



homeforward

Fiscal Year 2026

Moving to Work Plan

January 1, 2026 through December 31, 2026

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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 a MTW agency since 1999. The Consolidated Appropriations Act of 2024 included a ten-year extension of MTW from 2028 until 2038. This allows Home Forward to continue to utilize MTW flexibility to support our mission.

The following Fiscal Year 2026 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 the ability to 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. Long-Term MTW Goals and Objectives

Home Forward's long-term MTW goals and objectives align with the organization's strategic plan, which reaffirms our commitment to systemic change. Being agile, responsive, creative, and innovative with this plan defines Home Forward's position as a leader within the affordable housing ecosystem. We aim to improve our systems of offering pathways to housing stability and quality of life resources for the people we serve. The strategic plan identifies key priority areas that Home Forward will make progress on over the coming years: 1) improving service to residents and program participants; 2) supporting employees; and 3) leading within the housing stability ecosystem.

While Home Forward works towards housing our community with MTW flexibility, we also strive to hold ourselves accountable to our community, partners, and funders. Our goals reflect the importance of serving our community, currently and for generations to come.

B. Moving to Work Goals and Objectives for the Year

Home Forward will continue using our Moving to Work authority and internal policy reform work to advance our mission, promote housing stability, and improve access to our programs.

Home Forward is proposing two new MTW activities in this year's Plan. First, is a proposal for a locally designed homeownership program that will better serve the needs of our community. The traditional homeownership program is underutilized because it only offers assistance that aligns with the full term of the initial mortgage as a reasonable

accommodation or for limited populations. The current, traditional homeownership program does not adequately support families’ long-term economic self-sufficiency.

The second new activity proposes alternative occupancy requirements for the Housing Choice Voucher (HCV) program to better meet the needs of families in our community. The HCV occupancy requirements do not reflect the composition of households we see; the proposal would reduce administrative impact when households add or remove members. These additional flexibilities will enable us to reduce cost and achieve greater cost effectiveness of federal resources; support families in their journey to self-sufficiency; and increase housing choices for low-income families.

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
Albina 1	16	No	New PBV project
Alder 9	46	No	New PBV project
Aldea	15	No	New PBV project
Tistilal Rehab	8	No	New PBV project

TOTAL: Planned new Project Based Units in Plan Year	85
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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
Morrison	30	Leased/Issued	No	Project-Based Voucher
Musolf Manor	77	Leased/Issued	No	Project-Based Voucher
Alberta Plaza	23	Leased/Issued	No	Project-Based Voucher
12th Ave Terrace	118	Leased/Issued	No	Project-Based Voucher
Cambridge Court	19	Leased/Issued	No	Project-Based Voucher
The Jeffrey	30	Leased/Issued	No	Project-Based Voucher
Esperanza Court	14	Leased/Issued	No	Project-Based Voucher
Broadway Vantage	15	Leased/Issued	No	Project-Based Voucher
Clark Center Annex	10	Leased/Issued	No	Project-Based Voucher
Leander Court	11	Leased/Issued	No	Project-Based Voucher
Patton Park Apartments	11	Leased/Issued	No	Project-Based Voucher
The Watershed	40	Leased/Issued	No	Project-Based Voucher
Midland Commons Emerson Corner	22	Leased/Issued	No	Project-Based Voucher
Springwater Commons	18	Leased/Issued	No	Project-Based Voucher
Green Tree Court	7	Leased/Issued	No	Project-Based Voucher
Howard House	12	Leased/Issued	No	Project-Based Voucher
Hotel Alder	35	Leased/Issued	No	Project-Based Voucher
Village at the Headwaters	14	Leased/Issued	No	Project-Based Voucher
Lincoln Woods	13	Leased/Issued	No	Project-Based Voucher
Arbor Glen Apartments	21	Leased/Issued	No	Project-Based Voucher
Ritzdorf	22	Leased/Issued	No	Project-Based Voucher
Lents/Beyer/CS	22	Leased/Issued	No	Project-Based Voucher
Gladstone/Village Ct	20	Leased/Issued	No	Project-Based Voucher
Fountain Place	20	Leased/Issued	No	Project-Based Voucher
Kafoury	14	Leased/Issued	No	Project-Based Voucher
Rockwood Station	4	Leased/Issued	No	Project-Based Voucher

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Hamilton West	2	Leased/Issued	No	Project-Based Voucher
Clinton Ridge	10	Leased/Issued	No	Project-Based Voucher
Interstate Crossing	12	Leased/Issued	No	Project-Based Voucher
Hewitt Pl/Village Sq	8	Leased/Issued	No	Project-Based Voucher
Emerson Court	4	Leased/Issued	No	Project-Based Voucher
West Gresham	25	Leased/Issued	No	Project-Based Voucher
Willow Tree	10	Leased/Issued	No	Project-Based Voucher
Kateri Park	20	Leased/Issued	No	Project-Based Voucher
Westshore	6	Leased/Issued	No	Project-Based Voucher
Fenwick	7	Leased/Issued	No	Project-Based Voucher
8 NW 8th	47	Leased/Issued	No	Project-Based Voucher
Station Place	76	Leased/Issued	No	Project-Based Voucher
Cornerstone	4	Leased/Issued	No	Project-Based Voucher
Miraflores	7	Leased/Issued	No	Project-Based Voucher
Sacred Heart	12	Leased/Issued	No	Project-Based Voucher
Sacred Heart VASH	6	Leased/Issued	No	VASH Project-Based Voucher
Sandy	14	Leased/Issued	No	Project-Based Voucher
Shaver Green	8	Leased/Issued	No	Project-Based Voucher
Madrona Studios	25	Leased/Issued	No	Project-Based Voucher
Eastgate Station Apts	18	Leased/Issued	No	Project-Based Voucher
James Hawthorne Apts	9	Leased/Issued	No	Project-Based Voucher
Katherine Gray	45	Leased/Issued	No	Project-Based Voucher
Villa de Suenos	10	Leased/Issued	No	Project-Based Voucher
Clifford Apartments	15	Leased/Issued	No	Project-Based Voucher
Mayfield	15	Leased/Issued	No	Project-Based Voucher
Rockwood Building	14	Leased/Issued	No	Project-Based Voucher
Briarwood East Apts	9	Leased/Issued	No	Project-Based Voucher
Los Jardines Apts	10	Leased/Issued	No	Project-Based Voucher
Grays Landing Apts	42	Leased/Issued	No	Project-Based Voucher
Kah San Chako Haws	9	Leased/Issued	No	Project-Based Voucher
Carolyn Gardens	12	Leased/Issued	No	Project-Based Voucher
Otesha Place	10	Leased/Issued	No	Project-Based Voucher
Allen Fremont Plaza	30	Leased/Issued	No	Project-Based Voucher
McCuller Crossing	17	Leased/Issued	No	Project-Based Voucher
St. Francis Park	9	Leased/Issued	No	Project-Based Voucher
St. Francis Park VASH	9	Leased/Issued	No	VASH Project-Based Voucher
Victoria Inn	15	Leased/Issued	No	Project-Based Voucher
Center Village	16	Leased/Issued	No	Project-Based Voucher
Villa de Mariposas	8	Leased/Issued	No	Project-Based Voucher
Hill Park	10	Leased/Issued	No	Project-Based Voucher
Garlington Place	10	Leased/Issued	No	Project-Based Voucher
Garlington Place VASH	8	Leased/Issued	No	VASH Project-Based Voucher
East Burnside	16	Leased/Issued	No	Project-Based Voucher
Orchards of 82nd	12	Leased/Issued	No	Project-Based Voucher
72Foster	20	Leased/Issued	No	Project-Based Voucher
Patton Home	16	Leased/Issued	No	Project-Based Voucher

