#### **RESOLUTION 23-1035**

# A RESOLUTION APPROVING THE 2024 ANNUAL PLAN AND MOVE TO WORK SUPPLEMENT FOR THE HOUSING AUTHORITY OF THE CITY OF YAKIMA

WHEREAS, the Housing Authority of the City of Yakima, (YHA) is mandated by the U.S. Dept. of Housing and Urban Development to submit an annual and five year plan; and,

WHEREAS, YHA has prepared the plan in accordance with the requirements of the Quality Housing and Work Responsibility Act of 1998; and,

WHEREAS, HUD selected the YHA to participate in the Move to Work Demonstration Expansion under the Landlord Incentives Cohort, and in order to complete entry into the program, the agency must fully execute the Move to Work ACC amendment to the PHA Annual Plan; and,

WHEREAS, the adoption of Resolution 22-992 by the YHA Board of Commissioners approved the Move to Work ACC amendment and authorized its execution to the PHA Annual Plan.

WHEREAS, the Move to Work Supplement and hardship policies are included with the 2024 Annual Plan.

NOW THEREFORE, be it resolved by the Board of Commissioners of the Housing Authority of the City of Yakima, in a regular meeting, a quorum being present, does hereby adopt the 2024 Annual Plan with the Move to Work Supplement, substantially in the attached pages.

PASSED AND ADOPTED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF YAKIMA THIS 27th DAY OF SEPTEMBER 2023.

Chairman, Board of Commissioners

Date

Attest:

Secretary

# Streamlined Annual PHA Plan (HCV Only PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

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, including changes to these policies, 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-HCV is to be completed annually by HCV-Only PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

#### Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

А.	PHA Information.				
A.1	PHA Name: Housing Autho PHA Plan for Fiscal Year I PHA Inventory (Based on A Number of Housing Choice PHA Plan Submission Typ	Beginning: (MM/ Annual Contributi Vouchers (HCV	YYYY): 01/2024 ons Contract (ACC) units at time of Vs) 1,312		ode: WA042
	A PHA must identify the spe and proposed PHA Plan are reasonably obtain additional submissions. At a minimum encouraged to post complete Yakima Housing Authorit Administrative Office 810 North 6th Avenue Yakima, Washington 989	cific location(s) vavailable for inspi information of th , PHAs must post PHA Plans on the	ne items listed in this form, PHAs me where the proposed PHA Plan, PHA ection by the public. Additionally, the PHA policies contained in the start PHA Plans, including updates, at their official website.	Plan Elements, and all informathe PHA must provide informathed Annual Plan but excluded	ation relevant to the public hearing tion on how the public may d from their streamlined
	YHA website at www.yal		a joint Plan and complete table bel	om)	
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
	Lead HA:				
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В.1	Revision of Existing PHA Plan Elements.  a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?  Y N Statement of Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Operation and Management. Informal Review and Hearing Procedures. Homeownership Programs. Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. Substantial Deviation. Significant Amendment/Modification.
	Not applicable.
B.2	New Activities. – See attached.
B.3	Progress Report.  Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.  The Housing Authority has made progress in meeting the mission and goals in its 5-Year Plan in the following ways:  Continue to maintain a "high performance rating in SEMAP – The Housing Authority currently has a "high" performance rating in SEMAP.  Maintain a leasing or authorized budget authority utilization rate of not less than 98% for Section 8 – The Housing Authority's Section 8 utilization for calendar year 2023 is 104.61%.  Increase Section 8 vouchers through requests for incremental and/or special needs vouchers – The Housing Authority received an award of 10 additional Stability vouchers in coordination with the Balance of State Continuum of Care.  Grow the home ownership program, utilizing Section 8 vouchers, for not less than 10 families – The Housing Authority has developed a home ownership program and is working in connection with development to create home ownership opportunities for its residents.  Continue to house homeless through 100 project-based vouchers with our community partners – The Housing Authority has set aside 100 project-based vouchers for housing homeless throughout Yakima County.  Continue to lease all remaining 93 VASH vouchers in connection with the Veteran's Affair Office – The Housing Authority has currently leased 72 VASH vouchers and its working with the Veteran's Affair Office to lease the remaining vouchers.  Lease the five Mainstream vouchers in coordination with the Spokane Housing Authority – The Housing Authority currently is administering 115 mainstream vouchers and the Spokane Housing Authority ported the remaining mainstream vouchers it administered in coordination with the Yakima Housing Authority.  Work with our community partners to establish the Foster Youth Initiative – The Housing Authority created an MOU with its community partners and has currently housed five youth and is in the process of requesting and issuing and additional
B.4	Capital Improvements. – Not Applicable

B.5	Most Recent Fiscal Year Audit.				
	(a) Were there any findings in the most recent FY Audit?				
	Y N N/A ☑ □ □				
	(b) If yes, please describe: The Housing Authority received a finding due to understated assets, liabilities, and expenses as a result of a new development (a component unit of the Housing Authority). In addition, the Housing Authority received a finding for understating the Schedule of Expenditures of Federal Awards (SEFA). The Housing Authority outlined in its Corrective Action Plan that it has relied on outsourced fee accountants for proper recording of all development activities, financial statement and SEFA preparation, and reporting. The Housing Authority will establish a review process by an employee who understands Generally Accepted Accounting Principles and the Uniform Guidance to ensure accurate preparation and reporting of the financial statements total Federal awards expended.				
C.	Other Document and/or Certification Requirements.				
C.1	Resident Advisory Board (RAB) Comments.				
	(a) Did the RAB(s) have comments to the PHA Plan?				
	Y N 🛮 🗆				
	(a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attached.				
C.2	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. See attached.				
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.				
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attached.				
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  (a) Did the public challenge any elements of the Plan?  Y N  S  If yes, include Challenged Elements.				
D.	Affirmatively Furthering Fair Housing (AFFH).				
D.1	Affirmatively Furthering Fair Housing (AFFH).				
	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.				
	Fair Housing Goal:				
	Describe fair housing strategies and actions to achieve the goal				
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	Describe fair housing strategies and actions to achieve the goal
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	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal
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ľ	actions for Preparation of Form HUD-50075-HCV
	al PHA Plan for HCV-Only PHAs
	Information. All PHAs must complete this section. (24 CFR §903.4)
	Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), Number of Housing Choice Vouchers (He PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and pro-

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes"

☐ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the

Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

B.1 Revision of Existing PHA Plan Elements. PHAs must:

box. If an element has not been revised, mark "no."

Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))
Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))
Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))
Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))
Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).
☐ Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))
Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(I)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(I)(iii)).
☐ Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))
☐ Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan.
If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.
Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))
Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs
Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))
Document and/or Certification Requirements.
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C. Other

**B.2 B.3** 

**B.4** 

**B.5** 

- C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan

under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 6.02 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

# Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

# PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_\_\_ 5-Year and/or\_X\_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 01/2024, in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Yakima PHA Name	_WA042 PHA Number/HA Code
X Annual PHA Plan for Fiscal Year 2024	
5-Year PHA Plan for Fiscal Years 20 20	

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

Name of Executive Director		Name Board Chairman		
Lowel Krueger		Robert Ponti		2/1-1
Signature	10/	Date 9/ Signature	A Dat.	7/27/23 Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Certification by State or Local** Official of PHA Plans Consistency with the Consolidated Plan or **State Consolidated Plan** (All PHAs)

## U. S Department of Housing and Urban Development

Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024

# Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

l,	Joan Davenport	, the	AICP, Director
	Official's Name		Official's Title
-	y that the 5-Year PHA Plan 2024 of the <u>Housing Auth</u>	•	y of Yakima is consistent with the
	lidated Plan or State Consolid ng Choice or Assessment of F		ading the Analysis of Impediments (AI) to Fair AFH) as applicable to the
	City of Yakima		
		Local Jurisdi	tion Name
- Provid	<del>-</del>	v	nts are consistent with the Consolidated Plan or
	Consolidated Plan.		
The pl	an targets households with inc	ome under 50°	% of MFI, expanding housing opportunities
with a	reas outside of poverty and mi	nority concent	rations.
I hereby ce prosecute f	rtify that all the information stated herein, as well as alse claims and statements. Conviction may result in	s any information provid n criminal and/or civil pe	ed in the accompaniment herewith, is true and accurate. Warning: HUD will nalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)
Name of A	uthorized Official: Joan Davenport		Title: AICP, Director
Signature:	Joan Davenport  Joan Davenport (Sep 28, 2023 10:45 PDT)		Date: Sep 28, 2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

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# Certification by State or Local Official

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# Housing Authority of the City of Yakima

New Activities
Attachment to HUD-50075-HCV

The Housing Authority intends to award up to 49 project-based vouchers for new construction within the City of Yakima. The proposal will be awarded based on its consistency with the HUD statutory goals of deconcentration of poverty and expanding housing and economic opportunities and the Housing Authority's priorities to support housing for homeless individuals, housing which provides supportive services to their residents and housing located in the City of Yakima that serves to expand housing and economic activities.

