

Annual Plan 2025



MTW

Local • Innovative • Solutions



RENO HOUSING AUTHORITY

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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.

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SECTION 1

INTRODUCTION





I. Introduction

A. 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 Public Housing (PH) operating fund, Capital Fund Program (CFP) and Housing Choice Voucher (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.

B. 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. The executed agreement 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.

C. FY 2025 MTW Annual Plan overview

FY 2025 (i.e., the period from July 1, 2024 through June 30, 2025) will be RHA’s twelfth 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 2025 MTW Annual Plan, including each of the proposed/amended activities and ongoing PH repositioning strategies, during Resident Advisory Board and Resident Council meetings in January 2024. Public review and comments are then solicited prior to consideration and approval by RHA’s Board of Commissioners. Following approval from the Board of Commissioners, RHA’s FY 2025 MTW Annual Plan is submitted to HUD for review.¹

D. Overview of RHA’s annual goals and objectives

During its eleven 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 the PH and the HCV program, implementing true triennial recertifications for elderly/disabled participants on fixed incomes and waiving rent reasonableness determinations under certain conditions in the HCV program. 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 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 2025 MTW activities

RHA is proposing/reproposing the following MTW activities in FY 2025:

- ***Reduce Interim Recertifications***
RHA is proposing to eliminate interim recertifications due to an increase in household income unless requested under certain circumstances.

- ***Landlord Incentive Program***
RHA is reproposing this activity to allow for a vacancy loss payment if the unit passes Housing Quality Standards (HQS) on the first inspection and to extend the length of time that the initial inspection results are valid from 45 days to 90 days.

¹ Additional details on RHA’s public process can be found in Section VI of this plan and the accompanying attachments.



In addition, RHA is amending the following activity in FY 2025 which was previously approved by HUD:

- *Simplify rent calculations and increase the minimum rent*
RHA is amending this activity to allow HCV participants and PH residents with less than \$50,000 in assets to submit a self-certification as to the value and the amount of expected income.

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 December 2023, RHA’s Board of Commissioners identified several goals for the agency in the coming year. In FY 2025, leadership will work to:

- Continue to explore ways that RHA can increase the amount of affordable housing provided.
- Become an integral part of the community.
- Make data driven decisions.
- Increase opportunities for current and future PH residents/HCV participants to break the cycle of poverty.
- Promote health and wellness with current and future PH residents/HCV participants.

RHA continues to review its portfolio analysis which was updated in FY 2024 based on information provided through a capital needs assessment. This review identified ways RHA could sustain its housing portfolio over time. Repositioning strategies were identified, and applications were submitted to HUD for Rental Assistance Demonstration (RAD) repositioning at Silverada Manor and Section 18 Demolition/Disposition at Hawk View Apartments.

Repositioning options continue to be considered for RHA’s six other PH sites. Over the next several years, the following repositioning strategies may be considered for RHA’s remaining PH properties:

Property Name	AMP	# of Units	Repositioning Strategy
Stead Manor	NV39-P001-006	67	RAD
Essex Manor	NV39-P001-009	105	RAD
John McGraw Court	NV39-P001-018	34	RAD
Mineral Manor	NV39-P001-001	144	Section 18 Demolition/ Disposition
Tom Sawyer Village	NV39-P001-002	100	Section 18 Demolition/ Disposition
Myra Birch Manor	NV39-P001-010	56	RAD



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:

- 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.
- Continue to work toward increasing staff efficiencies by fully implementing an Electronic Document Management System (EDMS) that will manage the use and storage of documents created throughout the organization.
- Fully implement additional modules available in the new software system to further automate workflows and streamline agency operations.

