

# FY 2023 MOVING TO WORK ANNUAL PLAN



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## About

Founded in October 1943, the Housing Authority of the City of Reno (RHA) owns and manages 751 units of Public Housing in eight different locations in the City of Reno and City of Sparks. Using Neighborhood Stabilization Programs (NSP) and other funding, RHA acquired and manages over 160 scattered site rental properties specifically targeted for low-income households. RHA also provides housing subsidies to more than 2,500 low-income families in Reno, Sparks, and Washoe County through various rental assistance programs.

## Mission

Provide fair, sustainable, quality housing in diverse neighborhoods throughout Reno, Sparks and Washoe County that offers a stable foundation for low-income families to pursue economic opportunities, become self-sufficient and improve their quality of life. In doing so, RHA will continue to cultivate strong community partnerships, promote fiscal responsibility, and administer all its programs and activities in an efficient, ethical, and professional manner.

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# Table of Contents

I. Introduction.....	6
A. Agency Overview .....	6
B. What is MTW? .....	7
C. RHA’s designation as an MTW agency .....	8
D. FY 2023 MTW Annual Plan overview .....	8
E. Overview of RHA’s annual goals and objectives .....	8
II. General Operating Information.....	12
A. Housing Stock Information .....	13
i. Planned New Public Housing Units.....	13
ii. Planned Public Housing Units to be removed .....	14
iii. Planned New Project-Based Vouchers .....	14
iv. Existing Project Based Vouchers.....	15
v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year .....	16
vi. General Description of All Planned Capital Expenditures during the Plan Year .....	16
B. Leasing Information .....	17
i. Planned Number of Households Served .....	17
ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing.....	18
C. Wait List Information .....	18
i. Waiting List Information Anticipated.....	18
ii. Planned Changes to Waiting List in the Plan Year.....	19
III. Proposed MTW Activities .....	21
2014-06: Triennial recertifications for elderly/disabled participants on fixed incomes .....	21
2022-01: Workforce Development Program.....	25
IV. Approved MTW Activities .....	32
A. Implemented Activities .....	32
2014-01: Assign PBVs to RHA owned/controlled units without a competitive process .....	35
2014-02: Mobility Demonstration.....	35
2014-05: Simplify rent calculations and increase the minimum rent.....	36
2014-08: Partner with local nonprofit to provide special needs housing .....	36
2015-01: Elimination of all negative rents and simplification of HCV utility allowances .....	37
2015-02: Allow RHA to inspect its own HCV units.....	37
2015-03: Eliminate caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties .....	38
2016-01: Simplification of medical deductions .....	38
2016-02: Redefine near-elderly person .....	39
2016-04: Allow HCV participants to lease units that exceed the 40% rent burden .....	39

2016-05: Eliminate Earned Income Disallowance (EID).....	40
2016-06: Disregard earned income of PH household members, ages 18-20, who are not the head of household or co-head .....	40
2016-07: Implement a \$75 fee for each additional HQS inspection when more than two inspections are required .....	41
2016-08: Expand Project Based Voucher Program.....	42
2017-01: Increase verified application data for HCV applicants .....	42
2017-02: Asset threshold to determine eligibility for admission .....	43
2018-01: Landlord Incentive Program .....	44
2019-01: Redetermination of rent reasonableness as a result of a change in contract rent.....	44
2019-02: Provide incentives to \$0 HAP households.....	45
2021-01: Affordable Housing Acquisition, Rehabilitation and Preservation .....	46
2021-03: Partnership to Assist Homeless Youth.....	47
B. Not yet implemented activities.....	48
2021-02: STAR Apprenticeship Program .....	48
C. Activities on hold .....	49
D. Closed Activities .....	49
2014-03: Rent Reform Controlled Study .....	49
2014-04: Expand self-sufficiency activities .....	50
2014-07: Alternate HQS verification policy .....	50
2015-04: Required Savings Plan for Earned Income Disallowance (EID) PH clients .....	50
2016-03: Time limited vouchers and redesign of traditional FSS Program.....	51
V. Planned Application of MTW Funds.....	53
E. Planned Application of MTW Funds .....	53
i. Estimated Sources of MTW Funds .....	53
ii. Estimated Application of MTW Funds.....	53
iii. Description of Planned Application of MTW Funding Flexibility.....	54
iv. Planned Application of PHA Unspent Operating Fund and HCV Funding .....	55
v. Local Asset Management Plan.....	55
vi. Rental Assistance Demonstration (RAD) Participation.....	56
VI. Administrative.....	58



## **Section I**

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# **INTRODUCTION**





## **I. Introduction**

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### **A. Agency Overview**

RHA enters Fiscal Year (FY) 2023, its tenth year as a Moving to Work (MTW) agency, as housing choice remains limited in the Truckee Meadows, and costs continue to climb. Although ongoing economic growth and the resulting population influx diversified the workforce and bolstered the area's economy, the region's available housing inventory failed to keep pace. A housing shortage followed which led to significant increases in rents and an overall lack of affordable housing options for many low-income families. With the area's housing shortage continuing to linger, RHA's mission to provide sustainable and quality housing as a foundation for low-income families to pursue economic opportunities, become self-sufficient and improve their quality of life remains at the forefront for the agency.

As a property manager, landlord, voucher administrator, landowner, and developer, RHA has solidified its leadership role as a provider of quality affordable housing in the Truckee Meadows. The agency's participation in MTW for a decade has provided even more innovative ways to support the local community while staying true to the agency's mission. In FY 2023, RHA will continue to refine its current programs while cultivating partnerships that build upon the agency's vision going forward. Following are highlights of RHA's past successes and future priorities as a MTW agency.

#### ***Affordable Housing Development***

RHA's Board of Commissioners established several goals for agency staff to implement through a Strategic Plan that was approved in 2021. Based on several factors, including current market conditions, the creation of more affordable housing through acquisition and development was identified as an area of high importance. With this vision in mind, RHA's Development Committee, comprised of local community members, many of whom have experience with development in their professional backgrounds, began meeting on a regular basis. Members of this committee offer expertise and guidance to staff when identifying potential development opportunities to bring forward to staff and the Board of Commissioners for consideration.

As the lack of affordable housing throughout the Truckee Meadows increased, so did the area's homeless population. The City of Reno's homeless shelter became overcrowded and unsafe during the COVID pandemic. This overcrowding led to an increased number of homeless camps throughout Washoe County. To combat homelessness, local government jurisdictions joined resources made available through the CARES Act to acquire approximately 10 acres of land that was transformed into the Nevada CARES Campus, a regional homeless services facility. The Nevada CARES Campus offers families experiencing homelessness a secure environment where shelter, food, security, and wrap-around services are provided to help address some of the root causes of chronic homelessness. Utilizing MTW single fund flexibility, RHA purchased the land adjacent to the Nevada CARES Campus and continues discussions with stakeholders regarding the best use for this site.

#### ***COVID prepares RHA for future emergencies***

Although RHA's offices and meeting spaces were closed to the public for a lengthy period, the core functions of the agency continued. Virtual meetings became normal business practice as RHA continued to serve the community, Public Housing (PH) residents and Housing Choice Voucher (HCV) participants online and over the telephone. Although the ways that RHA staff communicated





with residents, clients, constituents, and each other changed, the agency remained committed to modifying its processes and facilities in ways that remained transparent and accessible to all community members. Staff began conducting small briefings and client meetings by appointment while maintenance staff began addressing priority work orders and housekeeping issues within units.

During this time, staff also began addressing the agency's technological limitations by exploring different ways the agency could take advantage of new technologies. Upgrades, including the implementation of an Electronic Document Management System (EDMS), are now taking place and should soon fully equip staff to work from home, should the need arise. Through these upgrades, the agency's vital work will continue should another regional or national emergency occur.

### ***Workforce Development***

As asserted in RHA's mission, housing is the foundation for low-income families to pursue economic opportunities, become self-sufficient and improve their quality of life. RHA believes that providing the right opportunities today will lead to long-term success and financial independence tomorrow. This is true for adults and youth alike. RHA's Workforce Development Program is designed to assist families and youth in increasing their level of education, workforce skills and employment earnings. In FY 2023, RHA will continue to connect youth and adults to available job training and job opportunities as staff continues to work to increase the number of residents moving toward self-sufficiency.

## **B. What is MTW?**

MTW is a demonstration program, established by Congress in 1996, that offers a limited number of "high performing" Public Housing Authorities (PHAs) the opportunity to propose and test innovative, locally designed approaches to administering housing programs and self-sufficiency strategies. The program permits PHAs to combine federal funds from the PH operating fund, Capital Fund Program (CFP) and HCV program into a single, agency-wide funding source known as a "block grant." This block grant approach allows MTW PHAs to allocate resources based on a local determination of how to effectively address the needs of the local community. It is important to note that the MTW designation does not provide PHAs with additional funding from the U.S. Department of Housing and Urban Development (HUD), but rather allows each agency to use their funding in a more flexible manner.

With HUD's approval, PHAs participating in the MTW program can waive certain statutes and regulations in the United States Housing Act of 1937 to explore different and creative ways to improve their housing programs. These policy changes allow PHAs to address challenges for low-income families that are unique to their local needs. In doing so, each of the activities proposed and implemented must address at least one of three MTW statutory objectives.

### **MTW Statutory Objectives**

- Increase housing choices for low-income families.
- 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.
- Reduce costs and achieve greater cost effectiveness in federal expenditures.



### **C. RHA's designation as an MTW agency**

After a national competition was held in 2012, RHA was selected and designated as one of four new MTW agencies in 2013. The MTW agreement between RHA and HUD was executed on June 27, 2013, and established RHA as an MTW agency through RHA's FY 2018. On April 14, 2016, RHA received notice that pursuant to Section 239 of Title II, Division L of the Consolidated Appropriations Act, 2016, RHA's current MTW agreement with HUD was extended through the end of FY 2028.

### **D. FY 2023 MTW Annual Plan overview**

FY 2023 (i.e., the period from July 1, 2022 through June 30, 2023) will be RHA's tenth year as an MTW agency. Each year RHA is required to adopt an MTW Annual Plan for HUD's approval in advance of the start of the fiscal year. This plan, which is organized according to HUD's requirements as outlined in Form 50900, explains the proposed/amended MTW activities for the coming year, and provides updates on current MTW activities that have already received approval from HUD. For this plan, an "MTW activity" is defined as any activity that requires MTW flexibility to be utilized to waive statutory or regulatory requirements.

The MTW Annual Plan is intended to provide PH residents, HCV participants, local officials, the public, and HUD with pertinent information on each of RHA's proposed and implemented activities. It also serves to provide stakeholders with details on RHA's operating budget and capital improvement plans.

As part of RHA's planning process, staff began discussing the FY 2023 MTW Annual Plan, including each of the proposed/amended activities and capital improvement plans, during Resident Advisory Board and Resident Council meetings in December 2021. Public review and comments are being solicited prior to consideration and approval by RHA's Board of Commissioners. Following approval from the Board of Commissioners, RHA's FY 2023 MTW Annual Plan will be submitted to HUD for review.<sup>1</sup>

### **E. Overview of RHA's annual goals and objectives**

During its nine years as an MTW agency, RHA implemented activities intended to simplify the administration of both the PH and HCV programs. These activities include, but are not limited to, simplifying medical deductions in both PH and the HCV program, implementing true triennial recertifications for elderly/disabled participants on fixed incomes and increasing the verified application data for HCV applicants. Furthermore, RHA created a Landlord Incentive Program within the HCV program, began providing an incentive to \$0 Housing Assistance Payment (HAP) households and received approval to use its funding flexibility for Affordable Housing Acquisition, Rehabilitation and Preservation.

Throughout RHA's participation in the MTW Demonstration, staff have continued to seek innovative activities that are designed to streamline resident requirements and increase the overall efficiency of

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<sup>1</sup> Additional details on RHA's public process can be found in Section VI of this plan and the accompanying attachments.





the agency. To identify ways that approved MTW activities might be improved upon, staff continue to monitor activities following full implementation.

***RHA's proposed/amended FY 2023 MTW activities***

Although RHA is not proposing any new MTW activities in FY 2023, RHA is seeking approval to amend the following two activities previously approved by HUD:

- *Triennial recertifications for elderly and/or disabled participants on fixed incomes*  
RHA is proposing to revise this policy and allow any changes in the HCV payment standard to be applied if/when a contract rent increase (CRI) is implemented by the participant's landlord.
- *Workforce Development Program*  
RHA proposes to amend this activity to allow for any adult member of the household to sign a contract to participate in the Workforce Development Program while also allowing the household to accrue and receive an escrow upon program completion.