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Clara Vista	45	Leased/Issued	No	Project-Based Voucher
Tistila/Nelson	8	Leased/Issued	No	Project-Based Voucher
Las Adelitas	8	Leased/Issued	No	Project-Based Voucher
Alberta Alive VASH	24	Leased/Issued	No	VASH Project-Based Voucher
Anna Mann	12	Leased/Issued	No	Project-Based Voucher
Argyle Gardens VASH	18	Leased/Issued	No	VASH Project-Based Voucher
Aurora	16	Leased/Issued	No	Project-Based Voucher
Beatrice Morrow	20	Leased/Issued	No	Project-Based Voucher
Beech Street Apartments	31	Leased/Issued	No	Project-Based Voucher
Breitung Building VASH	28	Leased/Issued	No	VASH Project-Based Voucher
Dahlke Manor	115	Leased/Issued	No	Project-Based Voucher
The Ellington	52	Leased/Issued	No	Project-Based Voucher
Emmons Place	47	Leased/Issued	No	Project-Based Voucher
Findley Commons VASH	20	Leased/Issued	No	VASH Project-Based Voucher
Francis + Clare Apartments	22	Leased/Issued	No	Project-Based Voucher
Gallagher Plaza	85	Leased/Issued	No	Project-Based Voucher
Hayu Tillixum	8	Leased/Issued	No	Project-Based Voucher
Hazel Ying Lee Apartments	11	Leased/Issued	No	Project-Based Voucher
Hollywood East	286	Leased/Issued	No	Project-Based Voucher
The Joyce	66	Leased/Issued	No	Project-Based Voucher
King + Parks	20	Leased/Issued	No	Project-Based Voucher
The Louisa Flowers	20	Leased/Issued	No	Project-Based Voucher
McCoy Village	10	Leased/Issued	No	Project-Based Voucher
Medallion Apartments	90	Leased/Issued	No	Project-Based Voucher
New Columbia	72	Leased/Issued	No	Project-Based Voucher
Northwest Tower	174	Leased/Issued	No	Project-Based Voucher
Powell Terrace	12	Leased/Issued	No	Project-Based Voucher
Station 162	17	Leased/Issued	No	Project-Based Voucher
Richmond Place	20	Leased/Issued	No	Project-Based Voucher
Songbird	40	Leased/Issued	No	Project-Based Voucher
Schrunk Riverview Tower	118	Leased/Issued	No	Project-Based Voucher
Starlight	70	Leased/Issued	No	Project-Based Voucher
Sellwood Center	110	Leased/Issued	No	Project-Based Voucher
Tamarack Apartments	120	Leased/Issued	No	Project-Based Voucher
The Vera	70	Leased/Issued	No	Project-Based Voucher
The Vera VASH	10	Leased/Issued	No	VASH Project-Based Voucher
Vibrant!	40	Leased/Issued	No	Project-Based Voucher
Waterleaf VASH	20	Leased/Issued	No	VASH Project-Based Voucher
Williams Plaza	101	Leased/Issued	No	Project-Based Voucher
Woody Guthrie	15	Leased/Issued	No	Project-Based Voucher
Bud Clark Commons	143	Leased/Issued	Yes	85 Stories RAD I Conversion
Jeffrey	18	Leased/Issued	Yes	85 Stories RAD I Conversion
Martha Washington	20	Leased/Issued	Yes	85 Stories RAD I Conversion

