting the Plan at the conclusion of the March 24th public hearing.

RAB Comments/EHA's Response:

1. A RAB member asked how EHA could make our communities healthier by preventing rampant drug use from overtaking apartment communities, such as the one she resided in (Broadway Plaza).

The drug epidemic has become widespread, reaching into every corner of our county and most multi-family residences. Unfortunately, this is a wider problem whose root extends beyond the purview of a housing authority's area of influence. However, to address the daily safety and comfort of residential buildings owned by EHA as well as others, landlords are able to enforce penalties for lease-breaking activities such as drug-taking on their premises.

Now that the eviction moratoriums from the COVID era have lifted, EHA expects landlords' ability and responsiveness regarding drug-related lease violations to increase, making for cleaner and safer residential communities.

2. A RAB member asked why some apartment complexes advertised as "affordable" are charging monthly rents much higher than her entire monthly income.

Even though the rental prices charged at some affordable properties are too high for all income levels of households to afford, their prices are lower than the current market rents in our community and across many places in the United States. These properties partner with EHA to access the Low-Income Housing Tax Credit provided by the federal government to incentivize private developers to reserve a certain percentage of their market rate rental units for households below a certain income level, and charge a commensurate, slightly lower rental price.

Unfortunately, affordable properties whose rents are subsidized in this manner are not targeted toward being affordable to all income levels, aiming instead toward households who are working steadily but may not receive a high income. Many developers of affordable housing in the state use this tax credit and cater to households in this tier of income. In most cases at properties like these, additional housing subsidy—such as a Section 8 voucher—would be the only way to make the rental prices on their affordable units truly affordable to everyone in the community.

One of the core issues causing the currently high fair market rental prices is a result of persistent under-production of housing stock in the state and across the United States over decades, resulting in triple the demand versus the current housing supply. EHA believes that increasing the overall supply of housing—especially over the long term—will eventually help address the affordability issue, but the current supply-demand gap is a major obstacle.

3. A RAB member asked about how voucher systems (such as Section 8) fit into making rental units more affordable, particularly for individuals working full-time but still unable to afford market-rate rents.

Rental assistance, including the Section 8 voucher program, was conceived as a federally funded fail-safe aid for those in our communities who were unable—due to disability or advanced age, or due to temporary economic hardship—to achieve an income level commensurate with the local fair market rent levels.

As the rental market has outstripped incomes, programs like Section 8 are essential in bridging the gap between current income levels and rent levels in our community. Many participants who are employed—including many who are employed full-time—still need assistance to afford rental housing, because of the high market rents in Snohomish County. Rental assistance such as Section 8 vouchers as well as tax-credit-funded affordable units make housing more affordable by subsidizing part of the rent, allowing low-income tenants to live in units and communities that might otherwise be out of reach for them. However, we recognize that the number of vouchers available is far below the demonstrated level of need in our community.

4. At EHA staff's request for opinions regarding how to shape agency policy regarding which households on the voucher program would be terminated first in the circumstance of inadequate government funding for all participants presently on our program, a RAB participant stated that she would prefer that such a situation should never come to pass, as the decision is too heart-rending to consider.

EHA currently has a policy in place that defines which households currently participating in its voucher program would be exempt from terminations due to a lack of funding to cover all current program participants. However, a need has arisen to formalize policy which defines which families would be terminated first in those circumstances.

Though the decision has not yet been made, one potential option is to prioritize non-elderly, nondisabled households that have been on the program the longest to be first to lose assistance in the event of inadequate funding.

PHA Name : Everett

PHA Code : WA006 MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2025 PHA Program Type: Combined MTW Cohort Number: Stepped and Tiered Rent MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

EHA was admitted to the federal Moving to Work (MTW) Demonstration in August 2021, as part of the Stepped and Tiered Rent Cohort. EHA calls its local MTW program "Making Things Work." Since joining the demonstration, EHA has focused on using its MTW flexibility to support three broad local initiatives that are in alignment with the three MTW statutory objectives as well as the agency's 10-Year Strategic Plan:

- A streamlining and cost savings initiative

- A resident success initiative, focused on increasing employment, earned income, and self sufficiency (including the Tiered Rent demonstration)

- A housing choice and mobility initiative

EHA will design and test activities to further these local initiatives over the course of its 20-year term of participation in the MTW demonstration. Proposed changes to policy and program administration, including requests for waivers, that will facilitate MTW demonstration activities will be described in successive MTW Supplements to the PHA 5-Year and Annual Plan.