***MTW goals and objectives***

Utilizing the flexibilities available through MTW to expand housing choice, streamline agency operations and develop creative solutions that meet the needs of low-income families in our community remains an ongoing goal of RHA. New initiatives that further both the MTW statutory objectives and RHA's strategic plan will continue to be explored and proposed if feasible.

In FY 2023, RHA will continue to review the capital needs of each of its PH properties to identify necessary capital improvement expenditures that will preserve, maintain, and enhance each of these complexes. Despite the lack of federal funding to address the necessary repairs needed at PH properties across the country, RHA has strived to maintain its portfolio to the highest standards possible to ensure long-term viability. Using MTW flexibility allowed for in Section B of Attachment C of the Standard MTW Agreement, RHA will continue to make additional improvements to these properties, specifically those focused on energy and water savings.

RHA continues to review the portfolio analysis provided by Praxis Consulting Group, LLC which will be updated based on information provided through a capital needs assessment. The goal of this analysis is to identify ways RHA can sustain its housing portfolio over time. Several options are being considered including maintaining current use, Section 18 Disposition Programs, and conversion to HUD's Rental Assistance Demonstration (RAD).

The RAD program allows housing authorities, with HUD approval, to convert properties from one federal funding platform, Section 9 PH operating subsidy, to another, project-based rental subsidy within the HCV program. By doing this, PHAs can leverage public and private debt and equity to reinvest in the PH stock. Moving to project-based rental subsidy ensures a more stable, long-term funding source for operating the property and provides opportunities for new investment to rehabilitate aging buildings. Except for any temporary relocation to accommodate major repairs, a RAD conversion is essentially seamless for residents as the following protections are written directly into the RAD requirements:

- Residents have the right to return to the property after work is complete should they need to move out for any renovations.



- Residents are not rescreened and do not lose eligibility.
- Rent calculations remain at 30% of adjusted income.
- Resident processes and rights remain the same, including the grievance process and funding for resident organizations.

Currently, RHA has no pending or approved application for RAD, however each application will follow the prescribed disclosure and public/resident engagement process required by HUD. As resident engagement is required before and during the process, RHA's residents will be the first to know if/when an application for a RAD conversion is being considered.

***Non-MTW goals and objectives***

Non-MTW goals and objectives are those activities that do not require MTW authority or flexibility to implement. In addition to its planned MTW goals and objectives, RHA will:

- Emphasize training, employment, contracting and other economic opportunities to RHA's PH residents and HCV participants pursuant to HUD's Section 3 program.
- Review and update the HCV payment standards to ensure viability with the area's rental market and maintain adequate lease up levels within the HCV program.
- Review staffing levels to ensure they are adequate to meet the agency's goals and the five statutory requirements of the MTW program.
- Assess RHA's scattered site portfolio to evaluate estimated appraised value, capital needs, operating efficiency, energy efficiency, etc. Once complete, a strategy will be developed to modernize units that will be kept in the portfolio and a disposition schedule will be established for those with large capital needs and/or those located in less convenient neighborhoods.
- Increase staff efficiencies by fully implementing an EDMS that will manage the use and storage of documents created throughout the organization.



## Section II

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# GENERAL OPERATING INFORMATION

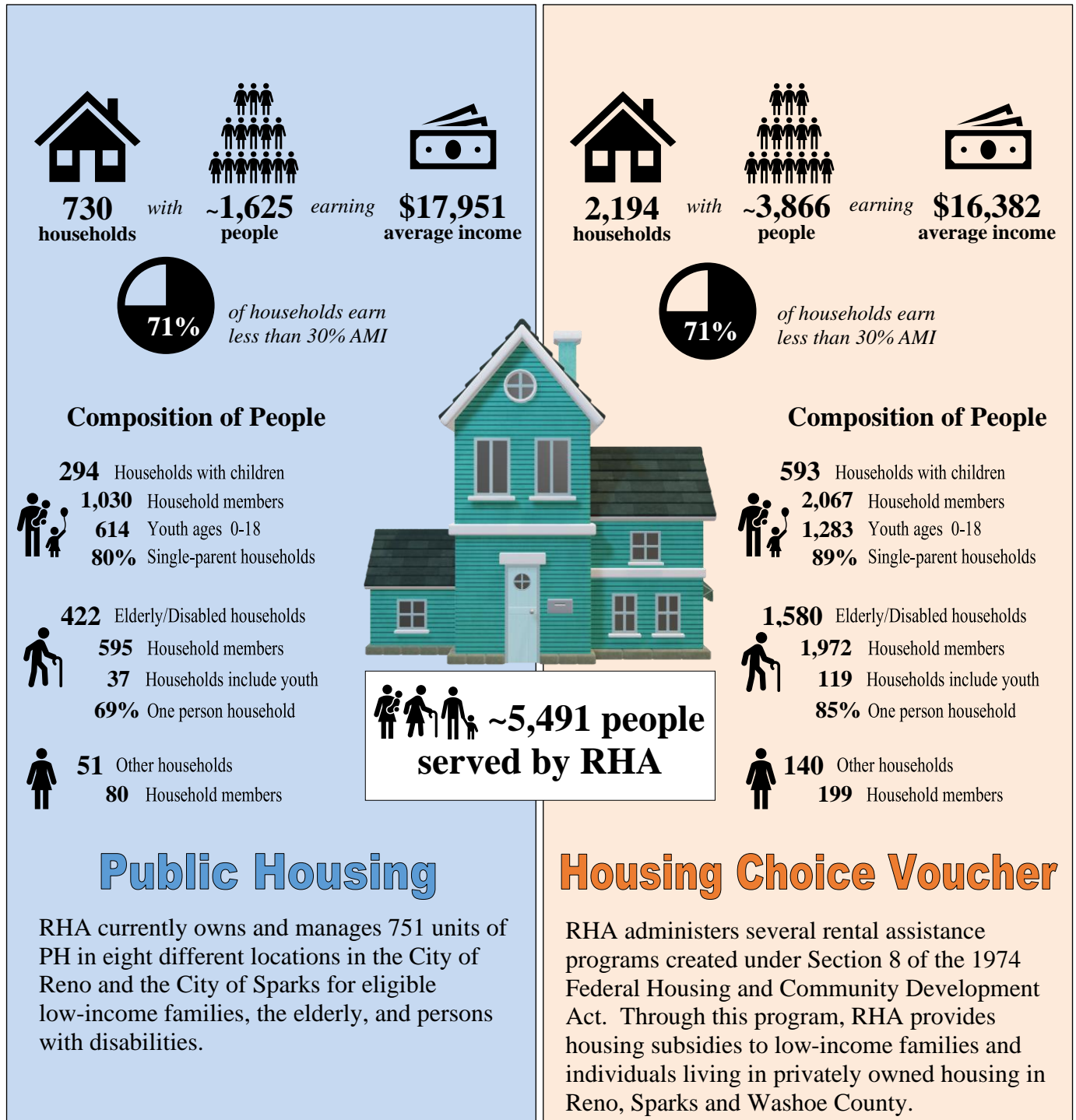




## II. General Operating Information

### RHA's Housing Assistance Programs

On January 1, 2022, RHA was providing housing assistance to 2,924 active households through its PH and HCV programs.





In addition to households assisted through its PH and HCV programs, RHA works closely with the local Department of Veterans Affairs (VA) office to provide assistance to over 400 veterans through the HUD-VA Supportive Housing (VASH) Program. Recently, RHA was also awarded 137 Emergency Housing Vouchers to assist unsheltered community members with housing and 15 vouchers through the Foster Youth to Independence Program.

Utilizing the Neighborhood Stabilization Program (NSP) along with other funding sources, RHA acquired over 200 scattered site properties throughout the local area; 166 of these properties are still a part of the agency's housing portfolio. Most of these scattered site rental properties are allocated specifically for very low-income households. In addition to these scattered site units, RHA owns nine unaided multi-family housing properties. Working with a private property management company, these nine properties provide an additional 376 housing units. Although not required to do so, RHA leases each of these properties at levels that are lower than HUD's Fair Market Rents (FMRs) for Washoe County.

This section includes RHA's general housing stock, lease-up, and wait list information.

## A. Housing Stock Information

### i. Planned New Public Housing Units

RHA will not be adding any new PH units in FY 2023.

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)
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	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 Unifor 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**

RHA has no pending or approved applications under RAD or Section 18 Disposition, however, in FY 2023, RHA may consider an application to HUD to participate in one or both repositioning strategies. Should an application submitted by RHA be approved by HUD, RHA will file a "substantial amendment" to the MTW Annual Plan to capture any planned changes to its PH portfolio. This will include identifying any planned PH units to be removed and new PBVs to be assigned.

At this time, RHA will not be removing any PH units in FY 2023.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Name/Number	0	N/A
Name/Number	0	N/A
Name/Number	0	N/A
<b>TOTAL:</b> Public Housing Units to be removed in the Plan Year	<b>0</b>	

**iii. Planned New Project-Based Vouchers**

In FY 2023, RHA anticipates project-basing the following tenant-based vouchers for the first time. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) will be in place by the end of the Plan Year. It also indicates whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Privately Owned Partnerships	25	No	RHA anticipates issuing an RFP to assign PBVs to privately owned properties in exchange for their commitment to provide affordable housing to individuals and/or families who are participating in workforce development programs throughout Washoe County.
<b>TOTAL:</b> Planned new Project Based Units in Plan Year	<b>25</b>		





#### iv. Existing Project Based Vouchers

RHA is currently project-basing the following tenant-based vouchers 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. It also indicates 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
Mobility Demonstration and Opportunity Properties	38	Leased/Issued	No	PH tenants in good standing are being allowed to move to RHA's scattered site properties on a two-year PBV.
Single Family Home Project Based Vouchers	16	Leased/Issued	No	RHA has several single-family homes acquired under NSP2 and other programs which are shifted to a PBV if/when the unit becomes vacant.
Yorkshire Terrace	16	Leased/Issued	No	RHA has assigned PBVs to units at Yorkshire Terrace, a 30-unit Low Income Housing Tax Credit (LIHTC) property.
Partnerships	11	Leased/Issued	No	RHA has formalized agreements with several nonprofit community partners to provide affordable housing for their clients.
Willie J. Wynn Apartments	12	Leased/Issued	No	Twelve PBVs have been assigned to this affordable housing development designed specifically to support seniors aging in place.
Privately Owned Partnerships	25	Leased/Issued	No	Privately owned properties are being assigned PBVs through a competitive process in exchange for their commitment to provide affordable housing to individuals and/or families who are experiencing homelessness.

<b>TOTAL:</b> Planned existing Project-Based Vouchers	<b>118</b>
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\* 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**

RHA plans to continue to purchase or repurpose single family homes, duplexes, and condominiums for use with PBVs. Scattered site properties in low poverty neighborhoods, either currently owned or yet to be acquired, may be identified for use in RHA's Mobility Demonstration. All other properties acquired or repurposed may be used to provide additional housing choice to low-income families through RHA's PBV program.

## **vi. General Description of All Planned Capital Expenditures during the Plan Year**

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

### **GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING PLAN YEAR**

RHA is planning work on the following capital projects in FY 2023. Planned capital improvements are based on funding availability and may change during the plan year based on the safety needs of RHA's PH residents:

- **Chiller replacement – expected FY 2019 expenditure: \$550,000**  
Air conditioning units will be replaced at Silverada Manor.
- **Sewer lines – expected FY 2019 expenditure: \$244,479**  
The sewer lines at Stead Manor will be replaced/repared.
- **Security improvements – expected FY 2019 expenditure: \$45,000**  
Security improvements, including the installation of upgraded cameras, will be carried out at McGraw Court.
- **Playground improvements – expected FY 2020 expenditure: \$60,000**  
Aging playground areas will be revitalized at Essex Manor, Hawk View Apartments, Mineral Manor, and Myra Birch Manor.
- **Security improvements – expected FY 2020 expenditure: \$100,000**  
Security improvements, including the installation of upgraded cameras, will be carried out at Stead Manor and Myra Birch Manor.
- **Water heaters – expected FY 2020 expenditure: \$275,000**  
Aging water heaters will be replaced to increase energy efficiency and reduce the amount of necessary maintenance at Stead Manor, Essex Manor, Myra Birch Manor, and McGraw Court.
- **LED exterior lighting – expected FY 2020 expenditure: \$60,000**  
Exterior lighting at Stead Manor, Hawk View Apartments, Essex Manor, and Myra Birch Manor will be upgraded to increase security and energy efficiency.
- **Gutter replacement – expected FY 2020 expenditure: \$75,000**  
Gutters will be replaced at Essex Manor.
- **Trash enclosure – expected FY 2020 expenditure: \$25,000**  
Trash enclosures will be added/replaced at Myra Birch Manor.