SECTION 2

**GENERAL OPERATING
INFORMATION**

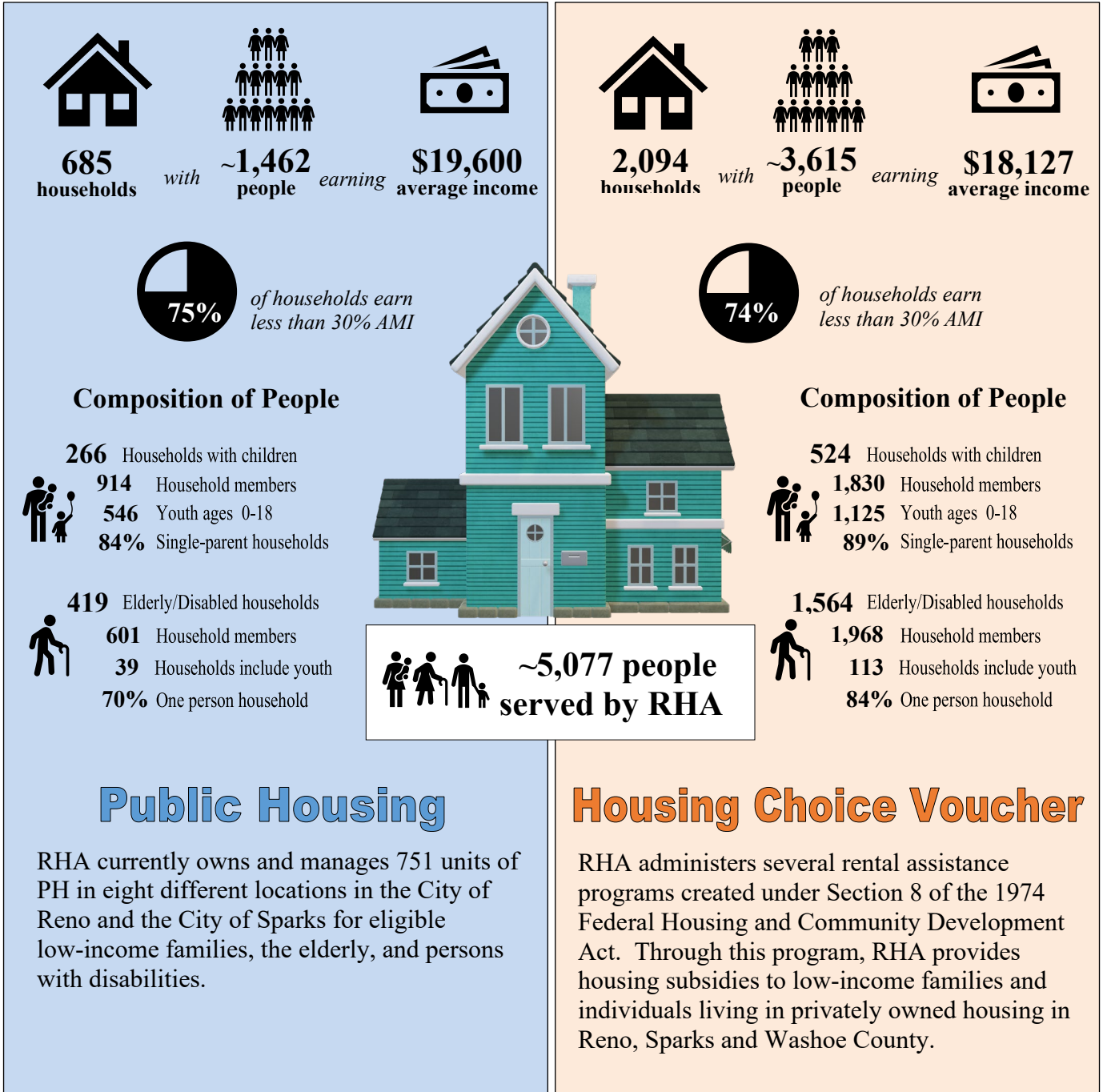




II. General Operating Information

RHA's Housing Assistance Programs

On January 1, 2024, RHA was providing housing assistance to 2,779 active households through its PH and HCV programs.²



Public Housing

RHA currently owns and manages 751 units of PH in eight different locations in the City of Reno and the City of Sparks for eligible low-income families, the elderly, and persons with disabilities.