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Rockwood Station	19	Leased/Issued	Yes	85 Stories RAD I Conversion
Fairview	40	Leased/Issued	Yes	85 Stories RAD I Conversion
Humboldt Gardens	1	Leased/Issued	Yes	85 Stories RAD I Conversion
SCC North	63	Leased/Issued	Yes	85 Stories RAD I Conversion
SCC South	46	Leased/Issued	Yes	85 Stories RAD I Conversion
New Columbia - Haven	22	Leased/Issued	Yes	85 Stories RAD I Conversion
New Columbia - Cecelia	64	Leased/Issued	Yes	85 Stories RAD I Conversion
New Columbia - Trouton	111	Leased/Issued	Yes	85 Stories RAD I Conversion
New Columbia - Woolsey	63	Leased/Issued	Yes	85 Stories RAD I Conversion
Camelia Court	13	Leased/Issued	Yes	85 Stories RAD I Conversion
Eliot Square	29	Leased/Issued	Yes	85 Stories RAD I Conversion
Maple Mallory	49	Leased/Issued	Yes	85 Stories RAD I Conversion
Bel Park	11	Leased/Issued	Yes	85 Stories RAD I Conversion
Winchell Court	10	Leased/Issued	Yes	85 Stories RAD I Conversion
Biltmore	79	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Butte	28	Leased/Issued	Yes	SRO/MOD RAD II Conversion
The Rose Apartments	51	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Ankeny Square Apts	99	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Sally McCracken	79	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Rose Wood Apts	20	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Eastwood Court	29	Leased/Issued	Yes	85 Stories RAD I Conversion
Fir Acres	31	Leased/Issued	Yes	85 Stories RAD I Conversion
Stark Manor Townhomes	32	Leased/Issued	Yes	85 Stories RAD I Conversion
Fairfield Apartments	75	Leased/Issued	Yes	SRO/MOD RAD II Conversion
Alderwood	20	Leased/Issued	Yes	85 Stories RAD I Conversion
Floresta	20	Leased/Issued	Yes	85 Stories RAD I Conversion
Powellhurst Woods	34	Leased/Issued	Yes	85 Stories RAD I Conversion
Hunters Run	10	Leased/Issued	Yes	85 Stories RAD I Conversion
Tillicum North	18	Leased/Issued	Yes	85 Stories RAD I Conversion
Tillicum South	12	Leased/Issued	Yes	85 Stories RAD I Conversion
Harold Lee Village	10	Leased/Issued	Yes	85 Stories RAD I Conversion
Dahlke Manor	115	Leased/Issued	Yes	Project-Based Voucher
Fir Acres	32	Leased/Issued	Yes	85 Stories RAD I Conversion
Stark Manor Townhomes	30	Leased/Issued	Yes	85 Stories RAD I Conversion
Eastwood Court	32	Leased/Issued	Yes	85 Stories RAD I Conversion
T Joyce Philips (formerly Dekum Court)	67	Leased/Issued	Yes	Project-Based Voucher
PCC/Killingsworth	28	Leased/Issued	No	New PBV construction in partnership with Portland Community College
	5,103			

* 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	235,035	4.43%	235,035	4.43%
PHA Wide	Discretionary Project Funds	1,950,331	36.75%	1,950,331	36.75%
Schiller Way	Affordable Housing Capital Works	569,820	10.74%	569,820	10.74%
Schiller Way	Security Cameras and LED Lighting	600,000	11.31%	600,000	11.31%
Sequoia Square	Affordable Housing Capital Works	1,952,062	36.78%	1,952,062	36.78%
	Total Capital Expenditures Budget	5,307,248	100%	5,307,248	100%

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	3,516	293
MTW Housing Choice Vouchers (HCV) Utilized	126,132	10,511
Local, Non-Traditional: Tenant-Based^	900	75
Local, Non-Traditional: Property-Based^	468	39
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	130,608	10,884

* “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	900	75
Property-Based	Program Based Assistance / 14	468	39
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	We continued to pull from our HCV waitlist in 2024 and early 2025. We opened the HCV waitlist in 2025 but anticipate pausing waitlist pulls in 2026 as we face additional demands from the early termination of the EHV program as well as other strains on voucher resources. 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 offer deposit assistance to participants that complete a tenant education class taught by a community organization.
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	13,325	Partially Open	Yes
MTW Housing Choice Voucher	Community-Wide	656	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	Partially Open	No

Please describe any duplication of applicants across waiting lists: 90 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.

If Local, Non-Traditional Housing Program, please describe:

Housing Development Local, Non-Traditional Program:

Home Forward acquired the Cesar Apartments and Goose Hollow Lofts as part of the local non-traditional MTW Program. These properties will be converted to permanent supportive housing and affordable housing restricted at 50% AMI, respectively.

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

Project-Based Local, Non-Traditional MTW Program: Home Forward funds three project-based, local, non-traditional rent assistance programs under Activity 14. The first is for former foster youth who are working or are in school. Rent assistance is contracted to a local non-profit that specializes in working with homeless youth. Because this program houses only five people, the waiting list opens only when a vacancy is projected and remains open for two weeks. The other two provide assistance aligned with Indian Housing Block Grant (IHBG) funded units at two projects. This assistance is accessed via the open waitlists for the IHBG units.

If Other Wait List Type, please describe:

Our Tenant Based Local Non-Traditional program is our Program-Based Assistance program (described in detail in Activity 14) which contracts funds to partner agencies, who then manage the participant selection process, sometimes in partnership with Home Forward. There are three currently funded projects that will continue in FY2026. Two of these projects utilize waitlists. The third tenant-based program, Economic Opportunity Program, does not utilize a waiting list. Rather, when funding becomes available, the funded partner begins accepting referrals from their partner agency, WorkSystems Inc, 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.

Tenant-Based MTW Housing Choice Voucher: We don't anticipate opening the waiting list in 2026.

Tenant-Based, Local, Non-Traditional MTW Assistance: We are currently exploring adding partners for Program-Based Assistance. Depending on funding availability, these partners may be funded in FY2026. All these programs will target families who are homeless or at risk of homelessness. The agencies will use some combination of four different methods for participant selection:

- Waitlists
- First-come-first-served basis to applicants who are already receiving services within their agencies. When funds become available, the next eligible household to inquire receives the resources.
- First-come-first-served basis to any eligible households that apply, regardless of whether they are currently receiving services within the agency.
- Monthly lottery from a list of all eligible households that requested assistance during that month.

Proposed MTW Activities

Home Forward is proposing the following new MTW activities for this Plan Year.

29 Homeownership Program

Proposed FY2026

Home Forward is proposing a locally designed homeownership program to better serve the needs of our community. The traditional Housing Choice Voucher (HCV) Homeownership program is underutilized. The traditional program only offers homeownership assistance that aligns with the full term of the initial mortgage as a reasonable accommodation or for limited populations. This means that for households that are not elderly or disabled, ongoing mortgage payment assistance is only available for 10 or 15 years. This program design does not adequately support families' long-term economic self-sufficiency, nor does it achieve greater cost effectiveness in federal expenditures.

Home Forward will implement an alternative approach to the homeownership program that accounts for local market conditions and better serves families in achieving self-sufficiency. All households participating in Home Forward's Homeownership Program will be eligible to receive homeownership assistance for a maximum term of 30 years to align with the initial mortgage incurred to finance the purchase of the home. Home Forward has performed analysis and maintains the capacity, or will acquire the capacity, to successfully operate a Section 8 homeownership program, and thus meets the requirements of 24 CFR 982.625(g)(3). This activity waives 24 CFR 982.634(a).