For the upcoming fiscal year, EHA does not plan to request any additional MTW waivers. Instead, EHA will focus on implementation of existing waivers not yet implemented, and evaluation of waivers that are already being implemented, to determine if any improvements can be made or if additional waivers will be needed in future years to maximize the benefits of these waivers.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies		
b. Tiered Rent (HCV)	Currently Implementing	
s. Elimination of Deduction(s) (HCV)	Currently Implementing	
u. Standard Deductions (HCV)	Currently Implementing	
2. Payment Standards and Rent Reasonableness		
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing	
3. Reexaminations		
b. Alternative Reexamination Schedule for Households	Currently Implementing	
(HCV)	, , , , , , , , , , , , , , , , , , ,	
d. Self-Certification of Assets (HCV)	Currently Implementing	
4. Landlord Leasing Incentives		
5. Housing Quality Standards (HQS)		
c. Third-Party Requirement (HCV)	Currently Implementing	
d. Alternative Inspection Schedule (HCV)	Currently Implementing	
6. Short-Term Assistance		
7. Term-Limited Assistance		
8. Increase Elderly Age (PH & HCV)		
9. Project-Based Voucher Program Flexibilities		
d. Alternative PBV Selection Process (HCV)	Currently Implementing	
h. Limit Portability for PBV Units (HCV)	Currently Implementing	
10. Family Self-Sufficiency Program with MTW Flexibility		
11. MTW Self-Sufficiency Program		
a.HCV Alternative Family Selection Procedures (HCV)	Currently Implementing	
b.HCV Policies for Addressing Increases in Family Income	Currently Implementing	
(HCV)		
12. Work Requirement		
13. Use of Public Housing as an Incentive for Economic Progress (PH)		
14. Moving on Policy		
15. Acquisition without Prior HUD Approval (PH)		
16. Deconcentration of Poverty in Public Housing Policy (PH)		
17. Local, Non-Traditional Activities		
b. Service Provision	Currently Implementing	
c. Housing Development Programs	Currently Implementing	

C. MTW Activities Plan that Everett Plans to Implement in the Submission Year or Is Currently Implementing

1.b. - Tiered Rent (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

As part of the cohort-specific Rent Reform study, EHA is comparing a tiered rent policy to the traditional rent policy. Qualifying families were randomly selected to either pay under the current or tiered rent policy. Under the tiered rent policy, families pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family is based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the

prior 12-month period for existing households, and based on current income for newly-admitted households.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Decreased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are

not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a

mixed citizenship status family.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a

mixed citizenship status family.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Study enrollment began in May 2024 and was completed in April 2024. Approximately 950 families were enrolled in the

study.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.

Please describe how the income bands are structured

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier

(representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

Please upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

1.s. - Elimination of Deduction(s) (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

As part of the Tiered Rent study, families who are selected to pay rent under the tiered rent policy will have their rent calculated using gross income from the prior 12 months (except that new admissions to the program will have their rent

calculated using current gross income).

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently

participating in the Family Self-Sufficiency Program, or a mixed citizenship status family.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a

mixed citizenship status family.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Study enrollment began in January 2023 for households with annual reexamination dates starting in May 2023, as well as

new admissions starting May 2023. Enrollment was completed in April 2024 and no additional families will be enrolled.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs; Other (please explain)

Other (please explain)

All deductions, including the dependent allowance and deduction for unreimbursed childcare costs, will be eliminated for

families who are part of the tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the

demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these

deductions will be able to request a hardship adjustment to their rent calculation.

1.u. - Standard Deductions (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

EHA will replace the medical/disability expense deduction threshold that is increasing to 10 percent of annual income under the Housing Opportunities Through Modernization Act (HOTMA) with a medical/disability expense deduction that has a threshold of 5 percent. "Medical/disability expense deductions" refer to unreimbursed health and medical care expenses and unreimbursed reasonable attendant care and auxiliary apparatus expenses as defined at 24 CFR 5.603. EHA is not proposing any modifications to the standard definition of expenses.

This activity will not apply to households who are subject to the tiered rent calculation as those households are not eligible for deductions.

EHA aims to achieve greater cost effectiveness with this waiver by applying a single threshold amount to all eligible households, which can be applied to both new admissions and current households. Households will be aware of their threshold amount and will not need to track phase-in periods to a higher threshold or have other changes made to their threshold amount. The activity will also encourage participant self-sufficiency as it allows households to retain more of their income for their needs, which they are best positioned to determine. EHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of EHA's overall rent reform initiative, this activity will contribute to a reduction in EHA staff

time spent on the certification process.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The MTW activity applies to voucher units occupied by households who qualify for the medical/disability expense

deduction.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

EHA received HUD approval for the waiver in January 2025 and plans to begin implementation during FY 2025-26 or when

HOTMA is fully implemented.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

How much will the single standard deduction be in the Fiscal Year?

\$

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

EHA is in a jurisdiction that is required to implement Small Area Fair Market Rent (SAFMR)-based payment standards. EHA has implemented SAFMR-based payment standards by creating three tiers of payment standards with zip codes grouped within these tiers. In connection with EHA's strategic plan objective to increase access to communities of opportunity, and with the MTW statutory goal of housing choice, EHA obtained this waiver to provide additional flexibility in grouping zip codes within payment standard tiers to ensure that zip codes with higher opportunity are affordable to tenant-based voucher participants. Under this waiver, EHA has the flexibility to designate zip codes within

payment standards between 80% to 150% of the applicable SAFMR.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver was approved during FY 2024-2025 and EHA is in the process of implementing.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Provided Already

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

EHA has implemented three tiers of payment standards. This waiver provides EHA with the flexibility to group zip codes within tiers as long as the applicable payment standard for that zip code is between 80% and 150% of the applicable

SAFMR.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

EHA is using its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based or tenant-based vouchers. EHA previously had a third party determine rent reasonableness on EHA units, despite the fact that many of these units are subject to rent restrictions due to other funding sources such as RAD PBV rent restrictions. EHA incurs cost and additional staff time to have these determinations done by a third party. This waiver is part of the overall goal to use MTW flexibility to streamline and reduce

costs.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

PBV-assisted units owned or controlled by EHA.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver has been fully implemented.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

EHA's reasonable process includes using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations are performed by an EHA staff person who is trained on PBV rent reasonableness regulations. EHA will implement a streamlined process for units where the requested rent is demonstrably below market because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has

HUD approval to use another local housing authority and a contracted inspector for inspections of EHA-owned units).