Housing Choice Voucher

RHA administers several rental assistance programs created under Section 8 of the 1974 Federal Housing and Community Development Act. Through this program, RHA provides housing subsidies to low-income families and individuals living in privately owned housing in Reno, Sparks and Washoe County.

² Number of active households indicated here does not include VASH, FYI or EHV participants. The number of active households depicted here is lower than previous years as RHA's new software reports active households differently.



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. RHA was also awarded 137 Emergency Housing Vouchers (EHV) to assist unsheltered community members with housing and 15 vouchers through the Foster Youth to Independence (FYI) Program.

Utilizing the Neighborhood Stabilization Program (NSP) and other identified funding sources, RHA acquired over 200 scattered site properties throughout the local area; 166 of these are still a part of the agency’s housing portfolio. While some of these scattered site rental properties are leased to higher income families, the majority are specifically allocated to house very low-income households. In addition to these PH and scattered site units, RHA owns nine unaided multi-family housing properties that provide an additional 376 affordable housing units and one LIHTC property providing 44 units of affordable housing to seniors. Working with a private property manager, RHA ensures that many of these properties are leased 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 2025.

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
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* 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 been exploring all options to reposition its PH portfolio including RAD and Section 18 Demolition/Disposition. RHA submitted an application under RAD/Section 18 for Silverada Manor and an application under Section 18 for Hawk View Apartments. Although no additional applications have been submitted, RHA continues to explore repositioning strategies for its other six PH properties.

A “substantial amendment” was submitted with the FY 2024 MTW Annual Plan, which captured the proposed changes to the PH portfolio. This includes identifying the planned PH units to be removed and the number of new PBVs to be assigned.

In FY 2025, RHA plans to remove the following PH units:

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Hawk View Apartments NV39P001007	99	In FY 2024, RHA submitted an application for Section 18 Demolition/Disposition on this property.
Silverada Manor NV39P001003	149	In FY 2024, RHA submitted an application to convert all units at this property to PBV utilizing RAD and a Section 18 Blend.
TOTAL: Public Housing Units to be removed in the Plan Year	248	

iii. Planned New Project-Based Vouchers

In FY 2025, RHA anticipates project-basing the following properties pursuant to the agency’s repositioning strategies. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. 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
Hawk View Apartments	99	N	PH general occupancy site that is being repositioned through Section 18 Demolition/Disposition.
Silverada Manor	149	Y	PH general occupancy site that will be repositioned using RAD PBV/Section 18 Blend.
Privately Owned Properties	50	N	Privately owned properties will be assigned PBVs through a competitive process.
VASH PBV	137	N	Private and agency owned properties are assigned VASH PBVs.
TOTAL:	435		



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	19	Leased/Issued	No	PH tenants in good standing are being allowed to move to RHA’s scattered site properties on a PBV.
Single-Family Home Project-Based Vouchers	12	Leased/Issued	No	RHA has several single-family homes which are shifted to a PBV if/when the unit becomes vacant.
Yorkshire Terrace	11	Leased/Issued	No	RHA has assigned PBVs to units at Yorkshire Terrace, a 30-unit Low Income Housing Tax Credit (LIHTC) property.
Partnerships	5	Leased/Issued	No	RHA has formalized agreements with nonprofit community partners and property owners to provide affordable housing.
Willie J. Wynn Apartments	12	Leased/Issued	No	Affordable housing development designed specifically to support seniors aging in place.
Privately Owned Partnerships	38	Leased/Issued	No	Privately owned properties being assigned PBVs through a competitive process.
Pilgrims Rest	7	Leased/Issued	No	Privately owned senior complex managed by RHA.
VASH PBV	31	Leased/Issued	No	Privately owned properties have been assigned VASH PBVs.
TOTAL:	135			

* 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 and/or acquire additional affordable housing units to provide additional housing choice to low-income families through RHA’s various programs. Furthermore, if presented with a feasible opportunity, RHA plans to acquire land for future affordable housing development.