This activity allows Home Forward to achieve greater cost effectiveness given that workforce households are more likely to have a higher tenant portion they are contributing toward their monthly mortgage payments. This expansion of eligibility for Home Forward's Homeownership Program decreases the per unit cost over time. This activity also increases housing choice by removing barriers to accessing homeownership for low-income families that Home Forward serves. This added flexibility also incentivizes families to become economically self-sufficient by extending the maximum term of homeownership assistance to ensure long-term housing stability for families.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

MTW authorization:

Attachment C, Section D(8) – Homeownership Program

Statutory objective:

Achieve greater cost effectiveness in federal expenditures

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

Increase housing choice for low-income families

30 Housing Choice Voucher Occupancy Requirements

Proposed FY2026

Home Forward is proposing alternative occupancy requirements for the Housing Choice Voucher (HCV) program to better meet the needs of families in our community. The HCV occupancy requirements do not reflect the range of household compositions that exist. These proposed flexibilities would reduce the administrative impact when households can add or remove household members.

Under these alternative occupancy requirements, Home Forward will allow households to continue to live in their current unit when their family size exceeds standard HUD occupancy requirements so long as occupancy is consistent with local code and state occupancy laws. Under standard HUD guidelines, a seven-person household living in a three-bedroom unit would be considered overcrowded and thus required to move to a larger unit. Under Home Forward's modified occupancy policy, the family may elect to remain in their current unit. This allows the family the choice to avoid the cost and disruption and moving in their household size increases by just one member beyond the standard HCV occupancy requirements. This activity waives 24 CFR 5.703(d)(5).

This activity allows Home Forward to achieve greater cost effectiveness given that this additional flexibility will reduce the number of processed annual moves, thereby decreasing both administrative and HAP expenses for Home Forward. This added flexibility will also increase housing choice for low-income families by allowing them the option to remain in their current home when their family composition changes should they choose.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

MTW authorization:

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

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

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

Statutory objective:

Achieve greater cost effectiveness in federal expenditures

Increase housing choice for low-income families

Approved MTW Activities

A. Implemented Activities

01 Rent Reform

Approved FY2012, Implemented FY2012, Amended FY2014, FY2015, 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 to 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.
- **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:

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(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

- The ceiling rent for public housing is set to match HCV 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 HCV 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 HCV 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 affordability. Home Forward will not require a re-examination to verify income for this purpose, unless the family requests it.
- When a HCV 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.
- Households with countable income are not required to report income increases outside of regular reexaminations. For households with countable income a reexamination will not be processed for increases in income except for adding income of a newly added family member.

All income sources used to determine a household’s public housing rent or HCV 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.
- The value of a resident service stipend in excess of \$200 per month is 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. Housing Choice Voucher 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 review and exceptions may be made. The committee has a menu of remedies to reduce a qualifying household's burden.

Home Forward may deny all rent increase requests, or pause the processing of all rent increase requests, from landlords of tenant-based Housing Choice Voucher holders for reasons other than non-compliance with rent reasonableness in rent setting. Home Forward will implement this approach based upon a consideration of the following factors:

- A consideration of financial and administrative impact on Home Forward;
- Rent burden on tenants participating in the Housing Choice Voucher program;
- Impact on participating landlords; and
- Other compelling situations which may include the declaration of a state of emergency.

Rent reform has been fully implemented. Currently, all MTW public housing and Housing Choice Voucher 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 third level of rent payment beginning in FY2017. 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 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.

Planned Non-Significant Changes

Home Forward intends to make two non-significant changes to this activity by waiving 24 CFR 982.201(e). This flexibility will allow Home Forward to receive information verifying that an applicant is eligible within a period of 120 days before Home Forward issues a voucher to the applicant. This aligns with Housing Opportunities Through Modernization Act (HOTMA) changes that allow public housing authorities to receive income verification up to 120 days before issuing a voucher.

The second non-significant change to this activity is to include all Emergency Housing Voucher (EHV) households whose assistance is at risk of termination due to lack of program funding in the Seniors and People with Disabilities category above for the purposes of rent calculation if these households transition to the MTW Housing Choice Voucher program. Home Forward will not require existing EHV households to verify their disability status.

Home Forward is making a non-significant change to how it considers rent increases. In addition to denying or pausing the processing of all rent requests, Home Forward may limit rent increase requests.

Planned Significant Changes

Previously HUD approved Home Forward's alternative subsidy proration for mixed-status households in which each ineligible household was charged a \$1 proration. HUD is now requiring Home Forward to cease this affected portion of this activity based on Section 214 of the Housing and Community Development Act of 1980 (42 USC 1436a). As a result, Home Forward is making a significant change by going back to a standard subsidy proration for mixed-status households despite its impact on overall agency finances, per voucher costs, and significant detrimental impact to assisted working families, especially those with children.

Home Forward is proposing a second significant change to this activity. This change would grant Home Forward discretion in determining rent-. In the event of a reduction in federal funding, Home Forward will have flexibility to temporarily calculate rents up to 35% of gross income (and utility reimbursements are allowed) if necessary to prevent termination of assistance for currently assisted families due to inadequate funding.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in tenant share of rent (Standard Metric: CE#5)			
Total annual tenant share of rent	FY2012: \$25,342,942	FY2026: \$36,414,156	At least \$36,000,000
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2011: \$3,324	FY2026: \$4,933	At least \$4,900
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)			
Number of households receiving TANF assistance	FY2012: 229 households (2.0%)	FY2026: 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	FY2026: \$1,345	Less than \$1,300 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	FY2026: 239 households	At least 230 households annually

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 HCV 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 previously 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 program for an additional 365 days, but no savings will accrue during this time. If the family is still at ceiling rent or

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

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.

