



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

OFFICE OF PUBLIC AND INDIAN HOUSING

February 9, 2024

Ms. Ivory Mathews
Chief Executive Officer
Home Forward
135 SW Ash Street
Portland, OR 97204

Subject: Home Forward FY 2024 Annual Moving to Work (MTW) Plan Approval

Dear Ms. Mathews:

The Department of Housing and Urban Development has completed its review of Home Forward's FY 2024 Annual Moving to Work (MTW) Plan. The FY 2024 Annual MTW Plan was initially submitted on October 13, 2023, and resubmitted per HUD's comments on November 17, 2023, and February 1, 2024. I am writing to inform you that Home Forward's FY 2024 Annual MTW Plan, as submitted on February 1, 2024, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local, non-traditional activities in compliance with Notice PIH 2011-45. In providing assistance to families under programs covered by this Plan, Home Forward must comply with the rules, standards and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Policy, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at Home Forward's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. If you have any questions, please contact Ann Becker, your MTW Coordinator, at (206) 220-6235.

Sincerely,

A handwritten signature in blue ink that reads "John M. Concannon".

John Concannon
Moving to Work Program Director
Office of Public Housing Investments

cc: Daniel Esterling, Portland Field Office
Chad Trepinski, Portland Field Office



Fiscal Year 2024

Moving to Work Plan

January 1, 2024 through December 31, 2024

Original Submission: October 13, 2023

Revised Submission: November 17, 2023

Second Revised Submission: February 1, 2024

HUD Approval Received: February 9, 2024



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Introduction

A. Introduction

Moving to Work (MTW) is a U.S. Department of Housing and Urban Development (HUD) demonstration program that offers public housing authorities (PHAs), like Home Forward, the opportunity to develop and pilot innovative, locally-designed housing and economic independence strategies for families by allowing exemptions from existing public housing and Housing Choice Voucher (HCV) regulations. The program also permits PHAs to combine operating, capital, and tenant-based assistance funds into a single agency-wide funding source. The purposes of the MTW program are to give PHAs and HUD the flexibility to design and test various approaches for providing and administering housing assistance that accomplish three primary goals:

1. Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2. Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. Increase housing choices for low-income families.

Home Forward has been designated an MTW agency since 1998. The 2016 Consolidated Appropriations Act extended the MTW demonstration through fiscal year 2028 for Home Forward. This allows Home Forward to continue to utilize MTW flexibility to support our mission of assuring that the people of the community are sheltered.

The following Fiscal Year 2024 Moving to Work Plan details how Home Forward intends to use our flexibility. We will continue to use our MTW authority to best meet the needs of our community, with thoughtful intent, and the ability to quickly respond to changes in our region's rental market and economy. Home Forward will continue to collaborate with local government and community partners to expand and sustain housing resources for the community. These partnerships and Home Forward's MTW flexibility are more important than ever as the Portland Metropolitan Area continues to experience a housing crisis, a crisis which the Portland City Council has recognized as a State of Housing Emergency since 2016 and has extended through March 2025.

B. Overview of the Agency's Long-Term MTW Goals and Objectives

Home Forward launched a strategic planning effort in July of 2022 and will have a new strategic plan to guide our work by the end of 2023. The development of the new strategic plan includes input from staff, the Board of Directors, the Resident Advisory Committee, residents and participants, and partners. While we are working on our new strategic plan, Home Forward continues to implement and close out elements of our current strategic plan. The current plan focuses on five key areas and includes an emphasis on equity, connection, unity, and racial justice.

One Portfolio: We'll continue to build and acquire housing with a goal of adding 500 affordable housing units to Home Forward's portfolio. We will convert our public housing properties to a Section 8-based subsidy while performing critical rehabs to best position the portfolio to remain stable for generations to come and to meet the needs of the people and neighborhoods they serve. We will also develop and implement performance standards at the property level and across the portfolio.

One Resource: We will work to create deeper connections and continuity between the types of housing assistance we provide to respond to the evolving needs of the people we serve. We'll make changes to the way we manage our waiting lists to better meet the needs of the community in the current housing market. In an effort to make ourselves

more available to the community and to better align staff resources and processes, we'll explore a new model of service delivery that puts more of our staff in the neighborhoods we serve.

One Agency: We will build our skills and work together in ways that help us constantly evolve and improve our ability to serve our community. As we move forward with our public housing conversion through the Rental Assistance Demonstration (RAD) program, we will prepare ourselves for the implications of converting our portfolio to a Section 8-based platform. We will create and implement a values-based communications plan, increase the use of surveys, focus groups and other forms of outreach to get resident input, assess current practices to identify opportunities to integrate a trauma-informed lens to our work, and increase hard skills training and leadership development for staff at all levels of the organization.

One Community: We will continue to define our equity platform with a particular emphasis on racial justice. We'll identify opportunities and set goals to increase participation of Minority, Women and Emerging Small Businesses (MWESB) in our contracting processes. We'll optimize our use of technology to increase the community's ability to interact and transact with us, and work to increase resident access to technology. We'll deepen our focus on supporting the needs of East Multnomah County and ensure the region is included in all of our strategic initiatives.

One System: We will leverage our role as the largest provider of affordable housing in Oregon to improve collaboration and efficacy between systems impacting people in poverty. We'll strengthen our engagement with the education and health care systems, and we will work tirelessly to add more affordable housing in our community, regardless of our role or ownership stake.

C. Overview of the Agency's Moving to Work Goals and Objectives for the Year

The Portland Metro region has experienced multiple emergencies over the past three years including wildfires, smoke, ice storms, extreme heat events, and the COVID-19 public health emergency. After multiple years of using our Moving to Work flexibility to maintain operations and respond to these various emergencies, this year's plan includes new activities that reflect policy work we have been doing as an agency to advance racial equity, promote housing stability, and reduce barriers to our programs. We do our work in a challenging context but with increasing commitment from our local and state leaders to address the housing crisis in Oregon. On the first full day of Oregon State Governor Tina Kotek's term, she signed a suite of Executive Orders aimed at addressing the housing crisis in Oregon. Among these Orders including a statewide housing production goal of 36,000 per year and the creation of the Housing Production Advisory Council (HPAC) to develop comprehensive budget and policy recommendations to meet that goal. Home Forward's Chief Executive Officer Ivory N. Mathews was selected as a member of the HPAC and is the Co-Chair of body's Financing Work Group, bringing the valuable perspective of Home Forward to this state-wide policy making table. In addition, during the 2023 Oregon legislative session, state lawmakers passed new protections for tenants facing eviction for nonpayment of rent and capped egregious rent increases while making historic investments in affordable housing development and preservation. Despite Oregon Governor's ambitious target there continues to be an extreme deficit of housing affordable to people earning low incomes across the State and in Multnomah County. The [Oregon Housing Needs Analysis Legislative Recommendations Report](#) found that over the next 20 years, Oregon's communities need to add more than 550,000 units, over 30 percent of which will house Oregon's lowest-income residents and will most likely require public funding or subsidy.. This severe housing deficit is impacting low-income households of color the most. The City of Portland's 2022 ["State of Housing Report"](#) found that there is not a single neighborhood where an average Black household could afford to live.

Many households earning low incomes were economically impacted by COVID-19 in Multnomah County, and Black, Indigenous, and people of color households were disproportionately impacted. Home Forward worked with local and State partners to secure external funding to alleviate rent debt that Home Forward residents accumulated during the pandemic. As a result of these resources, rent debts that accrued between March 1, 2020 to March 30, 2022 were waived and no households was evicted for nonpayment of rent that occurred during this period. In addition to supporting the housing stability of our residents during this difficult time, Home Forward also played a significant role

in the delivery of rent assistance in our community and Statewide by administering multiple locally funded rent assistance programs.

In addition to leveraging our Moving to Work authority to enable flexible and effective response to the lingering impacts of the pandemic, Home Forward has and plans to continue using our Moving to Work authority to advance racial equity. The pandemic deepened existing racial and economic disparities which has informed Home Forward's response both internally and in collaboration with our jurisdictional partners in the delivery of rent assistance. Home Forward is committed to being an anti-racist¹ institution and we have implemented and will continue to implement policy and practice changes to reduce racial disparities and advance racial equity. For example, Home Forward eliminated our rent reform minimum rent policy in 2021 because the policy disproportionately impacted Black, multiracial, and Hawaiian/Pacific Islander households. While eliminating minimum rents will reduce shelter burden for all households, the average reduction will be in the double digits for multiracial (16.3%), Black (11.2%), and Hawaiian/Pacific Islander (10%) households. Home Forward has also used our Moving to Work authority to adjust payment standards in a way that reduces racial disparities in shelter burden for Black and brown households, temporarily paused the ability to increase rents in the HCV program given existing racial disparities in rent increases and resulting rent burden in the private rental market, and adjusted our rent assistance termination policy in response to racial disparities in termination practices. In this year's plan, we are continuing to address racial disparities by proposing to address shelter burden for participants living in LIHTC units in our rent assistance program. During calendar year 2024, we plan to advance policy solutions to prevent evictions from housing that we own. This race equity work will continue within Home Forward's programs, policies, and practices. Perhaps more importantly, we will work to amplify this work locally and nationally to counter the racist outcomes we see daily in our nation's housing system.

Home Forward also continues to make progress towards our goal of converting our public housing portfolio to a Section 8-based platform through the Rental Assistance Demonstration (RAD) and Section 18 paths, tools that enables the preservation of this critical affordable housing infrastructure for generations to come. We converted 209 public housing units in 2021 and 67 public housing units in 2022, leaving 369 public housing units remaining to convert in upcoming years. The subsidy conversion transitions the public housing portfolio to a more stable funding source and will give Home Forward the ability to rehabilitate buildings and address long-standing capital needs while continuing to serve the same vulnerable population. We recognize RAD impacts our current residents who call our buildings home and additional organizational capacity will be required to effectively communicate and prepare them for the transition.

D. Overview of Non MTW Activities

Learnings from the COVID-19 Pandemic

Home Forward played a significant role in the delivery of emergency rent assistance in response to the COVID-19 public health emergency. To date, we have administered three statewide programs to alleviate tenant debt: the Landlord Compensation Fund, the Landlord Guarantee Program, and the Affordable Housing Stabilization Fund. We continue to administer American Rescue Plan Act (APRA) funded emergency tenant based rent assistance in collaboration with our local partners, Multnomah County and the City of Portland.

Home Forward also took comprehensive action to prevent nonpayment evictions for residents of Home Forward properties and participants in our long-term rent assistance programs. We implemented an internal eviction moratorium through March of 2022, beyond the requirements of any local, State, or Federal moratorium. We applied for landlord based rent assistance on behalf of our residents which enabled us to alleviate all rent debt from March 2020 to July 31, 2022. As a result of these resources, no residents of Home Forward owned properties accrued rent arrears between March 1, 2020 to July 31, 2022 and no households was evicted for nonpayment of rent that accrued

¹ The National Museum of African American History and Culture defines "anti-racist" as "fighting against racism". See <https://nmaahc.si.edu/learn/talking-about-race/topics/being-antiracist>.

during this period. Our community services staff proactively assisted residents in applying for rent assistance, receiving other emergency supports, and gaining access to on-site vaccination clinics. We also contracted with a local partner to support voucher holders in applying for emergency rent assistance if they were at risk of eviction. Finally, during the pandemic we stopped terminations of Section 8 assistance, and during 2020 we paused increases to tenant rents throughout the HCV program to promote housing stability.

In furtherance of our efforts to promote housing stability, while underpinned with our learnings from the pandemic and the economic realities of our residents, we adopted a Nonpayment of Rent Policy in 2022. This policy that slows down lease enforcement of nonpayment of rent by setting a threshold amount of rent arrears before lease enforcement can commence and requires the offering of a reasonable repayment plan at all phases of the process. Our Community Services Department also used lessons learned from the pandemic to re-envision the model of community services delivery. Through this pilot launched in July 2023, the residents of our high-rise buildings will be served through three specialized resident services teams rather than one Resident and Community Services Coordinator (RSCS) per building. These teams are Health & Wellness, Housing Stability, and Resident Leadership & Community Building. The Health & Wellness team's focus includes food insecurity, health fairs, nutrition classes, health related activities, hoarding, digital equity, and insurance needs. The Housing Stability team's focus includes lease enforcement, lease education, and rent and utility assistance. Finally, the Resident Leadership & Community Building team's focus includes volunteer opportunities, resident leadership workshops, Resident Councils, Resident and Community Builder Program, new resident orientation, and social activities. Home Forward adopted this change to promote equitable access based on need, a more tailored support based on the RSCS's area of experiences, a proactive approach to service delivery, and a standardization of practices and processes for all residents.

Regional Longterm Rent Assistance (RLRA)

In the spring of 2020, voters in the tri-County Metro region passed a bond measure to fund supportive housing rent assistance and services. Home Forward is implementing the rent assistance portion of this measure on behalf of Multnomah County. Home Forward's Moving to Work authority gave us experience with flexible rent assistance programming that was crucial to the development of this program and Home Forward's readiness to be a trusted and effective implementation partner.

VASH Households

Veterans Affairs Supportive Housing (VASH) vouchers are an important and valuable resource for homeless veterans in our community. Home Forward currently administers 1,045 VASH vouchers, up from our original award of 70 vouchers in FY2009. Home Forward was awarded 75 new VASH vouchers with an effective date of May 1, 2021. We are proud to administer these vouchers for the veterans in our community.

Our March 2018 VASH utilization level was up to 96%. Our utilization has dropped in 2019 and 2020 as we worked with the VA and community partners to lease-up these new vouchers. As of June 2023 our utilization is at 74%. The lease-up success rate for VASH vouchers continues to be high, at 94% in June 2023 and leasing continues to increase at a steady pace.

Our ability to effectively increase the scale of our VASH program in the face of an incredibly tight rental market is testament to the success of our partnership with the local Veterans Administration Medical Center, Multnomah County, the City of Portland and a host of non-profit agencies including Transition Projects, our community's Supportive Services for Veteran Families recipient. Home Forward continues to provide security deposit assistance, and our jurisdictional partners, through the Joint Office for Homeless Services, funds additional flexible placement and retention assistance which can be used for any costs related to removing barriers related to lease-up, such as application fees, utility and housing debt, and transportation costs associated with housing search. Additionally, Home Forward is working with the VA and partners to increase the number of Project Based VASH, in order to increase access to housing for Veterans that face the greatest barriers to lease up in the private rental market. There are

currently 86 Project Based VASH units. We anticipate the lease up of 65 more Project Based VASH units in 3 properties in 2024.

In both 2014 and 2016, we received approval to apply relevant MTW activities to VASH voucher holders.

General Obligation (GO) Bonds – City of Portland and Metro Regional Government

City of Portland GO Bond: In November 2016 voters in the city of Portland approved \$258.4 million in general obligation bonds to fund at least 1,300 units of newly affordable housing over the next five to seven years. As of December 2022, all bond funds had been allocated, bringing the total affordable units open or in progress to 1,859. 215 Project-based Section 8 units have been allocated of the 400 vouchers set aside by the MTW amendment 16 approved by HUD – “Affordable Housing General Obligation Bond Project Based Voucher Allocation.”

Home Forward is participating in the Portland GO Bond in two ways:

- 1) **Asset Management:** Home Forward’s asset management team is overseeing third-party property management on behalf of the City of Portland. As of December 31, 2023, three properties owned by the City of Portland are included in Home Forward’s asset management portfolio:
 - a. Ellington: 262 units (1 unit taken offline for Resident Services use)
 - b. East Burnside: 51 units
 - c. Headwaters: 100 units
- 2) **Development for City:** Initially after the bond was passed, Home Forward acted as the Portland House Bureau’s (PHB) developer. Since then, we have moved on to developing a site purchased by PHB, located at SE 30th and Powell. Home Forward closed on the financing in November 2021 and started construction immediately afterwards. The site includes 206 units of affordable housing. Fifty units will have Project Based Vouchers (PBVs) and will be designated as Permanent Supportive Housing for families who have previously experienced homelessness. Lease-up will begin in March of 2024.

Metro Regional GO Bond: Voters in the three-county area (including Multnomah County which is served by Home Forward) approved an affordable housing bond in November 2018. The Metro GO Bond plans to create 3,900 affordable units with 1,600 of these homes deeply affordable to households at or below 30% AMI. Half of the homes created will have two or more bedrooms to ensure access by families.

Home Forward received Metro GO Bond allocations for four projects:

- 1) **Redevelopment of Dekum Court:** Home Forward selected Dekum Court as for major redevelopment that leverages a Section 18 Disposition (approved in October 2018) and the transfer of 27 units of RAD assistance from Cora Park, Chateau Apartments and Scattered East A. Redevelopment will be completed in two phases, with Phase I ensuring that existing residents (40 units) have the choice to relocate into the new building (in the 2nd and 3rd quarter of 2023) prior to demolition of the current buildings. After completion of Phase II in Spring 2025, a total of 187 apartments will be located on the site. Financial close for both project phases and Transfer of Assistance occurred in April 2022.
- 2) **Troutdale property:** Due to smaller population sizes, the three cities in eastern Multnomah County did not qualify for individual allocations of bond funding. Instead, Multnomah County and Metro have designated Home Forward as the jurisdictional partner to receive the bond allocation to cover approximately 111 units of affordable housing in this area. Multnomah County has identified county-owned property in Troutdale that is in an area suitable for development as affordable housing. Home Forward is working with staff from the City of Troutdale, an architect and contractor to design a 84-unit project that serves the

community, meets funding requirements, and meets Troutdale's building and land use codes. We are currently completing the entitlements process. Formal transfer of ownership from the County to Home Forward is anticipated at financial closing in spring of 2024. Once closed, the project will take eighteen months to build.