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 to work on the following capital projects in FY 2025. These 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:

- Mineral Manor: site improvements and ADA accessible entries: \$85,317
- Tom Sawyer Village: landscape and site improvements: \$107,000
- Silverada Manor: relocation and predevelopment activities: \$842,000
- Stead Manor: relocation and predevelopment activities: \$598,000
- Hawk View Apartments: relocation and predevelopment activities: \$358,000
- Myra Birch Manor: appliance repairs and replacements, and a dumpster enclosure: \$90,000
- John McGraw Court: relocation and predevelopment activities: \$ 206,578



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 ³
MTW Housing Choice Vouchers (HCV) Utilized	27,936	2,328 ⁴
Local, Non-Traditional: Tenant-Based [^]	0	0
Local, Non-Traditional: Property-Based [^]	516	43 ⁵
Local, Non-Traditional: Homeownership [^]	0	0
Planned Total Households Served:	37,128	3,094

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	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.

³ RHA has 751 ACC units. Lease up is not anticipated to drop below 723 units, or 97% of the MTW baseline of 745. If/when RHA is approved for a RAD conversion, the actual number of households served may fall below the number planned as units are held to accommodate the conversion process.

⁴ RHA has 2,547 ACC Housing Choice Vouchers. Although our goal is 100% of the established baseline of 2,477, RHA anticipates leasing this program at 94% in the coming year.

⁵ 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. During colder months, they accommodate more than 20 youth by utilizing cots within the drop in shelter.



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	<p>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. As of January 1, 2024, this program was leased at 91.95% of the MTW baseline and is currently on track to maintain this lease up figure. Although there are currently no anticipated leasing issues in this program, RHA has held several units vacant as the agency prepares to reposition two of its PH sites. Currently 36 units are being held for this purpose.</p>
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 2023, RHA leased this program steadily around 91% of the MTW baseline. To maintain lease up numbers within its HCV program, RHA continued to monitor its payment standards to ensure they are accurately reflecting local market conditions, expanded its Landlord Incentive Program, and implemented a “lease in place” preference. RHA also adopted Exception Payment Standards for 12 specific zip codes throughout the Truckee Meadows where rents were unaffordable based on RHA’s traditional payment standards. Staff anticipates that the adoption of these small area payment standards will facilitate leasing in low-poverty neighborhoods and increase housing choice for RHA’s voucher holders. To further assist the lease up of this program, RHA hired a Landlord Liaison. The Landlord Liaison serves as the primary point of contact for anything landlord related and works to promote the HCV program to new landlords while retaining existing landlords throughout Washoe County.</p>
Local, Non-Traditional	<p>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.</p>



C. Wait List Information

The following table reflects RHA’s wait list information as of January 22, 2024.

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
Essex 2BR	General Occupancy PH site, 2 bedrooms	2,158	Closed	If needed
Essex 3BR	General Occupancy PH site, 3 bedrooms	761	Closed	If needed
Hawk View 2 BR	General Occupancy PH site, 2 bedrooms	2,159	Closed	If needed
HCV	Housing Choice Voucher	2,509	Closed	If needed
McGraw 1BR	General Occupancy PH site, 1 bedroom	622	Closed	If needed
Mineral 1BR	General Occupancy PH site, 1 bedroom	898	Closed	If needed
Mineral 2BR	General Occupancy PH site, 2 bedrooms	2,159	Closed	If needed
Mineral 3BR	General Occupancy PH site, 3 bedrooms	762	Closed	If needed
Mineral 4BR	General Occupancy PH site, 4 bedrooms	134	Closed	If needed
Myra 2BR	General Occupancy PH site, 2 bedrooms	2,157	Closed	If needed
PBV 1BR	Project Based Voucher, 1 bedroom	954	Closed	If needed
PBV 2BR	Project Based Voucher, 2 bedrooms	401	Closed	If needed
PBV 3BR	Project Based Voucher, 3 bedrooms	164	Closed	If needed
PBV 4BR	Project Based Voucher, 4 bedrooms	37	Closed	If needed
PBV Pilgrim Rest	Senior/Disabled PBV Complex	133	Closed	If needed
Silverada 0BR	General Occupancy PH site, 0 bedroom	726	Closed	If needed
Silverada 1BR	General Occupancy PH site, 1 bedroom	622	Closed	If needed
Silverada 2BR	General Occupancy PH site, 2 bedrooms	160	Closed	If needed