# MTW Supplement to the Annual PHA Plan

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226

Expires: 03/31/2024

**Purpose.** The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

**Applicability.** Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies that chose to follow the requirements of the MTW Operations Notice.

**Definitions.** All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) **Local, Non-Traditional Activities** (LNT) Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) **Safe Harbors** The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

Α.	PHA Information.
A.1	PHA Name: Yakima Housing Authority PHA Code: WA042 MTW Supplement for PHA Fiscal Year Beginning: 01/01/2024 PHA Program Type: Housing Choice Voucher (HCV) only MTW Cohort Number: 4 MTW Supplement Submission Type: Annual Submission
B.	Narrative.
B.1	MTW Supplement Narrative.  The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.  The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment.

#### **B.** Narrative

The Yakima Housing Authority's mission is "building stronger communities through our commitment to safe and affordable housing." We believe that our participation in MTW will help us further our mission. We have a vision where YHA is able to maximize the number of households served through the voucher program and making changes to the voucher program to make it more efficient to operate, more likely to increase the self-sufficiency of its participants, and more likely to attract and retain landlords. YHA has a vision to create locally designed programs which address the challenges we see here in Yakima and Kittitas Counties. Our vision would focus on the three statutory objectives: cost effectiveness, self-sufficiency, and housing choice as well as the required activities related to landlord incentives.

We look forward to implementing changes in the voucher program that will reduce the cost to administer the program, getting rid of or simplifying regulations and processes that are overly complicated and confusing to landlords, participants, and staff. We believe that there is already a wealth of ideas related to cost effectiveness used by current MTW agencies, however we also want to see if there are other changes that would make sense for us, based on our unique geographical, housing market and participant needs and challenges.

Our vision is also that self-sufficiency would increase among our program participants. We want to establish policies and provide resources and services that enable stability and motivate personal growth. We believe that through a combination of policy changes and partnering with other social service agencies we should be able to make changes that will increase self-sufficiency.

Finally, in the area of housing choice and landlord incentives, YHA will explore changes that will increase landlord participation as well as policies that will allow the voucher participants more choice. These ideas will have to be balanced with cost-effectiveness as many landlord incentives or higher payment standards that can provide more housing choice, are more expensive and we remain committed to serving as many households as possible.

# **Activity: 1.u. - Standard Deductions (HCV)**

**Narrative.** 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.

### Description:

YHA proposes replacing the expense deduction with the following standard expense deduction.

In determining adjusted income, for "qualifying" elderly/disabled households (described below), YHA must deduct the following amounts from annual gross income. To the extent the sum exceeds \$2,518 (which is the equivalent of elderly/disabled households' medical/disabled expense deductions (described below) exceeding three percent of gross annual income of record for elderly/disabled households with such expenses, YHA's initial medical / disability expense deduction will automatically be \$2,518, regardless of the amount of the family. If however, the "qualifying" family claims that they have a higher amount of medical/disability expenses, they will be afforded an opportunity through a hardship process to submit all of their medical/disability expenses for YHA's review and calculation. At the conclusion of this process, "qualifying" households will receive that actual and uncovered medical/disability expense above three percent of their gross annual income if it is greater than \$2,518.

(i) Unreimbursed medical expenses of any elderly family or disabled family; and (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus.

In terms of the elderly/disabled household allowance independent of whether or not such household also has medical/disability expenses above three percent of the gross annual income, YHA is adopting the \$525 amount as adjusted by applicable inflation (as posted on HUD's website) and will be adjusted upward when the adjusted allowance reaches an increase of at least \$25. In other words, the first time that the \$525 elderly/disabled household allowance gets adjusted upward for inflationary reasons, the allowance will increase to \$550.

Agency goals for MTW Activity:

For medical expenses and disability assistance expenses, YHA's goal with this activity for all parties involved, is a simpler method to calculate tenant rent and to eliminate original and third-party documentation for two out of the three years of triennial reexaminations.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Cost neutral
Different policy by household status/family types/sites?  Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	Medical expenses and disability assistance expenses apply to qualifying elderly/disabled households.
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households.
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	Only to selected family types (described above)
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities:  This activity applies to all tenant-based units and properties with project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.		
How much will the single standard deduction be in the Fiscal Year?	Medical and Disability Expense Deduction: YHA must deduct the following amounts from annual income. To the extent the sum exceeds \$2,518 (which is the equivalent of elderly/disabled households' medical/disabled expense deductions exceeding three percent of gross annual income for elderly/disabled households with such expenses)	
	To qualify, elderly/disabled households have to have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. The \$2,518 for each qualifying elderly/disabled household in medical/disability expenses, will be a standardized dollar amount. In other words, if an elderly/disabled household qualifies for a	

medical /disability expense deduction (as described above) they would automatically receive the \$2,518 as the amount of their medical/disability expense deduction, rather than a lesser or greater amount.
YHA will consider providing medical expenses and disability assistance expenses for those households who successfully claim a hardship or grievance under the enclosed hardship policy.

Activity: C.1.j. Alternative Utility Allowance (HCV)	
Narrative. 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.	Description: Yakima Housing Authority may create a utility schedule(s) for all HCV units based upon bedroom size, the unit location and/or the types of utilities paid by participant. The agency may establish a site-based utility allowance in PBV.  The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.  Agency goals for MTW Activity: The simplified alternative to creating and determining utility allowances will primarily reduce Yakima Housing Authority's contract costs to produce utility allowances both in its tenant-based and project-based voucher programs. Secondarily, this activity may reduce the extent and amount of utility reimbursements where applicable.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. 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
Different policy by household status/family types/sites?  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
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers.*
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No

Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

# **Custom Questions:** Custom questions are tailored to each MTW activity.

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

The agency may establish a site-based utility allowance in its PBV program. PBV units, particularly new construction and substantial rehabilitated units have lower utility costs as a result of modernized windows, heating and cooling systems, well-insulated elements, etc. Owners/Developers of newly constructed and substantially rehabbed PBV units provide YHA with extensive utility expense data and analyses specific to their dwelling units, upon which accurate utility allowances can be developed. Having a site-based PBV utility allowance would allow for a more accurately calculated utility allowances in these specific dwelling units by comparison with tenant-based voucher-assisted dwelling units which do not generally have the above elements. In addition, more accurately calculated PBV site-based utility allowances will allow for contract rents that are commensurate with their value.

Yakima Housing Authority may also create a utility schedule(s) for all tenant-based voucher-assisted units, based upon bedroom size, building type only broken down by single family home vs. multifamily unit rather than breaking down utilities into each of the types of muti-family buildings, the unit location and/or the types of utilities (e.g. gas, electric, oil) paid by participants. The simplified alternative to creating and determining utility allowances will primarily reduce Yakima Housing Authority's contract costs to produce utility allowances both in its tenant-based and project-based voucher programs. Secondarily, this activity may reduce the extent and amount of utility allowances where applicable.

The first method above is different than the standard method because it is PBV site-base specific rather than community wide. The second method above is different than the standard method because it would streamline the process by only breaking down utility allowances by single family home vs. multifamily unit rather than breaking down utilities into each of the types of muti-family buildings,

The first method above would reduce the extent and amount of utility reimbursements because energy efficient and site-specific PBV units are expected to have relatively lower utility allowances than community-wide utility allowances. The second method may or may not result in lower utility allowances after all of the multi-family building types are combined, depending on the weighted average of those results. However, in terms of administrative costs to contract and calculate utility allowances the above method should be more streamlined and less administratively burdensome and costly.