- 3) Killingsworth Housing (NE 42nd and Killingsworth): Home Forward has selected a design team and construction contractor for the development of affordable housing on approximately one acre of a three-acre site owned by Portland Community College (PCC). The college will be redeveloping an existing workforce training center and Home Forward will add 84 new apartment homes adjacent to PCC's new workforce facility. Home Forward's building will also include 4,200 square feet of ground floor commercial space for the Native American Youth and Family Center (NAYA). In 2022, PCC began building its new workforce training center and NAYA and Home Forward received ARPA funding to build out the commercial space as an early learning center. Affordable housing and early learning center construction will begin once PCC completes its new building, currently scheduled for completion in October 2023. The project will include 28 Faircloth-to-RAD units.
- 4) The Hattie Redmond: Home Forward successfully competed for funding from the State of Oregon and Metro Go Bond funding to redevelop 12 units of market-rate housing currently located on NE Interstate and Baldwin into 60 studio apartments which now serve as Permanent Supportive Housing for people who have experienced homelessness. Home Forward is partnering with the Urban League of Portland to ensure culturally responsive services are provided on site. A design team and contractor has been selected, community outreach has been completed and finance closing took place in September 2021. The project is open and will complete its lease up by the end of 2023.

Other Development

- 1) Fairfield Hotel Rehabilitation: In June 2021, Home Forward was awarded 9% Low Income Housing Tax Credits to rehabilitate the Fairfield Hotel—an 82-unit SRO project with 80 units of rental assistance via a Section 8 Moderate Rehabilitation contract. Home Forward converted the Fairfield to RAD in 2023 and is now undertaking extensive rehabilitation and seismic upgrades. RAD Conversion and financial closing occurred in March 2023, beginning a 14-month construction schedule. Our relocation team met with residents several times and followed URA rules to ensure that residents were relocated to a comparable home that they can afford. All residents will have the choice to return to the Fairfield after its complete.
- 2) Redevelopment of 4720 North Maryland, Portland Oregon: In July of 2021, Home Forward purchased a full city block (0.9 acres) within Portland for redevelopment. Home Forward is exploring the idea of co-locating affordable rental housing and early learning opportunities on the site. Site planning efforts and identifying potential funding sources will begin in 2024.
- 3) Rehabilitation of Grace Peck Terrace: Grace Peck Terrace is a Home Forward-owned property with a HUD Multifamily Section 8 contract for all units. It has 95 one-bedroom apartments for seniors and persons with disabilities. Home Forward is utilizing 4% Low Income Housing Tax Credits to undertake renovations necessary to preserve Grace Peck as affordable housing with rental assistance for future generations. Home Forward selected Grace Peck's design and construction team in June 2021. Renovations began in April 2023.

Public Housing Preservation Efforts: 85 Stories

As part of our Strategic Plan goal, One Portfolio, we will increase the number of housing units for our community through preservation, development, and acquisition. With approvals from HUD in both Section 18 and RAD, Home

Forward's entire public housing portfolio will be transitioned to either project-based vouchers or project-based rental assistance. We have engaged in this work in three phases:

Phase I: HUD approved our proposal to change the operating subsidy at four of our high-rise towers from public housing to project-based Section 8 funding (via a Section 18 disposition process). This subsidy change occurred in FY2013 and transfer to the LIHTC partnership in FY2015. The Phase I budget was approximately \$124.7 million. Because of the great importance of this work, the agency contributed a significant amount of its own resources to Phase I: \$13.6 million (11% of the total funding). Construction was completed during FY2017 at each of the first four properties (Group 1: Northwest Tower & Annex, and Gallagher Plaza; and Group 2: Hollywood East, and Sellwood Center).

Phase II: RAD conversions focused in two groups during FY2017. Group 3 included six mixed finance properties which were not in need of renovations. Group 4 included three HOPE VI properties which were also newer properties that were not in need of renovations.

Phase III: Group 5 had financial closing in FY2018 and included two Section 18 properties and five RAD properties with financial closing in FY 2018. Group 6 had financial closing in FY2019 and included two Section 18 properties along with seven RAD properties. Group 7 had financial closing in FY2021 and included one Section 18 property and three RAD properties. Financial closing for Dekum Court's redevelopment – a Section 18 conversion that also incorporates Metro Regional GO Bond funding and RAD Transfer of Assistance– occurred in April 2022 and its phased redevelopment will continue into 2025. A similar effort to redevelop and increase housing options on our Peaceful Villa public housing site will begin construction in 2024. Peaceful Villa's redevelopment efforts will include the conversion of its existing public housing via RAD and the usage of Faircloth to RAD for 96 units of new construction. Design and planning work for the renovation of Group 8 will begin in late 2023 and continue throughout 2024, with conversions and renovations currently planned for 1st quarter of 2025.

Public Housing Strategy

Several important policies guide us as we undertake this complex and challenging initiative. We developed these policies through our work over the last 15 years, starting with our first HOPE VI redevelopment, to preserve this vital community resource.

Policy Guidelines for Subsidy Conversion

- 1) Continue to serve very low-income populations in these communities
- 2) Maintain ownership or control of the properties
- 3) Improve the physical and financial condition of the properties
- 4) Partner to optimize public and private resources on behalf of the properties and our residents

The charts below summarize the conversion of properties by HUD program.

REMAINING CONVERSIONS

AMP (PH units)	Property Name	Total Public Housing Units in CHAPS
OR002000124	Lexington Court (RAD)	20
OR002000122	Townhouse Terrace (RAD)	32
OR002000126	Carlton Court (RAD)	24
OR002000131	Slavin Court (RAD)	24
OR002000132	Demar Downs (RAD)	18
OR002000142	Celilo Court (RAD)	28
OR002000108	Peaceful Villa (RAD)	70
OR002000140	Ruth Haefner Plaza (Sec. 18)	73
OR002000115	Holgate House (Sec. 18)	80

General Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A	0	0	0	0	0	0	0	N/A	0	0
Total Public Housing Units to be Added in the Plan Year:							0			

* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). 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, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

** Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

N/A

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A	N/A	N/A
	0	Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT- BASED	RAD?	DESCRIPTION OF PROJECT
N/A	N/A	N/A	N/A
TOTAL: Planned new Project Based Units in Plan Year	0		

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Alberta Alive	25	Committed	No	New construction with Community Development Partners. Will include 25 Project-Based VASH
Powellhurst	12	Committed	No	New construction with Catholic Charities. Will include 12 Project-based Vouchers for low-income families and seniors
Alder 9	46	Committed	No	New construction with Related Northwest. Will include 46 Project-based Vouchers for very low-income families, seniors, and communities of color
SE Powell	50	Committed	No	New construction with Home Forward. Will include 50 Project-based Vouchers for families experiencing homelessness
Total: Planned Existing Project-Based Vouchers	133			

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

N/A

General Description of All Planned Capital Expenditures During the Plan Year

Community	Activity	Capital Fund	Percentage of Capital Fund	Total Expended	Percentage of Total expended
PHA Wide	15% Administrative Allowance	802,193	6.56%	802,193	6.56%
Various Properties	Fleet Vehicles	343,000	2.80%	343,000	2.80%
Various Properties	AC Units Installation	584,250	4.77%	584,250	4.77%
Various Properties	Smart Burner Installation	215,750	1.76%	215,750	1.76%
Celilo Court	Security Systems Upgrade	1,251,700	10.23%	1,251,700	10.23%

Lexington Court	Lead Testing	10,000	0.08%	10,000	0.08%
Holgate House	Resealing/Pointing South Side	95,000	0.78%	95,000	0.78%
Ruth Haefner	Sewer Lines Replacement	100,000	0.82%	100,000	0.82%
Schiller Way	Radon Mitigation	89,150	0.73%	89,150	0.73%
Schiller Way	Security Cameras and LED Lighting	600,000	4.90%	600,000	4.90%
North Interstate Crossing	Roofing Replacement	55,000	0.45%	55,000	0.45%
Various Properties	Affordable Housing Capital Works	4,715,407	38.54%	4,715,407	38.54%
Fairfields Apartments	Development Project	50,000	0.41%	50,000	0.41%
Grace Peck Apartments	Development Project	175,000	1.43%	175,000	1.43%
Troutdale Housing	Development Project	3,150,000	25.74%	3,150,000	25.74%
	Total Capital Expenditures Budget	12,236,450	100%	12,236,450	100%

*Note: The Major Systems Upgrades titled 85 Stories is planned for Home Forward's public housing properties converting to HUD's RAD and/or Section 18 Disposition programs.

Group 5 received approval through HUD's RAD and Section 18 Disposition Programs. The group converted into a Tax Credit Limited Partnership in November 2018 and is currently in construction phase. This group consists of seven properties - Tamarack, Schunk Tower, Eliot Square, Maple Mallory, Bel Park, Winchell Court and Camelia Court.

Group 6 received approval through HUD's RAD and Section 18 Disposition Programs. The group converted into a Tax Credit Limited Partnership in June 2019 and is currently in construction phase. This group consists of nine properties - Medallion, Williams Plaza, Harold Lee, Floresta, Powellhurst, Tillicum North, Tillicum South Hunters Run and Alderwood.

Group 7 received approval through HUD's RAD and Section 18 Disposition Programs and are still in the planning phase. The group converted into a Tax Credit Limited Partnership in May 2021. Group 7 consists of four properties - Dahlke Manor, Fir Acres, Eastwood Court, Stark Manor—which will complete their renovations by the end of 2022.

Group 8 received approval through HUD's RAD and Section 18 Disposition Programs and are still in the planning phase. The work will be bundled into a Tax Credit Limited Partnership. Group 8 currently consists of three properties: Holgate House, Ruth Haefner Plaza, and Celilo Court.

B. Leasing Information

i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	4,339	362
MTW Housing Choice Vouchers (HCV) Utilized	116,640	9,720

Local, Non-Traditional: Tenant-Based[^]	2,100	175
Local, Non-Traditional: Property-Based[^]	60	5
Local, Non-Traditional: Homeownership[^]	0	0
Planned Total Households Served	123,139	10,262

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.

[^] In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Program Based Assistance / 14	2,100	175
Property-Based	Program Based Assistance / 14	60	5
Homeownership	N/A	0	0

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	There are no anticipated issues related to leasing public housing units.
MTW Housing Choice Voucher	<p>We opened a new HCV waitlist in June 2023 and will begin pulling names from the new waitlist in late 2023 and into 2024. We anticipate that we will exceed the stated number of households to be served in FY 2024.</p> <p>We continue to experience a very tight rental market made worse by the impacts of the COVID-19 pandemic. In the Portland area rental market, vacancy rates decreased while average rents significantly increased in the last year which has made it difficult for voucher holders to find housing to utilize their vouchers. To support voucher holders in their search, we have been offering deposit assistance to participants that complete a tenant education class taught by a community organization.</p>
Local, Non-Traditional	There are no anticipated issues related to local, non-traditional units.

C. Waiting List Information

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
MTW Public Housing	Site-Based	16,816	Partially Open	Yes
MTW Housing Choice Voucher	Community-Wide	2,245	Partially Open	No
MTW Housing Choice Voucher	Site-Based	18,756	Partially Open	Yes
Tenant-Based Local, Non-Traditional MTW Program	Other (see below)	0	Open	No
Project-Based Local, Non-Traditional MTW Program	Site Based	0	Closed	No

Please describe any duplication of applicants across waiting lists:

60 households are duplicated across the MTW Public Housing and MTW Housing Choice Voucher (Community-Wide) waitlists. The MTW Housing Choice Voucher (Site-Based) is a Project-Based voucher waitlist (see Activity 10), with waitlists kept by partner agencies administering the PBV contract. Additional households may be duplicated between MTW Public Housing, MTW Housing Choice Voucher (Community-Wide) and MTW Housing Choice Voucher (Site-Based).

Our MTW Public Housing waiting list is currently closed except for households needing an ADA accessible unit or applicants who have a documented terminal illness with a life expectancy of less than 12 months. Our Community-Wide MTW HCV waitlist is currently closed except for applicants who have a documented terminal illness with a life expectancy of less than 12 months.

Our Tenant-Based Local, Non-Traditional program is our Program Based Assistance program (described in detail in Activity 14). This program largely contracts funds to partner agencies, which then manage the participant selection process, sometimes in partnership with Home Forward.

Each agency currently uses different methods for participant selection, but all programs target families who are homeless or at risk of homelessness.

In 2023, Home Forward will fund three tenant-based local, non-traditional programs. These three programs are administered by two partner agencies.

The third tenant-based program, Economic Opportunity Program, does not utilize a waiting list. Rather, when funding becomes available, the STRA agency begins accepting referrals from their partner agency, Worksystems, until the available funding is obligated.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

N/A	N/A
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Proposed MTW Activities

28 MTW Alternative Rent Reasonableness Standard for Housing Choice Vouchers (HCV) Used at Low-Income Housing Tax Credit (LIHTC)-Assisted Units

This activity would allow Home Forward to use an alternative rent reasonableness standard at certain LIHTC units, in order to avoid additional rent burdens to HCV participants that undermine affordability and housing stability. Current law and regulations require that HCV contract rents in LIHTC units where the contract rent is greater than the rents charged for non-voucher families meet a two-part rent comparability study; the first being rent reasonableness compared to comparable units in the private market and the second being the payment standard. Home Forward would change the second prong of the rent comparability study to subtract any utility allowance from the payment standard—therefore, rents would not be considered reasonable if they exceed either 1) rents for comparable units in the private market, or 2) the greater of rents paid for non-HCV LIHTC units in the project or the payment standard minus any utility allowance. This activity does not apply to PBV.

Agency Metrics: This activity increases housing choice, by increasing the affordability of the affected HCV units. Home Forward expects the net housing choice impact to be positive.

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	FY2024: 3,850 units	FY2024: 4,000 units	At least 4,000 units
Units of housing preserved (Standard Metric: HC#2)			
Number of units preserved for households at or below 80% AMI that would otherwise not be available	Before implementation, 0 units preserved	FY2024: 100 units	At least 100 units
Displacement prevention (Standard Metric: HC#4)			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2024: 200 households	FY2024: 0 households	0 households

Cost Implications:

The result of this activity is anticipated to result in no cost implications to Home Forward and savings to participants in reduced shelter burden.

Justification for MTW Flexibility:

The MTW Agreement authorizes this activity under:

- Attachment C. Section D(2)(c): “The Agency is authorized to develop a local process to determine rent reasonableness that differs from the currently-mandated program requirements in the 1937 Act and its implementing regulations.” *This authorization waives certain provisions of Section 8(o)(10) of the 1937 Act and 24 CFR 982.507 as necessary to implement the Agency’s Annual MTW Plan.*

Approved MTW Activities

A. Implemented Activities

01 Rent Reform

Approved FY2012, Implemented FY2012, Amended FY2014, FY2020, & FY2021

In FY2012, Home Forward implemented a large-scale reform of rent calculation methods, applicable to all MTW public housing and Section 8 households, as well as VASH and FUP voucher holders. The simplified method distinguishes between the populations of seniors / people with disabilities and “work-focused” households. The fundamental premise is that deductions are eliminated from the subsidy calculation and the total tenant payment is determined using a percentage of gross income.

In early 2013, the federal government imposed sequestration: across-the-board reductions in federal funding. In response to these funding cuts, Home Forward amended the activity in FY2014 to increase the percentage of income used to calculate rent. The amended percentages are reflected below.

Seniors and People with Disabilities

For seniors and people with disabilities, rent is calculated based on 28.5% of gross income. All deductions are eliminated and this group has triennial income re-certifications. We define those aged 55 and older as “seniors”, and households fall into this population category if the head, co-head or spouse listed on the lease is 55 or older, or is disabled under the current HUD definition used by Home Forward. This group has a \$0 minimum rent and utility reimbursements are allowed.

Work-Focused Households

All households that do not fall into the population category above are considered work-focused households. All deductions are eliminated and this group has biennial income re-certifications. The percentages of income used to calculate the tenant portion of rent are as follows:

- **Years 1 and 2:** rent is based on 29.5% of gross income and. utility reimbursements are allowed.
- **Years 3 and 4:** rent is based on 29.5% of gross income and utility reimbursements are allowed.

MTW authorization:

Attachment C, Section B(3) – Definition of Elderly Family

Attachment C, Section D(2)(b) – Rent Policies and Term Limits

Attachment C, Section D(2)(e) – Rent Policies and Term Limits

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment D, Section B(2) – Rent Structure and Rent Reform

Attachment D, Section D(1) – Establishment of a local Section 8/HCV program

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

- **Years 5 and 6, and biennially thereafter:** rent is based on 31% of gross income and utility reimbursements are allowed.

The following policies apply to all households:

Home Forward has removed the set subsidy proration amount for mixed status families and replaced it with a proration of \$1 after reviewing impacts on overall agency finances, per-voucher costs, and a review of demographics of impacted households which revealed a large impact on households with minor children.

The ceiling rent for public housing is set to match Section 8 payment standards. There is no flat-rent option.

Home Forward has created a separate “release of information” form to supplement the HUD Form 9886, in order to obtain a release of information that covers the appropriate biennial or triennial review cycle.

For Section 8 households where the gross rent of the unit exceeds the applicable payment standard, Home Forward will approve the tenancy at initial occupancy so long as the household share does not exceed 50 percent of the household’s gross income.

When a Section 8 household is approved to move and the identified unit has a gross rent that exceeds the payment standard, Home Forward will use the existing income verification on file to test for affordability. Home Forward will not require a re-examination to verify income for this purpose, unless the family requests it.

When a Section 8 household reports a change in family size, if the household has resided in their unit for at least 12 months, Home Forward will require an interim review. Any changes to voucher size, payment standard and subsidy calculation will be effective 120 days after the interim review.

The earned income disallowance is eliminated.

All GOALS participants are included in the rent reform calculation.

Home Forward uses actual past income to determine annual income for participant families.

All income sources used to determine a household’s public housing rent or Section 8 assistance are the same as currently defined by HUD, with the following exceptions:

- The value of any asset or the value of any income derived from that asset is not used in the rent calculation, except when the asset makes regular payments (quarterly or more often) to the resident or participant. However, the value of assets or the value of any income derived from assets is used to determine initial eligibility. Home Forward allows households to self-certify assets with a net value of \$5,000 or less.
- All earned income of full-time students age 18 and over is excluded from the rent calculation, unless they are the head, co-head or spouse of the household.
- Student financial assistance is considered only for the purpose of determining eligibility. Student financial assistance is not used to determine annual income for rent and subsidy calculation.
- All adoption assistance payments are excluded from the rent calculation.