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
Stead 2BR	General Occupancy PH site, 2 bedrooms	2,250	Closed	If needed
Stead 3BR	General Occupancy PH site, 3 bedrooms	773	Closed	If needed
Tom Sawyer 0BR	General Occupancy PH site, 0 bedroom	726	Closed	If needed
Tom Sawyer 1BR	General Occupancy PH site, 1 bedroom	621	Closed	If needed
Tom Sawyer 2BR	General Occupancy PH site, 2 bedrooms	160	Closed	If needed

Please describe any duplication of applicants across waiting lists:

With RHA’s software conversion, all clients on current PH waiting lists were transferred to each of RHA’s new site-based waiting lists based on bedroom size. This describes the current duplications of applicants across waiting lists, however, at the time of application, clients may apply for all open waiting lists. The number of households reported will continue to reflect 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 will be opened and closed as needed.

SECTION 3

**PROPOSED MTW
ACTIVITIES**





III. Proposed MTW Activities

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.

RHA is proposing the following MTW activities in FY 2025:

2025-01: Reduce Interim Recertifications

A. Activity Description

Currently, RHA processes an interim recertification whenever a PH resident or HCV participant reports an increase or decrease in income or assets, when a change in family composition occurs or when a landlord in the HCV program requests a contract rent increase and/or decrease. In any given year, this can result in an excessive number of interim reviews. For RHA staff, having to process an interim recertification shortly after a recent annual or new admission can become overly burdensome and time-consuming. Additionally, for RHA's families, the interim review process can serve as a deterrence to increasing household income as any increase in income ultimately results in an increase in rent.

In FY 2025, RHA proposes to implement an activity to reduce the number of interim recertifications resulting in increased staff productivity while also encouraging PH residents and HCV participants to increase household income without adversely affecting rent. Following implementation of this activity, RHA will no longer process or require PH residents or HCV participants to report increases in household income until the household's next annual recertification. However, RHA will process interim recertifications and redetermine rent in both programs under the following circumstances:

- Any decrease in household income,
- Workforce Development Program participants with a signed contract of participation can request an interim to update the amount being contributed to their escrow accounts,
- When increased income would allow a new unit to meet affordability standards when a transfer and/or move is requested,
- Any change in family composition,
- When a contract rent increase or decrease is submitted by the landlord.

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

This activity will reduce costs and achieve greater cost effectiveness.

Anticipated impact of the proposed MTW activity on the stated objective

RHA anticipates that limiting interim recertifications will result in reduced administrative costs for the agency overall. As RHA will no longer process interim recertifications when a household



experiences an increase in income, the Enterprise Income Verification (EIV) New Hire Report and the corresponding Income Validation Tool will only be reviewed during the household’s annual recertification further reducing the amount and cost of staff time involved.

Anticipated schedule for implementing the proposed activity

Following HUD’s approval of this plan, RHA will update its Administrative Plan for Section 8 Housing Choice Voucher, Project Based Voucher, and Moderate Rehabilitation (Admin Plan) and its Admission and Continued Occupancy Policies (ACOP) to reflect the change in interim recertifications based on this policy.

