

MTW Supplement – Amended Annual Submission

PHA Name: Housing Authority of Clackamas County

PHA Code : OR001

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 07/01/2024

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Amended Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of Clackamas County (HACC) plans to use its MTW flexibility to align the needs of the community and residents with the three (3) MTW statutory objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives. After receiving notice of its selection to the Asset Building Cohort of the MTW Expansion, the HACC management team went through a visioning exercise to localize the MTW Statutory Objectives into language that fits both the agency's and the community's "business objectives" for the MTW program. These business objectives will be used to guide staff through its waiver/activity selection and the application of its MTW funding flexibility.

They are:

1. Efficiencies gained will be used to redirect staff toward activities that have a higher value for the client, such as building trusting relationships, connecting clients to resources, and educating clients on the impacts of financial
2. decisions.
3. Priority will be given to activities that seek a balance between reduced staff time and benefit HACC's clientele in order for HACC to serve more families and provide its services more equitably.
4. HACC seeks to impact the homelessness crisis in the County and recognizes that the first step to do this is through eviction and termination prevention measures, requiring innovative programmatic approaches to common problems seen in housing.

In the first year of activities, HACC focused on establishing and launching Asset Building MTW cohort activities. With Housing Opportunity Through Modernization Act (HOTMA) effective dates and implementation timelines, HACC requested additional waivers which intersected with HOTMA changes through a mid-year revision of their Annual Plan and MTW Supplement with a plan to implement additional MTW activities by July 1, 2024 in conjunction with HOTMA. Due to the extension of HOTMA implementation timelines, HACC is pushing back implementation timelines of MTW activities that intersect with HOTMA to no later than January 1, 2025.

Through the mid-year Revision of HACC's Annual Plan the following waivers were given conditional approval.

- Cohort Specific Waiver - Savings Account Component Updates – Savings Account participants only
- MTW Waivers 3.a, 3.b. - Alternate Re-examination schedule – HCV & PH
- MTW Waiver 5.c - Inspection Process – HCV only
- MTW Waiver 2.d - Rent Reasonableness 3rd Party Requirements – HCV only
- MTW Waiver 9.a,9.b - Increase PBV Program Cap – PBV only
- MTW Waiver 9.h - Limit Portability for PBV - PBV only

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented

m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing & Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented

h. Limit Portability for PBV Units (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
a. PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a. HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c. PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d. PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d. HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e. PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e. HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a. PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b. PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b. HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b. PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b. HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c. PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c. HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Housing Authority of Clackamas County Plans to Implement in the Submission Year or Is Currently Implementing

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

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

HACC proposes waiving certain provisions of 24 CFR 982.352(b) and 983.303, eliminating the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, HACC will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.

<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies to all family types</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls. properties it owns, manages, and controls.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload a description of the quality assurance method.</p> <p>HACC uses Nelrod's EZRRD software to compile, analyze, and validate its rent comparisons for rent reasonableness. Using a third-party system for objective market analysis adds an element of quality control into HACC's process. In addition, HACC will follow the SEMAP guidelines (SEMAP Indicator 2) for reviewing rent reasonableness determinations. <i>(No document is attached)</i></p>
<p>Please explain or upload a description of the rent reasonableness determination method.</p> <p>HACC relies on the Rent Reasonable Nelrod EZRRD Model, which offers a third party database of rents to determine rent reasonableness of all County units. This analysis is based on the unit amenities, age, location, and other factors. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis. <i>(No document is attached)</i></p>
<p>3.a. - Alternative Reexamination Schedule for Households (PH)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HACC proposes waiving certain provisions of the following policies:</p>

- i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
- ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

Waiving these provisions will allow HACC to implement a triennial recertification policy for all elderly and disabled households on fixed incomes in both its Public Housing and Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy

decisions were made:

- i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
- iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

The projected implementation date has been delayed to no later than January 1, 2025.

<p>Does this MTW activity require a hardship policy?</p> <p>Yes - <u>This document is attached.</u></p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. – Alternative Reexamination Schedule for Households (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>What considerations led the MTW agency to modify the hardship policy?</p> <p>The hardship policy was modified due to the removal of waiver requests 1.g, 1.h, 1.r, 1.s. which were originally included with 3.a, 3.b in the hardship policy.</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes - <u>This document is attached.</u></p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>What is the recertification schedule?</p> <p>Once every three years</p>
<p>How many interim recertifications per year may a household request?</p> <p>2 or more</p>
<p>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</p> <p>HACC interim policies are as follows:</p> <ul style="list-style-type: none"> i. HACC will allow households to request an interim if the household's income decreases by 10% or more. ii. HACC will apply the most recent payment standard and utility allowance during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household. <p>HACC will allow a maximum of 2 interims per year.</p>

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

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

HACC proposes waiving certain provisions of the following policies:

- i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
- ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

Waiving these provisions will allow HACC to implement a triennial recertification policy for all elderly and disabled households on fixed incomes in both its Public Housing and Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

- i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
- iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.