Households have the option to not report income that is not used in the rent calculation, such as foster care payments. However, Home Forward will accept income reporting of such sources for use in determining affordability of a unit. Home Forward permits families to rent units where the family share is up to 50% of their gross income.

Households may apply for a hardship review if their total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy. Section 8 participants who choose to rent housing where the total

shelter costs exceed 50% of total monthly income at the time of initial lease-up will not generally qualify for hardship review; however, all households have the right to request a hardship and exceptions may be made. The committee has a menu of remedies to reduce a qualifying household's burden.

Rent reform has been fully implemented. At this time, all MTW public housing and Section 8 households, as well as VASH and FUP voucher holders, are on the rent reform calculation. The earliest group of work-focused households transitioned to the second level of rent payment beginning in FY2015. Home Forward continues to monitor hardship requests, household and agency financial impacts and staff feedback to prepare for any changes that may need to be made to the activity.

In FY2020, Home Forward made two modifications to this activity. The first modification was adjusting the set subsidy proration amount for mixed status families after reviewing impacts on overall agency finances, per-voucher costs, and a review of demographics of impacted households. This analysis revealed a large impact on households with minor children compared against minor impacts to the overall annual agency budget and per unit voucher costs. The second modification was to allow Home Forward to temporarily deny all rent increase requests, or pause processing rent increase requests, from landlords of Tenant Based Voucher holders for rent increases that would go into effect during calendar year 2021 in response to the COVID-19 public health emergency. This modification ended on December 31, 2021 and rent increase requests consideration and approvals from landlords of Tenant Based voucher holders resumed in 2022.

In FY2021, Home Forward made a modification to this activity that eliminated minimum rent and allows for all households to be eligible for utility reimbursement payments. Previously, work-focused year 3 & 4 households were subject to a \$100 minimum rent and were not eligible for utility reimbursement payments. Work-focused year 5 households were subject to a \$200 minimum rent and were not eligible for utility reimbursement payments.

Changes or Modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2011: \$140,228	FY2024: \$101,292	Less than \$111,000 annually
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2011: 5,340 hours	FY2024: 4,200	Less than 4,200 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity. Through our quality control process, every error that is identified is corrected.			
Average error rate in completing task	FY2015: 7.5%	FY2024: 7.5%	Maintain 7.5% or less
Increase in tenant share of rent (Standard Metric: CE#5)			
Total annual tenant share of rent	FY2012: \$25,342,942	FY2024: \$37,095,696	At least \$37,000,000

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2011: \$3,324	FY2023: \$4,121	At least \$4,100
Increase in positive outcomes in employment status (Standard Metric: SS#3) Note: Because Home Forward has implemented biennial and triennial review schedules, the number of households who report an increase in earned income each year is reduced.			
Number of heads of households who: 6) Other (defined as having an increase in earned income)	FY2011: 866 heads of households	FY2024: 525 heads of households	At least 525 heads of households annually
Percent of work-focused households who: 6) Other (defined as having an increase in earned income)	FY2011: 16% of work-focused households	FY2024: 16% of work-focused households	At least 16% of work-focused households
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)			
Number of households receiving TANF assistance	FY2012: 229 households (2.0%)	FY2024: 100 households (1.0%)	At least 100 households (1.0%)
Reducing the per unit subsidy costs for participating households (Standard Metric: SS#6)			
Average amount of subsidy per household	FY2012: \$524 per household	FY2024: \$,143	Less than \$1,150 per household
Households transitioned to self-sufficiency (Standard Metric: SS#8)			
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2014: 521 households	FY2024: 330 households	At least 330 households annually
Displacement prevention (Standard Metric: HC#4) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not believe this metric is an accurate measure of this activity, but we have included it at HUD's request.			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2011: 233 households	FY2024: 0 households	0 households are required to move
Increase in resident mobility (Standard Metric: HC#5) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not use rent reform to impact mobility, but we have included it at HUD's request.			

Metric	Baseline	Benchmark	Final Projected Outcome
Number of households able to move to a better unit and/or neighborhood of opportunity	FY2013: 3,092 (28.4%) households lived in better neighborhoods	FY2024: 2,969 (24.6%) households	2,969 (24.6%) households lived in better neighborhoods

Additional Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Maintain stability for seniors and people with disabilities			
Shelter burden (rent + utility allowance divided by gross income) for seniors and people with disabilities	Before implementation, shelter burden was 27%	FY2024: Shelter burden will remain below 29%	Seniors and people with disabilities will maintain stability, with a shelter
Increased contribution to rent			
Total tenant payment (rent + utility allowance) for work-focused households	Before implementation: Section 8 average - \$267 Public housing average - \$249	FY2024: Section 8 average \$4391 Public housing average \$158	Maintain an average total tenant payment of at least \$390 for Section 8 and \$150 for Public Housing
Increased income in work-focused households			
Average income for work-focused households, as percentage of Median Family Income (MFI)	Before implementation, average income for work-focused households was 16.4% MFI	FY2024: 18% MFI	18% MFI

Home Forward's YARDI database continues to serve as the source for household income and total tenant rent payment information. The baseline data for hours required to conduct rent calculation and income reviews was collected through staff interviews and workflow analysis. This process will be repeated in subsequent years to determine progress towards benchmarks and goals.

02 GOALS – Home Forward’s Family Self Sufficiency Program

Approved FY2014, Implemented FY2014

This activity consolidated existing self-sufficiency programs into one program, which we refer to as the GOALS (Greater Opportunities to Advance, Learn and Succeed) program. This program is tailored to meet the needs of our community and be efficient for staff to administer. GOALS program requirements are the same regardless of funding source, program, or property, with a few minor exceptions for site-based programs.

The rent reform calculation (Activity 01) is used for all GOALS participants.

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 GOALS waiting list. 100% of the GOALS slots may be filled with participants utilizing this preference.

Home Forward will allow the GOALS contract to be in the name of any adult member of the household.

The traditional escrow account used in HUD Family Self-Sufficiency (FSS) programs has been replaced with a managed savings account. Any rent paid by a participant household above \$351 (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 family’s ceiling rent (for public housing families) or voucher payment standard (for Section 8 families). Households participating in GOALS whose unit is converted under RAD are subject to policies consistent with the RAD program.

Notwithstanding 24 CFR 984.303 (c), the length of time on the program will be five years from the date the contract is effective, with the opportunity to extend for an additional two years. The effective date of the contract is the first day of the month following the date the contract was signed by the designated GOALS participant and the Home Forward’s representative. 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.

Staff implementing the GOALS 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.

At properties where participation in GOALS was mandatory, the property will continue to utilize a site-based preference on the GOALS waitlist to encourage participation in the family self-sufficiency program at these sites.

When a public housing resident reaches ceiling rent, or a housing assistance payment for a voucher participant drops to zero, deposits into the family’s managed savings account will cease. Public housing residents can continue to participate in the program for an additional six months and voucher participants can continue to participate in the

MTW authorization:

Attachment C, Section E – Family Self Sufficiency Programs

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Statutory objective:

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

program for an additional 365 days, but no savings will accrue during this time. If the family is still at ceiling rent or 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 as long as the contract determines they are still eligible.

GOALS participants who enroll in the Individual Development Account (IDA) program will be able to withdraw from their managed savings account up to \$700 per year, for a maximum of 3 consecutive years or \$2,100. In order to utilize managed savings account for IDA deposits, participants will need to be co-enrolled in GOALS and IDA programs. If a participant withdraws from the IDA program before successfully completing the IDA program, the IDA provider will refund the full managed savings account to Home Forward. By allowing participants the option to apply more restricted funds towards their IDA, the intent is to allow households to use their more readily accessible, or unrestricted, funds such as earned income tax credit (EITC) returns, to meet more immediate financial needs. This would permit financially vulnerable households to continue working towards long term financial investment while maximizing choice in how to best apply unrestricted funds towards any current financial obligations.

Changes or Modifications:

Due to activity 24, Rent Assistance Termination Reform, approved in FY2023, voucher participants can now continue to participate in the GOALS program for an additional 365 days, rather than six months, after their housing assistance payment becomes zero. There will be no deposits into the family's managed savings account during the 365 days.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request.			
Total cost of task	FY2017: \$512,070	FY 2024: \$873,794	FY 2024: \$873,794
Staff time savings (Standard Metric: CE#2) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save staff time through this activity, but we have included it at HUD's request.			
Total time to complete task	FY2017: 18,509 hours	FY 2024: 16,806	FY 2024: 16,806
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity.			
Average error rate in completing task	FY2017: 2%	FY2024: 2%	FY2024: 2%
Increase in resources leveraged (Standard Metric: CE#4)			
Amount of funds leveraged	FY2017: \$190,507	FY2024: \$191,500	FY2024: \$195,500
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2017: \$12,472	FY2021: \$12,750	FY2021: 12,900
Increase in household savings (Standard Metric: SS#2)			
Average amount of escrow of households	FY2017: \$2,295	FY2024: \$2,350	FY2024: \$2,350

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in positive outcomes in employment status (Standard Metric: SS#3) ²			
Number of heads of households:	FY2017:	FY2024:	FY2024:
1) Employed full-time	1) 187	1) 187	1) 187
2) Employed part-time	2) 120	2) 120	2) 120
3) Enrolled in an educational program	3) 129	3) 130	3) 80
4) Enrolled in a job-training program	4) 81	4) 82	4) 82
5) Unemployed	5) 155	5) 155	5) 155
6) Other (defined as having completed an education or job training program)	6) 54	6) 55	6) 55
Increase in positive outcomes in employment status (Standard Metric: SS#3) ²			
Percentage of work-able households:	FY2017:	FY2024	FY2024
1) Employed full-time	1) 40%	1) 40%	1) 40%
2) Employed part-time	2) 27%	2) 27%	2) 27%
3) Enrolled in an educational program	3) 28%	3) 28%	3) 17%
4) Enrolled in a job-training program	4) 18%	4) 18%	4) 18%
5) Unemployed	5) 33%	5) 33%	5) 33%
6) Other (defined as having completed an education or job training program)	6) 12%	6) 12%	6) 12%
Households removed from TANF (Standard Metric: SS#4)			
Note: This metric is measured as a point in time count, which does not account for individual households who give up TANF assistance, graduate from the GOALS program, and are then replaced by income GOALS participants who have not yet given up TANF assistance.			
Number of households receiving TANF assistance	FY2017: 61 households	FY2024: 61	FY2024: 61
Households assisted by services that increase self-sufficiency (Standard Metric: SS#5)			
Number of households enrolled in GOALS	FY2013: 462 households enrolled	FY2024: 462	FY2022: 462
Reducing per unit subsidy costs for participating households (Standard Metric: SS#6)			
Average amount of subsidy per household	FY2017: \$671 per household	FY2024: \$671	FY2024: \$671
Increase in tenant share of rent (Standard Metric: SS#7)			

² Households may be counted in more than one category in the employment statuses shown above. For example, a household may be considered unemployed while enrolled in an educational program.

Metric	Baseline	Benchmark	Final Projected Outcome
Tenant share of rent	FY2017: \$1,926,589	FY2024: \$1,575,195	FY2024: \$1,575,195
Households transitioned to self-sufficiency (Standard Metric: SS#8)			
Number of households transitioned to self-sufficiency ²	FY2017: 27 households	FY2024: 27	FY2024: 27

²Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance

03 Local Blended Subsidy

Approved FY2012, Implemented FY2012

Home Forward has created a local blended subsidy (LBS) program to improve the financial viability of adding “banked” public housing units back into the portfolio. Public housing operating subsidy alone is often insufficient to support bringing these units back to properties. The LBS program uses a blend of MTW Section 8 and public housing operating funds to subsidize units reserved for families earning 80 percent or below of area median income. These units may be new construction, rehabilitated, or existing housing.

The LBS program combines tenant paid rent, Section 8 funds, and public housing funds, resulting in a total per unit rent amount. Rents are set by an internal process to determine the amount of subsidy that will meet property needs, and are subject to completion of rent reasonableness tests. Home Forward uses the payment standard as the maximum rent for LBS units, or up to 125% of Fair Market Rents in the case of service-enriched units. This leveraging of resources allows for a more adequate revenue stream and increases the number of households that can be served.

MTW authorization:

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Attachment C, Section C(2) – Local Preferences and Admission and Continued Occupancy Policies and Procedures

Attachment D, Section B(3) – Local Unit Based Subsidy Program

Statutory objective:

Increase housing choice for low-income families

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2024: 239 units made available	239 units made available
Units of housing preserved (Standard Metric: HC#2)			
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	FY2024: 45 units preserved after full implementation	45 units preserved
Increase in resident mobility (Standard Metric: HC#5)			
Number of households living in better neighborhoods	Before implementation, 0 households	FY2024: 109 households	109 LBS households located in better neighborhoods
Increase in resources leveraged (Standard Metric: CE#4)			
Amount of funds leveraged	Before implementation, \$0	FY2024: \$11,145,307	\$11,145,307 in leveraged debt, equity and increased services

06 Alternative Inspection Requirements for Partner-Based Programs

Approved FY2012, Implemented FY2012

Home Forward aligns our housing resources with the services of jurisdictional and community partners in order to maximize impact and effectiveness. In an effort to reduce costs and increase efficiencies, Home Forward uses MTW authority to allow alternate inspection standards for units assisted with rent assistance, including Program Based Assistance Units, where we contract out resources to be administered by partners. Rather than requiring full Housing Quality Standards (HQS) inspections, Home Forward requires that these units meet the habitability standards, unit inspection requirement, and lead-based paint visual assessment requirements of HUD's Homelessness Prevention and Rapid Re-Housing Program. In cases where the unit is subject to Uniform Physical Condition Standards, Real Estate Assessment Center (REAC), or other inspections as part of the Low-Income Housing Tax Credit compliance obligations, Home Forward will not require HQS inspections. Alternative inspections are recorded in the tenant file to demonstrate compliance. Staff from jurisdictional and community providers are able to arrange for and conduct required inspections themselves, in conjunction with other required visits to the assisted units, which is often more efficient and allows clients to move in faster than if they had to wait for a scheduled Home Forward inspection. These alternate inspection requirements ensure housing standards while increasing efficiency and cost effectiveness.

MTW authorization:

Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$35,500	FY2024: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Before implementation, 500 hours	FY2024: 0 hours	0 hours
Decrease in error rate of task execution (Standard Metric: CE#3)			
Note: Because this metric was established after implementation, Home Forward does not anticipate a change in the error rate.			
Average error rate in completing a task	FY2014: 4%	FY2024: Less than 5%	Less than 5%

07 Landlord Self-Certification of Minor Repairs

Approved FY2013, Implemented FY2013

In many cases, units may fail an initial or biennial inspection due to minor items, such as cracked socket plates or closet doors that are off track. Requiring a Home Forward inspector to make a trip back to a unit to verify such minor repairs is inefficient and costly. Home Forward has implemented a policy that in cases where there are no more than four minor deficiencies, we may accept an owner's certification that required repairs were made. This allowance is made at Home Forward's discretion, and in cases where all deficiencies are minor items as determined by an approved list maintained by Home Forward.

MTW authorization:

Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Allowing a landlord to self-certify a minor repair is left to each individual inspector's discretion, and inspectors remain cautious and thoughtful about when the option is best utilized. Because of this, the activity has not yet produced the level of savings hoped for. However, the inspections supervisor continues to work with inspectors on identifying situations where the strategy can be employed to save additional staff time. Home Forward believes this activity is still an effective strategy for saving time and money.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$140,092	FY2024: \$112,557	Less than \$125,000 to complete re- inspections
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Before implementation, 1,326 hours	FY2024: 1,090 hours	Less than 1,100 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.			
Average error rate in completing a task	FY2015: 0%	FY2024: Less than 3%	Less than 3%

08 Inspections and Rent Reasonableness at Home Forward-Owned Properties

Approved FY2013, Implemented FY2013

Home Forward owns over 5,000 units of affordable housing in Multnomah County. Many of these units have project-based Section 8 vouchers attached, and additional units are rented to families that are utilizing tenant-based Section 8 vouchers. In cases where a voucher holder is renting a unit we own, Home Forward utilizes our own staff to perform inspections and determine rent reasonableness.

In cases where Home Forward both owns and manages the unit, we hire a third party to conduct quality control inspections and rent reasonableness testing at a sample of these units. This ensures standards are being met while mitigating any conflict of interest. Since the implementation of this activity, 100% of quality control inspections reported the same result as the Home Forward inspection, and no problems have been identified with rent reasonableness.

MTW authorization:

Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Attachment C, Section D(2)(c) – Rent Policies and Term Limits

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Prior to implementation, \$17,750	FY2024: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation, 370 hours	FY2024: 0 hours	0 hours
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.			
Average error rate in completing a task	FY2015: 0%	FY2024: Less than 5%	Less than 3%

09 Measures to Improve the Rate of Voucher Holders Who Successfully Lease-Up

Approved FY2010, Implemented FY2010

Since 2010, Home Forward has implemented a variety of measures to improve landlord acceptance of HCVs in our community and improve the ability of voucher holders to successfully lease up. These measures include:

Vacancy Loss Payment: We provide vacancy loss payment to owners through the end of the month after the move-out month when vacancies are unforeseen or unexpected (such as a death or an unannounced move-out) and the owners have not received proper notice of the intent to vacate.

Landlord Incentive Payment: Since July 2014, Home Forward makes a one-time payment of \$200 to new landlords, defined as those who have not worked in partnership with us for the past two years. At the time of receiving payment, landlords are also given the opportunity to complete a survey to provide feedback on their experience and Home Forward's lease-up process.