Activity: C.1.n. Utility Reimbursements (HCV)	
Narrative. 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.	Description: Yakima Housing Authority may eliminate utility reimbursement payments in the HCV program when the utility allowance is greater than the total tenant payment.
	Agency goals for MTW Activity:
	This activity will help Yakima Housing Authority reduce paperwork requirements and related compliance matters having to do with - # of 10 Day compliance issues due to the fact that YHA follow up that we have to do to get the information from the tenants to to pay the utility reimbursement where we do not get a lot of responses from applicable households. As a result, YHA currently has to spend a lot of administrative hours spent following-up.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. 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
Different policy by household status/family types/sites?  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 family types

Household Status. 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *
For PH activities:  Does the MTW activity apply to all public housing developments?	
For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: 2.a. – Payment Standards – Small Area Fair Market Rents (FMR) (HCV)	
Narrative. 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.	Description:  This activity will allow YHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). YHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction. YHA's "opportunity areas" include: Yakima (West Valley) 98908, Yakima (West Valley) 98903, and Selah 98942. Among the geographic considerations in grouping SAFMRs, YHA may explore the use of school districts.  Agency Goals for the MTW Activity: YHA's goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program. Ultimately, the YHA will provide HCV participants with information about housing opportunity areas and bargains. This will be done through SAFMRs and the provision/access to information to families with neighborhood data and information to exercise their choices about where to live. YHA will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs. Through the measures above, YHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice and self-sufficiency.
<b>Cost implications.</b> 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
<b>Different policy by household status/family types/sites?</b> 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 family types

Household Status. 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *
For PH activities: Does the MTW activity apply to all public housing developments?	
For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
Please explain the payment standards by ZIP code or "grouped" ZIP codes.	Grouped ZIP codes based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc.,  Through this activity, YHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.  Among the geographic considerations in grouping SAFMRs, VHA may employe the use of school districts.
	YHA may explore the use of school districts.

Activity: C2.d. Rent Reasonableness – Third-Party Requirement (HCV)	
Narrative. 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.	Description: Yakima Housing Authority will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. Yakima Housing Authority will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.  Agency goals for MTW Activity: Decrease the rent reasonable turnaround time to support ontime reporting. This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. 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
Different policy by household status/family types/sites?  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
Household Status. 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers*
For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
Please explain or upload a description of the quality assurance method.	Reasonable rent determinations will be made with the support of a third-party software database (YARDI) that is updated annually based on market conditions. YHA is going through a software provider conversion from Tenmast to YARDI. Currently, YHA uses Tenmast software to determine rent reasonableness for all the other units not owned or substantially controlled by YHA. YHA will be using our new software provider's rent reasonableness system to determine rent reasonableness on YHA's owned, substantially controlled and/or managed dwelling units in the same manner that we will use it for all other dwelling units.  YHA will have a Supervisor conducting quality assurance on rent reasonableness determinations for all units that it owns, manages, and/or controls.
Please explain or upload a description of the rent reasonableness determination method.	The agency will determine rent reasonableness with the support of third-party software. Yakima Housing Authority will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

## Activity: 3.b. Alternative Reexamination Schedule for Households (HCV)

**Narrative.** 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.

Description:

YHA may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used, and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical/disability expenses, if certified and claimed by the household. Annual household income will be determined as current and as anticipated once every three years. If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's gross rent is above their payment standard. At their annual lease anniversary, YHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households. However, as described in Activity: 1.u. - Standard Deductions (HCV), fixed-income households will also be given an opportunity to certify their medical and/or disability expenses and to qualify for the MTW standard expense deduction. If a fixed-income household claims a hardship, they may go through the process outlined in the hardship and grievance policy if applicable, by provide proof of medical/disability expenses above the MTW standard expense deduction.

Households may continue to request interim reexaminations due to a decrease in income, and/or increases in eligible expenses through the hardship policy. Applicable households will be able to file one interim reexaminations for decreases in income and/or increases in eligible expenses. YHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. YHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except YHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and YHA may choose not to conduct an interim

reexamination in the last three months of a certification period. In other words, YHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, YHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Increases in the family's annual adjusted income – The agency must conduct an interim reexamination of family income when the agency becomes aware that the family's adjusted income (as defined in § 5.611) has changed by an amount that the agency estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except:

- (i) The agency may not consider any increase in the *earned* income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction under paragraph (c)(1) of this section during the certification period; and
- (ii) The agency may choose not to conduct an interim reexamination in the last three months of a certification period.

YHA will provide education and materials to participants to inform them that n instances when an elderly/disabled household's fixed income increases, such families will be required to report those increases (e.g. SSI to SSDI with an increased amount) and if the family's adjusted income (as defined in § 5.611) has changed by an amount that the agency estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice (with the exceptions noted above) the agency must conduct an interim reexamination of family income.

The above policy/treatment of income including increases in earned income and whether or not a PHA can or cannot conduct an interim recertification for this reason, comes directly from HUD's final rule implementing HOTMA.

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Triennial reexaminations for these households are expected to

	begin with reexaminations effective in 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations. YHA's implementation of triennial reexaminations will take effect in 2024 for all applicable households rather than being phased in. The administrative efficiencies which will result from this activity, particularly over two of the three years covered, will outweigh the administrative time and costs from YHA processing full reexaminations every three years.
	This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid during the term of the program participation and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.  **Agency goals for MTW Activity:**
	This activity will help YHA further its goals to increase cost effectiveness. This activity will reduce administrative costs and burdens by reducing the amount of recertification paperwork and staff time spent on the certification process for participants through triennial recertifications. This activity may also help reduce some fixed-income households' income to housing cost burdens.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Increased HAP expenditures  Decreased administrative expenditures  Neutral because that was this the single best choice. HUD's system only allows for one answer.
Different policy by household status/family types/sites?  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
Household Status. 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

Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to families where:  the head of household, co-head, and/or spouse is elderly or disabled,  the only current income in the household is fixed income (e.g., social security, pension), and  there are no minors in the household.
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities:  The MTW activity applies to all tenant-based units and properties with project-based vouchers
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
What is the recertification schedule?	Once every three years
How many interim recertifications per year may a household request?	1
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.	Family circumstances may change throughout the period between triennial reexaminations and between applicable households' annual lease anniversaries. HUD and YHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the YHA must process interim reexaminations to reflect those changes. HUD regulations also permit the YHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The YHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

At their annual lease anniversary, YHA will not apply the
applicable Cost-of-Living Adjustments for fixed-income
households based on the source of fixed-income, where fixed
income households will also be given an opportunity to certify
their medical and/or disability expenses and provide proof of
changes in those amounts if applicable.

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? N/A

# Activity: 4.c. – Other Landlord Incentives - New Landlord Incentive (HCV)

**Narrative.** 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.

Description:

YHA is considering the offer a HAP incentive payment of \$1,000 to new landlords, upon the execution of a new HAP contract for an MTW tenant-based HCV participant.

New landlords would be incentivized to begin participating in the program. New landlords would be eligible for this payment yearly, based on a new contract with a new tenant. A "new landlord" would be defined as a landlord who has not rented to a tenant-based voucher participant within the past twelve (12) months. The landlord would not be eligible for the \$1,000 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive. Authority for this incentive is provided by HUD through PIH 2022-18.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The New Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The New Landlord Incentive `will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
Cost implications. 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
Different policy by household status/family types/sites?  Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	New admissions and currently assisted households
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	The MTW activity applies to all family types
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: This activity will apply to units in YHA's service area. In these zip codes, YHA will offer an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Custom Questions: Custom questions are tailored to each MTW activity.		
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?	_x To all units [No follow-up questions]	
Maximum payment to the landlord is \$?	\$1,000	
How many payments were issued under this policy in the most recently completed PHA fiscal year? [number of payments]	N/A	

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

Activity: 4.c. – Other Landlord Incentives - Existing Landlord Incentive (HCV)		
Narrative. 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.	YHA is considering the offer of a one-time \$500 incentive HAP payment to existing landlords who execute a new HAP contract for an MTW tenant-based HCV participant. An "existing landlord" would be defined as a landlord who has rented to a tenant-based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible for the \$500 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive HAP payment. Authority for this incentive is provided by HUD through PIH 2022-18.  **Agency goals for MTW Activity:**  The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The Existing Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The Existing Landlord Incentive 'will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.	
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice	
<b>Cost implications.</b> 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	
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	New admissions and currently assisted households	
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	The MTW activity applies to all family types	
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	MTW activity applies to all family types	
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions	For HCV activities: Existing landlords who execute a new HAP contract for an	

applicable to PH or HCV.	MTW tenant-based HCV participant. An "existing landlord" would be defined as a landlord who has rented to a tenant-
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive HAP payment.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Custom Questions: Custom questions are tailored to each MTW activity.		
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?	x_ To all units [No follow-up questions]	
Maximum payment to the landlord is \$?	The payment amount will be a one-time payment of \$500.	
How many payments were issued under this policy in the most recently completed PHA fiscal year? [number of payments]	N/A	
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A	

# Activity: COHORT 4.1. Waiver of Mandatory Initial Inspection (HCV)

**Narrative.** 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.

Description:

YHA may eliminate the requirement for an initial inspection under certain circumstances.