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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in household income			
Average earned income of households	FY2017: \$12,472	FY2026: \$13,500	\$13,750
Increase in household savings			
Average amount of escrow of households	FY2017: \$2,295	FY2026: \$2,350	\$2,350
Reducing per unit subsidy costs for participating households			
Average amount of subsidy per household	FY2017: \$671 per household	FY2026: \$675	\$675
Increase in tenant share of rent			
Tenant share of rent	FY2017: \$1,926,589	FY2026: \$2,238,371	\$2,238,371
Households transitioned to self-sufficiency			
Number of households transitioned to self-sufficiency ¹	FY2017: 27 households	FY2026: 28	28

¹ Defined as households that have earned permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance and/or graduated from the GOALS program

In FY25, the GOALS Program at Home Forward continued to serve as a catalyst for lasting change, helping 400 residents of affordable housing move toward economic independence and long-term stability. Grounded in a people-centered, outcome-driven approach, the program equips families with the tools, support, and resources needed to reduce reliance on public assistance and build stronger financial futures.

GOALS Services Coordinators Impact

Over the past year, GOALS Coordinators played a pivotal role in guiding participants through education, employment, and savings milestones. Their work not only drove measurable progress for households but also deepened community partnerships and delivered results that align with HUD's goals for economic mobility.

In FY25, 90% of active participants consistently met with their GOALS Coordinator and updated their required Individual Training and Services Plans (ITSPs) - a key milestone in maintaining engagement and accountability. We expect this high level of participation to continue in FY26, with 90% of participants achieving this goal.

In FY25, the most common service referrals made by Coordinators supported workforce development, utility assistance, financial education, education and job training, and basic needs—services we anticipate will remain in high demand in FY26.

Participants collectively set over 1,800 goals in FY25, with projections pointing to an increase to 1,900 in FY26, reflecting continued growth in program engagement.

Increased Economic Mobility

In FY25, 65% of GOALS participants were employed—a strong indicator of upward economic mobility. This progress was fueled by targeted support from GOALS Coordinators, who provided individualized career coaching, resume development assistance, and personalized case management. These services played a critical role in helping participants secure employment, increase income, and build pathways toward long-term financial independence. In FY26, we project that 67% of GOALS participants will be actively employed.

Education and Workforce Engagement

In FY25, nearly 40% of GOALS participants took meaningful steps toward long-term career advancement by enrolling in higher education, vocational certification programs, or job readiness training. This progress was made possible through strong partnerships with the local Workforce Board, community colleges, universities, and pre-apprenticeship and apprenticeship programs—all of which expanded access to quality training opportunities. Looking ahead, we anticipate that 42% of participants will be actively engaged in education and job training programs in FY26, reflecting continued momentum in skill-building and career development.

Community and Workforce Development Partnerships

In FY25, the GOALS program collaborated with 78 community organizations to connect participants with a wide range of essential services—including financial education, job training, homeownership support, legal aid, small business development, and general education. These partnerships are critical to advancing participant goals and promoting long-term self-sufficiency. A few of these partnerships are highlighted below:

- **WorkSystems' Aligned Partner Network (APN):** As a member of APN—Portland Metro's workforce development network—GOALS provides participants with direct access to employment resources and career pathways. A dedicated Career Coach works one-on-one with participants to explore training opportunities, secure employment, and move toward economic independence.
- **CASA of Oregon – Individual Development Accounts (IDAs):** Through CASA, GOALS participants can open matched savings accounts for specific asset-building goals such as homeownership, education,

transportation, or launching a small business. Monthly deposits are matched 5:1 for up to three years, making long-term financial goals more attainable.

- **Save First Financial – Credit Counseling & Financial Education:** Save First provides free, personalized credit counseling to GOALS participants. Credit specialists help individuals improve their credit scores, reduce debt, and build stronger financial foundations—critical steps toward financial stability and larger asset purchases.

Participant Impact Story

Below is a story of the impact participating in the GOALS program has had for one family:

Since completing the GOALS program, I've become self-sufficient, financially literate, and empowered. My family no longer receives housing subsidy, and I continue to build long-term financial stability for myself and my children. I'm currently employed full-time as a high school administrator, where I've served as a campus lead, trained staff in trauma-informed care, and facilitated restorative justice practices for almost 8 years now. In 2023, I earned a university-issued graduate certificate (equivalent of a post-bachelor credential) as a restorative justice facilitator, certified by the State of Oregon.

In addition, I'm proud to share that both of my children are thriving. My daughter recently graduated as class president and valedictorian, earning a full-ride scholarship to Tulane University, where she continues to excel. My son earned a four-year scholarship to Central Catholic High School and made varsity football and track and field his freshman year. They are both deeply committed to serving their communities and remain humble and grateful for the support we've received throughout our journey.

As someone raised in poverty, navigating life as the daughter of an immigrant, former foster youth, unaccompanied youth from the age of 16, and a lifelong resident of public housing, this journey has been transformative. The GOALS program, Home Forward, and your ongoing encouragement helped me not only set long-term goals but also achieve them. You held me accountable, believed in me, and helped me change the course of my life and my children's future.

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 HCV 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, HCV 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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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 are met 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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Number of alternative inspections completed			
Total alternate inspections	FY2014: 0	FY2026: 100 units	100 units

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 originally 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Number of self-certification of repairs			
Self-certification repairs	FY2015: 0	FY2026: 100 units	100 units
Number of successful self-certification of repairs			
Successful self-certifications	FY2015: 0%	FY2026: Less than 1%	Less than 1%

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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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; and
- Posting tools for landlords on our website so landlords may 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Improve voucher success rate			
Issued voucher success rate	FY2009: 74%	FY2026: 76%	At least 75%
Decrease in lease-up time			
Average number of days for a voucher holder to lease up	Before implementation, 51 days	FY2026: 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 approximately 4,600 PBVs in the community. 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 both to set waiting list preferences for one or more vulnerable populations and to make services available to those households. As contracts are renewed, this results in all PBV buildings offering affordable housing with services to those most in need.

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, thereby 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.

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

- Adopts the local city and county site selection standards for PBV units in order to ensure alignment with jurisdictional partners regarding 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 from 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 (only applicable to the setting of initial contract rents), 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Decrease in wait list time 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	FY2026: 60 months	60 months
Increase in tenant share of rent 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	FY2026: \$8,670,000	Annual tenant rent share of \$8,600,000

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 the Housing Choice Voucher (HCV) program. 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 HCV 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 HCV program, public housing staff will review the utility allowance adjustments annually, with the adjustment going into effect at the resident's next regular review.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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 or near the market rate using local housing market data.
- 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.