Tenant Education Classes: Since May 2016, Home Forward contracts with the Community Alliance of Tenants (CAT) to teach a tenant education class to voucher holders. Class graduates have access to up to \$200 to help with a security deposit in their housing search.

We have continued with a variety of policy changes (which do not require MTW flexibility) to make the voucher program more appealing to landlords. These include:

- Allowing flexible lease terms based on an individual landlord's standard practice (including month-to-month)
- Accepting electronic Requests for Tenancy Approval from landlords to speed the process
- Posting tools for landlords on our website so landlords can assess whether their unit is likely to pass rent reasonable and affordability tests

In addition to the above, we continue to support voucher holders with an improved program orientation, an increased focus on housing search, and utilizing the higher payment standards in opportunity neighborhoods in hopes of helping voucher holders be better prepared for their housing search.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Households assisted by services that increase housing choice (Standard Metric: HC#7)			

MTW authorization:

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Attachment C, Section D(1)(d) – Operational Policies and Procedures

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment D, Section D(1) – Establishment of a Local Section 8 / HCV Program

Statutory objective:

Increase housing choice for low-income families

Metric	Baseline	Benchmark	Final Projected Outcome
Number of households receiving services aimed at increasing housing choice	Before implementation, 0 households	FY2024: 350 households	At least 300 households per year will benefit from the Landlord Incentive

Additional Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Improve voucher success rate			
Issued voucher success rate	FY2009: 74%	FY2024: 80%	At least 80%
Decrease in lease-up time			
Average number of days for a voucher holder to lease up	Before implementation, 51 days	FY2024: 50 days	Less than 50 days

10 Local Project-Based Voucher Program

Approved FY2012, Implemented FY2012

Home Forward has created a project-based voucher (PBV) program tailored to meet the needs of the local community. We currently administer over 2,000 PBVs in the community via more than 87 separate contracts. The program continues to represent our focus on coordinating with jurisdictional partners and enhancing the supply of permanent supportive housing for households with barriers to housing.

The objective of the PBV program is to provide housing stability for low-income, high-barrier households who would be unlikely to succeed with a tenant-based voucher. With that in mind, we are focusing PBVs on buildings with on-site services, ideally in opportunity areas, offering tenants affordable rents and access to community resources. As the original PBV contracts expire Home Forward offers renewals only to owners who have agreed to set waiting list preferences for one or more vulnerable populations, and to make services available to those households. This results in all PBV buildings offering affordable housing with services to those most in need as contracts are renewed.

MTW authorization:

Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project-Based Program

Attachment C, Section D(4) – Waiting List Policies

Attachment C, Section D(2) – Rent Policies and Term Limits

Attachment C, Section D(1)(e) – Operational Policies and Procedures

Statutory objective:

Increase housing choice for low-income families

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Home Forward has modified owner proposal selection procedures for PBV units in order to increase Permanent Supportive Housing in our community by awarding PBV units via a local competitive process in collaboration with the City of Portland and Multnomah County. This local process includes issuing a Notice of Funding Availability and accepting proposals from housing developers and owners across the County. This effort ensures that PBVs are aligned with capital and services funding made available from our jurisdictional partners.

The local competitive process may be waived and PBVs may be awarded based on a formal approval and resolution process by Home Forward's Board of Commissioners when the property is owned directly or indirectly by Home Forward, subject to HUD's requirements regarding subsidy layering. The owned units would not be subject to any required assessments for voluntary conversion.

In addition, Home Forward's local PBV Program:

- Exceeds the traditional 25% limit of PBVs in a single building, and allows project-based vouchers to be awarded to more than 25% of units in a given complex.
- Modifies waitlist policies to allow each PBV building to maintain its own site-based waiting list with its own preferences.
- Does not provide a preference on the tenant-based waiting list for PBV residents, and requires PBV residents to apply for and remain on the tenant-based waitlist in order to transfer to a tenant-based voucher unit.
- Modifies screening and eligibility requirements to differ from the traditional criteria at certain PBV properties which offer supportive services, therefore increasing housing choice for participants who might otherwise be ineligible for Section 8 housing. Home Forward determines an applicant's eligibility for a specific PBV property based on the capacity of the service provider who owns or contracts to manage the property.

- Adopts the local city and county site selection standards for PBV units in order to ensure alignment with jurisdictional partners in regards to site selection for low-income housing aimed at ending homelessness. Site selection standards are designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations of 20% or less.
- Modifies subsidy standards regarding under- and over-housing in order to ensure full utilization of PBV units. Subsidy standards are the same for PBVs as those used for tenant-based vouchers, but exceptions are granted when there are no appropriately sized households on the waiting list to fill a vacant unit.
- Modifies lease terms, renewal options, and termination policies to limit owners' ability to terminate tenancy without cause, maximizing housing choice for the families in those units. After the initial term, PBV leases convert to a month-to-month agreement unless owners and tenants agree to a longer term, and owners may not refuse to renew leases without cause. Owners of PBV units may not terminate tenancy without cause, except as follows:
 - The owner of a PBV unit may terminate tenancy for a family if Home Forward terminates the family's assistance for any reason in order to ensure that another low-income applicant can be served. However, instead of terminating tenancy, the owner may request Home Forward's approval to amend the PBV contract to remove a unit occupied by a zero subsidy family or amend the PBV contract to substitute a different unit with the same number of bedrooms in the same building.
- Modifies the way contract rents are determined for PBV units by limiting PBV contract rents to a maximum of the payment standard less any applicable tenant paid utility allowance, ensuring that PBV units are affordable even to zero-income households.
- Adapts the timing of applying payment standard adjustments for PBV participants. Any increase in payment standards to the PBV units is applied on the next anniversary date of the PBV Housing Assistance Payments Contract, following the effective date of the increase. Any decrease in payment standards to the unit is applied beginning on the second anniversary date of the PBV Housing Assistance Payments Contract following the effective date of the decrease. Home Forward also applies any changes to the utility allowances at the same time as the payment standard adjustments.
- Uses an alternate rent setting policy that allows the Rent Assistance Director, with Board approval, to set exception payment standards that are greater than 110% (up to a maximum of 160%) of Fair Market Rents for service-enriched buildings without requesting HUD approval. The payment standard granted applies to any unit under the project-based voucher contract serving a highly vulnerable population with intensive services. Data is required of the owner to verify the value of the services being provided, and this cost will not be included when conducting rent reasonableness tests.
- Uses an alternate rent setting policy that allows the Rent Assistance Director to set exception payment standards up to a maximum of 160% of Fair Market Rents (pursuant to Activity 13 "Broaden Range of Approved Payment Standards") without requesting HUD approval for:
 - Home Forward-owned units that utilize Rental Assistance Demonstration (RAD) PBVs, or
 - Units that utilize special purpose voucher PBVs.
- Allows Home Forward staff to conduct inspections, set rents and determine rent reasonableness for Home Forward-owned units that utilize PBVs. When Home Forward both owns and manages the unit, it hires a third party to conduct quality control testing of inspections and rent reasonableness determinations for a sample of these units. This activity is also described under Activity 08 Inspection and Rent Reasonableness to Home Forward Owned Properties.

- Eliminates the cap limiting project-basing to up to 20% of the amount of budget authority allocated to the agency by HUD in the voucher program.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	FY2011: 1,100 units	FY2024: 1,820 units made available	Maintain at least 1,800 units that have been made available through this activity
Units of housing preserved (Standard Metric: HC#2)			
Number of units preserved for households at or below 80% AMI that would otherwise not be available	Prior to implementation: 0 units	FY2024: 654 units preserved	654 units will be preserved through conversion from public housing to project-based vouchers
Decrease in wait list time (Standard Metric: HC#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity			
Average applicant time on wait list in months	FY2014: 15 months	FY2024: 50 months	50 months
Displacement prevention (Standard Metric: HC#4) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2015: 904 households	FY2024: 900 households	Over 800 additional project-based voucher units are available through our ability to exceed the 25% building cap
Increase in Resident Mobility (Standard Metric: HC#5)			
Number of households able to move to a better unit and/or neighborhood of opportunity	FY2011: 93 households	FY2024: 400 households	400 households
Agency Cost Savings (Standard Metric: CE#1)			
Total cost of task in dollars	Prior to implementation: \$30,720	FY2024: \$20,340	Less than \$20,000
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation, 917 hours	FY2024: 450 hours	Less than 500 hours

Metric	Baseline	Benchmark	Final Projected Outcome
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity			
Average error rate in completing task	FY2015: 2%	FY2024: Less than 5%	Less than 5%
Increase in tenant share of rent (Standard Metric: CE#5) Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity			
Total annual tenant share of rent	FY2014: \$3,570,859	FY2024: \$7,350,000	Annual tenant rent share of \$7,350,000

11 Align Utility Allowance Adjustment Procedures

Approved FY2011, Implemented FY2011

This activity aligns the public housing process for calculating and implementing utility allowance adjustments with that of Section 8. Previously, the public housing utility allowance process required Home Forward to conduct engineering surveys to determine energy consumption, which was cumbersome and costly. Additionally, public housing protocol required that a re-certification be completed for each resident when there were adjustments to the utility allowance.

MTW authorization:

Attachment C, Section C(11) – Rent Policies and Term Limits

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Aligning the utility allowance adjustment process with that of Section 8 allows public housing to adopt the methodology of using HUD's standard calculation, which is based on the type of utility and type of building. As in the Section 8 program, public housing staff will review the utility allowance adjustments annually, with the adjustment going into effect at the resident's next regular review.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$8,000 per year	FY2024: \$0	\$0 to complete survey
Staff time savings (Standard Metric: CE#2)			
Total time to complete task	Before implementation, approximately 393 hours	FY2024: 0 hours	0 hours

13 Broaden Range of Approved Payment Standards

Approved FY2015, Implemented FY2015, Amended FY2017

Regulations require that payment standards are set between 90% and 110% of Fair Market Rents (FMR), as defined by HUD for a Housing Authority's jurisdiction. Home Forward serves all of Multnomah County, a large geographic area with rents that differ throughout several submarkets. When the rental market conditions tighten, it is not uncommon for 110% of FMR to fall short of what is needed to rent a quality unit in large, and often higher opportunity, areas of Multnomah County. In addition, payment standards that are too high in particular neighborhoods can create concentrations of poverty.

MTW authorization:

Attachment C, Section D(2)(a) – Rent Policies and Term Limits

Statutory objective:

Increase housing choice for low-income families

In order to ensure that payment standards are sufficient to allow HCV participants reasonable choice in neighborhoods, Home Forward uses MTW authority to broaden its "base range" for payment standards to between 80% and 160% of the FMR without prior HUD approval.

Home Forward uses the following parameters to establish payment standards:

- Payment standards are broken down by nine separate neighborhoods as defined by ZIP codes. Each of these neighborhood payment standards is broken down by bedroom size.
- Payment standards are set at the market rate.
- Because data shows that market rents are significantly different for three-bedroom apartments and three-bedroom single-family homes and duplexes, Home Forward has established separate payment standards for the two housing types with three bedrooms.

In response to a FMR study commissioned by the local metro-area housing authorities, on February 3, 2016, HUD adopted revised FMRs for the Portland- Vancouver-Hillsboro, OR-WA, HUD Metropolitan Statistical Area (MSA). In March 2016, utilizing these new and substantially increased FMRs together with our existing authority, at the time, to set payment standards up to 120% of FMR. Home Forward's Board of Commissioners adopted new payment standards to be effective December 1, 2020.

With the latest payment standard update, our July 1, 2022 payment standards for studio, 1-bedroom, or 2-bedroom apartments are not below 95% of actual market rate in any of the nine payment standard areas. The following table illustrates the shortfall in studios, one-bedrooms and two-bedrooms throughout the county:

Submarket	Studio		1 Bedroom		2 Bedroom	
	Avg Shelter Cost	Shelter Cost as FMR %	Avg Shelter Cost	Shelter Cost as FMR %	Avg Shelter Cost	Shelter Cost as FMR %
Downtown Portland	1,584	106%	1,833	114%	2,375	129%
NW Portland	1,577	105%	1,942	121%	2,442	133%
Gresham, Fairview, Troutdale	1,587	106%	1,792	111%	1,876	102%
Inner & Central NE	1,614	108%	1,690	105%	1,970	107%
Inner & Central SE	1,667	111%	1,696	105%	1,856	101%
N Portland & St. Johns	1,614	108%	1,727	107%	1,947	106%
Outer NE	1,351	90%	1,503	93%	1,624	88%
Outer SE	1,463	98%	1,437	89%	1,482	81%
SW Portland	1,810	121%	1,783	111%	2,020	110%

We will always need to balance the opportunity created with higher payment standards with the increased per family costs associated with higher payment standards. Higher payment standards can put limits on our ability to respond to the overwhelming need in our community, but given the nature of the rental market in Multnomah County, the flexibility to set payment standards up to 160% of FMR may be necessary to create reasonable choice for participant families, particularly in low-poverty, high-opportunity areas. We most recently revised payment standards in July 2022, and depending on updated market survey data, utilization levels, and lease-up success, we may implement payment standards above 120% in some areas.

Home Forward has also been authorized to approve Exception Payment Standards up to 160% of Fair Market Rents in low-poverty areas or as a reasonable accommodation for a family that includes a person with disabilities.

Home Forward uses a higher payment standard for our VASH voucher-holders as well as Emergency Housing Vouchers (EHV). VASH and EHV households have all payment standards set at 120% of FMR, regardless of the area within Multnomah County.

Home Forward participants are on biennial and triennial recertification schedules, per Activity 01 Rent Reform. Because of this, there is sometimes a delay of several months or even years before the increased payment standard is applied to a participant's rent calculation. To address this delay, Home Forward has been authorized to apply updated payment standards at a participant's interim review.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in resident mobility (Standard Metric: HC#5)			
Number of households living in better neighborhoods	FY2013: 1,896 (30%) households lived in better neighborhoods	FY2024: 2,100 (31%) households	At least 2,100 (31%) households

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request			
Total cost of task	FY2014: \$48,597,556	FY2024: \$73,200,557	At least \$73,200,000

Additional Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Average Housing Assistance Payment Expense			
Average annual HAP expense by household	FY2014: \$6,690	FY2024: \$13,020	\$13,020

14 Program Based Assistance

Approved FY2015, Implemented FY2015

The need for rental assistance in Multnomah County far outstrips the supply.

In an attempt to increase the number of households served over a given period of time, Home Forward has designed Program Based Assistance. This local, non-traditional rent assistance program offers rent assistance, paired with services, to help families access and/or retain stable housing. While the HCV and public housing programs provide permanent subsidies in order to ensure long-term affordability for low-income families, the focus of Program Based Assistance is helping families and households achieve stability. These households may remain rent-burdened, but with services available to help families address other challenges in their lives, many will be able to avoid homelessness and remain permanently housed.

MTW authorization:

Attachment C, Section D(2)(a) – Rent Policies and Term Limits

Statutory objective:

Increase housing choice for low-income families

To administer Program Based Assistance, Home Forward sets aside a pool of flexible rent assistance funds to serve targeted populations, in partnership with one or more local service providers who ensure that the households have access to the supportive services or resources they need to be stable and successful. Target populations for Program Based Assistance are households for whom: 1) success on the HCV program would be unlikely; 2) the delay in accessing rent assistance permanent subsidies would most likely have devastating results (recidivism, relapse, death, homelessness, etc.); 3) the need for rental subsidy is short term while the client is receiving the support needed to stabilize in permanent housing; or 4) the household is representative of populations that experience disparities revealed in recent Point in Time counts or other surveys of homelessness and housing insecurity. Examples of target populations include families who are homeless or at risk of homelessness, families with children attending Alder Elementary School (which has one of the highest mobility rates in the County), former foster youth, or households representing those experiencing homelessness and housing insecurity disparities.

Program Based Assistance partners work with Home Forward to set program policies that are specific to the target population they are serving. Home Forward ensures that policies are clear, equitably managed, and in compliance with Fair Housing laws. All programs have common elements which include:

- **Uses of Funds:** Rental Assistance funds may be used for rent assistance, rent arrears with a current landlord, move-in fees and deposits, utility assistance and arrears, motel vouchers if housing is identified but not immediately available, and documented debt to a past landlord (other than a public housing authority).
- **Eligibility:** Eligibility is as low barrier as possible in order to provide housing access for hard-to-serve households. The only limitations on eligibility are: 1) the household must include at least one person who is a U.S. citizen, U.S. national, or noncitizen with eligible immigration status; 2) the household may not include any member who is subject to lifetime registration as a sex offender or has been convicted of production/manufacture of methamphetamine on premises of federally assisted housing; 3) no one in the household may owe Home Forward money; and 4) annual gross income cannot exceed 50% of area median income.
- **Subsidy Determination Method:** Each partner is required to write clear policies and procedures for how subsidy amount and duration will be determined. These policies must be applied to all participants in that partner's program.

- **Service Requirements:** Home Forward makes these funds available to target populations in partnership with one or more partners who are experts in providing the supports families may need to remain stably housed and move towards a stable, permanent housing situation. Therefore, partner agencies are required to make services available to all families accessing Program Based Assistance. Partner agencies will also have the discretion to discontinue rental assistance to households who violate their program policies or fail to engage in services after repeated attempts at engagement.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2020: \$198,000	FY2024: \$75,000	\$75,000 annually
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2020: 25 hours	FY2024: 0 hours	0 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3)			
Average error rate in completing task	FY2020: 0%	FY2024: 0%	Maintain 0%
Increase in resources leveraged (Standard Metric: CE#4)			
Amount of funds leveraged	FY2019: \$198,000	FY2024: \$75,000	No more than \$123,000/year
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	FY2019: 0 units	FY2024: 25 units	25 units
Increase in resident mobility (Standard Metric: HC#5)			
Number of households able to move to a better unit and/or neighborhood of opportunity	FY2019: 0 households	FY2024: 47 households	47 households
Households Assisted by Services that Increase Housing Choice (Standard Metric: HC #7)			
Number of households receiving services aimed to increase housing choice	Before implementation, 0 households	FY2024: 76 unduplicated households	76 households receive services annually through Program Based

Home Forward tracks this information through a combination of our Yardi Voyager database system, reporting by partner agencies, and the community's Homeless Management Information System (HMIS) software.