No document is attached.

Please explain or upload a description of the rent reasonableness determination method. EHA uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates at least 3 unassisted rent comparables for the subject unit, matching the unit characteristics and making adjustments based on unit-specific factors, similar to the approach used by property appraisers, and determines if the rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about rent reasonableness regulations reviews the comparables to confirm that they are

comparable to the subject unit.

No document is attached.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

EHA has received approval for three separate waivers implementing modifications to reexaminations, all of which contribute to EHA's efforts to streamline the reexamination process for staff and participants.

In FY22, EHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

In FY23, EHA received approval for the Simple Rent initiative, to implement triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled, and the household has at least 90% of their income from fixed sources.

In FY24, EHA received approval for the Streamlining Interim Reviews waiver. Under this waiver, EHA will not process interim reviews for any increases in earned and unearned income, including those that exceed a 10% increase in adjusted income, or such other amount as established by HUD through notice. EHA will incorporate income for any newly added family members regardless of the amount at the time the new member(s) are added to the household. This waiver applies to all household types, in the HCV and PBV programs, except those under the Tiered Rent policy, which eliminates interim

reviews.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Triennial reviews under the Tiered Rent Demonstration apply to non-elderly, non-disabled households who were selected

to be part of the Tiered Rent group during the study enrollment period.

Simple Rent triennial reviews apply to elderly and disabled households with mostly fixed income sources.

Streamlined Interim Reviews will apply to all households except those subject to the Tiered Rent policy.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Tenant-based and project-based voucher units occupied by families who are eligible for one or more of the applicable

MTW activities.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

FY22 Tiered Rent for employment-focused families - the HUD waiver was approved and enrollment in rent study began in January 2023 and was completed in April 2024.

FY23 Simple Rent waiver - EHA is finalizing details of implementation and expects to phase this in during CY2025, with 1/3 of eligible families being enrolled in Simple Rent each year for 3 years to ensure a consistent workload for staff.

FY24 Streamline Interim Reviews waiver - EHA plans to implement in conjunction with implementation of HOTMA, likely

during FY2025-2026.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waiver is for Tiered Rent triennials and allowed EHA to implement the tiered rent policy as designed by

HUD.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Other

For the Tiered Rent study, tiered rent households will be on a triennial reexamination schedule. No interim reviews will be made and no adjustments will be made to TTP between reexaminations unless the family requests a hardship.

For the Simple Rent initiative for primarily fixed income elderly/disabled households, a full reexamination will be done every three years, and a streamlined reexamination to apply cost of living adjustments will occur annually in between.

For the Streamlined Interims waiver, families will be on the applicable annual or triennial reexamination schedule (if qualifying for Simple Rent). This waiver will eliminate interim reviews for income increases but make no changes to the full reexamination schedule.

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

FY22 approved (Tiered Rent Demonstration): The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months.

FY23 approved for Qualifying Elderly/Disabled Households under Simple Rent: If a household's income increases in between triennial reexaminations, aside from published COLAs, the family total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. Families may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a family believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

FY24: for the Streamlined Interims waiver, families can continue to request an interim review for decreases in income in accordance with the current applicable HUD regulations and EHA policies. Interim reviews will be conducted when a family member is added, and any income from that new member will be factored into the family's TTP as part of the interim.

3.d. - Self-Certification of Assets (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY22 approved waiver. Under this waiver, EHA allows participants to self-certify assets of less than \$50,000 upon reexamination. This contributes to our streamlining initiative, as a significant amount of staff time goes to requesting and collecting verification documents for assets that have a negligible to no impact on the amount of HAP that the agency

pays. It will also benefit assisted families by decreasing the amount of paperwork required.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver has been fully implemented and is ongoing.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY22 approved waiver. Under this waiver, EHA is allowed to complete HQS inspections on PBV units that it owns or controls. This contributes to our streamlining and cost savings initiative, as EHA previously expended significant resources

coordinating and paying third-party inspectors to complete HQS inspections on units that the agency owns or controls.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

EHA-owned or controlled units under the project-based voucher program.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Additional EHA staff were trained and certified in the HQS inspection standard in FY23 to facilitate implementation of this waiver, and new staff are trained as needed due to turnover or capacity. EHA no longer requires the services of a contract

inspector, other than for quality assurance inspections.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

EHA will continue to inspect units to the HQS standard found at 24 CFR 982.401, or the current standard required by HUD, and any staff conducting inspections will be trained on the HQS standard or current HUD standard (e.g., NSPIRE).

A random sample of EHA-owned or controlled units that have been inspected by an EHA staff person will be selected for a quality control inspection by a third party. In addition, the majority of EHA-owned units with voucher assistance are also assisted with other public funding such as low-income housing tax credits, State, and or local funding which requires regular physical inspections and will provide an additional level of quality assurance.

Participants will be able to request an interim inspection.

EHA will obtain the services of a third-party entity to determine if PHA-owned units pass HQS, upon the request of HUD.

No document is attached.