## 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	8,676	723 <sup>2</sup>
MTW Housing Choice Vouchers (HCV) Utilized	26,868	2,239 <sup>3</sup>
Local, Non-Traditional: Tenant-Based <sup>^</sup>	0	0
Local, Non-Traditional: Property-Based <sup>^</sup>	516	43 <sup>4</sup>
Local, Non-Traditional: Homeownership <sup>^</sup>	0	0
<b>Planned Total Households Served:</b>	<b>36,060</b>	<b>3,005</b>

\* "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.

<sup>^</sup> 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	N/A	0	0
Property-Based	2021-03: Partnership to Assist Homeless Youth	516	43
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.

<sup>2</sup> RHA has 751 ACC units. Lease up is not anticipated to drop below 97% of the MTW baseline of 745.

<sup>3</sup> RHA has 2,524 ACC Housing Choice Vouchers. Although our goal is 100% of the established baseline of 2,382, RHA anticipates leasing this program at 94% in the coming year.

<sup>4</sup> Eddy House has 43 shelter beds; a portion of which are allocated specifically to house youth on a semi-permanent basis up to six months.



## 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	RHA continues to select applicants off the waiting list based on preferences set forth in the Admissions and Continued Occupancy (ACOP) for Public Housing for referral to vacant PH units. Throughout FY 2021, RHA leased this program at 98.74% of the MTW baseline and is currently on track to maintain this lease up figure. There are no anticipated leasing issues in this program.
MTW Housing Choice Voucher	<p>RHA continues to monitor its payment standards in relation to rental market conditions and promote the Landlord Incentive Program. In FY 2019, based on feedback provided from the local HUD Field Office, RHA implemented a "lease in place" preference for applicants on the waiting list. This preference will continue in the coming year.</p> <p>In FY 2021, RHA leased this program at 93.13% of the MTW baseline, up from 92.26% in FY 2020. Although RHA is currently on track to maintain current lease up figures within this program in FY 2023, staff will continue to explore additional solutions that could lead to an increase in HCV lease up numbers.</p>
Local, Non-Traditional	Although RHA does not anticipate any leasing issues related to Activity 2021-03, it is designed to assist homeless youth in both a community living space and 24-hour drop-in center. The very transient nature of the at-risk population being served make it difficult to anticipate any leasing issues that may be encountered.

## C. Wait List Information

The following table reflects RHA's wait list information as of January 5, 2022.

### 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
CV Public Housing	1-, 2-, 3- & -4-bedroom units servicing all populations	811	Open	Yes
Stead	2- & 3-bedroom units located at Stead Manor serving all populations	480	Open	Yes



Elderly & Disabled Public Housing	Studio, 1- & 2-bedroom units serving disabled and/or applicants age 55+	811	Open	Yes
HCV	Housing Choice Voucher Program serving all populations	1,998	Open	Yes
Project-Based Voucher	Unit Based Voucher serving all populations	910	Open	Yes

**Please describe any duplication of applicants across waiting lists:**

At the time of application, clients may apply for all open waiting lists. Therefore, the number of households reported will reflect some households who have applied for more than one program and/or bedroom size.

**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.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
All Waiting Lists	All RHA waiting lists were opened on January 24, 2022 and will remain open until February 11, 2022.
CV Public Housing, Stead, Elderly & Disabled Public Housing	RHA implemented an online application portal to assist in the admissions process. The online application portal now allows RHA to open unit-based waiting lists according to a specific bedroom size rather than opening the list to all bedroom sizes. As a result, waiting lists may be opened and closed as needed throughout the plan year.



### **Section III**

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# **PROPOSED MTW ACTIVITIES**







### **III. Proposed MTW Activities**

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This section describes RHA's proposed MTW activities for the coming year. Information is included on which MTW statutory objective(s) will be achieved, the anticipated impact of the proposed activity on the stated objective(s) and the anticipated schedules for achieving the stated objective(s). It also details specific waivers to be used along with data collection and evaluation criteria, if applicable.

Although RHA is not proposing any new MTW activities in FY 2023, RHA is seeking to amend the following activities:

#### **2014-06: Triennial recertifications for elderly/disabled participants on fixed incomes**

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##### **A. Activity Description**

This activity was proposed, approved, and implemented as a biennial activity for elderly/disabled PH residents and HCV participants on fixed incomes in FY 2014. It was expanded into a triennial activity in FY 2015 and amended in FY 2017 to allow for the use of local forms to accommodate the triennial schedule. In FY 2018, RHA began allowing for "true" triennial recertifications for this population resulting in all Cost-of-Living Adjustment (COLA) increases being processed every third year.

As mentioned previously, current housing market conditions have led to rents that are rising rapidly in the Truckee Meadows. As a result, RHA is adjusting its HCV payment standards on an annual basis based on HUD's corresponding Fair Market Rents to accurately reflect market conditions and maintain viability within the program. These updated payment standards are used to determine the amount of assistance a family will receive within the HCV program. Based on current HUD regulations, any adjustment to the payment standard can only be applied to a participant's rent calculation during the annual recertification.

Following implementation of this activity and the subsequent amendments and expansion, elderly and/or disabled HCV participants on fixed incomes now have an annual recertification based on a triennial schedule. This triennial recertification schedule has resulted in many of these households having the updated payment standard, which reflects current rental market conditions, applied to their rent calculation every three years regardless of the amount of rent being requested from the landlord on an annual basis.

RHA is proposing to amend this activity that will allow for adjustments to the HCV payment standard to be applied to the family's rent calculation once a Contract Rent Increase (CRI) is initiated by the participant's landlord and processed by RHA. All other aspects of this activity will remain in place.

*How does this achieve one or more of the statutory objectives(s)?*

Within the HCV program, an interim recertification is processed once a change in rent is received from the landlord. As no significant processing changes will occur for staff, this activity will continue to reduce costs and achieve greater cost effectiveness in federal expenditures.

*Anticipated schedule for implementing the proposed activity*

Following HUD's approval of this amendment, RHA will update its Administrative Plan for Section 8 Housing Choice Voucher, Project Based Voucher, and Moderate Rehabilitation (Admin Plan) to allow for payment standards to be updated to all eligible elderly/disabled HCV participants during the next CRI interim recertification.

**B. Activity Metrics**

The following Standard HUD Metrics were identified when this activity was proposed and approved in FY 2014. Each of these metrics will continue to be tracked.

<b>2014-06 CE #1: Agency Cost Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
Total cost for recertification of elderly/disabled participants on fixed incomes.	\$140,933 HCV: \$112,291 PH: \$28,642	\$113,887 HCV: \$91,989 PH: \$21,898

<b>2014-06 CE #2: Staff Time Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of staff time dedicated to the task after implementation of the activity (in hours).
Total amount of staff time to complete recertification of elderly/disabled participants on fixed incomes.	6,726.23 hours HCV: 468.02 hours per month or 5,616.23 hours annually PH: 92.5 hours per month or 1,110 hours annually	5,625.94 hours HCV: 401.49 hours per month or 4,817.86 hours annually PH: 67.34 hours per month or 808.08 hours annually

<b>2014-06 CE #5: Increase in Agency Rental Revenue</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).
Rental revenue in dollars (increase).	\$0	\$0



### **C. Cost Implications**

Each of RHA's elderly/disabled households on the triennial recertification schedule receive income from stable income sources limited to Social Security benefits, Supplemental Security Income (SSI), Social Security Disability (SSD), and pensions. Although the rental market has changed drastically throughout the region, the amount of rent RHA receives from these stable income households from year to year due to any increase in income is negligible by comparison. Currently, HCV payment standards are updated annually during the HCV participant's annual recertification and any household on the triennial recertification schedule can request an annual recertification. As a result, RHA does not anticipate any additional cost implications within the HCV program due to this policy change.

### **D. Need/Justification for MTW Flexibility**

*All references to authorizations are to the section and paragraph citation of Attachment C of the Standard MTW Agreement.*

This activity will continue to require the following authorizations to allow RHA to restructure the initial, annual, and interim review process. This authorization will also allow for established HCV payment standards to be applied to rent calculations for elderly/disabled households currently on the triennial reexamination schedule following the landlord's implementation of the approved CRI request:

#### C. Authorizations Related to Public Housing Only

##### **C.4. Initial, Annual and Interim Income Review Process**

The Agency is authorized to restructure the initial, annual, and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided. In addition, the Agency is expressly authorized to adopt a local system of income verification in lieu of the current HUD system. For example, the Agency may implement alternate time frames for validity of verification or adopt policies for verification of income and assets through sources other than those currently allowed under the 1937 Act. *This authorization waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 CFR §966.4 and §960.257.*

#### D. Authorizations Related to Section 8 Housing Choice Vouchers Only

D.1.c. The Agency is authorized to define, adopt, and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. *This authorization waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR §982.516.*

### **E. Rent Reform Information**

#### *Impact Analysis*

Throughout 2021, RHA received 698 Contract Rent Increase requests from landlords who rent directly to elderly and/or disabled families on RHA's triennial recertification schedule. Of these 698 households, 545 will not have an annual recertification in FY 2023 due to the current MTW policy. RHA is proposing to revise this policy and allow any changes in the HCV payment standard to be applied at the time a CRI is implemented by the landlord. Based on this amendment, 270 of the 545 elderly/disabled households who experienced a rent increase in 2021



would have been eligible for the updated payment standard. On average, this policy change would have saved these households approximately \$66/month.

*Hardship Case Criteria*

When this activity was proposed in FY 2014, RHA indicated that no hardship policy would be established as no additional burden is being placed on affected residents. This remains true with this amendment. This policy change will continue to be extremely positive for all HCV participants and there will be no impact on current PH residents. All elderly/disabled households affected by this ongoing policy can request an interim reexamination any time they experience a loss of income.

*Description of Annual Reevaluation*

RHA will continue to review this activity annually to ensure positive outcomes continue to be achieved. Should this activity negatively affect these vulnerable households in any way, RHA will request/propose additional modifications to the triennial reexamination policy.



## **2022-01: Workforce Development Program**

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### **A. Activity Description**

Beginning with its initial application to HUD in 2012, the Family Self-Sufficiency (FSS) program has been a critical component of RHA's participation in the MTW Demonstration. Based on activities implemented and expanded upon over the years, the FSS program has evolved. Past successes and failures led staff to revise the agency's definition of self-sufficiency in FY 2017 and restructure the FSS program into a Workforce Development Program in FY 2019. Through this restructuring, RHA began to provide a more client focused approach to all facets of self-sufficiency.

Increasing the number of PH residents and HCV participants moving toward the final phase of self-sufficiency by directly providing or connecting them to available educational opportunities and job trainings that promote economic independence continues to be a main pillar of RHA's Workforce Development Program. Addressing the need for sustainable employment that encourages economic mobility across multiple generations should be an integral part of the program's design. To achieve this, RHA's Workforce Development Program began addressing the needs of the entire family - from one individual member, to parents, and youth in FY 2022.

In FY 2023, RHA proposes to amend this activity and allow for any adult member of the household to sign a contract to participate in the Workforce Development Program. This policy change will also allow the household to accrue and receive an escrow when the participating household member fulfills the requirements of the program and completes the goals outlined in their Individual Training and Services Plan (ITSP) regardless of whether the head of household chooses to participate. Based on this amendment, households will still only be allowed to participate in the WFD program and receive an escrow one time. All other aspects of the program approved in FY 2022 will remain unchanged, including those that allow higher income households earning more than 80% AMI to remain on the program continuing to escrow even after 30% of their monthly adjusted income exceeds existing FMRs.

#### *How does this achieve one or more of the statutory objectives?*

Implementation of this activity will provide 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. RHA anticipates that implementation of this activity will increase the number of HCV participants and PH residents participating in the Workforce Development Program. Through ongoing participation, the activity is expected to increase employment opportunities among active participants, promote post-secondary plans among RHA youth, and improve the number of households transitioning to the final phase of self-sufficiency.