15 Tenant-Based Voucher Set Aside Policies

Approved FY2016, Implemented FY2016

Home Forward operates or participates in a number of programs designed to align housing with supportive services in order to ensure success for participating families including local non-traditional rent assistance programs, our local project based voucher programs, and the VASH program. In all cases, jurisdictional or community partners provide supports for families who access the housing, with target populations including families exiting homelessness, former foster youth, seniors, and people with disabilities.

MTW authorization:

Attachment C, Section D(4) – Waiting List Policies

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Home Forward has found that leveraging our housing resources with services from partners results in better housing stability and success for families with barriers to succeeding with a voucher alone. In addition to the above programs, we have also established a series of limited preferences for tenant-based vouchers. Through these limited preferences, specific community partners refer target populations to Home Forward for housing as they provide services. Among the set aside programs we've instituted are:

- Home Forward sets aside up to 200 vouchers for families currently served by Multnomah County's Homeless Family System of Care.
- Home Forward sets aside up to 50 vouchers for families that include a veteran experiencing homelessness, who are ineligible for VASH vouchers. These families are referred by and received services from Transition Projects, Inc.

HUD regulations for tenant-based vouchers require a PHA to select all participants from a waiting list. This activity allows Home Forward to accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral is maintained in the tenant file by Home Forward, but Home Forward does not add these households to the waiting list to be immediately selected. This flexibility increases efficiency and may reduce the number of days a family has to wait between referral and issuance of the voucher.

For each limited preference program, Home Forward executes a Memorandum of Understanding (MOU) with the partner specifying:

- Number of vouchers set aside for the preference;
- Eligibility criteria for the preference;
- Criteria for determining how families will be selected and referred to Home Forward by the partner(s);
- Type and duration of services the partner(s) will make available to the household; and
- That all referrals must be in writing and include a certification from the partner(s) that the family was selected and referred to Home Forward in accordance with the criteria outlined in the MOU.

Home Forward audits partner agencies to ensure that they adhere to selection criteria specified in the MOU.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2016: \$875	FY2024: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2016: 29.5 hours	FY2024: 0 hours	0 hours
Decrease in wait list time (Standard Metric: HC#3) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Because households are immediately pulled from the waiting list, this will have no impact on this metric; but we have included it at HUD's request			
Average applicant time on wait list in months	FY2016: 0 months	FY2024: 0 months	0 months

16 Affordable Housing General Obligation Bond Project-Based Voucher Allocation

Approved FY2018, Implemented FY2018

Home Forward received approval to allocate up to 400 PBVs to support the goals of a \$258.4 million Portland Housing General Obligation Bond that was approved by voters in 2016. From time to time, local jurisdictions may issue general obligation bonds to acquire, develop, and rehabilitate land and/or properties for affordable housing. Home Forward, as a MTW agency, is granted the ability to support such local housing programs. This includes collaborating with local jurisdictions to provide affordable housing and services for low income and/or disabled households in our community.

MTW authorization:

Attachment C, Section D(7)(b) – Local Competitive Process

Statutory objective:

Additional Units of Housing Made Available.

Home Forward, as a MTW agency, is granted the ability to support such local housing programs. This includes collaborating with local jurisdictions to provide affordable housing and services for low income and/or disabled households in our community.

Given that local jurisdictions may be the only owner of such housing when using general obligation bonds, for this specific financing situation, Home Forward is defining the ballot initiative as a competitive process. Ultimately, the local jurisdiction is competing for the use of vouchers and is seeking authorization from voters. If the voters elect to pass such a ballot measure, it is done so with the public's knowledge that the sole owner of these properties must be the jurisdiction issuing the bonds. Home Forward will have permission to allocate PBVs to such general obligation bond funded properties to ensure housing opportunities for very-low and extremely low-income families. Home Forward will measure the number of units made available to members of the community through utilization of this designation.

The Portland Housing Bond was designed to increase the affordable housing stock in a community with rapidly rising rents that limit choice for families living with low incomes. One of the location priorities of the Portland Housing Bond's framework is to prioritize acquiring land for new housing in high opportunity areas with access to education and economic opportunities, among other amenities. The Portland Housing Bond's framework includes recommendations for services related to "workforce skill development/employment resources and parenting resources, youth engagement and academic assistance" among other resident services' priorities.

The Portland Housing Bond will create approximately 1,300 permanently affordable units throughout the City of Portland, with 600 designated for households earning 0-30% of the area median incomes. According to the City of Portland, the allocation of up to 400 vouchers to the affordable housing general obligation bond will leverage an additional 200 units of housing for families earning between 0-30% of the area median income, netting a total of 600 units of deeply affordable, permanent housing added to the City of Portland. These permanent units will increase choice across the city for families living with low and extremely low incomes. The vouchers will be allocated over five to seven years as properties are acquired and built. On average, Home Forward anticipates that 57-70 vouchers will be deployed each year.

Changes or modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
The Portland Housing Bond anticipates adding 1,300 units of affordable housing over a seven year period. The 400 vouchers will be used to leverage an additional 200 units being available for households earning between 0 and 30% median family income.	FY2018: 0	FY2024: 400 units	600 units

Home Forward will measure the number of units made available to members of the community through the City of Portland’s Housing Bond reports to the community. Home Forward will measure the number of units made available to members of the community internally through utilization of this designation.

17 Mod Rehab and Mod Rehab SRO Rent Assistance Demonstration Rent Reform

Approved FY2019, Implemented FY2019

Home Forward administers project-based rent assistance for 517 units of housing assisted through HUD's Section 8 Moderate Rehabilitation and McKinney Moderate Rehabilitation Single Room Occupancy (SRO) programs. This housing is a critical component of our community's housing stock available to people leaving homelessness. Owners of these properties have the opportunity to participate in HUD's Rent Assistance Demonstration (RAD) in order to preserve and improve their properties. Participation in RAD can involve the conversion of a properties existing subsidy contract into a PBV contract that may operate under the program requirements of Home Forward's Local Project Based Voucher MTW activity. Participants in Home Forward's Local Project Based Voucher program are subject to Home Forward's Rent Reform Activity.

MTW authorization:

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment D, Section B(2) – Rent Structure and Rent Reform

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

While the Rent Reform activity has been successful in meeting its cost savings and self-sufficiency objectives, analysis shows that implementing the full Rent Reform activity at our Section 8 Mod Rehab and Mod Rehab SRO properties, which serve significant numbers of households moving out of homelessness, may result in household displacement over time and have a significant effect on these properties' ability to continue to serve these households. As a result, Home Forward implements an alternative rent reform initiative for these properties post-RAD to allow owners to take advantage of RAD while continuing to serve the same tenant population profile.

The SRO Mod Rehab Rent Reform initiative mirrors our existing Rent Reform activity but eliminates certain aspects of that activity, such as the tiered rent structure for work-focused households. Specifically the SRO Mod Rehab Rent Reform Activity implements the following policies:

- Eliminates all deductions in rent calculations. To offset the loss in deduction, rent will instead be calculated based on 28.5% of gross income. There is no minimum rent and utility reimbursements are allowed.
- Implements a triennial income re-certification schedule. Home Forward utilizes a separate "release of information" form to supplement the HUD Form 9886, in order to obtain a release of information that covers the appropriate biennial or triennial review cycle.
- Requires an interim review for a household that reports a change in family size and has resided in their unit for at least 12 months. Any changes to voucher size, payment standard, and subsidy calculation will be effective 120 days after the interim review.
- Eliminates the earned income disallowance. Makes use of actual past income to determine annual income for participant families. Uses all income sources as currently defined by HUD to determine a household's assistance, with the following exceptions:
 - The value of any asset or the value of any income derived from that asset is not used in the rent calculation, except when the asset makes regular payments (quarterly or more often) to the resident or participant. However, the value of assets or the value of any income derived from assets is used to determine initial eligibility. Home Forward allows households to self-certify assets with a net value of \$5,000 or less.

- All earned income of full-time students age 18 and over is excluded from the rent calculation, unless they are the head, co-head or spouse of the household.
- Student financial assistance is considered only for the purpose of determining eligibility. Student financial assistance is not used to determine annual income for rent and subsidy calculation.
- All adoption assistance payments are excluded from the rent calculation.
- Households have the option to not report income that is not used in the rent calculation, such as foster care payments. However, Home Forward will accept income reporting of such sources for use in determining affordability of a unit. Home Forward permits families to rent units where the family share is up to 50% of their gross income.

Home Forward utilizes an annual proration when reviewing agency rents and payment standards based upon funding availability for mixed status households. Depending on funding availability and proceeds at properties owned by Home Forward, the agency will also determine whether to utilize unrestricted local funds in support of this modification.

Hardship Policy: As with our standard Rent Reform activity, households may apply for a hardship review if their total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy. Section 8 participants who choose to rent housing where the total shelter costs exceed 50% of total monthly income at the time of initial lease-up in that unit will not generally qualify for hardship review; however, all households have the right to request a hardship and exceptions may be made. The committee has a menu of remedies to reduce a qualifying household's burden.

Changes or Modifications:

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2018: \$6,656	FY2024: Less than \$3,370	Less than \$3,370 annually
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2018: 320 hours	FY2024: Less than 162 hours	Less than 162 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3)			
Average error rate in completing task	FY2018: 7.5%	FY2024: 7.5% or less	Maintain 7.5% or less
Increase in tenant share of rent (Standard Metric: CE#5)			
Total annual tenant share of rent	FY2018: \$58,000	FY2024: \$61,000	\$61,000
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2018: \$1,360	FY2024: \$3,060	At least \$3,060

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in positive outcomes in employment status (Standard Metric: SS#3) Note: Home Forward does not collect detailed employment data from SRO participants. The number provided reflects the total number of work-focused households.			
Number of heads of households who: (6) Other	FY2018: 40 households	FY2024: 115 households	115 households
Percent of work-focused households who: (6) Other	FY2018: 40 households	FY2024: 115 households	115 households
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)			
Number of households receiving TANF assistance	FY2018: 0 households	FY2024: 0 households	0 households
Households transitioned to self-sufficiency (Standard Metric: SS#8) Note: Home Forward's SRO properties assist households transitioning from homelessness to permanent, stable housing. Rather than moving to self-sufficiency, Home Forward anticipates participant households will move from an SRO property into a long-term Home Forward subsidy program.			
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2018: 0 households	FY2024: 0 households	0 households

18 Transfer of Project-Based Voucher Contract to Support Local Preservation or Development of Affordable Housing

Approved FY2019, Implemented FY2019

Home Forward works closely with local affordable housing owners and developers to preserve and increase the affordable housing stock in the community. For many property owners participating in our - PBV program, the ability to transfer an existing PBV contract to a new location before its expiration greatly increases the owner's ability to expand the number of affordable units in the region. Traditionally, only a project owner that has completed a RAD conversion may request a contract transfer. Non-RAD PBV Project Owners have no such recourse.

Home Forward believes this situation discouraged some property owners from entering a HAP Contract as it limits the property owner's ability to engage in short- and long-term development and planning. In addition, Home Forward was concerned that with the extreme pressures on Portland's housing stock, property owners may opt to not renew a HAP Contract, as witnessed in similar tight housing markets. Such a situation would create a significant increase in the number of existing households switching to tenant-based assistance. This increase would tie up valuable staff resources and reduce our ability to help new households off the waiting list. Fiscally, an unanticipated increase in tenant-based vouchers reduces our ability to predict costs and may require us to redirect resources currently allocated to opportunity neighborhoods.

In response, Home Forward created the Transfer of Project-Based Voucher Contract to Support Local Preservation or Development of Affordable Housing activity for all non-RAD PBV property owners. This activity balances the needs to provide a streamlined process for PBV Project Owners with the need to ensure existing households retain their subsidy without impacting our ability to serve new households.

With Home Forward approval, a Project Owner may request a transfer of assistance after 5 years from the effective date of the initial HAP Contract. Home Forward may waive the 5-year requirement if:

- The agency or an affiliate holds ownership interest or manages the property;
- A transfer is needed sooner as a result of events such as eminent domain proceedings, natural disasters or unforeseen events; or
- HUD provides approval of a transfer for any other reason.

Home Forward may consider a partial or complete transfer of assistance to a new location if the new location complies with applicable site selection standards. If applicable, any lender and/or investor of the Covered Project must approve the transfer of the assistance. In the event of such transfer, the Project Owner may request, subject to Home Forward consent, that the original PBV Contract be modified or released to reflect such transfer of assistance. Home Forward will only approve such a request where the following policy goals and technical requirements are met:

- The proposed new development must add or preserve affordable housing in the community;
- The proposed new development must otherwise comply with environmental review and subsidy layering review;

MTW authorization:

Attachment C, Section B(2) – Partnerships with For-Profit and Non-Profit Entities

Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project Based Program

Attachment D, Section B(3) – Local Unit Based Subsidy Program

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

- Home Forward does not require a competitive process for the proposed new development as the initial PBV allocation removes the need for a subsequent competition. However, the proposed new development must meet all Home Forward's Site Selection Standards as well as any appropriate laws and regulations.
- Tenants residing in subsidized units within the assisted development must be offered the option of retaining a project-based voucher subsidy pursuant to the following guidelines:
 - Tenants within the assisted development must be offered the option of moving to a comparable subsidized unit in the new or preserved development upon completion of purchase, rehabilitation, or construction, or to another comparable subsidized unit offered by the Project Owner;
 - Comparable units must adhere to all required rules and regulations regarding relocations and tenant moves. Home Forward will prioritize preventing moves to distant geographic areas and/or lower opportunity neighborhoods but believes this ultimate choice should be left to the tenant, as we recognize that they may have circumstances that make some areas more desirable.
 - If tenants decline to move, they may remain in the assisted development and the subsidy will remain in place until the subsidized tenant vacates the assisted unit, at which point the project-based voucher subsidy will be converted to the new development and added to the new PBV Contract;
 - Because the above requirements protect the ability of tenants to remain in their choice of PBV subsidized units, Choice-Mobility vouchers will not be available for tenants under this proposal as a result of the contract transfer.
- Rents and bedroom sizes must remain comparable between the assisted development and the new development to maintain stability in Housing Assistance Payment costs.

In addition to the criteria above, Home Forward retains full discretion to deny a transfer of PBV assistance.

Changes or Modifications to Activity:

We do not anticipate any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1) Note: Home Forward is unable to calculate anticipated costs absent the activity.			
Total cost of task	FY2018: \$0	FY2024: \$0	\$0
Staff time savings (Standard Metric: CE#2) Note: Home Forward is unable to calculate anticipated costs absent the activity.			
Total time to complete the task	FY2018: 0 hours	FY2024: 0 hours	0 hours
Displacement prevention (Standard Metric: HC#4) Note: Number of households in a unit that has completed, or will complete, RAD conversion by December 31, 2018 used as a proxy for potential displacement absent the proposed activity.			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2018: 903 households	FY2024: 432 households	0 households

19 Program Transfer Flexibility Bridge

Approved FY2020, Implemented FY2020

Under current regulations, whenever an active household transfers from one Home Forward program to another (e.g. from Public Housing to a HCV), agency staff is required to administer complicated waitlist preferences, assess eligibility, and perform a full certification of eligibility for that household. Depending on when the household's regular recertification is due, this means staff could be recertifying the household's continuing program eligibility shortly before or after the certification of eligibility for the new program, resulting in an expensive and unnecessary duplication of efforts. This issue has increased significantly with the agency's RAD efforts, and has impacts on both staff and residents alike.

The Program Transfer Flexibility Bridge removes the requirement that staff run a full eligibility certification for households transferring between Home Forward MTW programs. Instead, staff will use information from the household's most recent recertification to determine eligibility. The household will retain their existing anniversary date, but otherwise be subject to all policies regarding income eligibility and recertifications in the new program. This initiative would also align waitlist preferences differently to ensure that program transfers occur more seamlessly without additional administrative burden.

MTW authorization:

Attachment C, Section C(4) - Initial, Annual, and Interim Review Process (Public Housing)

Attachment D, Section D(3) – Eligibility of Participants (HCV)

Attachment D - Use of Funds Amendment to Attachment D of the Amended and Restated MTW Agreement.

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Changes or Modifications to Activity

We do not anticipate any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
CE #1: Agency cost savings			
Total cost of task in dollars (decrease).	FY2020: \$6,007	FY2024: \$0	At least \$0
CE #2: Staff Time Savings			
Total time to complete the task in staff hours (decrease).	FY2020: 229 hours	FY2024: 0 hours	0 hours
CE #3: Decrease in Error Rate of Task Execution			
Average error rate in completing task as a percentage (decrease).	FY2020: 7.5%	FY2024: 0%	0%

Cost Implications

Home Forward anticipates this activity will reduce the administrative and staff time costs of program transfers resulting in an overall savings of \$6,007 and 229 staff time hours in the initial year.

20 Local Inspection Policies

Approved FY2020, Implemented FY2021

Under current regulations (24 CFR 982.405(a), 983.103(d)), PHAs are required to inspect the unit not less often than biennially during the term of the Housing Authority Payment (HAP) contract. In the event of a local disaster, emergency, or other situation which affects the health and/or safety of Home Forward participants, residents, staff, and/or the general public, Home Forward may implement certain temporary changes to biennial inspection protocols to ensure continuity of safe operations to the extent possible and practical. This modification was proposed in response to the COVID-19 pandemic, which created a need for physical and social distancing to protect against the spread of the disease. In compliance with the recommendations of the Centers for Disease Control (CDC), the “Stay Home Stay Safe” Executive Order issued by Oregon Governor Brown, and other guidance from local, state, and federal agencies, Home Forward reduced contact between individuals, including closing offices to the public and reducing the number of employees in the office. As a result, Home Forward foresees that some operations may need to be modified and/or deferred to a later time in response to the COVID-19 pandemic and in response to future local disasters or emergencies to protect the health and safety of Home Forward staff, residents, and participants. The proposed inspection protocols which Home Forward may temporarily implement are:

MTW authorization:

Attachment C, Section D(5) - Ability to Certify Housing Quality Standards

Attachment C, Section D(7)(d): Establishment of an Agency Section 8 Project-Based Program

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

- Home Forward may extend the validity of a family’s most recently completed biennial HQS inspection by one year.
- The due date of the family’s next biennial HQS inspection would be one year from the original due date, and subsequent inspections would occur on a regular biennial schedule based on the new adjusted biennial due date.
- Home Forward will continue to perform emergency inspections and initial HQS inspections in un-occupied units.