Agency goals for MTW Activity:

Through this activity, YHA's ability to retain and attract new landlords who want long-term tenants with low turnover would be improved through this activity. YHA would be positioned to overcome the perception that a PHA may be a hassle with which to do business and help deal with landlords' perceived risk of having a voucher client.

The safe harbors under cohort 4.1 are structured in a way that we believe are meaningful but measured. HUD's requirement that one of the three conditions must be met in order to eliminate the initial inspection (listed below), will result in opening up opportunities for a greater number of first-time and existing landlords to consider leasing under YHA's voucher program. In terms of retaining greater percentages of existing landlords participating in our voucher program, the criteria that a unit must have passed an HQS inspection (or equivalent inspection) within the previous three years, will provide the right incentive for them.

- i. One of the following must be met to eliminate the initial inspection: a) the unit is less than five years old (as demonstrated by a certificate of occupancy, provided by the landlord); b) the unit passed an HQS inspection (or equivalent inspection) within the previous three years; or c) the unit is located in a census tract with a poverty rate below 10 percent.
- ii. The participant must be able to request an interim inspection (agencies may not seek a Safe Harbor Waiver on this safe harbor).
- iii. This activity only applies to initial inspections. Units must still have regular inspections according to the agency's schedule.
- iv. HQS inspection standards must not be altered as found at 24 CFR 982.401 (agencies may not seek a Safe Harbor Waiver on this safe harbor).

YHA's service area does not have a tremendous number of affordable units that are less than five years old. However, there a few non-profit developers that have built new units within the last five years that would also benefit from this cohort-specific activity. There are not many census tracts in our service area with poverty rates below 10%, but YHA will certainly educate and market property owners in these areas about the benefits of this option. In terms of HUD's measured approach, voucher

	participants will still be able to request an interim inspection for YHA's inspection and enforcement measures, if applicable.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing Choice and cost effectiveness
Cost implications. 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
Different policy by household status/family types/sites? 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
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households. However, this activity only applies to initial inspections
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based	For HCV activities:  The MTW activity applies to specific properties with project-based vouchers. limited to higher performing landlords/property management companies.
units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	Yes

Activity: COHORT 4.2. Front-end Vacancy Loss Payment (HCV – Tenant-Based Assistance)	
Narrative. Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if	Description:
agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.	To incentivize a landlord's initial or continued participation in the HCV program, YHA will make additional payments to the landlord in circumstances where the previous tenant was not an HCV participant.
	This activity will enable YHA to provide an important financial inducement for some first-time landlords' perceived risk of voucher holders / participants and for some existing and previous landlords that had a bad experience of a voucher participant leaving their unit without proper written notice or had their participation in the voucher program terminated by YHA for violation of their family obligations and/or a voucher-assisted household who was evicted through the court system but did not leave on time.
	To incentivize a landlord's initial or continued participation in the HCV program, YHA would be able to make additional payments to the landlord in circumstances where the previous tenant was not an HCV participant. YHA's payments made to a landlord will be equal or lesser than one month of the contract rent, which will be made to the landlord when the next HAP contract is executed between them and our agency.
	The agency must update its Administrative Plan to reflect the vacancy loss policy (agencies may not seek a Safe Harbor Waiver on this safe harbor).
	Agency goals for MTW Activity:
	This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to increase housing choice.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing Choice
Cost implications. 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
Different policy by household status/family types/sites? 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
Household Status. 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types

<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all tenant-based units and units with project-based vouchers *	
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?		
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	Yes	
Custom Questions: Custom questions are tailored to each MTW activity.		
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?	To all units	
What is the maximum payment that can be made to a landlord under this policy?	One month of contract rent (upon releasing into YHA's voucher program).	
How many payments were issued under this policy in the most recently completed PHA fiscal year?	N/A	
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A	

Activity: C.5 Housing Quality Standards; 5.c. Third-Party Requirement (HCV)	
Narrative. 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.	Description: Yakima Housing Authority will perform HQS inspections on project-based voucher-assisted units and dwelling units with tenant-based vouchers that it owns, manages, and/or controls.  Agency goals for MTW Activity: Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
<b>Cost implications.</b> 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
<b>Different policy by household status/family types/sites?</b> 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
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types

#### Activity: C. 5.d. Alternative Inspection Schedule (HCV) Narrative. Describe the MTW activity, the MTW agency's Description: goal(s) for the MTW activity, and, if applicable, how the Yakima Housing Authority will establish a local inspection MTW activity contributes to a larger initiative. schedule for all or a portion of its HCV units at least every three years. YHA will also accept and rely upon other passed-inspections by governmental entities or other entities contracted by governmental entities that meet or exceed HQS / NSPIRE standards for decent, safe and sanitary housing, in lieu of performing its own required inspection within this three-year period. Such examples include but are not limited to passed-inspections under the LIHTC or HOME programs. Agency goals for MTW Activity: This will help YHA increase property owner participation and create more housing choice for voucher holders, and result in administrative cost savings to YHA. This activity will open opportunities for a greater number of firsttime and existing property owners to consider leasing under YHA's voucher program. Having more property owners participate in the voucher program will also lead to greater

MTW Statutory Objectives. Which of the MTW statutory	choice to voucher holders/households. In term of retaining greater percentages of existing property owners participating in our voucher program, will help stabilize tenancies, reduce voucherassisted households' costs relating to the frequency of their involuntary moves. This outcome will occur as a result of participating property owners being less likely to not renew the lease solely because they would like to be able to communicate, identify and resolve any HQS/NSPIRE items with their voucherassisted tenant(s) throughout the course of their tenancy without having a third-party / entity to participate in this process as is the case with private-market unassisted tenants. Currently, very few voucher-assisted units go into HAP abatement due to extended non-compliance with HQS/NSPIRE.  As an important but third-party, to the greatest extent possible YHA encourages property owners and voucher-assisted households to communicate and to maintain their respective responsibilities to maintain decent, safe, and sanitary housing conditions in compliance with HQS. YHA will provide an enhanced educational component for tenants and property owners to facilitate this activity. Like all other aspects of being a tenant, voucher-assisted households present no greater risk than unassisted tenants and participating property owners who receive a reasonable rent comparable with unassisted dwelling units are expected to maintain their units like unassisted dwelling units are expected to maintain their units like unassisted property owners. To this end, after a dwelling unit has passed an initial HQS inspection and it is properly maintained by the property owners. To this end, after a dwelling unit has passed an initial HQS inspection and it is properly maintained by the property owner and the tenant's use of the property is within normal wear and tear, the need for YHA to conduct annual HQS inspections when both parties can live up to their respective obligations similar to property owners and tenants in the private sector, is somet
objectives does this MTW activity serve?	
Cost implications. 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
Different policy by household status/family types/sites?  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

Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *  This MTW activity apply to all HCV tenant-based units and properties with project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: C 9.a. Increase PBV Program Cap (HCV)	
Narrative. 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.	Description: Yakima Housing Authority will increase the number of authorized units that it project-bases.
	Agency goals for MTW Activity:  Sometimes, people do not necessarily associate affordable housing at 30% of low-income households' monthly adjusted income in both tenant-based voucher and project-based assistance programs a directly relating to self-sufficiency. However, as noted in our application, relative to our entire portfolio and HAP contracts, YHA is involved with a substantial number of low-income households with housing costs at this affordability threshold. With the right type of wrap around services pertinent to each population type and household, coupled with this activity, YHA believes that significantly greater numbers of households will be able to become self-sufficient and to live independently. Specifically, this activity will enable YHA to provide a greater number of low-income families to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Self-Sufficiency
<b>Cost implications.</b> 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)
Different policy by household status/family types/sites? 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
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to properties with project-based voucher *
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No	
Does this MTW activity require a hardship policy?	No	
Does the MTW activity require an impact analysis?	No	
Custom Questions: Custom questions are tailored to each MTW activity.		
What percentage of total authorized HCV units will be authorized for project-basing?	Not more than 50%	

Activity: C 9.b. Increase PBV Project Cap (HCV)	
<b>Narrative.</b> 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.	Description:
	Yakima Housing Authority may raise the Project Based Voucher cap within a project up to 100%.
	Agency goals for MTW Activity:
	Create family stability in an environment with support to encourage family self-sufficiency. Specifically, this activity will enable YHA to provide a greater number of low-income families living within a PBV project to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc. to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Self-Sufficiency
Cost implications. 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)
Different policy by household status/family types/sites? 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
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all properties with project-based vouchers
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No

Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: C 9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	
Narrative. 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.	Description: Yakima Housing Authority will eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.  Agency goals for MTW Activity: Streamline the selection process for PBV. This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to streamline administrative processes.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. 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
Different policy by household status/family types/sites?  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
Household Status. 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all properties with project-based vouchers
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: C.9.d. Alternative PBV Selection Process (HC	V)
Narrative. 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.	Description:  The agency may establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing.  Under MTW activity 5c, if the selected project is one that the Yakima Housing Authority owns, manages, and/or controls, HQS inspections, YHA will perform HQS inspections on project-based voucher-assisted units and dwelling units with tenant-based vouchers.  Agency goals for MTW Activity:
	YHA's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. 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
<b>Different policy by household status/family types/sites?</b> 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
Household Status. 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
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all properties with project-based vouchers
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: C 9.f. Increase PBV HAP Contract Length (HCV)						
Narrative. 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.	Description: Yakima Housing Authority may lengthen the PBV HAP contract length up to 40 years.  Agency goals for MTW Activity:  This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households' income to housing cost burdens which directly impacts their long-term self-sufficiency. Specifically, this activity will provide a long-term HAP contract incentive to owners/developers to enable YHA to provide low-income families to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc. to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.					
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Self-Sufficiency and cost effectiveness					
<b>Cost implications.</b> 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					
Different policy by household status/family types/sites? 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					
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new	New admissions and currently assisted households					

<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all properties with project-based vouchers
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

#### **Activity: 10.c. Alternative Family Selection Procedures (HCV)**

**Narrative.** 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.

#### Description:

YHA proposes making participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income. These persons will be given a preference ahead of elderly and disabled households on the FSS waiting list as the goal of the Family Self-Sufficiency Program With MTW Flexibility, to get those households the tools they need to become self-sufficient. Tenants will be placed on the Family Self-Sufficiency Program With MTW Flexibility waiting list until a slot becomes available.

YHA proposes a mandatory self-sufficiency program to be phased in with all non-exempt households required to participate over a two-year period. The mandatory self-sufficiency requirement is driven by the following principles:

Mandatory Participation – Participation in a self-sufficiency program is a condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households who are non-elderly and/or non-disabled with zero income. Non-participation would result in denial of admission and termination of housing assistance to participants, following consultation with the family about the supportive services / information and referral offered under the Family Self-Sufficiency Program With MTW Flexibility.

Adult Requirements - All non-elderly and non-disabled households with zero income, are required to actively pursue activities to achieve economic self-sufficiency with a goal of employment for a minimum of 32 hours per week or the annual earned income for the year of participation.

Description - Participation in a self-sufficiency program for non-elderly and non-disabled households with zero income, is a condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households. All non-elderly and non-disabled households with zero income, would be required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the mandatory program and is held accountable for progress of all household members.

New Admissions - New admissions households including households porting from another jurisdiction will be provided one year from the date of the initial lease up in Yakima County to become compliant with requirements. If a new admission household is not compliant with requirements prior to submission of a Request for Tenancy Approval (RFTA), they must meet with a case worker and develop a plan. YHA will not approve a RFTA until the household has developed a plan and executed the Contract. If a member of a household claims self-employment and is establishing a new business, they must provide documentation required by local, state or federal law of the creation and/or existence of the business.

<u>Case Coordination</u> – To assist in the client's successful completion of their Contract of Participation, coordinators will assist the family in the development of an individual training and services plan and assure that program participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

YHA reviewed HUD's MTW FSS Guidance.

The agency will execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.

The agency, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 C.F.R. 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.

The agency will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.

A hardship policy will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.

The agency will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act. If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's Grievance Procedure (24 C.F.R. part 966, subpart B) or the HCV informal hearing process (24 C.F.R. part 982.555).

The agency must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV assistance.

Agency goals for MTW Activity:

The goal of YHA proposing to make participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income, is to get those individuals the tools they need to become self-sufficient.

**MTW Statutory Objectives.** Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

	,				
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Cost neutral				
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	Any household member that is non-elderly or non-disabled				
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households				
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	Any household member that is non-elderly or non-disabled				
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see	For HCV activities:				
questions applicable to PH or HCV.	This activity applies to all tenant-based units and properties with project-based vouchers.				
For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?					
Does the MTW agency need a Safe Harbor Waiver to implement	No				
this MTW activity as described?	YHA must review FSS Guidance.				
	YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.				
	YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.				
Does this MTW activity require a hardship policy?	Yes.				
	A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.				
	If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.				
	Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the				

	receipt of HCV assistance.
Does the MTW activity require an impact analysis?	Yes

# Custom Questions: Custom questions are tailored to each MTW activity. Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement. The goal of YHA proposing to make participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled individuals with zero income, is to get those individuals

the tools they need to become self-sufficient.

#### Activity: 10.d. Modify or Eliminate the Contract of Participation (HCV)

**Narrative.** 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.

Description:

Key modifications to the Contract of Participation (HCV) are as follows:

Mandatory Participation - Participation in its FSS Program with MTW Flexibility will be a mandatory condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households who are nonelderly and/or non-disabled. Non-participation would result in denial of admission and termination of housing assistance to participants, following consultation with the family about the supportive services / information and referral offered under the he Family Self-Sufficiency Program With MTW Flexibility.

YHA proposes making participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income. These persons will be given a preference ahead of elderly and disabled persons on the FSS waiting list as the goal of the Family Self-Sufficiency Program With MTW Flexibility, to get those households the tools they need to become self-sufficient. Tenants will be placed on the Family Self-Sufficiency Program With MTW Flexibility waiting list until a slot becomes available.

• Adult Requirements - All non-elderly and nondisabled households with zero income, are required to actively pursue activities to achieve economic selfsufficiency with a goal of employment for a minimum of 32 hours per week or the annual earned income for the year of participation.

Description - Participation in a self-sufficiency program for non-elderly and non-disabled households with zero income, is a condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants. All non-elderly and non-disabled households with zero income, would be required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the mandatory program and is held accountable for progress of all household members.

New Admissions - New admissions households including households porting from another jurisdiction will be provided one year from the date of the initial lease up in Yakima County to become compliant with requirements.

If a new admission household is not compliant with requirements prior to submission of a Request for Tenancy Approval (RFTA), they must meet with a case

worker and develop a plan. YHA will not approve a RFTA until the household has developed a plan and executed the Contract.

If a member of a household claims self-employment and is establishing a new business, they must provide documentation required by local, state or federal law of the creation and/or existence of the business.

Case Coordination – To assist in the client's successful completion of their Contract of Participation, coordinators will assist the family in the development of an individual training and services plan and assure that program participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

The agency is authorized to modify the terms of or eliminate the FSS Contract of Participation (HUD–52650), in lieu of a local form. The agency may modify the terms of the Contract of Participation to align with adjustments made to its MTW FSS Program using MTW flexibility. Further, the agency may discontinue use of the Contract of Participation and instead employ a locally-developed agreement that codifies the terms of participation.

- i. Agency must review FSS Guidance.\*
- ii. The agency must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
- iii. The agency, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.\*
- iv. The agency must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.\*
- v. If the agency requires MTW FSS Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.\*
- vi. If the agency requires MTW FSS Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.\*
- vii. The agency must not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.\*
- viii. If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's Grievance Procedure (24 CFR part 966, subpart B) or the HCV

	informal hearing process (24 CFR part 982.555).*  ix. The agency must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV assistance.*  **Agency goals for MTW Activity:*  The goal of this activity is to increase participation by non-elderly / non-disabled households in YHA's FSS Program with MTW Flexibility by making it a mandatory condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants who are non-elderly and/or non-disabled. By providing families with supportive services / information and referral offered under the he Family Self-Sufficiency Program With MTW Flexibility, YHA plans to enhance their ability to improve their education, employment, earnings and self-sufficiency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Self-sufficiency
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Cost neutral
Different policy by household status/family types/sites?  Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	All non-elderly and non-disabled households
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	All non-elderly and non-disabled households
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:	For HCV activities:  This activity applies to all tenant-based units and properties with project-based vouchers.
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	Yes
implement this 1911 w activity as described:	YHA must review FSS Guidance.
	YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.
	YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
	YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.
Does this MTW activity require a hardship policy?	Yes.
	A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.
	If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.
	Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the receipt of HCV assistance.
Does the MTW activity require an impact analysis?	Yes

## Activity: 10.e. Policies for Addressing Increases in Family Income (HCV)

**Narrative.** 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.

Description:

YHA proposes tailoring its Family Self-Sufficiency (FSS) program with MTW flexibilities to meet the needs of our community and be efficient for staff to administer. FSS program requirements are the same regardless of funding source, program, or property, with a few minor exceptions for site-based programs. Households participating in FSS whose unit is converted under RAD are subject to policies consistent with the RAD program.