#### *Anticipated schedule for implementing the proposed activity*

RHA will implement this amended policy change following HUD's approval of this amendment.

**Activity Metrics**

The following Standard HUD Metrics were identified when this activity was proposed and approved in FY 2022. Each of these metrics will continue to be tracked.

<b>2022-01 SS #1: Increase in Household Income</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy after implementation of the activity (in dollars).
Average earned income of households enrolled in WFD program.	\$7,222 <sup>5</sup>	\$10,111  RHA anticipates a 40% increase in household earnings during the first year of participation.

<b>2022-01 SS #2: Increase in Household Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow of households affected by this policy prior to implementation of the activity (in dollars).	Expected average savings/escrow of households affected by this policy after implementation of the activity (in dollars).
Average amount of savings/escrow of households enrolled in WFD program.	\$1,468 <sup>6</sup>	\$1,615  RHA anticipates a 10% increase in savings/escrow during the first year of participation.

<sup>5</sup> Baseline was established using historical data for Workforce Development Program households who are currently participating. The baseline reflects the average earned income at the time each household signed the contract of participation.

<sup>6</sup> Baseline was established using historical data for Workforce Development Program households who are currently participating. The baseline reflects the average amount of savings/escrow at the time each household signed the contract of participation.



**2022-01 SS #3: Increase in Positive Outcomes in Employment Status**

*Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.*

Unit of Measurement	Baseline	Benchmark <sup>7</sup>
	Head(s) of households prior to implementation of the activity (number).	Expected head(s) of households in after implementation of the activity (number).
Employed Full-Time	7 or 14% (6 head, 1 co-head)	9 or 18%
Employed Part-Time	11 or 22% (10 head, 1 co-head)	14 or 28%
Enrolled in an Educational Program	0 or 0%	0 or 0%
Enrolled in Job Training Program	0 or 0%	0 or 0%
Unemployed	37 or 74% (34 head, 3 co-head)	28 or 56%
Other	N/A	N/A

**2022-01 SS #5: Households Assisted by Services that Increase Self-Sufficiency**

Unit of Measurement	Baseline	Benchmark
Households assisted by services that increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number)
Number of households enrolled in WFD program and assisted by services that increased self-sufficiency.	50	67 <sup>8</sup>

<sup>7</sup> RHA anticipates a 25% increase in the number of head(s) of households employed full-time and part-time during the first year. Similarly, a 25% decrease is anticipated for those head(s) of households who are unemployed.

<sup>8</sup> As of January 25, 2021, RHA has 50 participants in its Workforce Development Program. Throughout FY 2020, RHA recruited and enrolled 17 new participants who signed contracts of participation. Benchmark for the coming year has been set estimating that the year will be similar with the addition of approximately 17 new households.

**2022-01 SS #8: Households Transitioned to Self-Sufficiency**

*RHA looks at self-sufficiency in two phases. The first phase occurs as household members maintain consistent employment for 12 months or when a reduction in subsidy results in the household being responsible for more than 50% of the rent. The final phase of self-sufficiency occurs automatically once the household is no longer receiving assistance or when the household voluntarily ends participation.*

For this plan and subsequent reporting, only those households are no longer receiving assistance or who voluntarily end participation are counted toward the established benchmark.

Unit of Measurement	Baseline	Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency prior to implementation of the activity (number).	Expected households transitioned to self-sufficiency after implementation of the activity (number).
Number of households enrolled in WFD program who successfully transitioned to self-sufficiency.	0	2

*Data source from which the metric data will be compiled*

RHA is currently using its software system to track participating households internally throughout the year to note any changes in family circumstances that prevent Workforce Development Program participants from securing employment, increasing earned income, and potentially becoming self-sufficient. In the coming months, RHA will use single fund flexibility to purchase and begin utilizing Tracking At-A-Glance® (TAAG) software which will allow for better caseload tracking from recruitment through program completion.

While RHA's youth will not be reflected in the metric data above, youth participation will be tracked internally and reported on within RHA's Annual MTW Report. RHA's Youth Workforce Development Coordinator will meet with enrolled students quarterly to ensure they are on track to graduate from the program and any workshop related activity resulting in financial credits will be tracked internally.

**B. Cost implications**

Using single fund flexibility, RHA implemented several incentives for Workforce Development Program participants working toward the goals identified in their ITSPs. This includes providing rent credits based on goal completion and financial assistance with some of the most common barriers to self-sufficiency through the establishment of a Self-Sufficiency Fund. Staff have found both incentives to be a useful recruiting tool and will continue to keep them in place.

RHA anticipates replenishing the \$50,000 Self-Sufficiency Fund on an as needed basis. RHA staff recently began utilizing the rent credit incentive as a recruitment tool for the Workforce Development Program. As additional participants join the program and complete their goals, staff anticipate that this incentive will grow in the coming year. Based on the goals identified by current participants, the following table provides an overview of the potential rent credit costs that may be incurred by RHA in FY 2023:



<b>FY 2023 projected rent credits based on current program participants</b>			
Goal Identified	# of participants to complete identified goal	Proposed rent credit	Total cost to RHA
Vocational Certification	12	\$150	\$1,800
AA/BS Degree	7	\$200	\$1,400
Consistent Employment for 6 Months	10	\$50	\$500
Consistent Employment for 12 Months	11	\$100	\$1,100
Consistent Employment for 18 Months	1	\$150	\$150
Consistent Employment for 24 Months	10	\$200	\$2,000
<b>Total cost:</b>			<b>\$6,950</b>

Implementation of this activity not only serves as a recruitment tool for RHA's Workforce Development Program, but also provides for an investment in RHA's youth. In the coming year, RHA anticipates reaching out to assisted families to continue to promote and build the program amongst eligible youth. Benefits of program participation will be highlighted with each eligible family including one-on-one mentoring with RHA staff, financial credits for workshop participation, job search support, and assistance with financial aid and scholarship searches. Furthermore, each Youth Workforce Development Program graduate will be given the opportunity to apply for one of three one-time scholarships, \$10,000 each, to be used toward post-secondary plans identified through participation in the program.

By the end of FY 2023, staff anticipates 30 actively participating youth as participation continues to grow. To provide the appropriate time needed to effectively mentor youth as they develop personalized skills and explore their post-secondary plans, the program will be capped at a maximum number of 30 participants at any given time.

With a two-year minimum participation requirement, RHA does not anticipate significant costs related to this portion of the activity in FY 2023. Although subject to change, the following table provides an example of the potential costs that could be incurred if/when the 30 participants begin to graduate from the program:

<b>FY 2023 proposed financial credits for each youth participant</b>			
Goal Identified	Frequency of Credit	Credit Amount	Total cost to RHA
Quarterly meeting with Youth Workforce Development Coordinator	4x per year	\$50	\$400
Workshop Series #1 (required)	Per Workshop (3 workshops in series)	\$200 for youth/additional \$200 for parent participation	\$1,200
Workshop Series #2 (required)	Per Workshop	\$200 for youth/additional \$200 for parent participation	\$400



Workshop Series #3 (required)	Per Workshop	\$200 for youth/additional \$200 for parent participation	\$400
Workshop Series #4 (required)	Per Workshop	\$200 for youth/additional \$200 for parent participation	\$400
Workshop Series #5 (required)	Per Workshop	\$200 for youth/additional \$200 for parent participation	\$400
Each workshop series after those required	Per Workshop (4 additional)	\$200 for youth/additional \$200 for parent participation	\$1,600
Obtain and maintain employment for eight weeks	Limit 2x per year	\$100	\$200
Complete an internship or apprenticeship program	Limit 2x per year	\$200	\$400
<b>Potential cost per participant:</b>			<b>\$5,400<sup>9</sup></b>

RHA recognizes that it is not uncommon for families to require assistance from a variety of sources to meet the final phase of self-sufficiency. Workforce Development staff remain committed to working with RHA's community partners who can provide additional guidance and support to program participants working toward their career and educational goals. Following implementation, RHA anticipates using single fund flexibility to assist this department on an as needed basis. This may include, but is not limited to, recruiting additional Workforce Development staff, providing workshops/training for staff, clients and youth who are actively participating in RHA's Workforce Development Program, and covering some expense incurred by partnering agencies who are committed to providing additional support to program participants.

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<sup>9</sup> To effectively mentor participating youth, RHA has set the maximum number of Youth Workforce Development Program participants at 30, a potential cost to RHA of \$162,000. Cost projections are based on all 30 youth and their parents participating in each of the seven required workshops, four additional workshops, the ability to obtain and maintain employment each year, and complete an internship or apprenticeship program each year.



## **Section IV**

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# **APPROVED MTW ACTIVITIES**





## IV. Approved MTW Activities

### A. Implemented Activities

The activities discussed in this section have previously been approved by HUD and implemented by RHA. The following tables provide an overview of each of the approved MTW activities including the year it was implemented, the primary statutory objective(s) the activity is intended to impact, and the Authorization(s) cited.

Approved MTW activities				
Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2014-01	Assign PBVs to RHA owned/controlled units without competitive process	2014	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections D.2.b. and D.7.a.
2014-02	Mobility Demonstration	2014	Increase housing choice for low-income families <u>and</u> create incentives for families to work, seek work or prepare for work.	Attachment C Sections D.1.b., D.4., D.7.a., and E.
2014-05	Simplify rent calculations and increase the minimum rent	2014	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.4., C.11, D.2.a., and D.3.b.
2014-08	Partner with local nonprofit to provide special needs housing	2014	Increase housing choice for low-income families and reduce costs <u>and</u> create incentives for families to work, seek work or prepare for work.	Attachment C Sections B.4., D.1.b., and D.7.a.
2015-01	Elimination of all negative rents and simplification of HCV utility allowances	2015	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2015-02	Allow RHA to inspect its own HCV units	2015	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.9.a. and D.5.
2015-03	Eliminate Caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties	2015 amended 2017	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.7.a.
2016-01	Simplification of medical deductions	2016 amended 2018	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.





Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2016-02	Redefine near-elderly person	2016 amended 2020	Increase housing choices for low-income families.	Attachment C Section C.2.
2016-04	Allow HCV participants to lease units that exceed the 40% rent burden	2016	Increase housing choices for low-income families.	Attachment C Section D.2.a.
2016-05	Eliminate Earned Income Disallowance (EID)	2016	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2016-06	Disregard earned income of PH household members, age 18-20, who are not the head of household or co-head	2016	Create incentives for families to work, seek work or prepare for work.	Attachment C Section C.11.
2016-07	Implement a \$75 fee for each additional HQS inspection when more than two inspections are required	2016	Reduce costs and achieve greater cost effectiveness.	Attachment C Section D.1.a.
2016-08	Expand Project Based Voucher Program	2016 amended 2019	Increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.4.
2017-01	Increase verified application data for HCV applicants	2017	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Section D.3.a.
2017-02	Asset threshold to determine eligibility for admission	2017 amended 2019	Increase housing choices for low-income families.	Attachment C Sections C.2., D.3.a., D.3.b., and D.4.
2018-01	Landlord Incentive Program	2018 amended 2020	Increase housing choices for low-income families.	Attachment C Sections D.1.a. and D.1.d.
2019-01	Redetermination of rent reasonableness as a result of a change in contract rent	2019	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Section D.2.c.



Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2019-02	Provide incentives to \$0 HAP households	2019	Create incentives for families to work, seek work or prepare for work.	Attachment C Sections D.1.a, D.1.b, D.1.c and Section E.
2021-01	Affordable Housing Acquisition, Rehabilitation and Preservation	2021	Increase housing choices for low-income families.	Attachment D - Use of MTW Funds and MTW block grant outlined in PIH 2011-45 (HA)
2021-03	Partnership to Assist Homeless Youth	2021	Increase housing choices for low-income families.	Attachment D - Use of MTW Funds and MTW block grant outlined in PIH 2011-45 (HA)



## **2014-01: Assign PBVs to RHA owned/controlled units without a competitive process**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2014.

### **Description**

RHA owns several single-family homes, duplexes and condominiums throughout Reno, Sparks, and Washoe County that were purchased using various funding sources. To expand the housing choice of low-income households, PBVs have been assigned to several of these scattered site units without going through the competitive process. To assist in expediting the PBV approval process, initial contract rents at or below the applicable Low HOME Rents, are set by RHA. RHA sets these rents in lieu of utilizing a state-certified appraiser and a HUD-approved independent agency.