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

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

<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Applies to all tenant-based and project-based.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already - <u>This document is attached.</u></p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Provided Already - <u>This document is attached.</u></p>
<p>What is the recertification schedule?</p> <p>Once every three years</p>
<p>How many interim recertifications per year may a household request?</p> <p>2 or more</p>
<p>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</p> <p>HACC interim policies are as follows:</p> <ul style="list-style-type: none"> i. HACC will allow households to request an interim if the household's income decreases by 10% or more. ii. HACC will apply the most recent payment standard and utility allowance during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household. iii. HACC will allow a maximum of 2 interims per year.

<p>5.c. - Third-Party Requirement (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HACC proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f). Waiving these provisions will allow HACC to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls.</p> <p>Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, HACC will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program. The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by HACC are uniform fair and that the process is transparent and auditable.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>

<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies to all family types</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>Following will explain the quality assurance method: <i>(No document is attached)</i></p> <p>HACC will apply the SEMAP standards and methods (SEMAP Indicator 5) to select PBV inspections performed during the year by HACC staff. HACC will conduct Quality Assurance inspections on the selected units to ensure consistency and transparency.</p>

<p>9.a. - Increase PBV Program Cap (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HACC proposes waiving certain provisions of section 8(o)(13)(B) of the 1937 Act and 24 C.F.R. 983.6(a)-(b), as superseded by the Housing Opportunity through Modernization Act of 2016 (HOTMA) Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions will allow HACC to increase the Project Based Voucher program cap to 50% of the lower of either HACC's total authorized units or HACC's annual budget authority.</p> <p>Project-based vouchers (PBVs) are an important resource in the community and increasing the program cap will allow the agency to coordinate with local property owners, developers, service coordinators, and jurisdictional partners to provide housing for targeted populations.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>

<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>What percentage of total authorized HCV units will be authorized for project-basing?</p> <p>50.00%</p>

<p>9.b. - Increase PBV Project Cap (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HACC proposes waiving certain provisions of section 8(o)(13)(D) of the 1937 Act and 24 C.F.R. 983.56(a)-(b), as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions will allow HACC to increase the Project Based Voucher project cap to 100%. This will allow HACC to project-base 100% of the units in future housing developments.</p> <p>Project-based vouchers (PBVs) are an important resource in the community and having the ability to project base all of the units in a project will help HACC and its partners secure additional financing and leverage its resources to better meet the needs of the local community.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

9.h. - Limit Portability for PBV Units (HCV)	
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HACC proposes waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow the HACC to waive the requirement that PHA's provide a tenant- based voucher to project-based households after being on a project-based voucher for twelve (12) months. Instead, HACC proposes to limit portability to twenty-four (24) months. Waiving the 12-month portability requirement will:</p> <ul style="list-style-type: none"> i. Lower the cost of turning units for households moving to a tenant- based voucher ii. Help the project-based voucher project to cash flow by continuing to assist the household. iii. Decrease the administrative burden associated with program unit transfers. iv. Ensure that households on HACC waitlists, some of whom are currently unhoused and have been waiting their chance for a voucher, are offered a tenant-based voucher first. 	
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>	
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue; Decreased expenditures</p>	
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>	
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>	
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies to all family types</p>	
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to all properties with project-based vouchers</p>	
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>	
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>	

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p>
	<p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received: Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers.</p>

F.	Public Housing Operating Subsidy Grant Reporting.				
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.				
Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline	
2024	\$1,176,859	\$1,025,967	\$150,892	2032-09-30	
2023	\$1,306,533	\$1,197,157	\$109,376	2031-09-30	
2022	\$0	\$0	\$0	2030-09-30	
2021	\$0	\$0	\$0	2029-09-30	

G.	MTW Statutory Requirements.
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No	
Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. MTW agency has not yet established a rent reform policy to encourage employment and self-sufficiency.	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
N/A													

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.	
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.		
Family Size:	Occupied Number of Local, Non-Traditional units by Household Size	
1 Person	0	
2 Person	0	
3 Person	0	
4 Person	0	
5 Person	0	
6+ Person	0	
Totals	0	

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments. See Attachments J & O of the Annual Plan.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
No known evaluations.	

The **HARDSHIP POLICY** and **IMPACT ANALYSIS** attachments for Waivers 3.a and 3.b and MTW certification follow.

HARDSHIP POLICY for MTW Waivers 3.a and 3.b.