The key elements of the FSS program are as follows:

- The rent calculation is used for all FSS participants.
- The traditional escrow account used in HUD Family Self-Sufficiency (FSS) programs will be replaced with a managed savings account. Any rent paid by a participant household above \$350 (known as the "strike point") will be placed into the managed savings account. The monthly amount placed into a family's managed savings account is limited to the difference between the strike point and the lesser of the family's voucher payment standard or gross rent for PBV-assisted households.
- They will earn escrows with a maximum earning potential of \$10,000 and a minimum of \$500.
- Participants who are engaged in a designated program intended to increase the family's economic independence (such as an employment or training program) will receive a preference on the FSS waiting list. 100 percent of the FSS slots may be filled with participants utilizing this preference.
- YHA will allow the FSS contract to be in the name of any adult member of the household.
- The length of time on the program will be five years, with the opportunity to extend for an additional two years. Eligibility for the two-year extension follows current policy and HUD guidelines.
- Participants graduate and have access to the funds in their managed savings account when they have completed their training plan and fulfilled the obligations identified in their contract.
- Families who leave the program prior to graduation will forfeit any money accrued in their managed savings account.

YHA will continue to provide FSS services at developments where that is required. YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. That stated, YHA will have sitebased preferences for developments where YHA is required to provide FSS services. At such properties, YHA's FSS Program With MTW Flexibility will be mandatory for any non-elderly or non-disabled individuals with zero income. When a housing assistance payment for a voucher participant drops to zero, deposition into the family's managed savings account will cease. Families can continue to participate in the program for an additional six months, but no savings will accrue during this time. If the family is still at zero assistance after six months, they will graduate from the program. If the family's income decreases to a level that housing assistance is reinstated during that six-month period, they may begin to earn escrow again, and continue participation in the program if the contract determines they are still eligible. Staff implementing the FSS program will be funded by a combination of HUD-funded FSS Coordinator money, grant funding, and agency budgeting. FSS Coordinator funds will be used only for FSS Coordinator salaries, as directed by the respective NOFAs (Notice of Funding Availability). Agency goals for MTW Activity: YHA proposes use of a strike point escrow system and modifications to the graduation process to give incentives to non-elderly / non-disabled families where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient. MTW Statutory Objectives. Which of the MTW statutory Self-sufficiency objectives does this MTW activity serve? **Cost implications.** What are the cost implications of this Decreased expenditures MTW activity? Pick the best description of the cost implications based on what you know today. Different policy by household status/family types/sites? All non-elderly and non-disabled households Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? Household Status. Does the MTW activity apply only to new Both new admissions and currently assisted households admissions, only to currently assisted households, or to both new admissions and currently assisted households?

<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	All non-elderly and non-disabled households
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.  For HCV activities:  Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities:  This activity applies to all tenant-based units and properties with project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No YHA must review FSS Guidance. YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.
	YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
	YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.
Does this MTW activity require a hardship policy?	Yes.  A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.
	If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.
	Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the receipt of HCV assistance.
Does the MTW activity require an impact analysis?	Yes

#### Custom Questions: Custom questions are tailored to each MTW activity.

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

Instead of the escrow contribution calculation used in standard FSS programs, under this FSS program with MTW flexibilities, each participating household's escrow account would receive an amount equivalent to any rent paid over \$350 (the "strike point") each month. In addition to being more costeffective than the traditional escrow (because no escrow is paid before the household passes the strike point) and thus potentially more scalable, this incentive avoids the "fairness" problem of providing a larger escrow-building opportunity to households that begin FSS with little or no earnings and thus have the biggest potential to increase their earnings. The strike point model would also be simpler for YHA staff to administer than the traditional model. As part of its efforts to increase self-sufficiency, YHA also proposes making participation in the FSS program mandatory for non-elderly and non-disabled households.

They will earn escrows with a maximum earning potential of \$10,000 and a minimum of \$500.

#### 17. Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

#### Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs

**Narrative.** 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.

#### Description:

YHA may utilize this activity to provide gap financing to affordable housing developments including, but not limited to RAD-PBV developments, PBV developments Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the YHA's Board of Commissioners. YHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments. YHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.

In implementing this activity, YHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.

Agency goals for MTW Activity:

	This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> 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, Increased expenditures
Different policy by household status/family types/sites?  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 all assisted households
<b>Household Status.</b> Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to only to all family types
<b>Location.</b> Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.	For HCV activities: The MTW activity applies to all properties with project-based vouchers
<b>For HCV activities:</b> Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW a	ectivity.
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?	See table below.

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name			Number of U	Units	Units		Number of Units by Affordability
of Development and Address	MTW Role: Acquisition, Rehabilitation, Ne w Construction?	ng, Tax Credit Part nership, Other		- 80% of AMI	- 60% of AMI	- 30% of AMI	- Other

Yakima Valley Preservation – Scattered Site	Rehabilitation	Gap financing	149	149	24	60	65	
Fair Avenue Apartments 110 South Fair Avenue	Rehabilitation	Gap financing	150	150		45	60	45 (40% AMI)
Pacific Apartments 50/508 Pacific Avenue								
Evergreen Apartments 1322 South 18th Avenue								
Cascade Apartments 615 North 15th Avenue								
Eastwood Apartments 610 East Arlington Street								
Spruce Lane Apartments 914 East Spruce Street								
Edgewood Apartments 621 North 16th Avenue								
Willow Lane Apartments 1214 Willow Street								
Sierra Apartments 603 Central Avenue								
Parkview Apartments 801 Central Avenue								
9th Street Apartments 1212 South 9th Street								
Yakima Terrace 1307/1309/1311 A&B South 18th Avenue								
Nueva Primavera 810 North 6th Avenue								

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 - 60% 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  Name of Development Affordable Development Affordable Units  Tax Credit Partnership, Other  Total Number of Affordable Units	Number of Units by Affordability - 80% of AMI - 60% of AM	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability
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# D. Safe Harbor Waivers. D.1 Safe Harbor Waivers The MTW Operations

Safe Harbor Waivers seeking HUD Approval:

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year?

Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]

#### E. Agency-Specific Waivers.

#### **E.1** Agency-Specific Waivers 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

### Custom Questions: Custom questions are tailored to each MTW activity.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

No [If no, skip to E.2]

#### E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:

For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

Does the MTW agency have any approved Agency-Specific Waivers?

No [If no, question set concludes]

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

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

#### G. MTW Statutory Requirements.

#### G.1 75% Very Low Income – Local, Non-Traditional.

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

<sup>\*</sup>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.

Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	No [If Yes]: please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. [Text box]

#### G.3 Substantially the Same (STS) – Local, Non-Traditional.

Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 unit months
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program	0 unit months
for the prior full calendar year.	
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	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?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

<sup>\*</sup> User will select one of the following from the "Population Type" dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the "Population Type" of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

\*\* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <a href="https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf">https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf</a>. This would also include adaptable units as defined by HUD's Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

#### Comparable Mix (by Family Size) – Local, Non-Traditional.

In order to demonstrate that the MTW statutory requirement of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

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

#### **G.5** Housing Quality Standards.

Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

#### H. Public Comments.

H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment
Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.	Upload Attachment
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	No
If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	Upload Attachment

I	Evaluations.
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including
	the information requested in the table below. In the box "title and short description," please write the title of the evaluation and
	a brief description of the focus of the evaluation.

Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	No

#### **Table I.1 - Evaluations of MTW Policies**

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

ī	J MTW Certifications of Compliance.							
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.							

#### YHA MTW Hardship Policy

YHA has created a hardship policy for when a requirement or provision of certain MTW activities constitutes a financial or other hardship for an YHA household. YHA will review its hardship policy with clients during the intake and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the PHA necessary to consider if a resident qualifies for a hardship exemption. The agency will also consider if a client qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a client requests a hardship exemption from an MTW activity included in this policy, YHA will suspend the activity for the household beginning the next month after the request until YHA has determined if the request is warranted. Hardship information will be retained by YHA for the duration of YHA's participation in the MTW demonstration program.

#### Hardship Policy: 1.u. Standard Deductions (HCV)

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

#### **Automatic Hardships:**

These hardships may be granted at the time of the triennial recertification for the following reasons.