### **Status/Update**

Although the housing market has strengthened and the amount of available inventory has become extremely limited, RHA remains committed to purchasing or developing additional housing if the units will further the agency's mission. New and existing properties will be reviewed to determine whether the use of a PBV is appropriate. RHA will continue to utilize this flexibility should the opportunity present itself.

This activity will remain ongoing in FY 2023.

### **Planned Changes**

To facilitate the leasing of units utilized in RHA's Mobility Demonstration (*Activity 2014-02*), RHA will keep the PBV assigned to a unit rather than requesting removal from HUD followed by another request to assign a PBV to the same unit if/when the unassisted family moves out.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2014-02: Mobility Demonstration**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2014.

### **Description**

RHA's Mobility Demonstration allows qualified low-income PH families with children to move to neighborhoods where opportunities are more abundant within the surrounding area. To enable these families to move, RHA is utilizing MTW flexibilities (*Activity 2014-01*) and assigning PBVs to agency-owned single-family homes, duplexes and condominiums located within low-poverty neighborhoods throughout the City of Reno and the City of Sparks. Based on a pool of eligible households and the family's approved voucher size, PH families with children, who are currently in good standing and who meet the established requirements to participate in the program, are provided with the opportunity to move into one of the identified properties.

### **Status/Update**

To date, 49 PH families with children have moved to properties located in low-poverty census tracts, 23 of whom are still participating in the demonstration. Overall, this activity has been



successful with nearly 31% or 15 families having successfully transitioned off housing assistance. In addition, four families, who are currently paying full contract rent, are expected to become self-sufficient and move off the program in the coming year.

This activity will remain ongoing in FY 2023.

### **Planned Changes**

In FY 2023, RHA will complete a review of each of the scattered site properties in the agency's portfolio with the intention to expand upon this activity if appropriate. RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2014-05: Simplify rent calculations and increase the minimum rent**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2014.

### **Description**

RHA is excluding all educational financial aid from income calculations and allowing self-certification of assets under \$10,000. The full amount of student financial assistance paid directly to the student or to the educational institution is excluded from income calculations for HCV participants. RHA's HCV participants can now benefit from being able to attend an institution of higher education without being penalized with an increase in rent due to any financial assistance that they may secure. Furthermore, households with assets less than \$10,000 can submit a self-certification as to the value of the asset. At the time of application, applicants are asked to provide a well-documented baseline asset value. RHA staff will only calculate income on assets if the value of the assets total more than \$10,000.

RHA also raised the minimum rent from \$50 to \$75 not only to save significant HCV and PH operating subsidy but provide an incentive for participants to seek employment due to the higher participant contribution to rent.

### **Status/Update**

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2014-08: Partner with local nonprofit to provide special needs housing**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2014.

### **Description**

RHA is providing PBV units to clients of its nonprofit partners including the Domestic Violence Resource Center (formerly CAAW), Casa de Vida, Human Services Agency of Washoe County,



Safe Embrace, Northern Nevada HOPES and Northern Nevada Adult Mental Health Services (NNAMHS). These PBVs are for two years and each of the nonprofit partners provides the supportive services.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

**2015-01: Elimination of all negative rents and simplification of HCV utility allowances**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2015.

**Description**

RHA's PH residents and HCV participants no longer receive negative rents due to utility allowances. Furthermore, RHA simplified the HCV utility allowances for all units by creating a flat utility allowance schedule based on structure type and authorized voucher bedroom size. The new utility allowances are designed to cover the full cost of apartment utilities, but a lesser percentage proportionally for participants who choose single family homes, duplexes, and mobile homes.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA continues to contract with The Nelrod Company to review RHA's utility allowance schedule. Based on their review, utility allowances are adjusted and approved by RHA's Board of Commissioners. Although the study provided by The Nelrod Company is very comprehensive, it is also very time consuming to review the utility usage for each HCV unit to determine the best use of the data provided. Often, the revised utility allowance following the data review does not result in a significant change to the schedule for any identified unit type. In future years, RHA may consider use of a methodology that reflects local consumption patterns and costs by providing an allowance adjustment when the Consumer Price Index produces a change of more than 10%. RHA feels that this would be a more cost-effective approach to updating the utility allowance schedule on an annual basis.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

**2015-02: Allow RHA to inspect its own HCV units**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2015.

**Description**

RHA owns a significant number of units which, under HUD's established rules, had to previously be inspected by third party contractors. In FY 2015, RHA staff began conducting inspections on all HCV and PBV units, regardless of ownership or property management status, rather than using third party contractors.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

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**2015-03: Eliminate caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2015. It was amended in FY 2017 to eliminate the voucher allocation cap.

**Description**

RHA owns several non-PH complexes and dwelling units that have been utilized in various housing programs through the assignment of PBVs. To provide additional low-income families housing assistance and increase the agency's rental revenue, the cap on the number of units where a PBV can be assigned within each project was lifted. This has allowed for the assignment of PBVs to up to 100% of these RHA-owned, non-PH units. In FY 2017, the 20% limit on the amount of voucher funding that may be utilized under the PBV program was also eliminated.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

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**2016-01: Simplification of medical deductions**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016. It was amended in FY 2018 to modify the income tiers further and establish a requirement that all eligible households self-certify actual medical expenses rather than allowing all participants to simply receive the simplified medical deduction regardless of whether the household incurs the expense.

**Description**

Rather than use third party verifications and require residents to provide receipts showing out of pocket medical expenses, RHA established and implemented a simplified medical deduction schedule based entirely on the household's gross income. Implementation resulted in the process



becoming streamlined for RHA staff and the policy becoming easier for PH residents and HCV participants to understand.

#### **Status/Update**

This activity will remain ongoing in FY 2023.

#### **Planned Changes**

RHA anticipates reviewing and adjusting the standardized medical deduction table frequently to determine its overall viability for program participants. Following a review of the income guidelines provided by the Medicare Assistance Program in relation to the 2021 Medicare premiums and coverage, staff determined modifications to the medical deduction table would not be necessary this year.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

### **2016-02: Redefine near-elderly person**

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#### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016. It was expanded upon in FY 2020 to include the use of the near-elderly definition within the PBV program and allow PBV sites, which define elderly as 55 years of age and older, to be considered an elderly property.

#### **Description**

In FY 2016, RHA implemented a change to the near-elderly definition for the PH program to limit it to persons who are at least 55 years of age but below the age of 62. These newly defined households are treated as “elderly” to allow for their admission from the waiting list to one of RHA’s senior PH complexes. This has allowed the number of eligible families referred to these PH units to increase without raising concerns from current residents regarding potential lifestyle conflicts. By redefining near-elderly and allowing these households to be treated as “elderly” for admission to RHA’s senior PH complexes, the affordable housing opportunities for these individuals has successfully increased.

#### **Status/Update**

This activity will remain ongoing in FY 2023.

#### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

### **2016-04: Allow HCV participants to lease units that exceed the 40% rent burden**

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#### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016.





### **Description**

To allow HCV participants to choose housing in accordance with their individual financial circumstances, RHA began allowing HCV participants, at their option, to lease units that exceed the 40% maximum rent burden. However, at the time tenancy is approved and the HAP contract is executed, the maximum initial rent burden cannot exceed 50% of monthly adjusted income. Implementation of this activity allows participants to look for housing that may be more costly than otherwise permitted under HUD regulations, but it also gives participants the option to live in lower poverty neighborhoods with access to better schools and employment opportunities.

### **Status/Update**

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2016-05: Eliminate Earned Income Disallowance (EID)**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016.

### **Description**

Earned Income Disallowance (EID) allows eligible tenants in the PH and HCV programs to increase their incomes through employment without triggering rent increases. The resulting income increase is fully excluded for 12 months and 50% excluded for an additional 12 months. Under the "Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing, and Community Planning and Development Programs" published on March 8, 2016, the duration for this exclusion of wages was revised from 48 months to 24 months. However, each eligible family member may be in a different exclusion phase or month count, which remains burdensome for PHA staff to track. In FY 2016, RHA eliminated the HUD-mandated EID from the calculation of rent.

### **Status/Update**

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2016-06: Disregard earned income of PH household members, ages 18-20, who are not the head of household or co-head**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016.

### **Description**

HUD regulations for PH residents require that earned income of adult children, between the ages



of 18 and 20, be factored into the household's rent calculation. In many cases where an adult child works, the head of household has no control over the child's willingness to contribute to the rent. In some cases, this increased rent burden may place the family at risk of being terminated from the program if the head of household is unable to pay their portion of the increased rent.

In FY 2016, RHA began providing these adult children, ages 18-20 who live in PH and are not the head of household or co-head, an incentive to pursue employment and become economically self-sufficient by revising the definition of countable income. This revision excludes all earned income for these young adults when determining rent for the entire household.

### **Status/Update**

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2016-07: Implement a \$75 fee for each additional HQS inspection when more than two inspections are required**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016.

### **Description**

Currently RHA is required to conduct a re-inspection on units that fail an annual HQS inspection to ensure that the owner/manager has corrected the noted violations. If the unit fails HQS, the owner/manager is notified in writing of the deficiencies and repairs that need to be made within 30 days. If the owner/manager does not take the required corrective action within the specified time, RHA can abate the HAP beginning 30 days from the date of the first inspection until the required work is totally complete. Frequently, a third inspection is required to verify the completion of the noted deficiencies.

To encourage owners/managers to correct the noted violations quickly and provide RHA's HCV participants with safer living conditions, RHA began to assess a \$75 fee for each additional HQS inspection. This fee commences when more than two HQS inspections are required due to the owner/manager's failure to complete the necessary repairs. The fee for the inspection does not remove the abatement of the subsidy, but rather seeks to cover the administrative costs of conducting a third inspection that would not have been required had the owner/manager corrected the noted violations in a timely manner and incentive landlords to make timely repairs. The owner/manager **cannot** pass this fee on to the tenant.

Owners/managers frequently request extensions to complete the necessary repairs prior to the third inspection, and RHA anticipates that this will continue. However, upon implementation of this activity, extensions are no longer granted for more than 30 days following the date of the second inspection except under certain circumstances which are approved by RHA.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

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**2016-08: Expand Project Based Voucher Program**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2016. It was expanded upon in FY 2019 to include families who are participating in Washoe County's workforce development programs.

**Description**

RHA allocates PBVs to RHA-owned units which are utilized in several of RHA's housing programs and to assist RHA's local nonprofit partners in housing high risk families who have immediate housing needs. On May 11, 2016, RHA received approval to amend its FY 2016 MTW Annual Plan to allow for the expansion of its PBV program.

This expansion allows for the allocation of up to 50 PBVs to privately owned properties in exchange for the owner's commitment to provide affordable housing to individuals and/or families who are experiencing homelessness. This activity was amended in FY 2019 to expand RHA's PBV program to address the lack of affordable housing options for families who are actively participating in workforce development programs within Washoe County.

To implement the activity effectively, RHA also received approval to remove the 25% per building cap established in 24 CFR §983.56 for all PBVs assigned under this activity.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

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**2017-01: Increase verified application data for HCV applicants**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2017.

**Description**

RHA's Admin Plan and federal regulations require that information submitted by each applicant be verified by staff to ensure that the data provided by the applicant that was used to determine eligibility, priority status, HAP to be paid and voucher size is true and complete. Per CFR §982.201(e), RHA must receive information verifying that an applicant is eligible for the HCV program within the period of 60 days prior to the issuance of a voucher to the applicant. Information not subject to change (i.e., date and place of birth) does not need to be re-verified.



Information that is subject to change, which was verified more than 60 days prior, must be re-verified close to certification of the applicant's file. If there is a delay after the file has been certified and referred to the HCV program that will cause an applicant to not lease up, the voucher is suspended while the information is re-verified. If changes are reported late, the file will be returned to Admissions staff to obtain written verification and to determine their effect on eligibility, rent and unit size.

The amount of time RHA staff spent following-up and tracking third-party verification requests was significant and often resulted in information that was no more reliable than the documents provided by the applicants directly. To streamline the admissions process, reduce the amount of time required by staff, and decrease the time necessary to build a qualified applicant pool, RHA received approval to extend the length of time that all verified application data related to income is deemed valid for the HCV program to 120 days. Furthermore, this activity also allows stable income verifications, such as pensions and Social Security award letters, to be valid for the current year.

### **Status/Update**

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2017-02: Asset threshold to determine eligibility for admission**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2017. It was amended in FY 2019 to exclude cash assets of elderly/disabled applicants.