Home Forward continues to utilize triannual FMR reevaluation studies commissioned by the local metro-area housing authorities, and duly approved by HUD as a representative survey sample, and adjusts payment standards based on those FMR outcomes. 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. As of the Plan year, Home Forward is using the FY2025 HUD published FMRs.

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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in resident mobility			
Number of households living in better neighborhoods	FY2013: 1,896 (30%) households lived in better neighborhoods	FY2026: 2,290 (31%) households	At least 2,200 (31%) households
Average Housing Assistance Payment Expense			
Average annual HAP expense by household	FY2014: \$6,690	FY2026: \$14,214	\$14,214

14 Program Based Assistance

Approved FY2015, Implemented FY2015

The need for rental assistance in Multnomah County far exceeds available resources.

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, often 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 housing and service providers who work to 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) a 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 housing and supports families may need to remain stably housed and move towards a stable, permanent housing situation.

Planned Non-Significant Changes

Given the various services provided by external partners, where our direct housing partner (program-based assistance administrator) may not directly provide these services, Home Forward removed the requirement that partner agencies make services available to all families accessing Program Based Assistance. This is a non-significant change because it conforms the initiative to the reality of diffuse and diverse services provision in our community.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Households Assisted by Services that Increase Housing Choice			
Number of households receiving services aimed to increase housing choice	Before implementation, 0 households	FY2026: 154 unduplicated households	154 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. Home Forward may use this activity with our authorized Family Unification Program, Foster Youth to Independence, and Mainstream vouchers. Applicants selected for FUP, FYI, and Mainstream assistance under this activity will continue to meet all applicable eligibility requirements and will be administered in accordance with the HUD requirements for each SPV type.

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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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.

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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available			
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	FY2026: 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.

- 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in tenant share of rent			
Total annual tenant share of rent	FY2018: \$58,000	FY2026: \$63,000	\$63,000
Increase in household income			
Average earned income of households	FY2018: \$1,360	FY2026: \$2,880	At least \$2,800
Households transitioned to self-sufficiency 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.			

Metric	Baseline	Benchmark	Final Projected Outcome
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	FY2026: 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Number of units transferred			
Units transferred	FY2018: 0 units	FY2026: 0 units	0 units

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 C, 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

Planned Non-Significant Changes

Home Forward is proposing a non-significant change to this activity that would streamline the transition of participants from locally funded housing assistance programs (e.g., locally funded rent assistance, supportive housing initiatives, or time-limited shallow subsidies) into the HCV program. Eligibility criteria for these locally funded housing assistance programs were created based on the HCV program. Therefore individuals or households who were determined eligible for housing assistance under a local program administered by Home Forward or a partner agency operating under a Memorandum of Understanding (MOU) with Home Forward may be admitted to the HCV program without repeating duplicative eligibility and verification processes that were already conducted and that align with federal standards. Households will retain their existing anniversary date. Home Forward will ensure that all eligibility criteria meet minimum federal requirements for HCV admission.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Number of households transferred between MTW Programs			
Number of households transferred	FY2020: 0 households	FY2026: 5 households	5 households

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 temporarily 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. As of the current Plan year, Home Forward has resumed non-emergency inspections.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Number of inspections waived			
Waived Inspections	FY2020: 0 inspections	FY2026: 0 inspections	0 inspections

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:

- 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 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.

As of the current Plan year, Home Forward has resumed income verification using HUD's verification hierarchy.

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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics:

Metric	Baseline	Benchmark	Final Projected Outcome
Number of households with Self-Certified Income			
Households with Self-Certified Income	FY2021: 0 households	FY2026: 52 households	52 households

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 is conducting the required oral/virtual briefings (as well as other appointments) for new HCV and PBV households through alternative means in response to COVID-19 and will continue to do so 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 will also conduct in person meetings if the applicant/participant family does not have access to technology or per request from the family.

MTW authorization:

Attachment C, Section B(1)(b) – Flexibility in the design and administration of housing assistance

Attachment C, Section B(1)(b)(iii) – Provision of housing or employment-related services or other case management activities

Statutory objective:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

These alternative means may include: webcast, video call, or expanded written 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.

Planned Non-Significant Changes

Home Forward is proposing a non-significant change to this activity to allow these alternative means of conducting oral briefings and other appointments for new HCV and PBV households even when there is not a specific need to protect the health and safety of participants and staff. Home Forward may elect to continue alternative means of conducting the required oral/virtual briefings and other appointments in times when there is not a local, state, or nationally declared emergency so long as the alternative means meets the needs of each household and family member.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Number of households attending virtual briefings			
Virtual Briefings	FY2021: 899 households	FY2026: 1,061 households	1,061 households
Number of households attending in-person briefings			
In-Person Briefings:	FY2021: 300 households	FY2026: 187 households	187 households

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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Number of inspections on Home Forward-owned properties			
Number of inspections	Prior to implementation: 0 inspections	FY2026: 200 inspections	200 inspections
Percentage of failed inspections on Home Forward-owned properties			
Percentage of failed inspections	Prior to implementation: 0%	FY2026: Less than 2%	Less than 2%

24 Rent Assistance Termination Reform

Approved FY2023, Implemented FY2024

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 group's 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 D, 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

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

- 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 subsequently have a loss of income, thus promoting housing stability.
- Who is 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.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant 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.

25 Preservation and Expansion of Affordable Housing

Approved FY2023, Implemented FY2024

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

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Additional Units of Housing Made Available			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2026: 150 units	150 units

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 start 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; and
- 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 HAP. 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 objective of increasing housing choice for low income families by giving households more flexibility to access stable housing sooner or to stay assisted in current housing.

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Number of HAP contracts executed			
Within 120 days of the start of the lease	Prior to implementation: 0	FY2026: 10 households	10 households
Where minor discrepancies exist between the lease and HAP contract	Prior to implementation: 0	FY2026: 25 households	25 households
Before HQS is completed	Prior to implementation: 0	FY2026: 0 households	0 households

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
Number of households self-certifying income			
Number of households	Prior to implementation: 0 households	FY2026: Less than 50 households	Less than 50 households

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

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

Approved FY2024, Implemented FY2024

This activity allows 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 the greater of either 1) rents for comparable units in the private market, or 2) 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.