5.d. - Alternative Inspection Schedule (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY24 approved waiver. EHA will implement a triennial inspection schedule specifically for project-based voucher units operated by EHA. These units are already inspected annually by EHA property management staff as part of their standard property management oversight, which includes very similar inspection criteria. Removal of the requirement to complete an additional inspection, or to have to complete an inspection following two separate inspection criteria, will decrease staff time spent on administrative activities. EHA plans to continue to conduct inspections of non-EHA managed voucher units

at least biennially.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

Currently assisted households only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Project-based voucher units managed by EHA.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver has been approved and implementation is in process.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.d. - Alternative PBV Selection Process (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY24 approved waiver. EHA will implement an alternative selection process for PBV properties developed or acquired and rehabilitated by EHA or through a affiliate or partnership of which EHA is a participant. Instead of conducting an RFP, EHA will award PBVs to new EHA-affiliated developments or acquisition/rehabilitation projects based on threshold criteria: 1) The units proposed for PBV assistance at the development will serve households at or below 50% of the area median income, 2) the development demonstrates the need for PBV subsidy based on an operating pro forma showing that PBV subsidy is needed to serve the target income population for the proposed assisted units while ensuring that the development is financially feasible, and 3) the commitment of PBVs will not result in EHA exceeding the applicable PBV program cap (including any increases to the cap under approved MTW waivers). This waiver will decrease the administrative burden and staff cost associated with conducting a competitive process to award PBVs to a development that is being constructed or acquired and rehabilitated by EHA or an EHA affiliate or partnership. This waiver is in alignment with EHA's Strategic Plan, as well as its PHA Plan objectives, to increase EHA's housing portfolio by 1,500 units primarily through new construction, and to increase access to housing in communities of opportunity. In awarding PBVs to any property, EHA will meet the following safe harbor requirements for this waiver: EHA will continue to follow the requirements of PIH Notice 2013-27, and EHA will have an independent entity conduct HQS inspections before executing

a PBV HAP contract.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions (i.e., applicants) only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Project-based voucher units that are selected under this alternative process.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver was approved. EHA has not yet used the alternative process.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.h. - Limit Portability for PBV Units (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY23 approved waiver. This waiver modifies the regulations at 24 CFR 983.261, which require EHA to give tenants who have lived in a project-based voucher (PBV) unit the next available opportunity for tenant-based assistance. This activity enables EHA to prioritize limited resources to the needlest families and align available housing resources with community needs. Instead, EHA has implemented a tiered prioritization system for turnover vouchers:

1. Turnover vouchers will first be issued to households in RAD PBV properties and who live at Pivotal Point, which serves a vulnerable population of households who have experienced domestic violence, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit.

2. Of the remaining turnover vouchers available during the calendar year, 20% will be issued to tenants moving out of a PBV unit, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit, and 80% will be issued to households on the tenant-based voucher waiting list.

However, households in tier 2 who have been waiting at least 24 months for a voucher will be prioritized before issuing vouchers to households on the tenant-based voucher waiting list.

This activity increases housing choice for families who are not yet receiving housing assistance while maintaining the stability of families who are already housed, without impacting the rights of RAD PBV tenants to choice mobility. EHA continues to process requests from PBV tenants for tenant-based assistance due to VAWA (domestic violence) or

reasonable accommodations for a disability in accordance with applicable regulations.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The MTW activity applies to all properties with project-based vouchers.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver has been implemented and EHA continues to issue vouchers under choice mobility to PBV tenants pursuant to the waiver. The initial benefits of the waiver were limited while EHA worked through the list of existing PBV tenants on the list who have been waiting at least 24 months. EHA anticipates that over time, this waiver will allow EHA to increase the

share of households who will be pulled from the regular waiting list.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

11.a.HCV - Alternative Family Selection Procedures (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY23 approved waiver. Under this activity, EHA will be creating an alternative self-sufficiency program that will be offered to households participating in the Tiered Rent study (both treatment and control group households) in lieu of the traditional Family Self-Sufficiency program (the traditional FSS program will continue to be offered to non-study households). This program will use an alternative method of calculating escrow that is based on the family completing milestones during their contract of participation. Participants will sign a 5-year contract of participation with a potential extension up to 2 years.

Self-sufficiency and economic success coaching and referrals will be provided by the specialists working with the rent study families. Participation in the program will be optional. EHA will not use income increases during participation in the alternative self-sufficiency program to change the eligibility status of a family for purposes of participation in the alternative

self-sufficiency program or for the receipt of HCV or PBV assistance.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

Currently assisted households only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.
Households participating in the tiered rent study. The tiered rent study is targeted to households that are non-elderly,
non-disabled, and also excludes mixed citizenship status families and current traditional FSS and homeownership program
participants.
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based youchers participate in the MTW activity.
Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional. Non-rent study households will continue to be offered the option to participate in
the traditional FSS program.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
Details of the program are being finalized and it is expected to be offered to rent study households in CY2025.
Does this MTW activity require a hardship policy?
No
No document is attached.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
No
No document is attached.
Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?
No

11.b.HCV - Policies for Addressing Increases in Family Income (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

FY23 approved waiver. This waiver is being implemented in connection with the THRIVE + initiative, the alternative self-sufficiency program offered to households in the tiered rent study, both tiered rent policy and standard rent policy households. Under this activity, EHA is implementing an alternative to the traditional FSS program that provides a milestone-based escrow deposit model, instead of the traditional model of escrow deposits based on increases in earned income.