B. Activity Metrics

The following Standard HUD Metrics were identified and will be tracked for this activity:

2025-01 CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmark
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 to complete interim recertifications due to an increase in household income.	\$21,518 ⁶ PH: \$10,485.72 HCV: \$11,032.28	

2025-01 CE #2: Staff Time Savings		
Unit of Measurement	Baseline	Benchmark
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 total staff time dedicated to the task after implementation of the activity (in hours).
Total number of staff hours to complete interim recertifications due to an increase in household income.	754.64 hours PH: 350.4 hours HCV: 404.24 hours	

Data source from which the metric data will be compiled

RHA will utilize its internal software system to process interims due to one of the circumstances noted in the activity description.

⁶ Baseline figures are based on interim recertifications processed throughout FY 2023.



C. Cost Implications

The following cost are incurred for each interim recertification processed by RHA throughout the year:

Time and cost incurred in processing an Interim Recertification							
PH Program				HCV Program			
	Material	Time	Labor		Material	Time	Labor
Cost for Asset Manager	\$4.86	2.40 hours @ \$27.90/hour	\$66.96	Cost For Housing Specialist	\$2.63	2.04 hours @ \$25.86/hour	\$52.75
Cost for Office Clerk				Cost for Office Clerk	\$6.34	1.22 hours @ \$22.34/hour	\$27.25
Total	\$4.86		\$66.96	Total	\$8.97		\$80.00
Total Cost per Client:			\$71.82	Total Cost per Client:			\$88.97

In addition to the per client costs noted, RHA spends approximately 42 hours per month in the HCV Program and 30.097 hours per month in the PH Program reviewing EIV New Hire Report and requesting verifications from employers. Although not included in the metric above, the following costs are also incurred each month for all activities related to this report:

Time and cost incurred to review EIV New Hire Report							
PH Program				HCV Program			
	Material	Time	Labor		Material	Time	Labor
Time to review each month		1.433 hours per month @ \$27.90/hour	\$39.99	Time to review each month		2.04 hours per month @ \$25.86/hour	\$51.72
Cost to send verifications each month	\$69.64	28.66 hours per month @ \$27.90/hour	\$799.61	Cost to send verifications each month	\$92.69	40 hours per month @ \$25.86/hour	\$1,034.40
Total	\$69.64		\$839.60	Total	\$92.69		\$1,086.12
Total Monthly Cost:			\$909.24	Total Monthly Cost:			\$1,178.81

Following implementation of this activity, RHA anticipates an annual savings of \$46,986.39.

D. Need/Justification for MTW Flexibility

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

This activity requires the following authorizations to allow RHA to eliminate and/or reduce the number of interim recertifications due to an increase in household income.

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. *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.*

C.11 *Rent Policies and Term Limits*

The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rents in public housing including but not limited to establishing definitions of income and adjusted income or earned income disallowance that differ from those in current statutes or regulations. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A), and Section 6(l) of the 1937 Act and 24 CFR §§5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A.

D. Authorizations Related to Section 8 Housing Choice Vouchers Only

D.1. *Operational Policies and Procedures*

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 implementation regulations. *This authorization waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR §982.518.*

D.2. *Rent Policies and Term Limits*

D.2.a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR §§982.503, 982.508, and 982.518.



Rent Reform Information

Impact Analysis

Throughout FY 2023, RHA processed 1,850 interim recertifications for HCV participants and 428 interim recertifications for PH residents.

FY 2023 Interim Recertifications		
	HCV Program (# processed)	PH Program (# processed)
Contract Rent Increase	1,113	0
Update Information Form submitted	389	361
Finalize prior interim/annual recertification	248	0
Admin error, misc., etc.	100	67
Total	1,850	428

Through this activity, RHA intends to simplify the interim recertification requirements to avoid confusion for RHA staff and decrease some of the administrative burden required daily. If this activity had been implemented in FY 2023, RHA would have avoided processing 124 interims within the HCV Program and 146 interims within the PH Program. Furthermore, once the regulation changes contained in the Housing Opportunities Through Modernization Act (HOTMA) become required, many of the interim recertifications related to increases in income will no longer be processed making the impact of this activity overall minimal.