MTW authorization:

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

Statutory objective:

Increase housing choices for low-income families

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
Number of units subject to alternative rent reasonableness calculations			
Number of units	FY2024: 0 units	FY2026: 300 units	300 units

Planned Non-Significant Changes

We are not anticipating any non-significant changes to this activity.

Planned Significant Changes

We are not anticipating any significant changes to this activity.

B. Not Yet Implemented Activities

All activities have been implemented.

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.

Planned Application of MTW Funds

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	\$186,270,180
70610	Capital Grants	\$2,504,799
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+7 1500	Other Income	\$5,658,620
70000	Total Revenue	\$194,433,599

ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by 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	\$24,922,138
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$6,296,693
92500 (92100+92200+92300+92400)	Total Tenant Services	\$3,576,706
93000 (93100+93600+93200+93300+ 93400+93800)	Total Utilities	\$6,856
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,988,891
95000 (95100+95200+95300+95500)	Total Protective Services	\$113,100
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$146,005
96000 (96200+96210+96300+96400+ 96500+96600+96800)	Total Other General Expenses	\$1,419,706
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0

97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$183,567,551
97400	Depreciation Expense	\$8,482
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$223,046,128

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

There is a variance of \$28,612,529 between Estimated Total Revenue and Estimated Total Expenses. Home Forward plans to cover the variance in Total Expenses by utilizing HUD-held Reserve draws and funding from PHA-held reserves. The majority of the variance is related to Total Operating Administrative costs, which Home Forward utilizes Single Fund Flexibility to fund a number of community initiatives and departments within the agency, such as Integrated Facilities, Safety, and Sustainability.

iii. Description of Planned Use of 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 operational needs. Some of these initiatives are aspects of our MTW Activities, described earlier in this Plan.

Listed below are initiatives that only use single-fund flexibility:

Wealth Creation: Wealth Creation initiatives help youth and adults improve their quality of life. For adults, initiatives include an Employment and Training Interest Inventory; aligning existing self-sufficiency programs into a single program (GOALS) with site-based and non-site-based component; facilitating the hiring of low-income (Section 3) residents and participants by Home Forward and contractors; and integrating Action for Prosperity 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/participants reaching a living wage if they exit housing subsidy. For youth, programming includes attaining education success and developing 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 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 acknowledges 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 recognize symptoms of trauma and apply 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 participants leasing up with 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: Home Forward partners with a community-based tenant advocacy organization, the Community Alliance of Tenants, 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 rental market, and with 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 agencies 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 appropriate funding for relocation costs and intends to absorb the vouchers referred by partnering MTW agencies.

Expungement Partnership: Home Forward collaborates with Metropolitan Public Defender, a non-profit law 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 barriers to housing and employment that are associated with a criminal background, Home Forward supports residents to have greater housing choice in our community and ability for increased opportunity 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 uses 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 online portal to allow landlords to schedule inspections, view payment information, and communicate with Home Forward. Home Forward is still building out the ability to electronically process a Request for Tenancy Approval. It is our objective to streamline the process and reduce the time required to lease a 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.

Housing Navigators: Home Forward created a Housing Navigator program to support new Housing Choice Voucher recipients in successfully leasing up with their voucher. Housing Navigators assist applicants who are pulled from the Housing Choice Voucher waitlist. The Leasing team identifies and refers applicants who have barriers such as zero income or low/fixed income. Navigators provide unit search assistance and can offer financial support to cover application fees or security deposits. Navigators assist with voucher paperwork during the housing search process and maintain connections to resources such as expungement clinics. The Navigators seek out and maintain landlord connections in the community with varying rental criteria to assist in the housing search. They take opportunities to explain the HCV program to new landlords, share vacancies with searching voucher holders, and assist voucher holders with appeals if their rental application is denied.

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*	\$0	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
TOTAL:	\$0	\$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 shortages 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.

FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Amount
Current Assets		
111	Cash-Unrestricted	\$14,040,707
114	Cash-Tenant Security Deposits	\$50,610
115	Cash-Restricted for Payment of Current Liabilities	\$0

FDS Line Number	FDS Line Item	Amount
120	Total Receivables	\$73,578
131	Investments-Unrestricted	\$0
135	Investments-Restricted for Payment of Current Liability	\$0
142	Prepaid Expenses and Other Assets	\$0
144	Inter-program-Due From	\$35,505
145	Assets Held for Sale	\$0
Current Liabilities		
310	Total Current Liabilities	\$12,923,128
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	\$0

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.

Home Forward plans to use unspent HCV HAP as part of its Moving to Work Single Fund Flexibility to fund agency-wide initiatives such as Community Services, Integrated Facilities, Safety, & Sustainability. These initiatives provide support to the entire agency and have no dedicated funding source.

* 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.

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 the Plan Year.

Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

Home Forward uses our development expertise to advance innovative solutions that expand housing supply and address community needs. To that end, we continue to prioritize transitioning public housing units to project-based vouchers by deploying the tools available including the Rental Assistance Demonstration (RAD), Faircloth to RAD, and Section 18 regulatory mechanisms.

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

B. Documentation of Public Process

Number of Attendees: 0

Public Comments

C. Planned and Ongoing Evaluations

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

D. Lobbying Disclosures

To be updated upon Board of Commissioners approval.

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/handyman 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 as well as in the necessary contract reporting requirements. Central procurement services are part of Home Forward's indirect overhead allocation.

Human Resources: Along with the public housing program and 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.