The goal for the alternative model is to provide incentives for families to increase their earned income without tying the escrow deposits to the reexamination, since tiered rent policy households will have fewer opportunities to escrow during their contract of participation. EHA will not use income increases during participation in the alternative self-sufficiency

program to change the eligibility status of a family for purposes of participating in the alternative self-sufficiency program or

for the receipt of HCV or PBV assistance.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

Currently assisted households only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy

households).

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Details of the THRIVE+ program are being finalized and it is expected to be offered to households in CY2025.

Does this MTW activity require a hardship policy?

No

No document is attached.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?

Families participating in the THRIVE + program will sign a 5-year contract of participation, with the possibility of up to a 2-year extension, agreeing to completion of specific milestones that will increase their economic success and earning potential. They will earn escrow credits for each activity that is completed. The final amount of the escrow payout at the end of the contract will be based on completion of the contract milestones as well as a cost neutrality calculation based on any family increases in earned income. The escrow payout can be no more than the amount of HAP cost savings generated based on increases in earned income by the family.

17.b. - Service Provision

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

There are two activities included under this waiver. Both activities have been approved by HUD.

The first allows for the use of HAP and other MTW funds for supportive services and related activities to support EHA residents and program participants. All activities will be in alignment with the EHA strategic plan and its mission statement to help households to thrive. Examples of activities that EHA may use MTW funding to support include paying for service coordinators at EHA-owned/controlled properties, both with and without PBVs, to connect residents to resources to enhance the quality of their lives and increase self-sufficiency and provision of high-speed internet at certain EHA-owned/controlled properties with and without PBVs. Access to internet allows residents to participate in online services, search for jobs, and complete required voucher review activities online. All activities will support households at or below 80% of area median income.

The second activity, which was approved in FY24, authorized creation of an Inspection Success Fund that the Inspections team may use to purchase an inventory of small items needed to address minor items that cause a unit to fail an inspection.

Examples of items that EHA anticipates purchasing using the fund are battery-sealed smoke detectors and switch plate/outlet covers. The goal of the fund is to increase the percentage of units that pass an inspection on the first attempt and decrease the time for a unit to pass inspection, thereby reducing staff time spent on reinspections and verifying corrective actions, reducing the amount of time before a participant can move into a new unit, and increasing landlord satisfaction with the HCV program.

The upcoming new housing inspection standard for the HCV program, the National Standards for the Physical Inspection of Real Estate (NSPIRE) will require that each bedroom have a smoke detector installed. EHA will be implementing the NSPIRE standard in CY2025. The Federally Assisted Housing Fire Safety Act of 2022 required that, starting in December 2024, smoke detectors in federally assisted units have a sealed battery. EHA anticipates that these new requirements will increase the rate of failed inspections while landlords become familiar with them. In addition, EH already frequently encounters units with minor fail items such as a cracked switch plate or outlet cover. This waiver allows EHA inspection staff to purchase and retain a supply of battery-sealed smoke detectors and switch plate and outlet covers that can be installed during inspections to allow the unit to pass inspection immediately. EHA staff may also identify other items to

purchase using the Success Fund that would be consistent with the goal of increasing the pass rate of inspections.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Different supportive services activities will support different program participants. For example, service coordination activities support residents of EHA-owned and controlled PBV properties.

The Inspection Success fund will be used for items that can be used during inspections of either HCV or PBV units.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. The first activity within this waiver has been approved, and EHA has implemented funding flexibility to pay for certain service coordination expenses at PBV properties.

The second activity, Inspection Success Fund, was newly approved for FY24, and staff have begun implementing the

waiver.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What types of services is the MTW agency providing? Service coordination at certain EHA-owned/controlled PBV properties; EHA may also provide high speed internet at certain EHA-owned/controlled PBV properties.

EHA has created an Inspection Success Fund to purchase small items to facilitate passed inspections.

How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?

Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to specific units/properties

Describe which LNT units/properties participate in the MTW activity?

EHA is currently only using this waiver to assist PBV units. However, certain EHA-owned/controlled units that offer service coordination but are not assisted with PBVs, serving households up to 80% of area median income, could be assisted with service coordination funding in the future.

The Inspection Success Fund will not apply to LNT units.

Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?

No

17.c. - Housing Development Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
EHA has obtained MTW authority to use MTW funds, including up to 10% of HAP, to pay for activities associated with EHA
development projects. This activity is in line with the EHA strategic objective to increase the EHA housing portfolio by at
least 1,500 units, primarily through new development. EHA has identified multiple projects in various phases of development or in the pipeline that may receive MTW funding through this activity, as well as the potential for additional
opportunities that may be identified during the upcoming fiscal year, as housing acquisition and development is
opportunistic, particularly desirable properties in high opportunity areas and/or close to transit.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness; Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on
what you know today.
Decreased expenditures
Deep the MTW activity under this weiver early to all appieted beyondelds or only to a subact or subacts of
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW
activity.
Units that receive funding under this activity - specific units are to be determined.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about
what has been accomplished or changed during the implementation. HUD approved the waiver and EHA has begun implementing the waiver by expending funds on certain development
activities.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
RAD4PRAC Sites	Rehabilitation	Gap Financing	369.00	378.00	369.00	0.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	Land acquisition, new construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00
Bakerview/Grandview	Rehabilitation	TBD - likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00
TBD - future opportunities	TBD - acquisition, rehabilitation, and/or new construction possible	TBD	0.00	0.00	0.00	0.00	0.00	0.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	New construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00
Bakerview/Grandview	Rehabilitation	TBD; likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.					
DA	Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?					
D.1	No Safe Harbor Waivers are being requested.					