FINANCIAL HARDSHIP EXEMPTION FROM MTW RE-EXAMINATION POLICIES

For a PHA in the Moving to Work demonstration, HUD requires the agency to adopt a policy for addressing hardship cases caused by agency established rent reform initiatives.

Therefore, HACC is adopting the following hardship policy regarding the triennial exam schedule for elderly and disabled families on a fixed income in alignment with HOTMA final rule.

Families eligible for triennial examinations may request an interim examination in writing, if they are reporting a reduction in their household's income of 10% or more which might result in a decrease in their tenant rent payment. This policy is in alignment with the HOTMA ruling and also applies to families on a traditional annual schedule.

IMPACT ANALYSIS for MTW Waivers 3.a and 3.b

DESCRIPTION OF WAIVER – Alternative Re-examination Schedule – HCV & PH

The Housing Authority of Clackamas County (HACC) proposes to implement a triennial reexamination schedule for all households on a fixed income households who are elderly or disabled. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use an interim 50058 and will apply the most current payment standard. This will not result in an income review.
2. HACC will not conduct an interim reexamination when a new household member is added, regardless of work/income status, age, or disability.
3. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
4. Interims due to decreases in income will follow HOTMA rules, which stipulate an interim will be done if the household's income decreases by 10% or more.

Definitions Used in this Analysis

- Work able: household does not receive an elderly/disabled allowance.
- Race and ethnicity: race and ethnicity apply to the head of household only, not other individual household members.
- Large families: a family of four (4) or more members.
- ELI: Extremely Low Income, equal to 30% or less of the area median income
- VLI: Very Low Income, equal to income between 30% and 50% of the area median income
- LI: Low Income, equal to income between 50% and 80% of the area median income

Impact Analysis Method

An in-depth analysis was performed using 50058 data from the last three (3) years. The goal of the analysis is to identify the following:

1. Financial impact to the agency
2. Disparate impact based on demographics

Answers to the standard HUD impact analysis questions identified in the MTW Operations Notice were derived from these analyses. Note that HACC does not anticipate the policy changes to have a negative impact on any specific households. Therefore, HACC measured the positive impact to identify cases where certain groups were impacted more positively than others. The analysis confirmed that there will not be a negative impact to the families currently on program.

However, the analysis also shows that fewer families may be able to be served in the future due to these changes.

RESULTS

Financial Impact to the Agency

Based on its analysis, HACC determined that this policy change will have a negative impact to the agency's HAP expenses, increasing annual HAP expenditures by \$64,506 per year (row "e" in the chart below). This is measured by looking at the increases in income that have been processed over the last three years and the associated increase in rent and decrease in HAP. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be realized.

The chart also shows that HACC will be able to offset some of this increase in HAP by eliminating the staff time needed to complete annual reviews and interims for increases in income. This savings is estimated to be \$28,142 annually (row "c" in the chart below).

Population	Scenario	Formula
Elderly/Disabled on Fixed Income	Triennial	
Households with Earned Income	Annual	
Households on TANF	Annual	
Households with Zero Income	Annual	
Other Work Able Households	Annual	
Triennials		
- Total Households	2,290	
a1 - Average increase in income last 3 years	\$2,001	
b1 - Average decrease in income last 3 years	\$3,624	
c1 - Number of households with increase in income last 3 years	1,257	
d1 - Number of households with decrease in income last 3 years	247	
e1 - Reduction in HAP due to income increases	\$64,506	
f1 - Increase in HAP due to income decreases	\$52,411	
g1 - Number of interims last 3 years	1,323	
h1 - Number of annuals last 3 years	2,303	
i1 - Number of annuals under new policy	768	$h1 / 3$
j1 - Number of interims under new policy	247	$d1 / 3$
k1 - Reduction in number of reviews	194	$(g1 + h1)/3 - i1 - j1$
Agency Impact		
c - Annual cost savings due to reduction in number of reviews	\$28,142	$((g1 \times a) + (h1 \times b) - (i1 \times b) - (j1 \times a)) / 3$
d - Increase in HAP expenditures annually	\$64,506	$e1 + e2$
e - Total annual cost savings (loss)	(\$36,364)	$c - d$

Demographic Impact

To measure the demographic impact, HACC looked at the number of income increases over the last three (3) years by demographic group, including race, ethnicity, large families, elderly, income level, and disabled households. Race and ethnicity data is based on the head of household only. This assessment was done for all HCV households, work able households with an increase in any type of income, and work able households with an increase in earned income. The results shown in the chart below confirm the assumptions made by the team:

1. No households will see a negative impact due to this policy change, so the analysis shows which households had a more positive impact than others;

2. Large households would have more increases in income and those increases would be larger than other groups since there are more household members to earn income and a larger household to sustain;
3. Elderly and disabled households saw increases in income, but this was mainly due to fixed income increases and the amounts were marginal;
4. There was not a significant difference in the impact on households based on race or ethnicity and the most disproportionate impact (Native Hawaiian/Pacific Islander) is likely due to the small number of households in that group.
5. The higher a household's income is, the more likely they are to have an increase in income and higher the increase in income is likely to be.