These temporary changes will be ended or adjusted as soon as it is safe, feasible, and practical to do so. These changes were implemented in response to the COVID-19 pandemic, and may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

Changes or Modifications to Activity

We do not anticipate any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Agency Cost Savings (Standard Metric CE #1):			
Total cost of task	FY2020: \$744,190	FY2024: \$0	Less than \$701,000 annually
Staff time savings (Standard Metric: CE#2)			

Metric	Baseline	Benchmark	Final Projected Outcome
Total time to complete the task	FY2020: 7,730 hours	FY2024: 0 hours	Less than 7,250 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3)			
Average error rate in completing task	FY2020: 3.5%	FY2024: 3.5%	Maintain 3.5% or less

Cost Implications

Home Forward anticipates this activity will defer the administrative and staff time costs of inspections resulting in an overall savings of \$43,190 and 480 staff time hours in the initial year.

21 Self Certification of Income

Approved FY2021, Implemented FY2021

As evidenced by the COVID-19 public health emergency, there are circumstances during which temporarily accepting self-certification of income is necessary to maintain efficient operations and promote housing stability. Home Forward implemented HUD waivers allowing self-certification of income in responses to the COVID-19 public health emergency provided in the current HUD Notice PIH 2020-33(HA) Rev-2 which was preceded by HUD Notices PIH 2020-05, PIH 2020-13, and PIH 2020-33 (HA). This activity allows Home Forward to continue to accept self-certification as the highest form of income verification to process annual and interim reexaminations. Home Forward may also accept self-certification of income as the highest form of income verification to process annual and interim reexaminations in response to future local, State, or National emergencies or disasters that result in significant barriers to households being able to access information from their employer to verify their income. The proposed protocols which Home Forward may temporarily implement in response to the COVID-19 and other local, state, or national emergencies or disasters are:

MTW authorization:

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment C, Section C(2) – Local Preferences and Admission and Continued Occupancy Policies and Procedures

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

- 1) Annual Re-examination Income Verification (PH and HCV-3): Home Forward may forgo third-party income verification requirements for annual reexaminations. Home Forward may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur over the telephone (with a contemporaneous written record by a Home Forward staff person), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. After a period of temporarily using this alternative flexibility, Home Forward will be responsible for addressing any material discrepancies that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool (IVT) shows that the tenant's employment continued, Home Forward will take enforcement action in accordance with our policies and procedures. While HUD waives the use of EIV (e.g., HUD Notice PIH 2020-33 (HA) Rev-2, Home Forward may also forgo the use of EIV when doing annual re-examination income verification but must resume use of EIV when HUD waivers are no longer in effect.
- 2) Interim Re-examinations (PH and HCV-4): Home Forward may forgo third-party income verification requirements for interim reexaminations. Home Forward may consider self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone (with a contemporaneous written record by a Home Forward staff person), through an email with a self-certification form by the family, or through other electronic communications. After a period of temporarily using this alternative flexibility, Home Forward will be responsible for addressing any material discrepancies that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool (IVT) shows that the tenant's employment continued, Home Forward will take enforcement action in accordance with our policies and procedures. While HUD waives the use of EIV (e.g., HUD Notice PIH 2020-33 (HA) Rev-2, Home Forward may also forgo the use of EIV when doing annual re-examination income verification but must resume use of EIV when HUD waivers are no longer in effect.

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2021: \$127,195	FY2024: \$94,204	Less than \$94,500 annually
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2021: 3,027 hours	FY2024: 2,241 hours	Less than 2,300 hours annually
Decrease in error rate of task execution (Standard Metric: CE#3)			
Average error rate in completing a task	FY2021: 5.5%	FY2024: 5.5% or less	Maintain 5.5% or less

Cost Implications:

Home Forward anticipates cost savings of \$31,795 as a result of implementing this activity.

22 Modernizing HCV/PBV Oral Briefings

Approved FY2021, Implemented FY2021

Under 24 Code of Federal Regulations (CFR) 982.301, PHAs are required to provide families eligible to participate in the voucher program with an “oral briefing”. During the COVID-19 public health emergency, Home Forward implemented HUD waiver HCV-2 provided in HUD Notice PIH 2020-05, which was extended and superseded by HUD Notice PIH 2020-13 and, HUD PIH Notice 2020-33(HA) Rev-2, allowing flexibility in how the required oral briefing for HCV and PBV households are conducted. Through this activity, Home Forward conducts required oral briefings for new HCV and PBV households through alternative means in response to COVID-19 and in the future when necessary to protect the health and safety of participants and staff due to local, state, or national state of emergencies or disasters. Home Forward may also use this flexibility on a case by case basis if an individual or household faces extenuating circumstances that prevent them from coming to an in-person oral briefing. In these individual cases, Home Forward will note the extenuating circumstances in the tenant file.

MTW authorization:

Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

These alternative means may include: webcast, video call, or expanded information packet. Home Forward ensures that the method of communication for the briefing effectively communicates with, and allows for equal participation of, each family member, including those with vision, hearing, and other communication-related disabilities, and ensures meaningful access for persons with limited English proficiency.

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2021: \$14,177	FY2024: Less than \$8,861	Less than \$8,900 annually
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2021: 312 hours	FY2024: 195 hours	At least 195 hours

Cost Implications

Home Forward does not anticipate any cost implications as a result of this activity.

23 Independent Entities: Use of Staff Instead of Third Parties for Home Forward Owned Properties

Approved FY2023, Implemented FY2023

This activity consolidates and clarifies the scope of Home Forward's use of staff rather than independent entities to perform various functions with respect to HCV or PBV units owned by Home Forward. The activity covers all such functions otherwise required to be performed by independent entities by applicable law, regulations or notices. For PBVs, this includes all of the functions listed in "Table 1: Overview of Independent Entity Functions" in Attachment B of Notice PIH 2017-21 (pp. 14-15), except for functions related to the voucher homeownership option.

Activity 08, Alternative Inspection Requirements for Partner-Based Programs, and Activity 10, Local Project-Based Voucher Program references use of staff for rather than independent entities in connection with. Both of those activities state that where Home Forward both owns and manages a unit, it hires a third party to conduct quality control testing of inspections and rent reasonableness determinations for a sample of these units. Home Forward continues that practice.

MTW authorization:

Attachment C, Section D(1)(f) – Property Eligibility Criteria

Attachment C, Section D(2)(c) – Rent Policies and Term Limits

Attachment C, Section (D)(5) - Ability to Certify Housing Quality Standards

Attachment C, Section D(7) - Establishment of an Agency MTW Section 8 Project-Based Program

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Prior to implementation: \$0	FY2024: \$88,466	Less than \$88,500
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 1,697 hours	Less than 1,700 hours

Cost Implications

Home Forward anticipates cost savings of \$88,500 as a result of implementing this activity.

24 Rent Assistance Termination Reform

Approved FY2023

This activity authorizes Home Forward to adopt and implement policies that limit the circumstances in which Home Forward will terminate HCV assistance to recipients. This activity was the result of extensive resident, participant, and Home Forward staff collaboration through a work group that met for over a year and reviewed data on demographic disparities in program terminations. The work group members engaged the broader rent assistance department and key decision makers at Home Forward. This groups work resulted in a report entitled “Policy Recommendations—Rent Assistance Termination Policy” that included a summary of how the work group reviewed the rent assistance termination policies and HUD regulatory requirements with a racial equity framework and a goal of increasing housing stability for households who have a HCV.

MTW authorization:

Attachment C, Section D(1)(h) added by the Ninth Amendment to Moving to Work Agreement - Policies for terminating program assistance

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

work resulted in a report entitled “Policy Recommendations—Rent Assistance Termination Policy” that included a summary of how the work group reviewed the rent assistance termination policies and HUD regulatory requirements with a racial equity framework and a goal of increasing housing stability for households who have a HCV.

As a result of this activity, Home Forward does not terminate HCV assistance to a recipient:

- If the owner evicts the household. Eviction and lease enforcement is a landlord/tenant issue. Home Forward’s mission is to shelter people.
- If the household’s income reaches the level where Home Forward will pay no subsidy (Housing Assistance Payments) on behalf of the family for 180 days. Home Forward allows an assisted household to go without assistance for 365 days prior to termination. . This gives households more time to complete an income recertification and regain assistance if they have a loss of income, thus promoting housing stability.
- Who are absent for 180 days from the assisted unit. Home Forward allows a recipient to be absent from the assisted unit for up to 270 days when the absence is due to attendance at specific institutional settings, as detailed in Home Forward’s administrative plan, rather than at the overall regulatory limit of 180 days..

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics

While no HUD Standard metrics would apply to this activity, Home Forward will track the number of households who retain housing assistance because of this activity.

Cost Implications

Home Forward anticipates cost savings of \$21,425 as a result of implementing this activity.

25 Preservation and Expansion of Affordable Housing

Approved FY2023

This activity authorizes Home Forward to use MTW funding to preserve and expand affordable housing units in any manner that Home Forward judges most effective. Alternatives include direct grants, hard or soft loans, loan guarantees, property purchases, purchases of investor interests and others. This activity authorizes Home Forward to provide critical flexible assistance to affordable housing units serving households with incomes not exceeding 80% of the Area Median Income, which Home Forward is not subsidizing under the PBV or public housing program.

MTW authorization:

Attachment D - Use of MTW Funds

Attachment D, Section (B)(3) - Local Unit-Based Subsidy Program

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Additional Units of Housing Made Available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2024: 84 units	84 units
Units of Housing Preserved (Standard Metric: HC#2)			
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	FY2024: 0 units	

Cost Implications

Home Forward does not anticipate any cost implications as a result of this activity.

26 Initial HQS Inspection and HAP Contract Execution

Approved FY2023, Implemented FY2023

This activity authorizes Home Forward to use flexibilities granted by HUD during the COVID-19 pandemic to support households in leasing up with their voucher in perpetuity. Specifically, Home Forward:

- Executes the Housing Assistance Payment (HAP) contract within 120 days of the lease term. HUD initially granted PHAs the authority to do this in waiver HCV-4, Notice PIH 2021-14(HA);
- Executes the Housing Assistance Payment (HAP) contract despite minor discrepancies between the lease and the HAP contract;
- Makes Housing Assistance Payments (HAP) to the owner before the Housing Quality (HQS) Inspection is complete as needed. Home Forward requires the owner's self-certification that "the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question instead of conducting an initial inspection." For any unit for which Home Forward accepted an owner's self-certification, Home Forward completes the initial inspection as soon as is reasonably possible, but no later than 60 days of the owner's self-certification. While the HQS inspection is pending, a tenant may request an expedited inspection as a Reasonable Accommodation request or if the tenant makes a report of a life-threatening condition. If, upon inspection, a unit is found to not meet the HQS standards, Home Forward follows the process to enforce an owner's obligation to comply with HQS standards outlined in Home Forward's Administrative Plan including owner notification, reinspection, HAP abatement, and, in limited cases, termination of the HAPC. HUD initially granted PHAs the authority to do this in waiver HQS-1, Notice PIH 2021-14(HA);

MTW authorization:

Attachment C, Section (D)(1)(a) - HCV Program Operational Policies and procedures

Attachment C, Section (D)(5) - Ability to Certify Housing Quality Standards

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

This activity furthers the increase housing choice for low income families objective by giving households more flexibility to access stable housing or stay assisted in current housing sooner.

Changes or modifications

We are not anticipating any changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Prior to implementation: \$0	FY2024: \$2,960	Less than \$3,000
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 285 hours	Less than 300 hours

Cost Implications

Home Forward anticipates cost savings of \$3,000 as a result of implementing this activity.

27 Income Verification at Admission to Housing Choice Voucher Program

Approved FY2023, Implemented FY2023

This activity allows Home Forward to accept self-certifications and allows for the delay of receipt of documentation and/or third party verification past the regulatory 60-day required time from all applicants to the HCV program. HUD provided a similar waiver with respect to the Emergency Voucher Program in Notice PIH 2021-15, Section 9.h. (pp. 32-33); Home Forward will consider that waiver language as general advisory guidance in connection with this activity.

MTW authorization:

Attachment C, Section (D)(3)(b) - Eligibility of Participants

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Increase housing choices for low-income families

The program regulations under § 982.201(e) require that the PHA must receive information verifying that an applicant is eligible within the 60-day period before the PHA issues a voucher to the applicant. For verification purposes, Notice PIH 2018-18 states that third-party generated documents be dated within 60 days of the PHA's request.

For homeless families and other vulnerable HCV applicant families, documentation may not be readily on-hand and may be difficult to obtain quickly. Accepting self-certifications and allowing for the delay of receipt of documentation and/or third-party verification allows the family to obtain necessary documentation without unduly delaying the family's housing assistance. This activity enables Home Forward to move more rapidly through intake and voucher issuance, allowing vulnerable families to lease up and increase their housing stability as they are collecting necessary documentation.

With self-certification, applicants submit an affidavit attesting to reported income, assets, expenses and known pending income that would affect an income eligibility determination. Self-certification serves as the highest form of income verification at admission and no additional third-party document is needed. Subsequent to admission, when Income Validation Tool reports are available through EIV, Home Forward compares the reports to the participant's self-certification. Any inconsistencies or discrepancies are addressed in accordance with Home Forward's Administrative Plan, which may entail entering into a repayment plan or termination, if found ineligible.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Prior to implementation: \$0	FY2024: \$3,358	Less than \$3,500
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation: 0 hours	FY2024: 122 hours	Less than 130 hours

Cost Implications

Home Forward anticipates cost savings of \$3,358 as a result of implementing this activity.

B. Not Yet Implemented Activities

24 Rent Assistance Termination Reform

Approved FY2023

Home Forward anticipates implementing this activity in 2024 due to delays in the execution of the Ninth Amendment to Home Forward's Moving to Work Agreement.

25 Preservation and Expansion of Affordable Housing

Approved FY2023

Home Forward anticipates implementing this policy in 2024 to support the Troutdale development. Work is currently underway to design 84 affordable apartments at a site provided by Multnomah County in the historic old town area of Troutdale, adjacent to SW 257th Avenue. Metro's affordable housing bond funds are providing the financial base for this project. Home Forward plans to include locally funded long term rent assistance and MTW funding in this project. Home Forward does not plan to include PBV.

C. Closed Out Activities

12 Alternative Initial Housing Assistance Policy

Approved FY2015, Never Implemented

Home Forward determined that the administrative costs to manage this activity would offset the proposed savings.

Alternate Rent Calculation for Public Housing Units

Approved FY2011, Implemented FY2022, Closed Out FY2012

This activity was discontinued on April 1, 2012 when our current Rent Reform activity was implemented and the units at those buildings shifted to the Rent Reform calculation.

Limits for Zero-Subsidy Participants

Approved FY2012, Implemented FY2020, Closed out FY2012

This activity was discontinued on April 1, 2012 with the implementation of Rent Reform.

Limiting Portability in Higher Cost Areas

Approved FY2013, Never Implemented

Home Forward determined that the administrative costs to manage this activity would offset the proposed savings.

04 Bud Clark Commons**Approved FY2010, Implemented FY2010, Closed Out FY2014**

Home Forward has determined that operations at Bud Clark Commons do not utilize MTW flexibility.

05 Biennial Insections**Approved FY2008, Implemented FY2008, Closed out FY2015**

The FY2014 Appropriations Act allows all housing authorities to conduct inspections on a biennial basis. This activity no longer requires MTW flexibility.

Sources and Uses of MTW Funds

A. Estimated Sources and Uses of MTW Funds

i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$0
70600	HUD PHA Operating Grants	\$127,365,918
70610	Capital Grants	\$358,788
708000	Other Government Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$0
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$11,386,403
70000	Total Revenue	\$139,111,109

ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$11,911,022
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$4,251,164
92500 (92100+92200+92300+92400)	Total Tenant Services	\$69,793
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$48,400
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$1,378,802
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$131,594

96000 (96200+96210+96300+96400+ 96500+96600+96800)	Total Other General Expenses	\$689,316
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$120,626,110
97400	Depreciation Expense	\$5,508
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$139,111,109

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

We have no variance between Estimated Total Revenue and Estimated Total Expenses.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

Replacement Housing Factor Funds/Demolition or Disposition Transition Funding: Home Forward's efforts to reposition its public housing portfolio can result in a formal disposition approval from HUD and then the sale of the asset. In these instances, Replacement Housing Factor (RHF) or Demolition or Disposition Transitional Funding (DDTF) funds are received by Home Forward as part of the Capital Fund Formula and used to create a new public housing unit. Home Forward utilizes MTW authority to use these RHF or DDTF funds within its single fund flexibility to create new public housing units in a mixed-finance project. In doing so, these funds provide a portion of the total development capital needed for a particular project. Given the development cash flow needs of any particular mixed-finance project, Home Forward may also use these funds to repay construction financing. This would be done without formally pledging the future RHF or DDTF funds to the lender as collateral.

MTW Initiative Funds: Home Forward has created MTW Initiative Funds, comprised of Home Forward's MTW block grant funding. Funding for these programs is first provided by a combination of PHA and HUD-held reserves prior to using any current year appropriations. This is a funding source to support initiatives that will advance the goals and objectives of MTW and Home Forward's Strategic Operations Plan. Some of these initiatives are aspects of our MTW Activities, described earlier in this Plan.