E.	Agency-Specific Waiver(s).
	Agency-Specific Waiver(s) for HUD Approval:
	The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.
	In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.
	For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.
	Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?
E.1	

	Agency-Specific Waiver(Does the MTW agency ha Yes		•		
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	lessons learned from implementing	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
E.2	Allow Residents of PBV Units to Resume Assistance After Zero HAP	No			
	Modify Verification Hierarchy	No			
	Modify Discrepancy Threshold	No			
	Inspection and Rent Reasonableness Efficiency Improvements	No			

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.

MTW Statutory Requirements.

75% Very Low Income – Local, Non-Traditional.

G.1 HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.		

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	IRPI	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	Type' is Other	# of Section 504 Accessible (Mobility)**	(·····	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4 Comparal	ble Mix (by Family Size) – Local, Non-Traditional.
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

н.	Public Comment
	d you will find a copy of all of the comments received and a description of how the agency analyzed the hts, as well as any decisions made based on those comments.

I. Evaluations.

Yes - This table lists evaluations of Everett's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

Title and	Evaluator name and	Time	Reports available
ah art			
short	contact information	period	
description			

Stepped and Tiered Rent Demonstration. EHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. EHA will be studying a Tiered Rent model. An independent research team led by MDRC will work with HUD, EHA, and the other selected PHAs to assist in implementation and evaluate the effects of the alternative rent policy.	James Riccio, MDRC James.Riccio@mdrc.org	July 1, 2022 through June 30, 2028	Rent Reform in Subsidized Housing: Launching the Stepped and Tiered Rent Demonstration https://www.mdrc.org/work/publications/rent-reform-subsidized-hous
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Everett Housing Authority Tiered Rent Table

Rent Tier	Tier Annual Gross Income Minimum	Tier Annual Gross Income Maximum	Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$3 <mark>9,9</mark> 99	\$904
17	\$40,000	\$42 <mark>,49</mark> 9	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896
34	\$82,500	\$84,999	\$1,954
35	\$85,000	\$87,499	\$2,012
36	\$87,500	\$89,999	\$2,071
37	\$90,000	\$92,499	\$2,129
38	\$92,500	\$94,999	\$2,187

	[Continued from Previous Page]				
Rent Tier	Tier Annual Gross Income Minimum	Tier Annual Gross Income Maximum	Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)		
39	\$95,000	\$97,499	\$2,246		
40	\$97,500	\$99,999	\$2,304		
41	\$100,000	\$102,499	\$2,362		
42	\$102,500	\$104,999	\$2,421		
43	\$105,000	\$107,499	\$2,479		
44	\$107,500	\$109,999	\$2,537		
45	\$110,000	\$112,499	\$2,596		
46	\$112,500	\$114,999	\$2,654		
47	\$115,000	\$117,499	\$2,712		

The 2021 Median Family Income for the Seattle-Bellevue Metropolitan Area, as determined by HUD, is \$115,700, which is partway through Rent Tier 47.

Everett Housing Authority MTW Hardship Policy

If a requirement or provision of an MTW activity may constitute a financial or other hardship for EHA households, EHA will create a hardship policy. EHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a household requests a hardship exemption from a required MTW activity, EHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by EHA for the duration of EHA's participation in the MTW demonstration program and available for public review and inspection.

Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

What is a Hardship Exemption?

The Tiered Rent policy is intended to benefit assisted households by allowing them to increase their income without an immediate increase in their total tenant payment (TTP). Households will have an income examination every three years, and in between the triennial reexaminations their TTP will not increase. In addition, their TTP will not increase even at a triennial reexamination unless their income rises into a higher tier. However, some households may need a hardship exemption to avoid negative consequences of the tiered rent. A hardship exemption is a temporary rent that is lower than the family's assigned Tiered Rent.

There are several situations for which a family in the Tiered Rent group can receive a hardship exemption. Some are automatic based on the information the family submits to EHA at the time of their reexamination, and some will require the family to report information to EHA between reexaminations.

What Does EHA Consider a Hardship?

EHA considers the following situations to be hardships:

1. For automatic hardships, at time of triennial reexamination:

a. Your family qualifies for an exemption under the traditional rent policy due to having 4 or more dependents at the time of your triennial reexamination and/or hardship renewal.

a. Your family qualifies for an exemption under the traditional rent policy due to have unreimbursed child/dependent care expenses over \$2,500 at the time of your triennial reexamination and/or hardship renewal.

a. Your family has had a loss of income and the 12-month period used to calculate your new rent at your recertification is less than your current income.

1. For hardships requested by the family, which can be requested at any time:

a. Your family has a loss of income that would drop the family into a lower rent tier than the one that you are currently in

a. Your family experiences a new or increased unreimbursed child/dependent care expense of over \$2,500 per year/\$209 per month

a. Your family has 4 or more dependents due to additions to the household between triennial reexaminations

a. Your family faces another unexpected situation, such as the death of a family member or a major medical expense, and requires temporary rent relief to avoid eviction for non-payment of rent or a similar situation

To qualify for a hardship exemption, you must:

• Be following all program rules and regulations

• Not owe EHA any money, or if you do owe money, you have a repayment agreement in place and you are current on your payments

What Help Can I Get Under the Hardship Policy?

If your hardship request is approved, your temporary new rent will be lower than the assigned tiered rent.