Hardship Case Criteria

RHA anticipates that this policy change will be extremely positive for all HCV participants and PH residents. RHA is allowing for those who may be otherwise impacted by this policy (i.e., WFD participants with a current contract of participation) to request an interim reexamination any time they experience an increase 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 households in any way, RHA will request/propose additional modifications to the policy.

Transition Period

RHA does not anticipate a transition period beyond the anticipated implementation schedule related to this activity.



2018-01: Landlord Incentive Program

Activity Description

This activity was approved and implemented in FY 2018. It was amended in FY 2020 and FY 2024 to expand upon the conditions for qualification and allow for additional incentives including a referral bonus and a re-lease bonus.

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 and FY 2024. 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. In addition, RHA allows for one additional month of HAP to be paid to landlords regardless of the actual move-out date of the participant. In FY 2024, RHA received approval to pay one additional month of the actual full contract rent amount rather than the HAP amount automatically. Although RHA continues to pay landlords one additional month of their HAP amount, if requested, this amount may be adjusted to the full contract rent amount based on current rental market conditions, budget availability, and RHA's voucher utilization rate.

In FY 2024, RHA expanded the Landlord Incentive Program to provide landlords with a \$500 re-lease bonus and a \$1,000 referral bonus. Based on this expansion, current HCV landlords who sign a HAP contract to lease the same unit to another HCV program participant, will automatically receive a \$500 re-lease bonus. In addition, current landlords who refer a new landlord to the HCV program will be eligible for an automatic referral bonus. To qualify for the referral bonus, the new landlord must be one who has never leased to one of RHA's HCV program participants before.

This activity is being repropose in FY 2025 to provide a vacancy loss payment if the unit passes HQS on the first inspection and allow for an extension to the actual length of time that the initial inspection results are valid for, from 45 days to 90 days.

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

Vacancy loss payments are limited to units that pass HQS on the first inspection and are considered an MTW Voucher or Special Purpose Voucher (Non-MTW Voucher) as noted in the Cost Implication section of this activity. The payment is designed to cover the time between RHA's receipt of a Request for Tenancy Approval (RFTA) and the actual lease date by the tenant.

Implementation of this activity is expected to increase housing choice for low-income families by providing an incentive for landlord participation within the HCV program. However, to ensure landlords can maintain equal housing opportunities for all low-income households and follow existing lease-up procedures, RHA will not require landlords to rent to another voucher holder to qualify for any aspect of the Landlord Incentive Program.

Anticipated schedule for implementing the proposed activity

Following HUD's approval of this plan, RHA will update its Administrative Plan for Section 8 Housing Choice Voucher, Project Based Voucher, and Moderate Rehabilitation (Admin Plan) to allow for a vacancy loss payment and increase the length of time that the inspection results are



valid for. RHA will notify current and potential landlords of the change to the activity. Notification will include the steps to be taken to request and ensure receipt of any of the benefits provided through the Landlord Incentive Program.

Activity Metrics

The following Standard HUD Metrics were identified when this activity was proposed and approved in FY 2018. This metric will continue to be tracked.

<i>2018-01 HC #2: Units of Housing Preserved</i>		
Unit of Measurement	Baseline	Benchmark
Number of new housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation of the activity (number).	Expected housing units preserved after implementation of the activity (number).
Number of housing units preserved for households at or below 80% AMI.	19	31 ⁷

Cost Implications

Throughout FY 2023, RHA received 656 RFTAs of which 455 passed HQS on the first inspection, 92 passed HQS following multiple inspections, 34 were not processed for various reasons, and 75 remained in process.

The following table details the number of units which passed HQS following the first inspection broken out by voucher increment. It also details the average number of days from RFTA submittal to lease and the potential cost implications once this activity is implemented:

MTW Vouchers			
Voucher increment	# of units that passed on first inspection	Average # of days from RFTA to lease	Potential cost for Vacancy Loss Payments
V00	292	25.19	\$308,018
MS1	2	41	\$3,783
TOTAL			\$311,801

⁷ Of the 126 move outs that would have been eligible to receive this proposed incentive, 19 of these landlords leased their units to another HCV participant. This number is expected to increase by 25%.