- 1. A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
- 2. YHA will provide medical and disability expense deductions to those households who successfully claim a hardship or grievance. Medical and disability expenses total more than the dollar equivalent of 15 percent of a qualifying household's gross annual income used for TTP purposes for each elderly/disabled household that demonstrates and certifies that their medical expenses exceed at least three percent of their gross income and have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. In other words, if an elderly/disabled household claims and qualifies for a medical and disability expense deduction and provides any/all of the documentation in the categories below that exceeds 3 percent of a qualifying household's gross annual income, YHA will provide the full amount of their actual medical and disability expense deduction as documented minus three percent of their gross annual income. Eligible expenses include:
  - (i) Unreimbursed medical expenses of any elderly family or disabled family; and
  - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and

#### Other Hardships:

• Awaiting approval for benefit income

• Such other situations and factors as determined by the agency to be appropriate, such as eviction, or termination of utilities.

Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances. YHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

#### Long Term Hardship:

1. Death of a household member.

#### **Requesting A Hardship:**

To request a hardship, the participant/resident must complete a Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required. The request will be reviewed and the household notified of the approval or denial in a timely manner.

YHA will determine whether an approved hardship exists within 30 days after the request is received. Hardship requests may be denied for the following reasons:

- Failure to provide verification for loss or reduction of benefit income
- Failure to provide verification for eligibility of benefit income
- Failure to provide verification of increased expenses
- Family is not subject to eviction, utility shut off, or wage garnishment
- Failure to provide supporting documentation related to loss of income due to death in the family

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request does not meet the above criteria. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify. Prior to the expiration of the hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

#### **Grievance Procedure:**

If a client disagrees with a hardship determination, they will follow YHA's informal hearing process outlined in the Administrative Plan.

A family may request for second level review of denied hardship requests, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their hardship request.

If the request does not meet YHA hardship standards outlined above, YHA will resume the MTW activity. If the

request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity until the next reexamination. If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

#### **Exemption Period:**

If YHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

- 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
- 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
- 150 days for loss of income due to death by head, spouse, or co-head
- 90 days for increased expenses
- 60 days for break in approval of benefit income
- 30 days for all other circumstances

#### Activity: 3.b. Alternative Reexamination Schedule for Households (HCV)

YHA will move to a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

At their annual lease anniversary, YHA will automatically apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

Households may continue to request interim reexaminations due to a decrease in income and/or increases in eligible expenses. Applicable households will be able to file one interim reexaminations for decreases in income and/or increases in eligible expenses. YHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. YHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except YHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and YHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, YHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim

reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, YHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

Triennial reexaminations for these households are expected to begin with reexaminations effective July 1, 2023. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually and implementing a release form that is valid for 45 months. In addition, households on a triennial recertification schedule will not utilize the Income Validation Tool (IVT) Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of YHA staff. Unreported income requires no change or rent correction for triennial tiered rent households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. YHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

#### **Hardship Standard**

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship.

Approval will be for the following reasons only:

- A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
- A qualifying household's including medical expenses and/or disability-related expenses exceeds the amount of YHA's expense deduction for such household.
- Awaiting approval for benefit income
- Such other situations and factors as determined by the agency to be appropriate, such as eviction, or termination of utilities.

#### **Grievance Procedure**

YHA will determine whether an approved hardship exists within 30 days after the request is received.

If the request does <u>not</u> meet YHA hardship standards outlined above, YHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity for 12 months or until the next triennial reexamination.

If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship

renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

If a client disagrees with a hardship determination, they will follow YHA's informal hearing process outlined in the Administrative Plan.

A family may request for second level review of denied hardship requests. The family must submit a request must be in writing within 30 days the of the PHA written notice. Hardship request may be denied for the following reasons:

- 1. Failure to provide verification for loss or reduction of benefit income
- 2. Failure to provide verification for eligibility of benefit income
- 3. Failure to provide verification of increased expenses
- 4. Family is not subject to eviction, utility shut off, or wage garnishment
- 5. Failure to submit verification for decrease or loss of employment
- 6. Failure to provide supporting documentation related to loss of income due to death in the family

#### **Exemption Period**

If YHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

- 1. 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
- 2. 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
- 3. 150 days for loss of income due to death by head, spouse, or co-head
- 4. 90 days for increased expenses
- 5. 60 days for break in approval of benefit income
- 6. 30 days for all other circumstances

#### Activity: 2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

- 1. The household is in compliance with all the program rules and regulations.
- 2. The household does not owe YHA any money or is current with a re-payment agreement.
- 3. The household must be admitted to the program prior to July 1, 2023.
- 4. The household has not relocated on or after July 1, 2023.
- 5. The household must experience an increase of 5 percent or more in rent as a direct result of the MTW rent reform initiatives.
- 6. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or hardship review.
- 7. The household has not received a rent reform hardship relief for the Payment Standards application at interim recertification previously.

Hardship relief for households who qualify and receive wavier approval would pay their portion of rent based on the calculation under HUD regulations prior to YHA's implementation of this MTW activity, until their next reexamination / recertification or relocation. At the next reexamination / recertification, or relocation, whichever comes first, the household will automatically be subject to the payment standards set by YHA at that time.

Each household is only eligible for one term of relief for the payment standards initiative.

### Activity: 10.c. Alternative Family Selection Procedures (HCV) & Activity: 10.e. Policies for Addressing Increases in Family Income (HCV)

All households participating in an MTW eligible program may submit a hardship exemption request.

Households may qualify for a hardship exemption if one of the following criteria is met:

1. Households may qualify for a hardship exemption if the total shelter costs exceed 50 percent of the gross monthly income used to determine household's rent and subsidy.

Total shelter costs are defined as rent and utilities paid by the household.

While all households qualify to request a hardship exemption, generally those having the following criteria will not qualify for an exemption:

- a. Amount of subsidy reduction for mixed families
- b. Additional amount a household has chosen to pay above the payment standard for an HCV assisted unit.

Households receiving zero assistance may not qualify to receive a rent reduction even if the circumstances that qualified them for an automatic phase-in continue. However, if the household experiences a change in circumstances that would result in a HAP payment to owner within the 180-day period, the continuing phase-in hardship and rent reduction will be reviewed at that time.

#### Applying for a Hardship Exemption

All hardship exemption requests must be made in writing and submitted to YHA's office. Requests must be received by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests / adjustments will not be retroactive.

Only hardships expected to last longer than 90 calendar days will be considered.

Households applying for a hardship exemption are strongly encouraged to include the following documents / verifications with their request, as applicable:

- For households who have recently lost earned income proof of application for unemployment;
- For households with children proof of application for TANF and / or child support;
- Proof of application through WorkSource;
- Proof of application / participation in one of the PHA's self-sufficiency programs;
- Proof of application for low-income energy assistance through an external community agency.

#### **Determination of Hardship Exemptions**

A hardship committee with representatives from the YHA staff will review hardship requests on a monthly basis. The committee has the authorization to implement an agreed upon exemption remedy. If the committee cannot reach consensus regarding a hardship request, the majority vote will rule.

The committee will consider each household's circumstances on a case-by-case basis. The committee will have a menu of remedies to reduce a qualifying household's rent burden. These choices may include, but are not limited to, the following:

- Set tenant rent to \$0 for a specific period of time. This option would not include a utility reimbursement to the family.
- Extend a utility reimbursement for a specific period of time.
- Cap total shelter costs to not exceed 50 percent of gross monthly income or other appropriate percentage for a specific period of time.
- Reduce the amount of tenant rent.
- Remove minimum tenant rent for a specific period of time.
- A household's rent amount may result in a credit or utility reimbursement payment however the amount the households receive will never be more than the utility allowance for their unit.
- Any combination of the above remedies.

The hardship exemptions will be granted to eligible households for a minimum of 3 months and a maximum of 12 months. Households may apply for another exemption once their exemption expires.

In cases when the committee recommends denial of a hardship request, the Director or Assistant Director of Rent Assistance or designee will make the final determination. In extraordinary cases, the hardship committee may make a final recommendation to the Director or Assistant Director of Rent Assistance who will have final approval when circumstances call for a deviation from hardship policy.

#### Notice of Hardship Exemption or Denial of Exemption

In cases when the committee grants a hardship exemption, the PHA will notify the owner and the family of the

effective date, the new HAP payment and tenant rent, and the expiration date of the exemption.

If the hardship exemption is denied, the family will be notified of a decision in writing within 15 business days of the determination.