- For childcare expenses, the family will be placed in the rent tier that matches their income after deducting any unreimbursed child care expenses.
- For families with 4 or more dependents, the family's rent will be reduced by one tier from the tier that corresponds to their income.
- For family-requested hardships, the temporary rent will be based on the rent tier that corresponds to the family's reduced income, or based on the rent tier that corresponds to the family's income after deducting any extraordinary expenses.

How Long Will My Reduced Rent Last?

The hardship rent is temporary and will last between 1 and 12 months. EHA will work with you to determine how long the hardship rent should last, based on your family's circumstances, including how long you expect to have a lower income.

Generally, automatic hardships due to childcare expenses over \$2,500 and/or having 4 or more dependents will be approved for 12 months, and the family can request additional renewals as long as the circumstance leading to the hardship (childcare expenses, 4 or more dependents) will continue.

For family-requested hardships, the hardship rent will generally be granted for:

6 months if the hardship is expected to last for 6 months or less 9 months if the hardship is expected to last between 6 and 9 months 12 months if the hardship is expected to last for more than 9 months

The family can request extensions of the hardship rent prior to its expiration if the circumstance requiring the hardship rent continues.

If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship. Once the PHA approves a hardship, the hardship will not end early.

How Do I Request a Hardship Exemption?

EHA will remind you of this Hardship Policy during the intake and reexamination processes.

EHA will provide automatic hardship exemptions based on the information you provide at your triennial recertification.

You will be able to request a hardship exemption at any time between triennial recertifications. The application process will be done via RENTCafé and will be similar to the current process for requesting an interim review when you have a change of circumstance. You will be required to provide supporting documentation to verify your hardship.

EHA will also consider if you qualify for a hardship exemption at the time of a potential termination of assistance related to the Tiered Rent policy.

How Will EHA Review My Hardship Request?

All family-initiated hardship requests will be reviewed by staff to ensure consistency in the review process. When a family requests a hardship exemption, EHA will implement the hardship rent beginning the first of the month following the family's request. EHA will strive to review hardship requests within 10 business days of receiving a request and all documentation needed to process the request. EHA will prioritize requests where the family is on the verge of eviction or similar consequences.

What Happens if EHA Does Not Approve My Hardship Request?

If your hardship request is not approved, or if you think that you should have received an automatic hardship and you did not, you will be able to appeal EHA's determination of your monthly rent.

If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by EHA's Hearing Officer. See Chapter 16 for additional information.

What Happens When My Hardship Expires?

You can request a renewal of your hardship rent if it is expiring and your family continues to experience a hardship.

Once the hardship rent and any extensions expire, your rent will return to the tiered rent assigned at your most recent triennial recertification until your next triennial recertification is completed or unless you are approved for a new hardship.

Hardship Policy: Elderly/Disabled Households Triennial Recertifications – Simple Rent

Households experiencing a decrease in income may request an interim reexamination.

If a household believes they have another circumstance that qualifies as a financial hardship, the household must complete the Hardship Request form and include proof of the hardship.

The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Hardship Policy: Standard Medical/Disability Expense Deduction (new for FY 2024)

Households experiencing a financial hardship as a result of the standard medical/disability expense deduction, can request a hardship exemption from the standard deduction. The hardship exemption will last until the family's next annual reexamination.

To request a hardship, a household must provide the following information with their hardship request:

- A detailed explanation of why the standard medical/disability expense deduction threshold has created a hardship for the household that may result in the household not being able to pay their rent
- A list of all anticipated medical expenses for the upcoming year
- Proof of medical expenses incurred over the past year to verify the list of anticipated expenses

When a family requests a financial hardship exemption, EHA will suspend the MTW activity by setting the medical/disability expense deduction threshold at 3% while the request is being processed, beginning the first of the month following the family's request, until EHA determines if the request is warranted.

During this suspension, EHA will determine whether the financial hardship exists. EHA will determine the nature of the hardship within 30 calendar days of the request being received. If EHA requests information from the family and it is not received within the 30 days after the original request was made, EHA may deny the request and require the family to repay the additional assistance paid during the suspension of the MTW activity period.

If EHA determines that the family has a qualifying financial hardship, EHA will suspend the MTW activity for the family until their next annual reexamination. The family will be eligible to request a renewal of the hardship exemption at the time of their annual reexamination if the hardship is continuing.

Hardship Policy: SAFMR-Based Payment Standards (new for FY 2024)

Households experiencing a hardship as a result of the payment standards activity may request a hardship exemption.

A financial hardship for a decrease in payment standards would only apply when the payment standard would decrease in an established unit (not at unit transfers or issuance of voucher, or household

composition changes that result in a change to the subsidy size/voucher size for the household (?)), where the payment standard is set at less than 90% of the zip code-based Fair Market Rent (FMR), and where:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the assisted family, or reduction in or loss of earnings or other assistance; and
- The family has experienced an increase in expenses because of changed circumstances, for medical expenses, childcare, or other costs impacting the family's TTP calculation.

When a family requests a financial hardship exemption, EHA will suspend the MTW activity (by setting the family's payment standard at no less than 90% of the applicable small area FMR) while the request is being processed, beginning the first of the month following the family's request, until EHA determines if the request is warranted.

During this suspension, EHA will determine whether the financial hardship exists. EHA will determine the nature of the hardship within 30 calendar days of the request being received. If EHA requests information from the family and it is not received within the 30 days after the original request was made, EHA may deny the request and require the family to repay the additional assistance paid during the suspension of the MTW activity period.