- Elderly/disabled on fixed income = Triennials

- All others = Annuals

Metric	African American	Asian	Native HI/Pacific	Native Amer.	White	Hispanic	Non-Hispanic	Large Family	Disabled	Elderly	ELI	VLI	LI	Formula
a. Total Population (# annuals + move-ins)	25	136	14	92	2,102	153	2,150	176	1,509	1,050	1,981	302	18	
b. Households with Increase in Income	17	75	5	53	1,422	80	1,450	83	1,065	811	1,317	195	16	
c. Percent of Population with Increase	68%	55%	36%	58%	68%	52%	67%	47%	71%	77%	66%	65%	89%	b / a
d. Average Income Increase	\$2,045.18	\$2,818.99	\$6,419.00	\$1,463.28	\$1,975.31	\$5,117.88	\$1,828.89	\$7,798.64	\$1,322.35	\$899.30	\$1,099.06	\$5,975.74	\$20,352.94	
e. Total Work Able Population (# annuals + move-ins)	0	0	0	0	0	0	0	0	0	0	0	0	0	
f. Work Able Households with Increase in Income	0	0	0	0	0	0	0	0	0	0	0	0	0	
g. Percent of Population with Increase - Work Able	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	f / e
h. Average Income Increase - Work Able	0	0	0	0	0	0	0	0	0	0	0	0	0	
j. Work Able Households with Increase in Earned Income	0	0	0	0	0	0	0	0	0	0	0	0	0	
k. Percent of Work Able HH's with Increase in Earned Income	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	j / e

Other Impact Analysis Questions

Below are answers to the additional impact analysis questions identified in the MTW Operations Notice.

#	Question	Answer
1	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	While there is a chance that one or more families becomes over-income and remain housed (see question 2 below), HACC anticipates any impact to the waitlist or the amount of time families on the waitlist to be inconsequential.
2	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	HACC anticipates that this policy change could result in a family becoming over-income and remaining on program until the next review. This would most likely impact Low Income households (AMI>80%), whose increases in income were the largest over the last three years (\$20,352 vs. \$1,099 for ELI families). These households represent less than 1% of the total population, so the rate of occurrence will be minimal.
3	Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	With a reduction in HAP, HACC may see a slight reduction in utilization due to this policy change. However, the agency will still meet its Substantially the Same (STS) requirement and the reduction in households served will be offset by future MTW policy changes.
4	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice	Cost effectiveness HACC analysis shows that by reducing the number of annuals and interims, this policy change will save the agency \$28,142 per year in administrative expenses.
		Self-sufficiency HACC believes that allowing households to increase their income without an impact on rent will encourage households to increase their income and work to become self-sufficient.
		Housing HACC does not anticipate any impact on housing

#	Question	Answer	
		choice	choice.
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	HACC will continue to use its current admissions policies, ensuring that this requirement is met.
		2. Establish a reasonable rent policy that encourages employment and self-sufficiency	While this policy is not a rent change policy, HACC believes that allowing households to increase their income without an impact on rent will encourage households to increase their income.
		3. Continue to assist substantially the same number of households	With a reduction in HAP, HACC will be able to serve fewer households. The agency will still meet its STS requirement and the reduction in households served will be offset by administrative efficiencies gained and other MTW policy changes.
		4. Continue to assist a comparable mix of households by family size	This policy will not have an impact on the household size of households served, although the analysis has shown that larger households will see more benefit from this policy change than small households.
		5. Meet Housing Quality Standards requirements	This policy change will not have any impact on HQS.
6	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	HACC does not anticipate any hardships as a result of this policy change as it will not have a negative impact on household's rent or utility payments.	

Conclusions for Waiver 3.a,3.b

HACC recognizes that the change to reexamination frequency will have a negative impact on the funds it has available to house families in the HCV program. However, the agency also recognizes that the positive impact that this change will have on households could be significant and the increase in HAP expenditures can be offset by reduced administrative costs and other policy choices that the agency will be considering prior to the next MTW planning cycle.

MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d- 2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of Clackamas County

MTW PHA NAME

OR001

MTW PHA NUMBER/HA CODE

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

Commissioner Tootie Smith

NAME OF AUTHORIZED OFFICIAL

Chair

TITLE

SIGNATURE

DATE

* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*