#### "Committed to Safe and Affordable Housing"

#### **Yakima Housing Authority Resident Advisory Board Meeting Minutes September 19, 2023** 5:30 P.M.

**Residents Present** Roxanne Basford/Glenn Acres Noemi Cisneros/S8 Raymond Hernandez/YHA Family

**CAP Participants** Keenan Tillison **Crystal Weston** Barabara McClaughtrey Stella Boyd

Staff Present Lowel Krueger Carlos Reyes Amanda Delp Eliel Cruz Kimberly Roberts

Monica Rubin

Call to order 5:34 p.m.

#### 2024 Annual Plan

- Review of section A-PHA Information A.1
- Basic information and PHA code
- The plan begins in January 2024
- Housing Choice Voucher numbers have increased to 1,312 including 5 Foster Youth Initiative and 10 **Housing Stability vouchers**
- That doesn't include Emergency Housing Vouchers (75) but they aren't part of the Annual Contributions Contract, as they can't be reissued after the end of the Federal Fiscal Year
- PHA Plan Submission Type is annual, and a 5 year plan will be required for 2025
- YHA's physical address and website
- E.D. Krueger asked if there were any questions
- Review of Section B-Plan Elements B.1 Revision of Existing PHA Plan Elements
- Nothing has changed on the Admin plan it is in process to make sure all program requirements for Move To Work, and HOTMA are met
  - B.2 New Activities
- New Activities has an attachment, and has to do with YHA's intention to project base 39 vouchers, with 2 properties -25 in partnership with Catholic Charities for a youth development
- And 14 project based vouchers will be for Fruitvale
- B.3 progress report this section reviews each goal from the last 5 year plan
- High performer rating in SEMAP YHA is still designated a high performer
- Maintain a leasing or authorized budget authority utilization rate of not less than 98%- this is specific to Section 8
- YHA lacks the funding to house every person who applies for Section 8, however, YHA met that goal as YHA's Section 8 utilization for 2023 is 104.61%

- Increasing Section 8 vouchers through requests for incremental and/or special needs vouchers –
   YHA received 10 additional Stability Vouchers (Project Based) in coordination with Yakima
   Neighborhood Health Services to assist families experiencing homelessness
- YHA has developed a Homeownership program and is working to develop opportunities for YHA residents in conjunction with the Development team
- YHA has set aside 100 project based vouchers for housing the homeless in conjunction with community partners-primarily with Yakima Neighborhood Health Services, Next Step Housing, Central Washington Comprehensive Mental Health, The YWCA, and Triumph Treatment
- Lease all remaining 113 VASH vouchers this will be updated in the next 5 year plan
- YHA is utilizing 72 VASH vouchers and is working with the Veteran's Affairs for case management
- Lease the 5 mainstream vouchers in coordination with Spokane Housing Authority as reviewed last year, HUD had a larger allocation, that YHA applied for and received, and is now up to 115 Mainstream vouchers, with 80 currently utilized - Mainstream targets those experiencing homelessness
- Work with Community Partners on Foster Youth Initiative vouchers YHA has 5 housed, and 5 more recently issued, and is working with Catholic Charities in coordination with their Foster Youth program, for those exiting the foster care system
- Preserving the Family Self-Sufficiency Program for at least 125 families on Section 8 YHA has
  consistently maintained 125 families, but after a number of graduations, the number is now at 115
  and further enrollments are in process
- Establish Supportive Employment YHA has a program in place with 15 participants
- Maintain applicable program requirements YHA received 2 findings at the last audit that will be discussed a bit later
- No capital improvements
   B.5 Most Recent FY Audit As previously mentioned, this is a review of the findings due to understated assets
- Understating the SEFA, the schedule that is attached to the financials that explains to funders what occurred there
- Corrective action YHA has outsourced the recording of development activities, financial statement
  and SEFA preparation, and is currently in the process of hiring an internal staff person who has the
  knowledge to perform these tasks correctly
- E.D. Krueger asked if there were any questions
- Q. On the previous page, you were talking about please clarify the housing for veterans, about the 72 vouchers in conjunction with the VA, She is a veteran and is curious about that, if they are the vouchers from the veterans program or if it is the same thing.
- A. Through the utilization of a DD214 through the VA, if they say the person is qualified, then YHA is able to house them
- Q. Are these the vouchers from Dave Brown's office?
- A. No, those are from Yakima County, these are through Section 8, and qualified through the VA Q. What about the FSS program, and Supportive Employment can you explain how you have implemented them?
- A. Supported Employment is a 1115 Medicaid waiver program, and funds that support it are billed through Medicaid, that typically would be used for medical, but in this case it is used for Supportive Employment.

Q. I am enrolled in that program, and I have not seen any action from the program. I had to find employment on my own. It is a temporary job. I have not interacted with the program for 6 months. I am enrolled in the program, 15 people are enrolled, but that is not very many. I'm trying to find out why I haven't heard anything from the FSS program for 6 months. We are supposed to have progress reports.

A. One of the FSS staff has been out on medical leave

Q. I didn't know that

A. Follow up with Eliel Cruz with Supported Employment to find out your status, as he is there with your group

A. Others have had success with the program, and it is unfortunate that the program may not be working for you

A. You haven't had any contact in 6 months

Q. No, I didn't know the staff person was out on medical leave. The chain of command needs to step in, as the program isn't working for me.

A. I'm the Resident Services Program Manager (Carlos Reyes) – I will follow up with you, we will reach out to you after the meeting. The program is a partnership between YHA and the participants, and I'm not sure about the miscommunication

C.

C.1

- RAB Comments Minutes are being taken in order to provide the Resident Advisory Board's comments to HUD
- Certification by State or Local officials the City of Yakima will sign off that the Annual plan is consistent with the consolidated plan – they receive CDBG and HOME dollars
- There have been some changes at the Office of Neighborhood Development Services, due to the Manager's retirement; this form will now go to Joan Davenport to be signed
- C.3 Civil rights certification This is signed by the Board Chair and YHA's Executive Director
- C.4 Challenged elements marked as "no"
   D Affirmatively Furthering Fair Housing (AFFH) HUD has implemented a new way of handling it, and YHA will coordinate with the City of Yakima and will be taking additional action with them in the next few years
- Additional questions none

#### **Move to Work Supplement**

- For those who attended the meeting a few months ago, this is primarily the same document, but there are two changes that will be discussed
- C. 9.D. Alternative PBV Selection Process (HCV) this is fairly straightforward, to award project base vouchers that are owned by a nonprofit, or a for profit, or to YHA owned units
- YHA will perform its own HQS inspections
- YHA went through an award process, for Fruitvale and Catholic Charities
- This is a more cost effective process
- The MTW statutory objective is a more cost effective process
- MTW applies to all households
- Household status new admissions, and currently assisted households
- Family Types All
- Location YHA is Housing Choice Voucher only, and it applies to all properties with project based vouchers
- No Safe Harbor or hardship policy
- Questions

Q. I was at the first Zoom when we talked about it, and you talked about getting more landlords to take S8, how is that going

A. The MTW cohort YHA was selected for was the Landlord Cohort, to be implemented for more S8 landlords. This first must be approved by HUD, and it has not been officially approved yet. YHA has hired a Landlord Liaison staff member, and that has been relatively successful. They have been able to bring more landlords on the program

Q. Great!

10. d Modify or Eliminate the contract of participation (HCV)

- YHA has a contract, a form HUD provides, tailored to the program, as an MTW participant, the contract needs to be modified
- The FSS program works closely with new families at zero income to connect them with resources and get them on the program early on
- It doesn't affect the elderly or disabled or specialty programs; only zero income families, who initially will be enrolled in FSS
- The new contract will be modified for the requirements of the FSS program in order to provide services, and formalize the requirements
- Any additional comments or questions
- Those are the changes that will be attached to the annual plan and submitted to HUD for the calendar year 2024
- Since this is a public hearing, please sign the sign in sheet
- Raymond Hernandez commented that he graduated from the program, and it's a great program
- Eliel Cruz is the facilitator for Supported Employment Services and Family Self Sufficiency
- Additional personnel will be added for Family Self Sufficiency, since one of the staff members is out on leave.
- Additional comments or feedback should be provided in the next week, copies can be provided of the packet by contacting YHA
- A public hearing for any additional comments or feedback will be held on Wednesday September 27 at 3:30 p.m.
- After that it will be submitted to HUD

Next RAB meeting – RAB members will be notified of the date and time

• If there is anything you'd like to bring forward to add to the agenda, please reach out to Resident Services Coordinator Kimberly Roberts or Resident Services Program Manager Carlos Reyes

Αd	ljourn	6.21	p.m.

Respectfully submitted by:

Sally Shelton, Recording Secretary