### **Description**

Under 24 CFR §5.609, annual income is defined to include amounts derived (during the 12-month period) from assets to which any member of the family has access. Income resulting from any assets held by the family must be calculated and included when determining program eligibility and rent portions. However, under HUD's current guidelines, there is no limit on the amount of assets a family may have access to prior to determination of eligibility.

To serve applicants who are most in financial need, RHA received approval to establish an asset threshold when determining eligibility for admission to its housing programs. Should an applicant have combined assets with a cash value of more than \$50,000, or ownership in a suitable dwelling unit which they have a legal right to reside in, they are determined to be ineligible for admission.

In FY 2019, RHA amended this activity to exclude cash assets only when determining eligibility for elderly/disabled HCV and PH households. Ownership in a property that the applicant has a legal right to reside in remains in place for all applicants when determining eligibility for RHA's housing programs.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

**2018-01: Landlord Incentive Program**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2018. It was amended in FY 2020 to expand upon the conditions for qualification.

**Description**

Based on information received from landlords through a survey which noted barriers to their continued participation in the HCV program, RHA implemented a Landlord Incentive Program in FY 2018 that was expanded upon in FY 2020. The program allows landlords to receive their contracted HAP payment through the end of the month for units occupied by HCV participants vacating under the following conditions: (1) deceased tenant, (2) eviction, (3) skip, (4) a family responsibility violation, or (5) excessive damage to the unit that is beyond normal wear and tear. As these conditions are of no fault or cause of the landlord, RHA will provide the contracted HAP payment automatically through the end of the month. Furthermore, a HAP payment equal to one additional month may be made for these same units regardless of the actual move-out date of the participant, if requested in writing by the landlord. Landlords can utilize the additional HAP toward damages incurred within the unit or as compensation for a vacancy loss.

To ensure that landlords can maintain equal housing opportunities and follow their existing procedures, RHA does not require landlords to rent to another voucher holder to qualify for this incentive.

**Status/Update**

This activity will remain ongoing in FY 2023.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

**2019-01: Redetermination of rent reasonableness as a result of a change in contract rent**

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**Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2019.

**Description**

The strengthening housing market and the lack of affordable housing in the City of Reno, the City of Sparks and Washoe County has resulted in private landlords becoming wary or simply refusing to rent to HCV participants. This is oftentimes made worse by the myriad of regulations that must



be adhered to when leasing to a family participating in the HCV program. These burdensome regulations include mandatory inspections and the requirement to determine whether a CRI request is reasonable. Several of RHA's landlords expressed dissatisfaction in having to complete a rent reasonableness determination when requesting a rent increase and many disagree with the comps used if the amount requested is determined to be unreasonable. In fact, some landlords have openly expressed that they can easily rent the unit to a family who is not receiving assistance at whatever price they deem appropriate.

Based on the local rental market, RHA began waiving the requirement for a rent reasonableness determination in FY 2019 if the new requested rent amount represents a change of 10% or less. This policy change is anticipated to assist in retaining landlords who continue to lease to HCV participants in this challenging rental market and alleviate the amount of time required of staff to process requests.

### **Status/Update**

During FY 2021, RHA processed 1,020 rent change requests of which 852 or 84% sought a change of 10% or less. Rent reasonableness determinations are still made by RHA staff on a regular basis. Staff continue to complete a rent reasonableness determination when a unit is placed under a HAP contract for the first time, when an owner requests a contract rent change of more than 10%, or at any other time RHA deems necessary.

RHA conducted a general analysis of the local rental market to ensure this policy change continues to be a viable option for waiving the required rent reasonableness determination following a CRI request of 10% or less. According to Apartment Guide, the City of Reno, which saw a year-over-year rent increase of 48.27% for a one-bedroom apartment, was ranked as one of the top ten cities to have experienced the biggest increases for this particular bedroom size. With current rental market conditions in mind and the ongoing impacts of COVID-19, RHA plans to continue to alleviate some of the administrative burden required of RHA staff while at the same time continuing to provide an incentive to RHA's HCV landlords by leaving this threshold at 10% for the coming year.

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2019-02: Provide incentives to \$0 HAP households**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2019.

### **Description**

Many of RHA's families who increase their household earnings and begin to pay full contract rent also experience the "benefits cliff." For many of these families, an increase in earned income results in a loss of eligibility for certain public benefits such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), childcare subsidy and





housing. As a result, it is not uncommon for households approaching the end of the six-month period of zero assistance to elect to reduce their income or lose employment in order to keep their housing assistance as many remain fearful of no longer having the safety net offered through assistance eligibility.

To ease this fear and increase the success rate of RHA's HCV households in becoming economically self-sufficient, RHA adopted a new policy in FY 2019 that extends the length of time a household can remain on the HCV program while receiving zero assistance. By lengthening the period from six months to 12 months, RHA expects to provide an additional level of security and confidence. Participants can continue to increase their earned income while at the same time eliminating the incentive to terminate employment or reduce working hours.

As an additional incentive to HCV participants on their way to self-sufficiency, RHA began allowing households at \$0 HAP to accrue an escrow account for up to 12 months. Using single-fund flexibility, RHA began setting aside 15% of each household's contracted rent monthly in an escrow account for no more than 12 months while the household remains on the program receiving zero assistance. This escrow accrual begins the first month that the family reaches \$0 HAP, accumulate monthly for up to 12 months and will be provided to the family once the HAP contract is terminated by RHA and the family has successfully transitioned off the HCV program. If, at any time during the 12-month accrual period, the family becomes eligible to receive housing assistance again, the amount of money accrued is forfeited and the escrow accrual starts over from zero if/when the household reaches \$0 HAP again. Should the family choose to move off the HCV program within the 12-month period that they are receiving zero assistance, they move off the program with the amount accrued in the account up to the date of their voluntary departure.

This policy change is intended to encourage increased earnings and upward mobility by providing a small amount of additional assistance for RHA's families as they approach the benefits cliff. As a result, it is not RHA's intent to put restrictions on what the escrow amount can be spent on. However, each escrow accrual during this \$0 HAP period is subject to funding availability and payouts will be limited to one per lifetime for all adults within the household at the time the escrow accrual is paid to the family. Households who accept the escrow accrual payment and transition off housing assistance will only be allowed to reapply following a three-year period without housing assistance. Furthermore, families who are participating in RHA's traditional FSS program and escrowing as part of their participation, will only be allowed to receive one escrow.

#### **Status/Update**

This activity will remain ongoing in FY 2023.

#### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

### **2021-01: Affordable Housing Acquisition, Rehabilitation and Preservation**

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#### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2021.





### **Description**

Rents in the Truckee Meadows remain unstable leaving many families struggling to pay rent as housing affordability continues to be an issue. In FY 2021, RHA began exploring ways that single fund flexibility through the MTW Demonstration could be used to assist in the acquisition/development of new affordable units, the rehabilitation of newly acquired properties, and the preservation and revitalization of existing affordable housing properties.

### **Status/Update**

As the lack of affordable housing throughout the Truckee Meadows has increased, so has the area's homeless population. The City of Reno's homeless shelter became overcrowded and unsafe during the COVID-19 pandemic. This overcrowding led to an increase in homeless camps throughout Washoe County. To combat homelessness, the City of Reno, the City of Sparks and Washoe County joined resources to acquire approximately 10 acres of land that was transformed into the Nevada CARES Campus, a regional homeless services facility. Utilizing MTW funding flexibility, RHA purchased the lot adjacent to the Nevada CARES Campus for \$5,150,000.

Recently, Washoe County began overseeing the Nevada CARES Campus and discussions with stakeholders began regarding the best use for RHA's neighboring property. As the expansion of the Nevada CARES Campus is already needed, these discussions led to RHA leasing a portion of the current structure to Washoe County to allow them to provide a winter warming space when overflow occurs from the adjacent homeless shelter. In the coming months, discussions regarding a future land trade with Washoe County, the option to outright sell RHA's adjacent lot to Washoe County or a combination of both ideas will ensue.

This activity will remain ongoing in FY 2023.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## **2021-03: Partnership to Assist Homeless Youth**

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### **Plan Year Approved, Implemented, and Amended (if applicable)**

This activity was approved and implemented in FY 2021.

### **Description**

In FY 2021, RHA partnered with Eddy House, a local 501(c)3 non-profit, that serves as the central intake and assessment facility in northern Nevada for homeless youth, ages 12-24. Recently the local non-profit purchased a building that now serves as a resource center during the day and an overnight facility. RHA assists Eddy House with their 24-hour facility by funding up to 43 beds.

### **Status/Update**

Washoe County continues to see a steady number of individuals experiencing homelessness, including youth. Through this activity, RHA assists Eddy House in their mission to provide shelter and services to the homeless youth population. Recently, Eddy House began implementing new programming designed to promote self-efficacy amongst the homeless youth they serve.



These programs such as Job/Life Skills Training, Client Internships and Weekly Family Meetings have been met with enthusiasm and maximum participation.

RHA is proud of this developing partnership with Eddy House and will continue to explore additional non-profits to partner with in the future. This activity will remain ongoing in FY 2023.

### Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

## B. Not yet implemented activities

The activities discussed in this section have previously been approved by HUD, but not yet implemented by RHA. The following table provides an overview of each of the approved MTW activities that have not yet been implemented including the year it was identified, the primary statutory objective(s) the activity is intended to impact, and the Authorization(s) cited.

MTW activities approved but not yet implemented				
Activity #	Plan Year Approved	Activity Name	Statutory Objective(s)	Authorization(s)
2021-02	2021	STAR Apprenticeship Program	Create incentives for families to work, seek work or prepare for work.	Attachment C Section C.11 and Section D.2.a.

### 2021-02: STAR Apprenticeship Program

#### Description

As Washoe County's workforce and employers evolve, training and preparation programs are becoming necessary to secure several of the higher paying jobs that are available within the region. In FY 2021, RHA proposed using single fund flexibility to establish the STAR Apprenticeship Program. This 24-week program will be designed to provide career-connected learning opportunities for residents of all ages. Through the program, PH residents and HCV participants will be provided with on-the-job training and related classroom instruction that will serve to increase current skill levels. More importantly, each STAR participant will gain valuable work experience within one of RHA's departments (maintenance, development, finance, etc.) and be provided with continuous feedback regarding expectations and overall performance throughout.

#### Update/timeline for implementation

Although this activity was scheduled to begin in January 2021, due to the rapidly evolving nature of the COVID-19 pandemic, it is now unclear when this activity will be implemented.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

**C. Activities on hold**

Not applicable. RHA does not have any activities on hold.

**D. Closed Activities**

The activities discussed in this section have previously been approved by HUD but closed by RHA. The following table provides an overview of each of the approved MTW activities that have been closed by RHA including the year it was identified and implemented, the primary statutory objective(s) the activity was intended to impact, and the Authorization(s) cited.

Closed MTW activities					
Activity #	FY Implemented	FY Closed	Activity Name	Statutory Objective(s)	Authorization(s)
2014-03	2014	2019	Rent Reform Controlled Study	Create incentives for families to work, seek work or prepare for work <u>and</u> reduce costs and achieve greater cost effectiveness.	Attachment C Sections D.1.b., D.1.c., D.2.a., and D.4.
2014-04	2014	2021	Expand self-sufficiency activities	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E.
2014-07	2014	2017	Alternate HQS verification policy	Reduce costs and achieve greater cost effectiveness.	Attachment C Section D.5.
2015-04	2015	2018	Required Savings Plan for Earned Income Disallowance (EID) PH clients	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E.
2016-03	N/A	2020	Time limited vouchers and redesign of traditional FSS Program	Create incentives for families to work, seek work or prepare for work <u>and</u> reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Section D.1.b., Section D.1.c., Section D.2.d., and Section E.  Attachment D Use of MTW Funds

**2014-03: Rent Reform Controlled Study****Plan Year Approved, Implemented, and Closed Out**

This activity was approved and implemented in FY 2014. It was closed out in FY 2019.

**Reason for close out**

RHA staff considered several factors before reaching a decision to close this activity. Based on current rental market conditions resulting in a decline in RHA's current HCV lease up figures along with the undue stress that a time-limited voucher may cause for the participating family, this activity was closed. Notification was given to all remaining Rent Reform Controlled Study participants of RHA's intent to close the activity at which time all active households were transitioned to a regular HCV voucher. This activity was closed in FY 2019 and is no longer being reported on.