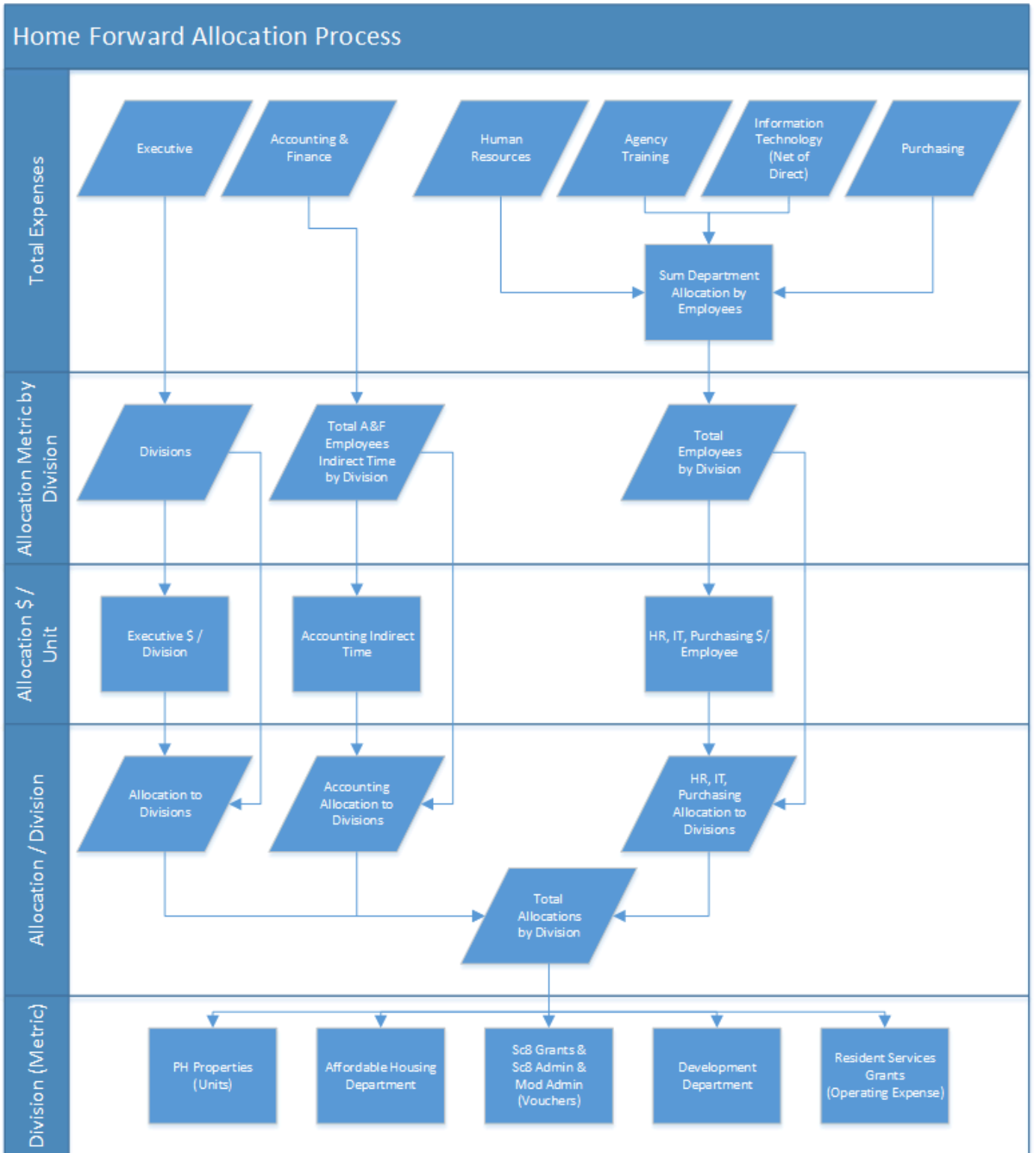
Balance Sheet Accounts

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.



Appendices

Resident Rights, Participation, Waiting List, and Grievance Procedures

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

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.² 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

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

² 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.

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 78100.³ 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 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

³ 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.

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),⁴ 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.
 - 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.

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

- 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.⁵ 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 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.

⁵ 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.

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.

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.⁶
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.
 - 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

⁶ 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.

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).

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 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.

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 Funding⁷

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

⁷ 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. 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:
 - 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

Rental Assistance Demonstration

Home Forward began converting public housing to RAD in 2017. As of December 31, 2024, Home Forward had successfully converted 1,148 public housing units to RAD.

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. 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 FY2026.

Development #1

Development Name	Gresham Civic Station	
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: 60
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
		10 2BRs 40 3BRs 10 4BRs

De Minimus Reduction None

Transfer of Waiting List Not applicable.

Other Information Home Forward will build 60 affordable rental homes on a site awarded through a competitive Request for Proposals process. The site, which is adjacent to a light rail stop, will also house early learning spaces operated by a third party non-profit childcare provider. Home Forward plans to break ground on this property in Fall 2025.

Development #2

Development Name	Holgate House & Ruth Haefner Plaza	
PIC Development ID #	OR002000115 - Holgate House; OR002000140 - Ruth Haefner Plaza	
Conversion Type	RAD	
Total Current Units	153 (80 at Holgate House; 73 at Ruth Haefner Plaza)	Total Post-RAD Units: 153
Pre-RAD Unit Type	Seniors and individuals with disabilities	Post-RAD Unit Type Seniors and individuals with disabilities
Capital Fund Allocation	\$0	
Transfer of Assistance	N/A	
Pre-Conversion Bedroom Type	80 1BR units at Holgate House; 73 1BR units at Ruth Haefner	Post-Conversion Bedroom Type 153 1BRs
De Minimus Reduction	None	
Transfer of Waiting List	Yes. Current waiting list will be updated and vacancies filled once scope of work completed.	
Other Information	Holgate House Apartments was built in 1971, and Ruth Haefner Plaza was built in 1983. Home Forward has owned and operated both properties as Public Housing since their initial construction. The properties have many essential building systems that have reached the end of their functional lives and need to be replaced and/or upgraded. The project is not encumbered with any debt. There are Public Housing regulatory covenants in place, which is why the project will need to undergo a RAD Conversion to continue providing deep affordability and long-term subsidy through Project-Based Section 8 Vouchers, which will be administered through a HAP Contract. All tenants currently pay no more than 30% of their monthly income towards rental costs, and will continue to do so, while benefiting from the many improvements and upgrades included in the project scope of work. Home Forward is grouping these two properties together into "Group 8" for the purposes of the RAD Conversion. The two properties have similar physical needs as well as tenant populations. Addressing building needs simultaneously allows the projects to leverage more debt than they would with individual RAD Conversions, while still preserving the long-term affordability for tenants and financial viability for the project owner.	

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: All conversions comply 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:** Home Forward is currently providing substantial capital rehab work to Sequoia Square. Capital funds in the amount of approximately \$1.9 million will be used along with grant funds from the state of Oregon to complete with capital maintenance work.
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:** Not applicable.

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.