Action for Prosperity: Action for Prosperity is a partnership between Home Forward, Worksystems, Inc., the Multnomah County Anti-Poverty system, and the State Department of Human Services. Each system leverages its resources by delivering core services and utilizing the other systems to provide wrap-around supports. With access to stable housing, the appropriate level of case management, and priority access to workforce services, we believe that a significant number of households will be able to develop the skills they need to gain employment within two years. Home Forward contributes rent assistance, in the form of

Program Based Assistance, which is contracted to agencies in the Anti-Poverty system who use it to help stabilize families who are engaged in training or employment programming.

Wealth Creation: Wealth Creation is the umbrella for the initiatives designed to help youth attain education and leadership success to help adults make economic mobility progress and improve the quality of life.

- For adults: Wealth creation will include the following four strategies: collecting information about families through an Employment and Training Interest Inventory; aligning existing self-sufficiency programs into a single program called GOALS, with site-based and non-site based components (since this this done, do we need to remove it? If so, then we need to change four to three strategies); facilitating the hiring of low-income (Section 3) residents and participants by Home Forward and contractors; and integrating Action for Prosperity (mentioned above) into Economic Opportunity work. Ultimately, the goals for this initiative include increases in resident/participant earned income, increases in residents'/participants' contribution to rent, and residents/p participants reaching a living wage if they exit housing subsidy.
- Youth Initiatives: Initiative and programming to help youth attain education success and develop leadership skills.

Aging at Home Strategies: Home Forward is developing and implementing initiatives to increase independence and a sense of community at our properties that serve seniors and people with disabilities. In addition, we plan to continue administering the Congregate Housing Services Program at five properties and are evaluating expansion of this program and/or implementing certain aspects of this program at other properties.

Staff Training: Home Forward's current strategic plan (2016-2020) recognizes that how our work is done matters to our community and staff. To strengthen our relationship with the people we serve and with each other, Home Forward continues to re-evaluate best practices and approaches to offer relevant information and training for staff. Training includes Trauma- Informed practice, a recognized model that recognizes the impact trauma can have on people and commits to not repeating traumatic experiences. The goal is to provide staff with knowledge and tools suitable for their position to recognizing symptoms of trauma and applying trauma informed awareness in engaging in the work and to support this by creating Trauma Informed policies and procedures that encourage healing and a sense of safety.

Security Deposit Assistance: Home Forward uses single-fund flexibility to offer security deposit assistance to t participants leasing up with Veterans Affairs Supportive Housing (VASH) vouchers. For homeless veterans, a lack of funds for security deposits is a serious barrier to successful use of VASH vouchers. . Home Forward's funds are to be used only when the service agencies working with these populations are not able to otherwise arrange for deposit assistance.

Tenant Education Class and Deposit Assistance: During FY2016, Home Forward entered into a contract with a community- based tenant advocate organization, the Community Alliance of Tenants (CAT), to teach new and transferring HCV holders about their rights and responsibilities as tenants. Upon completing the class, voucher holders are given one- time access to \$200 in deposit assistance for their housing search. This partnership grew out of concern that in the current competitive rental market, and with the recent changes in Oregon landlord/tenant law, voucher holders needed more education about how to be successful applicants and tenants.

Inter-jurisdictional Transfer Program for Survivors of Domestic Violence: In collaboration with other MTW-authorized housing authorities and the local domestic violence service system, Home Forward has implemented an inter-jurisdictional transfer program to assist participants who are survivors of domestic violence. The program ensures continued access to stable and safe housing when it is deemed necessary that the household move to another jurisdiction to avoid violence that is likely to become lethal or near-lethal. A local domestic violence service provider has assigned two full-time advocates to work on-site with Home Forward participants and residents. The advocates can recommend voucher participants to this transfer program and provide advocacy and assistance with relocation to the new jurisdiction. Clients are connected with a local domestic violence agency in the new jurisdiction for support after their transfer. Home Forward allocates up to \$2,000 per household for relocation costs, for up to five households each

year. In addition, Home Forward intends to absorb the vouchers of up to five families referred by partnering MTW agencies.

Expungement Partnership: Home Forward is collaborating with Metropolitan Public Defender (MPD), a non-profit legal firm, to provide legal services to assist Home Forward residents, participants, and waitlist households with criminal record expungements along with consultation on any outstanding obligations to the court system. By reducing a barrier to housing and employment that is associated with a criminal background, Home Forward will help residents gain greater housing choice options in our community and ability for increased opportunity for work focused households to obtain employment. Home Forward also plans to see a decrease in administrative costs related to screening denials as an outcome of this project. Home Forward is using MTW Initiative Funds to support this program.

Affordable Housing Opportunities: With incredibly low vacancy rates and a lack of affordable housing, Home Forward is dedicated to preserving and increasing the number of housing units in our community. Home Forward will use MTW Initiative Funds to leverage additional funding for the preservation of existing affordable housing and development of new affordable housing. By using methods such as site acquisition, predevelopment loans, and gap financing, Home Forward is able to invest in projects to expand the availability of housing that is affordable to families at different income levels in our community. **Grant shortfalls:** A large share of tenant/resident services are funded from grants and foundations. These funds augment local funds to provide supportive services and self-sufficiency services to residents. In order to optimize available services, any costs not eligible for state and local grants will be funded by single-fund flexibility. **Emergency fund:** In the event of an emergency that affects a public housing family's ability to live safely in their unit, Home Forward has created a fund to help the family temporarily find safe housing in a hotel. **Landlord portal:** Home Forward developed an e-Center which allows landlords to view and schedule inspections, view payment information, and communicate with Home Forward. Home Forward is still building out the portal's ability to electronically process a Request for Tenancy Approval. It is our objective to streamline the entire process and reduce the time required to lease an apartment or home to a voucher holder. **MTW Operating Reserve:** Home Forward will set aside funds each year, as determined by the Board of Commissioners, towards building an Operating Reserve sufficient for Operating Expenses and Housing Assistance Payments.

iv. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$19,616,708	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
TOTAL:	\$19,616,708	\$0

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

Home Forward is planning on utilizing all of its current year Admin Fee and Operating Subsidy Revenue. The reserves will be made up of solely HCV funds. Home Forward will continue to use its MTW authority to meet its financial and programmatic goals.

Home Forward anticipates not having to use any previously unspent balances unless there are unforeseen needs or shortage of funding for the upcoming year Home Forward could provide a revised schedule if that situation were to occur.

* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

** HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

B. Local Asset Management Plan

- i. Is the MTW PHA allocating costs within statute? **NO**
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)? **YES**
- iii. Has the MTW PHA provide a LAMP in the appendix? **YES**
- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

Home Forward does not plan to make any changes to its Local Asset Management Plan in FY2021.

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

Additional detail about Home Forward's RAD conversion can be found in Attachment R

Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval. **NO**

If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment? **N/A**

Administrative

A. Board Resolution and Certifications of Compliance



RESOLUTION 23-10-01

RESOLUTION 23-10-01 AUTHORIZES HOME FORWARD STAFF TO SUBMIT THE 25TH YEAR ANNUAL MOVING TO WORK (MTW) PLAN TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

WHEREAS, the MTW Plan provides Home Forward with the authority to adopt new policies and to flexibly use HUD funding to maximize the effectiveness of this important resource; and

WHEREAS, the plan was posted for public comment on Home Forward's website and social media on July 28, 2023 and was publicly noticed in the Oregonian on July 28, 2023; and

WHEREAS, on August 22, 2023 the Director of Policy and Planning conducted a public hearing on the draft MTW plan where no public comment was made; and

WHEREAS, HUD has requested that the Home Forward Board of Commissioners authorize the execution of its Twenty fifth Year MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of Home Forward that the Chair of the Board of Commissioners is authorized to enter into and execute the Twenty fifth Year Annual MTW Plan with the Department of Housing and Urban Development.

ADOPTED: OCTOBER 4, 2023

Attest:


Kandy L. Sage, Chief Financial Officer

Home Forward:


Damien R. Hall, Chair

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2023), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) 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.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW 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.
- (11) The MTW 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 75.

form HUD 50900: Certifications of Compliance (3/2021)

OMB Approval No. 2577-0216 (exp. 3/31/2024)

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW 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.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW 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.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Home Forward

OR002

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Damien R. Hall

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE



October 4, 2023

SIGNATURE

DATE

form HUD 50900: Certifications of Compliance (3/2021)

B. Documentation of Public Process



Number of Attendees: 0

Public Comments

Home Forward did not receive public comment.

C. Planned and Ongoing Evaluations

Home Forward is not participating in any third-party evaluations at this time.

D. Lobbying Disclosures

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Home Forward

Program/Activity Receiving Federal Grant Funding

Moving To Work

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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 Authorized Official

Ivory N. Mathews

Title

Executive Director

Signature



Date (mm/dd/yyyy)

10/04/2023

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

E. Local Asset Management Plan

Home Forward Asset Management Program

The First Amendment to the Amended and Restated Moving to Work (MTW) Agreement allows Home Forward to develop a local asset management program for its Public Housing Program. The following describes Home Forward's asset management program and identifies where differences exist from HUD's asset management guidance.

Home Forward's Local Asset Management Program

Home Forward operates a property/project-based management, budgeting, accounting, and reporting system. Our project-based management systems include:

- Annual budgets are developed by on-site property managers. These budgets are reviewed and further consolidated into portfolio level budgets managed by housing program managers.
- Budgets at the property level are provided an allocation of public housing operating subsidy based on factors which differentiate subsidy based on building age, type, size, and relative poverty of the population of the various public housing properties.
- Weekly monitoring of occupancy by property, including notices, vacancies, and applicants, is published to the Public Housing management and Executive management.
- Monthly property-based financial reports comparing month-to date and year-to-date actual to budget performance for the current year are provided to site managers, portfolio managers, and the Director of Property Management. These reports are available to other management staff as needed to monitor specific properties.
 - Monthly reviews are held at the property level with Site Managers and their portfolio management.
 - Quarterly reviews of the Public Housing portfolio in its entirety are held at the division level with Property Management Director and Regional Property.
 - Managers, as well as the Chief Operating Officer and Chief Financial Officer. This review covers each property Net Operating Income and Cash Flow.

Home Forward applies the same project/program based budgeting system and financial performance review to its HCV program, local MTW programs, and non-federal programs and properties.

Home Forward's Cost Objectives

OMB Circular A-87 defines cost objective as follows: Cost objective means a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred. The Cost Objectives for Home Forward's asset management program are the organizational subdivisions:

- Public Housing properties - includes resident services and management staff directly supporting this program
- Rent Assistance programs - includes management staff directly supporting this program and Family Self Sufficiency staff (including those supporting Public Housing residents)
- Moving to Work - includes activities related to our MTW agreement and local programs
- Affordable Housing
- Development

Home Forward's Treatment of Certain Costs

Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, Home Forward has identified all of its direct costs and segregated all its costs into pools, as either a direct, direct allocated, or indirect allocated. We have further divided the indirect allocated pool to assign costs based on a relevant metric, as described in Attachment 1.

CORE Maintenance: Home Forward is committed to a cost effective approach to managing our public housing assets. As such, Home Forward has developed a balance of on-site capacity to perform property manager functions and basic maintenance/handyperson services, with more skilled services performed by a centralized group of trades and specialty staff (CORE maintenance). CORE maintenance performs services covering plumbing and electrical repairs, painting and pest control, as well as garbage and recycling. Although these maintenance functions are performed centrally, the decisions and control remains at the property level as it is the property manager and/or housing program manager who determines the level of service required from the CORE maintenance group. All services are provided on a fee for service basis.

Procurement: Home Forward has adopted procurement policies that balance the need for expedient and on-site response through delegated authorization to site staff for purchases under \$5,000. Purchases greater than this limit requires engaging central procurement. The Procurement staff are well trained in the special requirements of procuring goods and services for a federal program and provides necessary contract reporting requirements as well. Central procurement services are part of Home Forward's indirect overhead allocation.

Human Resources: Along with the public housing program and its Section 8 voucher program, Home Forward has non-federal affordable properties, a development group, and locally funded rent assistance programs. Home Forward's Human Resources department serves the entire agency and certain human resource activities that HUD would consider a direct cost, such as recruitment and pre-employment drug testing and screening, are centralized and are part of Home Forward's indirect overhead allocation. Home Forward has determined that the cost of keeping extremely detailed records of HR activity for direct cost assignment exceeds the value received from such effort.

Information Technology: Hardware and software costs will be directly charged to the appropriate cost objective when such costs are available and specific to that cost objective. When a reasonable measurement of such IT costs can be obtained, an allocation based on the number of users (computers, software applications, etc.) will be utilized to directly charge the cost objective.

Resident Services: A large share of tenant/resident services are funded from grants and foundations and these funds augment local funds to provide supportive services and self-sufficiency services to residents. In order to optimize available services, any costs not eligible for state and local grants will be funded by Home Forward's public housing properties and HCV program.

Rent: Home Forward charges rent to each cost objective based on the space they occupy in our central office building. Rent is based on estimated costs and adjusted for actual costs at year-end.

Home Forward's Treatment of Public Housing Operating Subsidy

Home Forward's flexibility to use MTW funding resources to support its low-income housing programs is central to our Asset Management Program. Home Forward will exercise our contractual authority to move our MTW funds and project cash flow among projects and programs as the Authority deems necessary to further our mission and preserve our low income housing assets and local programs.

Home Forward's Indirect Cost Allocations

Costs that can specifically and efficiently be identified to a cost objective are counted as direct costs to that objective. Costs that cannot be readily or efficiently identified as specifically benefiting a cost objective will be considered indirect and allocated. The Home Forward Allocation Process – Process Flow Diagram shown at the end of this policy is a graphic representation of Home Forward's allocation methodology. Home Forward has determined that some costs, defined as "direct costs" by HUD for asset management, require effort disproportionate to the results achieved and have included those costs as part of the indirect cost pool allocated to cost objectives as overhead.

Home Forward Indirect Costs

OMB Circular A-87 defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Home Forward's indirect costs include, but are not limited to:

- Executive
- Policy & Planning
- Accounting & Finance
- Purchasing
- Human Resources, including job applicant screening, payroll, labor negotiations & organization wide training
- Information Technology: costs not specifically identified and charged as a direct expense to a cost objective

Differences – HUD Asset Management vs. Home Forward Local Asset Management Program

Home Forward is required to describe in the MTW Annual Plan differences between our asset management program and HUD's asset management program as described in HUD's Financial Management Guidebook. Below are several key differences:

HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Public Housing (PH) property level and voucher program. Home Forward has implemented an indirect allocation methodology that is much more comprehensive than HUD's asset management system which includes all of Home Forward's cost objectives listed above.

Home Forward has defined the treatment of direct and indirect costs differently than HUD's asset management program. From the agency perspective, we view the program operations management as direct costs of the program.

These differences include, but are not limited to:

- HUD Indirect/Home Forward Direct:
 - Portfolio and program ("regional") management, including hiring, supervision and termination of frontline staff is considered a direct cost. These costs are pooled and then allocated to each property based on units, vouchers, or other relevant metrics. Work with auditors and audit preparation by HCV and PH staff is considered a direct expense. Executive management is considered an indirect cost.
 - Storage of HCV and PH records and adherence to federal and/or state records retention requirements will be considered a direct cost of the program.
 - Development and oversight of office furniture, equipment and vehicle replacement plans will be considered a direct cost of the program.

- Advertising (notification) costs specific to HCV, including applicants and landlords, will be considered a direct expense.
- HUD Direct/Home Forward Indirect:
 - Advertising for new hires will be considered indirect and allocated to the program and properties.
 - Staff recruiting and background checks, etc. will be considered indirect and allocated to the program and properties.
- Other:
 - Using MTW authority to improve efficiencies across programs, all staff associated with the Family Self Sufficiency program, regardless of serving public housing or HCV residents, will be considered a direct cost of the HCV program and managed by the HCV management.
 - Preparation and submission of HCV and public housing program budgets, financial reports, etc. to HUD and others will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.
 - Investment and reporting on HCV proceeds will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.

HUD's rules limit the transfer of cash flow between projects, programs, and business activities. Home Forward intends to fully use its MTW resources and flexibility to move project cash flow among projects as locally determined and use MTW funding flexibility to provide additional funding to public housing properties when appropriate and necessary to provide for and preserve our public housing assets.

HUD's rules provide that maintenance staff be maintained at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, and asset preservation work.

HUD's rules provide that purchasing is performed at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central purchasing, depending on the total cost of procurement and complexity of applicable procurement laws and reporting requirements.

HUD intends certain property management activities to be at the property level. Home Forward has centralized selected property management functions, including but not limited to denial hearings, occupancy management, transfers, reasonable accommodations, auditing, training, compliance, and some waitlist management, and will allocate these costs as a direct expense to the properties based on a relevant metric such as units.

Home Forward employs its own development staff. Any work on Public Housing Capital projects will be subject to a cost recovery fee paid from the capital fund to cover costs of development staff engaged in such capital projects.