**2014-04: Expand self-sufficiency activities**

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**Plan Year Approved, Implemented, and Closed Out**

This activity was approved and implemented in FY 2014. It was closed out in FY 2021.

**Reason for close out**

RHA recently restructured its entire FSS Program into a Workforce Development Program focused on Job placement and job retention for all able-bodied participants in RHA's housing programs, including youth. As the goal of this activity is to propel households toward the final phase of self-sufficiency, RHA will no longer refer households with delinquent community service hours to the Workforce Development Program. This fundamental change resulted in this activity, including the FSS Lite Program, being closed and replaced with 2022-01: Workforce Development Program.

**2014-07: Alternate HQS verification policy**

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**Plan Year Approved, Implemented, and Closed Out**

This activity was approved and implemented in FY 2014. It was closed out in FY 2017.

**Reason for close out**

As HUD is now allowing for Biennial HQS Inspections through Section 220 of the 2014 Appropriations Act, this activity was closed out in FY 2017 and is no longer being reported on.

**2015-04: Required Savings Plan for Earned Income Disallowance (EID) PH clients**

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**Plan Year Approved, Implemented, and Closed Out**

This activity was approved and implemented in FY 2015. It was closed out in FY 2018.

**Reason for close out:**

RHA received approval through Activity 2016-05 to eliminate the HUD-mandated EID from the calculation of rent. To alleviate the impact that this would have on rent calculations for some PH residents and HCV participants, EID participants could keep their benefits for one year following plan approval. After this initial year, all participants will have their EID benefits eliminated upon their first annual recertification or immediately following the termination of employment income. All participants have been phased off EID. This activity was closed in FY 2018 and is no longer being reported on.



## **2016-03: Time limited vouchers and redesign of traditional FSS Program**

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### **Plan Year Approved, Implemented, and Closed Out**

This activity was approved in FY 2016 but never implemented. It was closed out in FY 2020.

### **Reason for close out:**

In FY 2014, RHA began issuing vouchers limited to five years as part of a Rent Reform Controlled Study (Activity 2014-03) within the HCV program. RHA partnered with an outside institution to evaluate the continuing effects and changing statuses of families participating in the Rent Reform Controlled Study. The purpose of the evaluation was to properly gauge whether increases in income that do not affect a household's rent and whether limiting vouchers to five years was incentive enough for families to become self-sufficient. As RHA worked through the lessons learned from the Rent Reform Controlled Study and current rental market conditions, staff determined that implementation of this activity on all non-elderly/non-disabled HCV participants would result in undue stress on participating families. This activity was closed in FY 2020.



## **Section V**

# **PLANNED APPLICATION OF MTW FUNDS**





## V. Planned Application of MTW Funds

This section includes summary budget information for FY 2023 including planned sources and uses for MTW funds.

### E. Planned Application 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. Following is RHA's estimated sources and amount of MTW funding by FDS line item:

ESTIMATED SOURCES OF MTW FUNDS		
FDS Line-Item Number	FDS Line-Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$2,828,596
70600	HUD PHA Operating Grants	\$24,514,164
70610	Capital Grants	\$424,906
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$152
71600	Gain or Loss on Sale of Capital Assets	\$100
71200+71300+71310+71400+71500	Other Income	\$704,155
<b>70000</b>	<b>Total Revenue</b>	<b>\$28,472,073</b>

#### ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year are identified here; unspent funds that the MTW PHA is not planning during the plan year are not included in this section. Following is RHA's estimated application of MTW funds by FDS line item:

ESTIMATED APPLICATION OF MTW FUNDS		
FDS Line-Item Number	FDS Line-Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,560,470
91300+91310+92000	Management Fee Expense	\$1,298,932
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$282,663
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$615,865





93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$1,395,836
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$198,743
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$382,240
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$18,604,855
97400	Depreciation Expense	\$1,494,616
97500+97600+97700+97800	All Other Expense	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$28,834,220</b>

### Description of Variance between Estimated Total Revenue and Estimated Total Expenses:

The Housing Authority of the City of Reno populates the amounts in the preceding table directly from our most recent FDS submission whether unaudited or audited. RHA has not experienced a change in the number of PH units. RHA has continued to experience a change in HAP revenue and HAP expense due to a significant increase in payment standards. The increased payment standards meant higher HAP payments for clients which is driven by an extremely tight rental market in Washoe County. According to our FY 2021 unaudited FDS draft submission, expense exceeded revenue by \$362,147 including non-cash depreciation charges of \$1,494,616. This deficit will be covered by profits generated from our business activities.

### iii. Description of Planned Application of MTW Funding Flexibility

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

#### PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

RHA does not have any additional planned use of MTW single fund flexibility other than those found in Section (III) or Section (IV) of the Annual MTW Plan.

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

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). 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.

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$ 13,987,353	\$ 652,000
HCV Admin Fee	\$ 0	\$ 0
PH Operating Subsidy	\$ 0	\$ 0
<b>TOTAL</b>	<b>\$ 13,987,353</b>	<b>\$ 652,000</b>

\* 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.

Description
The Planned Application of PHA Unspent Funds during the Fiscal Year is based on RHA's FY 2021 use of single fund flexibility for each of the activities approved by HUD and accounted for in VMS as MTW spending. This amount does not include any acquisition, rehabilitation or preservation of land/buildings that may be incurred by RHA to provide additional affordable housing within the community.

**v. Local Asset Management Plan**

- a. Is the MTW PHA allocating costs within statute? **YES/No**
- b. Is the MTW PHA implementing a local asset management plan (LAMP)? **Yes/NO**
- c. Has the MTW PHA provided a LAMP in the appendix? **Yes/NO**
- d. 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.

N/A



**vi. Rental Assistance Demonstration (RAD) Participation**

a. Description of RAD Participation

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

Rental Assistance Demonstration (RAD) Participation
N/A

b. 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.

Yes/NO

c. 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



## Section VI

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# ADMINISTRATIVE





## VI. Administrative

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### A. Board Resolution and Certifications of Compliance

Board Resolution 2022-03-03 RH approving the content and submission of the FY 2023 MTW Annual Plan and the Certifications of Compliance (see Attachment I).

### B. Documentation of Public Process

- The FY 2023 MTW Annual Plan was discussed at multiple Resident Advisory Board and Resident Council meetings beginning in December 2021. The plan continued to be discussed at meetings of the Resident Councils through March 2022. Resident sign in sheets from each of the above-mentioned meetings are available upon request.
- The FY 2023 MTW Annual Plan is being made available for public review and comment on RHA's website and at RHA's Administrative Office from January 28, 2022 through March 22, 2022.
- The FY 2023 MTW Annual Plan was advertised in the Legal Notices section of the Reno Gazette-Journal as follows:

The Housing Authority of the City of Reno (RHA) is required to submit an Annual Plan for HUD's approval as part of its participation in HUD's Moving to Work (MTW) Demonstration Program.

RHA's FY 2023 MTW Annual Plan for the period July 1, 2022 – June 30, 2023, will be available for public review and comment from January 28 - March 22, 2022, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at [www.renoha.org](http://www.renoha.org). A copy of the FY 2023 MTW Annual Plan can also be obtained by contacting Kim Anhalt, MTW Coordinator, at (775) 329-3630; TTY (385) 770-7166 or by email at [kanhalt@renoha.org](mailto:kanhalt@renoha.org).

Comments on RHA's draft FY 2023 MTW Annual Plan must be received by close of business on Monday, March 21, 2022.

A Public Hearing to answer questions and receive all comments will be held at 6:00 PM on Wednesday, March 2, 2022, in Silverada Manor's Community Room, 1400 Silverada Blvd., Reno, NV 89512.

Proof of Publication Notice (see Attachment II).

- A public hearing for the FY 2023 MTW Annual Plan was held at 6:00pm on Wednesday, March 2, 2022. The public hearing was attended only by staff.



**C. Planned and Ongoing Evaluations**

(see Attachment III)

**D. Lobbying Disclosures**

Certification of Payments to Influence Federal Transactions and Disclosure of Lobbying Activities (see Attachment IV).



# **BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE**

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## **Attachment I**





HOUSING AUTHORITY OF THE CITY OF RENO  
RESOLUTION 22-03-03 RH

A RESOLUTION APPROVING THE CONTENT AND SUBMISSION OF THE AUTHORITY'S  
FY 2023 MOVING TO WORK ANNUAL PLAN AND CERTIFICATIONS OF COMPLIANCE TO  
THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, Moving to Work (MTW) is a demonstration program, established by Congress in 1996, that offers a limited number of "high performing" Public Housing Authorities the opportunity to propose and test innovative, locally-designed approaches to administering housing programs and self-sufficiency strategies; and

WHEREAS, after a national competition was held in 2012, the Housing Authority of the City of Reno was selected and designated as one of four new MTW agencies in 2013; and

WHEREAS, the Authority's MTW agreement was signed by Sandra B. Henriquez, Assistant Secretary of the U.S. Department of Housing and Urban Development (HUD) on June 27, 2013; and

WHEREAS, on June 28, 2016, the Board of Commissioners approved an extension to the Authority's agreement with HUD to participate in the MTW Demonstration Program through the end of the Authority's Fiscal Year (FY) 2028; and

WHEREAS, in compliance with the Authority's MTW agreement, HUD requires an annual submission of a MTW Plan and Certifications of Compliance following a public process; and

WHEREAS, the Authority developed the FY 2023 MTW Annual Plan and invited public comment beginning on January 28, 2022 allowing for a 30-day comment period; and

WHEREAS, comments were solicited through notices posted on the Authority's website, and through legal notice publications in the *Reno Gazette-Journal* on January 26, 2022 and February 2, 2022; and

WHEREAS, a public hearing was held on March 2, 2022 to receive comments on the Authority's plan which was attended only by staff;


NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

1. That the Board of Commissioners hereby authorizes and directs the Executive Director to submit the Authority's FY 2023 Moving to Work Annual Plan and Certifications of Compliance to HUD.
2. This Resolution is to be effective upon the date of its adoption.

ADOPTED THIS 22<sup>nd</sup> DAY OF March, 2022.

ATTEST

  
CHAIRMAN

  
SECRETARY



## CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2022), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

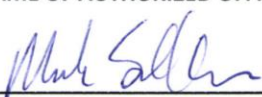
form HUD 50900: *Certifications of Compliance (3/2021)*





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

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

<p>Housing Authority of the City of Reno</p> <hr/> <p><b>MTW PHA NAME</b></p> <p>Mark Sullivan</p> <hr/> <p><b>NAME OF AUTHORIZED OFFICIAL</b></p>  <hr/> <p><b>SIGNATURE</b></p>	<p>NV001</p> <hr/> <p><b>MTW PHA NUMBER/HA CODE</b></p> <p>Chairman, Board of Commissioners</p> <hr/> <p><b>TITLE</b></p> <p>3-22-22</p> <hr/> <p><b>DATE</b></p>
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*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. § 3729, 3802).*

\* Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

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



# **PROOF OF PUBLICATION**

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## **Attachment II**



**PROOF OF  
PUBLICATION**

**STATE OF WISCONSIN SS.  
COUNTY OF BROWN**

RENO HOUSING AUTHORITY  
RENO HOUSING AUTHORITY  
1525 E 9TH ST  
RENO NV 89512

Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper issue dated between: 01/26/2022 - 02/02/2022, for exact publication dates please see last line of Proof of Publication below.

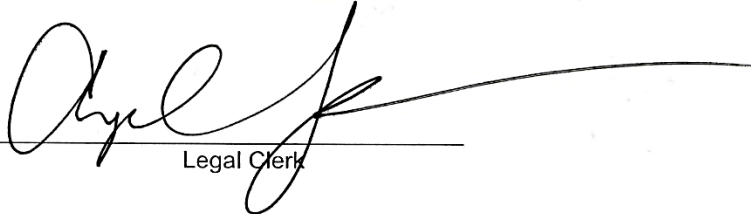
The Housing Authority of the City of Reno (RHA) is required to submit an Annual Plan for HUD's approval as part of its participation in HUD's Moving to Work (MTW) Demonstration Program.

RHA's FY 2023 MTW Annual Plan for the period July 1, 2022 - June 30, 2023, will be available for public review and comment from January 28, 2022 - March 22, 2022, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at [www.renoha.org](http://www.renoha.org). Copies of the FY 2023 MTW Annual Plan may also be obtained by contacting Kim Anhalt, MTW Coordinator at (775) 329-3630; TTY (385) 770-7166 or by email at [kanhalt@renoha.org](mailto:kanhalt@renoha.org).