If EHA determines that the family has a qualifying financial hardship, EHA will suspend the MTW activity for the family until their next annual reexamination. The family will be eligible to request a renewal of the hardship exemption at the time of their annual reexamination if the hardship is continuing.

Capital Fund Program - Five-Year Action Plan

Status:	Draft	Approval Date:	Apj	proved By:			01/31/2023
Part	I: Summary						
РНА	Name : Hous	ing Authority of the City of Everett	Locality (City/Co	•	Revised 5-Year I	Plan (Revision No:)
РНА	Number: W	/A006					
А.	Deve	lopment Number and Name	Work Statement for Year 1 2025	Work Statement for Year 2 2026	Work Statement for Year 3 2027	Work Statement for Year 4 2028	Work Statement for Year 5 2029
	AUTHORITY-V	VIDE	\$852,500.00	\$852,500.00	\$852,500.00	\$852,500.00	\$852,500.00

Identifier	Development Number/Name	General Description of Major Work Categories Quantity	Estimated Cos
	AUTHORITY-WIDE (NAWASD)		\$852,500.00
D0000050	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements	\$77,500.00
D0000051	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan.	\$774,000.00
D0000052	Audit(Contract Administration (1480)-Audit)	Audit Fees	\$1,000.00
	Subtotal of Estimated Cost		\$852,500.00

	AUTHORITY-WIDE (NAWASD)		
			\$852,500.00
D0000053	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements.	\$77,500.00
D0000054	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan	\$774,000.00
	Audit(Contract Administration (1480)-Audit,Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Audit fees	\$1,000.00
:	Subtotal of Estimated Cost		\$852,500.00

Work State	ment for Year 3 2027		
Identifier	Development Number/Name	General Description of Major Work Categories Quantity	Estimated Cos
	AUTHORITY-WIDE (NAWASD)		\$852,500.00
ID0000056	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements	\$77,500.00
D0000057	Moving to Work Initiatives(MTW (1492))	Moving to work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in out Moving to Work plan.	\$774,000.00
ID0000058	Audit(Contract Administration (1480)-Audit)	Audit Fees	\$1,000.00
	Subtotal of Estimated Cost		\$852,500.00

Work State	ment for Year 4 2028		
Identifier	Development Number/Name	General Description of Major Work Categories Quant	ty Estimated Cos
	AUTHORITY-WIDE (NAWASD)		\$852,500.00
ID0000059	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements	\$77,500.00
ID0000060	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan	\$774,000.00
ID0000061	Audit(Contract Administration (1480)-Audit)	Audit fees	\$1,000.00
	Subtotal of Estimated Cost		\$852,500.00

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cos
				#05 2 500 00
	AUTHORITY-WIDE (NAWASD)			\$852,500.00
ID0000062	Management Fees(Administration (1410)-Salaries)	Management Fees including administrative costs which are necessary for the planning, design, implementation and monitoring of capital improvements		\$77,500.00
D0000063	Moving to Work Initiatives(MTW (1492))	Moving to Work opportunities that may include HAP funding, development of new affordable housing and other costs to be determined in our Moving to Work plan		\$774,000.00
ID0000064	Audit(Contract Administration (1480)-Audit)	Audit fees		\$1,000.00
	Subtotal of Estimated Cost			\$852,500.00

Part III: Supporting Pages - Management Needs Work Statements ((s)	
Work Statement for Year 1	2025	
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Management Fees(Administration (1410)-Salaries)		\$77,500.00
Moving to Work Initiatives(MTW (1492))		\$774,000.00
Audit(Contract Administration (1480)-Audit)		\$1,000.00
Subtotal of Estimated Cost		\$852,500.00

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year 2 2026		
Development Number/Name	Estimated Cost	
General Description of Major Work Categories	Estimated Cost	
Housing Authority Wide		
Management Fees(Administration (1410)-Salaries)	\$77,500.00	
Moving to Work Initiatives(MTW (1492))	\$774,000.00	
Audit(Contract Administration (1480)-Audit,Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	\$1,000.00	
Subtotal of Estimated Cost	\$852,500.00	

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year 3 2027			
Development Number/Name General Description of Major Work Categories	Estimated Cost		
Housing Authority Wide			
Management Fees(Administration (1410)-Salaries)	\$77,500.00		
Moving to Work Initiatives(MTW (1492))	\$774,000.00		
Audit(Contract Administration (1480)-Audit)	\$1,000.00		
Subtotal of Estimated Cost	\$852,500.00		

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year 4 2028			
Development Number/Name General Description of Major Work Categories	Estimated Cost		
Housing Authority Wide			
Management Fees(Administration (1410)-Salaries)	\$77,500.00		
Moving to Work Initiatives(MTW (1492))	\$774,000.00		
Audit(Contract Administration (1480)-Audit)	\$1,000.00		
Subtotal of Estimated Cost	\$852,500.00		

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year 5	2029		
Development Number/Name General Description of Major Work Categories		Estimated Cost	
Housing Authority Wide			
Management Fees(Administration (1410)-Salaries)		\$77,500.00	
Moving to Work Initiatives(MTW (1492))		\$774,000.00	
Audit(Contract Administration (1480)-Audit)		\$1,000.00	
Subtotal of Estimated Cost		\$852,500.00	