Balance Sheet Accounts

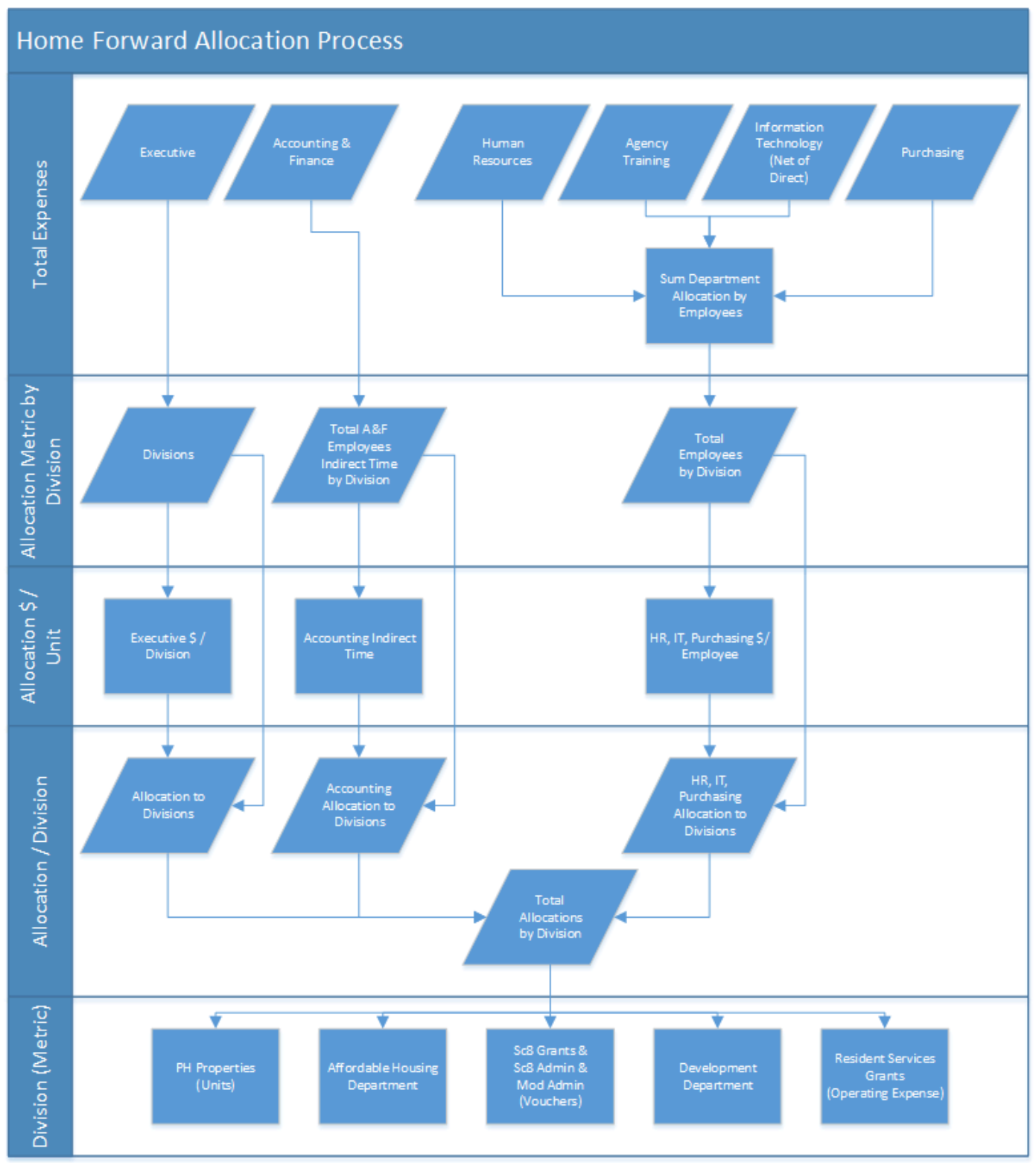
Most balance sheet accounts will be reported in compliance with HUD's Asset Management Requirements and some will deviate from HUD's requirements, as discussed below:

- Cash
- Restricted Cash

- Petty Cash
- Investments
- Selected Prepaid Expenses and Deferred Charges
- Selected Accrued Liabilities
- Payroll Liabilities
- Compensated Absences
- Other Post-Employment Benefits (OPEB) Liability
- Unfunded Pension Liabilities (GASB 68)
- Unrestricted and Restricted Net Assets

Home Forward's asset management program will maintain the above balance sheet accounts centrally. Maintaining these accounts centrally has proven to be the most cost effective and least labor intensive method ensuring efficient accounting operations and ultimately reducing costs charged to the programs. This deviates from HUD's asset management requirements as these accounts will not be reported at the AMP or program. Additionally, the centralization of cash and investments is in keeping with the single fund precept of our MTW authority. For those balance sheet accounts that are originated from expense entries, the related expenses will continue to be reported as an expense to the appropriate program, department and AMP-based income and expense statement through direct charges or allocations.

The agency is continually reviewing our asset management practices and will likely revise our approach over the coming years.



Appendix B

A. Resident Rights, Participation, Waiting List, and Grievance Procedures

Section 1.6 – Special Provisions Affecting Conversions to Project-Based Vouchers from PIH Notice 2013-23

C. PBV Resident Rights and Participation

1. **No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.³ Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.
2. **Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.
3. **Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project. Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.
4. **Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent.

This policy must be in place at conversion and may not be modified after conversion. The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP

³ These protections (as well as all protections in this Notice for current households) apply when in order to facilitate repairs a household is relocated following the conversion and subsequently returns to the property, even if they are considered a "new admission" upon return.

Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase in:

Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three-year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this requirement.

1. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.⁴ Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted

⁴ The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents.

2. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
3. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
 1. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - a. A reasonable period of time, but not to exceed 30 days:
 - i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or ii. In the event of any drug-related or violent criminal activity or any felony conviction;
 - b. 14 days in the case of nonpayment of rent; and
 - c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
 2. Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
 - a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),⁵ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.

⁵ § 982.555(a) (1) (IV) is not relevant to RAD as the tenant-based certificate has been repealed.

- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

4. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the HCV program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.) is covered by this waiver.

5. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant re-location and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.
6. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e. residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.⁶ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the

⁶ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

7. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.⁷
3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.

⁷ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

- ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.
- iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁸

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2).

However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

- 5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- 6. **Agreement Waiver.** This section has been moved to 1.6.(B)(7).
- 7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)
- 8. **Administrative Fees for Public Housing Conversions during Transition Period.** For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs

⁸ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

9. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

10. **Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the PHA.

B. Attachment 1B: Resident Provisions in Conversions from Public Housing to PBRA and PBV

This Attachment contains two sections, describing:

- 1B.1 Summary of Resident Provisions
- 1B.2 Resident Participation and Funding

1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD:

Conversion will be considered a significant amendment to a PHA Plan (see Section 1.5(E) of this Notice);

Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);

No rescreening at conversion (see Section 1.6(C)(1) of this Notice for conversions to PBV and Section 1.7(B)(1) for conversions to PBRA);

Right to return after temporary relocation to facilitate rehabilitation or construction (see Section 1.6(C)(2) of this Notice for conversions to PBV and Section 1.7(B)(2) for conversions to PBRA);

Phase-in of tenant rent increases (see Section 1.6(C)(4) of this Notice for conversions to PBV and Section 1.7(B)(3) for conversions to PBRA);

Continued participation in the ROSS-SC and FSS programs (see Section 1.6(C)(5) of this Notice, for conversions to PBV and Section 1.7(B)(4) for conversions to PBRA);

Continued Earned Income Disregard (see Section 1.6(C)(8) of this Notice, for conversions to PBV and Section 1.7.(B)(7) for conversions to PBRA);

Continued recognition of and funding for legitimate residents organizations (see Section 1.6(C)(6) of this Notice for conversions to PBV, Section 1.7(B)(5) of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);

Procedural rights consistent with section 6 of the Act (see Section 1.6(C)(7) of this Notice for conversions to PBV and Section 1.7(B)(6) of this Notice for conversions to PBRA); and

Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the Covered Project (see 24 CFR § 983.260 for conversions to PBV and Section 1.7(C)(5) of this Notice for conversions to PBRA).

For additional information, refer to Notice H2014-09; PIH 2014-17 for additional information on relocation requirements under RAD.

1B.2 Resident and Participation Funding⁹

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

A. PBRA: Resident Participation and Funding

Residents of Covered Projects converting assistance to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, a Project Owner must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate tenant organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project:

1. HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization; and
2. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner.

B. PBV: Resident Participation and Funding

To support resident participation following conversion of assistance, residents of Covered Projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. **Legitimate Resident Organization.** A Project Owner must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a Covered Project, meets regularly, operates democratically, is representative of all residents in the project, and is completely independent of the Project Owner, management, and their representatives.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization; and

2. **Protected Activities.** Project Owners must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:

⁹ For the purposes of this Attachment, HUD uses the term “Project Owner” to refer to the owner of a converting or Covered Project. In some instances the owner of a project could be a public, non-profit, or for-profit, e.g., mixed finance projects).

- a. Distributing leaflets in lobby areas;
- b. Placing leaflets at or under residents' doors;
- c. Distributing leaflets in common areas;
- d. Initiating contact with residents;
- e. Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
- f. Posting information on bulletin boards;
- g. Assisting resident to participate in resident organization activities;
- h. Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
 - i. Formulating responses to Project Owner's requests for:
 - ii. Rent increases;
 - iii. Partial payment of claims;
 - iv. The conversion from project-based paid utilities to resident-paid utilities;
 - v. A reduction in resident utility allowances;
 - vi. Converting residential units to non-residential use, cooperative housing, or condominiums;
 - vii. Major capital additions; and
 - viii. Prepayment of loans.

In addition to these activities, Project Owners must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization.

Project Owners shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

3. **Meeting Space.** Project Owners must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:
 - a. Residents or a resident organization and used for activities related to the operation of the resident organization; or
 - b. Residents seeking to establish a resident organization or collectively address issues related to their living environment.

Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the project has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

Project Owners may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

4. **Resident Organizers.** A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective Project Owners, managers, or their agents.

Project Owners must allow resident organizers to assist residents in establishing and operating resident organizations.

5. **Canvassing.** If a Covered Project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

6. **Funding.** Project Owners must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate resident organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project:

- a. HUD encourages the Project Owner s and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owner are also encouraged to actively engage residents in the absence of a resident organization; and
- b. Project Owner s must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner.

Attachment R

A. Rental Assistance Demonstration

Home Forward is a successful applicant in the Rental Assistance Demonstration (RAD).

In May 2015 Home Forward submitted six Rental Assistance Demonstration (RAD) applications for six properties, with a total of 285 public housing units. We received six initial Commitments to enter into a Housing Assistance Payment (CHAPs) in September 2015, with amended CHAPS issued in March 2016 (RAD Phase 1). In addition, Home Forward received 24 additional CHAPs in August 2016, totaling 498 units (part of RAD Phase 2). Home Forward is currently working with HUD to determine the timeline of conversion for these properties (see section titled Public Housing Strategy).

Home Forward is converting to project-based vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to project-based vouchers, Home Forward will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PHI-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this attachment. Additionally, Home Forward certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authorities access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, Home Forward’s Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Home Forward may also borrow funds to address their capital needs. Project-based voucher subsidy is sized to replace the reduction in Capital Funds and operating subsidy lost from the RAD conversions. Home Forward currently has debt under the Capital Fund Financing Program and will be working with Wells Fargo to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, Home Forward certifies that it will maintain its continued service level.

Under HUD Notice PIH-2012-32, REV-2, Home Forward’s RAD conversion is detailed below as part of its Annual Moving to Work Plan.

The following are the remaining public housing properties that Home Forward anticipates converting via RAD by the end of FY2024.

Development #1

Development Name	Dekum Court (Receiving Property for Transfer of RAD Assistance)		
PIC Development ID #	OR002000111		
Conversion Type	See “Other Information” Below		
Total Current Units	No RAD Units	Total Post-RAD Units	27 RAD units
Pre-RAD Unit Type	Not Applicable (it’s the receiving site)	Post-RAD Unit Type	Family

Capital Fund Allocation \$0

Transfer of Assistance Yes (as a receiving site)

Pre-Conversion Bedroom Type 16 2BR and 11 3BR at sending sites

Post-Conversion Bedroom Type: 16 2BR and 11 3BR at receiving site

De Minimus Reduction None

Transfer of Waiting List See relevant information above for Chateau Apartments and Cora Park

Other Information Dekum Court has a Section 18 Demolition/Disposition Approval. Pursuant to this approval, Home Forward will demolish the project's existing 40 public housing units and replace them with 187 new affordable housing apartments. Ground-breaking occurred in April 2022.

Dekum Court's redevelopment will occur in two phases. In Phase 1:

- Home Forward will build 48 units on a portion of the site.
- Forty of these 48 apartments will have project-based Housing Choice Vouchers.
- These 48 apartments will replace, on a one-for-one basis, all forty of the existing two and three-bedroom apartments currently comprising Dekum Court.
- Home Forward will move all current Dekum residents from their current homes to their newly-built apartments

In Phase 2:

- Home Forward will demolish Dekum's 40 existing apartments once vacated by their residents.
- Home Forward will build 139 new affordable apartments.
- 27 of these 139 new apartments will have RAD PBVs due to the transfer of assistance from Cora Park, Chateau Apartments and Scattered East A.
- Those 27 RAD PBV units will replace, on a one-for-one basis, the 16 two-bedroom and 11 three bedroom apartments at the three transferring properties.

Development #2

Development Name Peaceful Villa

PIC Development ID # OR002000108

Conversion Type Project-Based Vouchers

Total Current Units 69

Total Post-RAD Units: 69

Pre-RAD Unit Type Family

Post-RAD Unit Type Family

Capital Fund Allocation \$0

Transfer of Assistance N/A

Pre-Conversion Bedroom Type 8 studios
53 1BRs

Post-Conversion Bedroom Type Replacement Housing
8 studios

Type	8 2BRs	53 1BRs 8 2BRs New Homes via Faircloth to RAD 4 studios 9 1BRs 45 2BRs 34 3BRs 4 4BRs
De Minimus Reduction	None	
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Peaceful Villa Court will be moved onto a Home Forward project based voucher site-based waiting list for Peaceful Villa. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Peaceful Villa.	
Other Information	<p>CHAP received April 2018.</p> <p>Peaceful Villa is a 69 unit public housing property that has a CHAP and will be converting to RAD. It is approximately 80 years old and sits on four acres in a high opportunity neighborhood close to frequent service transit, affordable groceries and parks. The property has been significantly upzoned and can accommodate far more than 69 affordable homes for households with low-incomes.</p> <p>Due to Peaceful Villa's age and condition, and the opportunity to add a significant number of new affordable homes to the site, Home Forward plans to demolish and redevelop Peaceful Villa. Site planning and design began in 2022 and Home Forward successfully competed for approximately \$19 million of state funding for the site's redevelopment in 2023. Construction is scheduled to begin in the 3rd quarter of 2024..</p> <p>The redeveloped Peaceful Villa will (a) contain total of 166 affordable homes, which more the doubles the density on the site (b) replace the 69 current public housing units with 69 RAD PBV units of identical bedroom sizes (8 studios, 53 one-bedrooms, 8 two-bedrooms.) (c) use Faircloth to RAD to provide rental assistance for all the additional, new homes added to the site.</p>	

Development #3

Development Name	Killingsworth Housing (42 nd and Killingsworth)	
PIC Development ID #	Not applicable; no public housing currently on-site	
Conversion Type	Faircloth to RAD	
Total Current Units	Not applicable	Total Post-RAD Units:28
Pre-RAD Unit Type	Not applicable	Post-RAD Unit Type
Capital Fund Allocation	\$0	

Transfer of Assistance	N/A	
Pre-Conversion Bedroom Type	Not applicable	Post-Conversion Bedroom Type
		12 studios
		2 1BRs
		10 2BRs
		4 3BRs
De Minimus Reduction	None	
Transfer of Waiting List	Not applicable.	
Other Information	Home Forward will build 84 affordable rental homes on a site owned by Portland Community College (PCC). The site will also house PCC's new Opportunity Center--a hub for local workforce training efforts. Home Forward's building will also contain 4,200 square feet of early learning space build and operated by the Native American Youth and Family Center. Home Forward plans to break ground on this property in October 2023.	

Changes in policies that govern eligibility, admission, selection, and occupancy of units at the project after conversion, including any waiting list preferences that will be adopted for the converted project:

Home Forward's Board of Commissioners approved changes to the Section 8 Administrative Plan to accommodate the RAD transition on April 19, 2016. The changes include adopting guidelines for choice mobility. Home Forward is continuing to review RAD requirements and may submit additional changes to the Section 8 Administrative Plan and the Admissions and Continued Occupancy Policy for public housing. All policy changes adhere to RAD requirements listed below under Appendix A, that informs resident rights, participation, waiting list and grievance procedures.

Compliance agreements: Home Forward is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Site selection: This conversion complies with all applicable site selection and neighborhood reviews standards. All appropriate procedures have been followed.

Substantial Deviation Definition: As part of RAD, Home Forward is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD specific items:

1. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
2. Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
3. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
4. Changes to the financing structure for each approved RAD conversion.

Information regarding use of MTW Fungibility as defined in PIH Notice 2012-32, REV-2: Impact on Capital Fund:

1. **Estimate the amount of the current Capital Fund grant that is associated with the proposed projects and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Action Plan:** The current impact associated with the six CHAPS in this application is \$160,000. \$20,000 has been set aside for each CHAP and another \$40,000 set aside for Sequoia Square and Schiller Way, the two properties that will receive units for transfer of assistance (upon approval from HUD) from Rockwood Station and Fairview Oaks & Woods.
2. **If the RAD conversion will impact an existing CFFP or EPC, or if it proposes to utilize RHF funds to facilitate conversion, the PHA should also indicate the estimated impact of those activities:** Home Forward has submitted 31 additional RAD applications that total 1,008 public housing units. These additional applications are on the RAD waitlist and if approved, will impact our formula Capital Fund Grant allocation by approximately 56% of our current public housing unit count. We will not utilize RHF funds to facilitate conversion.

Special Provisions Affecting MTW Agencies: MTW agencies will be able to apply activities impacting the PBV program that are approved in its MTW Plan to those properties as long as they do not conflict with RAD requirements. RAD requirements include statutory requirements or specifically identified special provisions affecting conversions to PBVs, or other conditions and requirements, as detailed in PIH Notice 2012-32 REV-1, including, but not limited to, RAD contract forms or Riders. With respect to any existing PBV regulations that are waived or modified below in Appendix B, except where explicitly noted below in Appendix B, MTW agencies may modify these or other requirements to the PBV program if the activity is approved in its MTW Plan. All other RAD Requirements listed below in Appendix A or elsewhere in PIH Notice 2012-32 REV-1 shall apply to MTW agencies.