Comments on RHA's draft FY 2023 MTW Annual Plan must be received by close of business on Monday, March 21, 2022.

A Public Hearing to answer questions and receive comments will be held at 6:00 PM on Wednesday, March 2, 2022, in Silverada Manor's Community Room, 1400 Silverada Blvd., Reno, NV 89512.  
No.5105233  
Jan 26, Feb 2, 2022

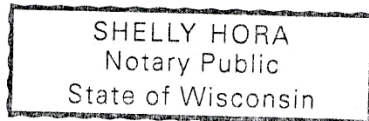
01/26/2022, 02/02/2022

  
Legal Clerk

Subscribed and sworn before me this  
2nd of February 2022.

  
NOTARY PUBLIC RESIDING  
AT STATE OF WISCONSIN  
COUNTY OF BROWN

Notary Expires: 8-25-23



Ad#:0005105233  
P O : Legal Notice

# of Affidavits 1

This is not an invoice

*o Kim A  
Finance*



# **EVALUATION OF THE DEMONSTRATION**

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## **Attachment III**



## Attachment I: Mobility Demonstration Study

### Analyses and Results as of August 31, 2021

The Mobility Demonstration began in 2014 and allows households in public housing to move to PBV single-family, duplex, or multifamily units in low-poverty neighborhoods. The purpose of this study is to determine if a move out of public housing to a low-poverty neighborhood improves outcomes for households with children. RHA has partnered with Dr. Rebecca J. Walter at the University of Washington to analyze the data and outcomes for the Mobility Demonstration Study.

A within-subject design is used to compare household outcomes over time using administrative and American Community Survey (ACS) data (Table 1). Many of the households moved in public housing before the Mobility Demonstration Study was initiated and were enrolled in the study when they moved from public housing to a PBV unit. The household characteristics, household outcomes, and neighborhood characteristics assessed in this study are included in Table 1. The Wilcoxon Rank Sum Test was used instead of the Paired Samples T-Test since the data violates the assumption of normality, there are outliers in the data, and the sample size is small. The 2016 ACS 5-year Estimates were used for the neighborhood characteristics since a majority of the participants moved from public housing to a PBV unit in 2014.

Table 1. Variables

	Data Source	Data Type	Statistical Test
<b>Household Characteristics</b>			
Gender	Administrative	Categorical	Descriptive Statistics
Race	Administrative	Categorical	Descriptive Statistics
Ethnicity	Administrative	Categorical	Descriptive Statistics
Years in Public Housing	Administrative	Discrete	Descriptive Statistics
Head of Household Age	Administrative	Discrete	Descriptive Statistics
Household Size	Administrative	Discrete	Descriptive Statistics
Number of Adults in Household	Administrative	Discrete	Descriptive Statistics
Number of Children in Household	Administrative	Discrete	Descriptive Statistics
<b>Outcome Variables</b>			
Employment Status	Administrative	Categorical	McNemar
Annual Household Income	Administrative	Continuous	Wilcoxon
<b>Neighborhood Characteristics</b>			
Percent high school graduate or higher	ACS	Continuous	Wilcoxon
Percent bachelor's degree or higher	ACS	Continuous	Wilcoxon
Unemployment rate	ACS	Continuous	Wilcoxon
Median household income	ACS	Continuous	Wilcoxon
Percent of people in poverty	ACS	Continuous	Wilcoxon
Proportion of vacant housing units	ACS	Continuous	Wilcoxon
Proportion of single-family homes	ACS	Continuous	Wilcoxon
Owner occupancy rate	ACS	Continuous	Wilcoxon
Median home value	ACS	Continuous	Wilcoxon
Median gross rent	ACS	Continuous	Wilcoxon
Percent White	ACS	Continuous	Wilcoxon
Percent Hispanic or Latino	ACS	Continuous	Wilcoxon

Only households that participated in the study for at least one year were included in the study so within-subject analyses over time can be conducted. This resulted in 46 households being included in the analyses.





Households entered and exited the study at different times. There are 21 households that are currently enrolled in the study and 25 households that have exited the study (Table 2). Note that no exits occurred within the first year because participants are not included in the study until one year has passed so they can be compared over time.

Table 2. Sample Size and Number of Years of Participation in the Study

Participant Year	Count	Currently Enrolled	Exits
Year 1	46	2	0
Year 2	36	2	8
Year 3	27	4	7
Year 4	19	1	4
Year 5	14	1	4
Year 6	11	5	2
Year 7	6	6	0
Total		21	25

Of the 25 exits, over half of the exits from the mobility program have been voluntary self-sufficiency exits (Table 3). Within the second year after the move from public housing, some households voluntarily exited the program and were able to pay their rent in full on their own, while on the other hand, it took other households over five years to reach this point. There are 12 households currently enrolled in program that have been in it for at least five years. The sample size is too small to generalize an approximate period for how long the average non-elderly and/or non-disabled household needs housing assistance before they can afford housing without a subsidy.

Table 3. Reasons for Exiting the Program

Reason	Count	Percent
Deceased	1	4%
Program/Lease Violation	3	12%
Transferred to VOO	6	24%
Voluntarily Left Program	3	12%
Paying Full Rent/Purchased Home	12	48%
Total	25	100%

Many households in the study are White, non-Hispanic, and female-headed households that are single, divorced, or widowed (Table 4). The median number of years that households were in public housing before transferring to a PBV unit was four, with the range being from one to seventeen years. The median household age is thirty-six with the youngest head of household at the beginning of the study age 23 and oldest 63. The median household size is four and ranges from two to nine members (this study is specifically for families with children). The median number of adults per household is one while the median number of children is two (Table 4).

Table 4. Household Characteristics at Baseline ( $n=46$ )

		Count	Percent
Gender	Male	5	10.9%
	Female	41	89.1%
Race	White	36	78.3%
	Non-White	10	21.7%
Ethnicity	Hispanic or Latino	16	34.8%
	Non-Hispanic or Latino	30	65.2%
Marital Status	Married/Cohabiting	12	26.1%
	Single/Divorced/Widowed	34	73.9%
		Median	Range
Years in Public Housing		4	1 - 17
Head of Household Age		36	23 - 63
Household Size		4	2 - 9
Number of Adults in Household		1	1 - 4
Number of Children in Household		2	0 - 7

Although more heads of household are typically employed in PBV units compared to their tenure in public housing, the only year that there is a statistical difference in employment is Year 2 (Table 5).

Table 5. Employment Status

		Baseline Unemployed	Baseline Employed	$p$ -value <sup>1</sup>
Year 1 ( $n=46$ )	Unemployed	16	2	0.109
	Employed	8	20	
Year 2 ( $n=36$ )	Unemployed	12	1	0.039*
	Employed	8	15	
Year 3 ( $n=27$ )	Unemployed	8	1	0.125
	Employed	6	12	
Year 4 ( $n=19$ )	Unemployed	4	2	0.289
	Employed	6	7	
Year 5 ( $n=14$ )	Unemployed	3	2	0.688
	Employed	4	5	
Year 6 ( $n=11$ )	Unemployed	5	0	----- <sup>2</sup>
	Employed	1	5	
Year 7 ( $n=6$ )	Unemployed	2	0	----- <sup>2</sup>
	Employed	2	2	

\*  $p < 0.05$ ; <sup>1</sup>The exact  $p$ -value is calculated based on a binomial distribution because there are 25 or fewer records in at least one cell. <sup>2</sup>No value is reported because each group must have a minimum of one to conduct a statistical comparison.



Annual household income is statistically significantly higher from baseline compared to every year recorded after baseline (Years 1 through 7) for households that moved from public housing to PBV units (Table 6). The median household income increased after each subsequent year following baseline except in Year 4 where it decreases but remains statistically significantly higher than baseline.

Table 6. Annual Household Income

	Baseline Median	Comparison Year Median	Median Difference	Z
<i>Annual Household Income</i>				
Year 1 (n=46)	\$15,738	\$19,091	\$3,353	-3.065**
Year 2 (n=36)	\$14,496	\$19,297	\$4,801	-3.172**
Year 3 (n=27)	\$15,622	\$23,081	\$7,459	-3.060**
Year 4 (n=19)	\$15,853	\$20,952	\$5,099	-2.415*
Year 5 (n=14)	\$14,612	\$24,281	\$9,670	-2.417*
Year 6 (n=11)	\$13,370	\$26,899	\$13,529	-2.934**
Year 7 (n=6)	\$19,887	\$37,529	\$17,643	-2.201*

\* p < 0.05; \*\* p < .01; \*\*\* p < .001

For neighborhood characteristics of public housing compared to PBV unit location, there are statistically significant differences in all neighborhood characteristics except for the owner occupancy rate. Educational attainment, median household income, and median home value are all statistically significantly higher in PBV neighborhoods compared to public housing neighborhoods. In the neighborhoods where PBV units are located, the poverty rate, unemployment rate, and proportion of vacant housing units are statistically significantly lower than the neighborhoods where public housing is located. Additionally, in PBV neighborhoods, there are statistically significantly higher proportions of single-family homes and rent rates. In the PBV neighborhoods, there is a higher percentage of White households and less Hispanic or Latino households than in the public housing neighborhoods (Table 7).

Table 7. Neighborhood Characteristics (n=46)

	Public Housing Median	PBV Median	Median Difference	Z
Percent high school graduate or higher	65.2%	91.2%	26.0%	-5.163***
Percent bachelor's degree or higher	14.95%	26.2%	11.3%	-5.060***
Unemployment rate	9.3%	5.3%	-4.0%	-4.197***
Median household income	\$25,545	\$52,008	\$26,463	-4.409***
Percent of people in poverty	40.1%	12.9%	-27.2%	-5.907***
Proportion of vacant housing units	8.6%	8.4%	-0.2%	-4.351***
Proportion of single-family homes	45.0%	60.9%	15.9%	-3.229**
Owner occupancy rate	44.8%	53.4%	8.6%	-1.530
Median home value	\$100,800	\$164,450	\$63,650	-5.513***
Median gross rent	\$823	\$998	\$175	-2.195*
Percent White	68.9%	83.5%	14.6%	-4.136***
Percent Hispanic or Latino	51.6%	27.1%	-24.6%	-4.541***

\* p < 0.05; \*\* p < .01; \*\*\* p < .001



For neighborhoods where PBV units are located compared to the Reno Metropolitan Area, neighborhood characteristics throughout Reno are comparable to the neighborhoods where households moved into PBV units (Table 8). The only major differences are the unemployment rate and median home value, which are both lower in neighborhoods where PBV units are located compared to Reno Metropolitan Area.

Table 8. Neighborhood Characteristics in PBV Neighborhoods Compared to Reno Metro Area (*n*=46)

	<b>Reno</b>	<b>PBV Units</b>
Percent high school graduate or higher	87.1%	91.2%
Percent bachelor's degree or higher	28.9%	26.2%
Unemployment rate	8.0%	5.3%
Median Household Income	\$55,103	\$52,008
Percent of people in poverty	14.9%	12.9%
Proportion of vacant housing units	10.0%	8.4%
Proportion of single-family homes	59.9%	60.9%
Owner occupancy rate	57.1%	53.4%
Median home value	\$236,300	\$164,450
Median gross rent	\$917	\$998
Percent White	84%	83.5%
Percent Hispanic or Latino	23.4%	27.1%



# **LOBBYING DISCLOSURES**

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## **Attachment IV**



**Certification of Payments  
to Influence Federal Transactions**

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Housing Authority of the City of Reno

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration Program

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

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

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

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

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

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

Name of Authorized Official

Heidi McKendree

Title

Interim Executive Director

Signature

Date (mm/dd/yyyy)

3/22/22

Previous edition is obsolete

form HUD 50071 (01/14)




**DISCLOSURE OF LOBBYING ACTIVITIES**

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		<b>2. Status of Federal Action:</b> <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: NV-02			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:		
<b>6. Federal Department/Agency:</b> Department of Housing and Urban Development			<b>7. Federal Program Name/Description:</b> Moving to Work Demonstration Program CFDA Number, if applicable: _____		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI): N/A			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI): N/A		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u></u> Print Name: <u>Heidi McKendree</u> Title: <u>Interim Executive Director</u> Telephone No.: <u>(775) 329-3630</u> Date: <u>3/22/22</u>		
<b>Federal Use Only:</b>				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	