Special Purpose Vouchers (Non-MTW Voucher)⁸			
Voucher increment	# of units that passed on first inspection	Average # of days from RFTA to lease	Potential cost for Vacancy Loss Payments
EHV	48	23.54	\$44,451
FYI	4	27	\$3,058
VET	83	22.51	\$68,128
VSH	1	58	\$2,051
TOTAL			\$117,688

As RHA works to increase landlord participation and promote the affordable housing needs of the local community, single fund flexibility may be utilized to provide additional outreach, including, but not limited to, additional staff and resources.

Need/Justification for MTW Flexibility

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

To implement this activity, the following authorizations are needed:

D. Authorizations Related to Section 8 Housing Choice Vouchers Only

D.1. *Operational Policies and Procedures*

D.1.a. The Agency is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. However, any revised HAP contract must include language noting that the funding for the contract is subject to the availability of Appropriations. *This authorization waives certain provisions of Sections 8(o)(7) of the 1937 Act and 24 CFR §982.162.*

D.1.d. The Agency is authorized to determine a damage claim and/or vacancy loss policy and payment policy for occupied units that differs from the policy requirements currently mandated in the 1937 Act and its implementing regulations. Damage and vacancy authority are subject to state and local laws. *This authorization waives certain provisions of Section 8(o)(9) of the 1937 Act and 24 CFR §982.311.*

D.5. *Ability to Certify Housing Quality Standards*

The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. The Agency is also authorized to perform HQS inspections on PHA-owned HCV and PBV units in lieu of the independent inspection

⁸ Although special purpose vouchers are not part of the MTW flexibility, they do take advantage of specific MTW activities based on program needs and should be considered in the overall cost of the proposed the activity. Furthermore, as vacancy loss payments can be built into the HAP contract for the PBV unit, they have not been considered for this part of the Landlord Incentive Program.



requirements. *This authorization waives certain provisions of Section 8(o)(8) and 8(o)(11) of the 1937 Act, 24 CFR §§982.352(b) and 982, Subpart I.*

Need/Justification for MTW Flexibility:

The authorizations cited allow RHA to pay an additional amount of HAP to HCV landlords as an incentive for their continued participation in the program. The authorizations allow RHA to insert additional language into the HAP contract for an additional one-time payment provision, if needed. These additional HAP payments can be used at the discretion of landlord to cover either a vacancy loss payment or damage claim. Furthermore, the authorizations allow RHA to extend the length of time that the initial inspection is valid from 45 days to 90 days.

SECTION 4

**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
2014-02	Mobility Demonstration	2014	Increase housing choice for low-income families <i>and</i> 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 amended 2024	Reduce costs and achieve greater cost effectiveness <i>and</i> create incentives for families to work, seek work or prepare for work.	Attachment C Sections C.4., C.11, D.2.a., and D.3.b.
2014-06	Triennial recertifications for elderly/disabled participants on fixed incomes	2014 amended 2015 amended 2017 amended 2018 amended 2023	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.4. and D.1.c.
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.
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.
2016-02	Redefine near-elderly person	2016 amended 2020	Increase housing choices for low-income families.	Attachment C Section C.2. and D.4.
2016-05	Eliminate Earned Income Disallowance (EID)	2016	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
2016-06	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.
2017-01	Increase verified application data for HCV applicants	2017	Reduce costs and achieve greater cost effectiveness <i>and</i> 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.
2019-01	Redetermination of rent reasonableness as a result of a change in contract rent	2019 amended in 2024	Reduce costs and achieve greater cost effectiveness <i>and</i> increase housing choices for low-income families.	Attachment C Section D.2.c.
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)



Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2022-01	Workforce Development Program	2022 amended 2023	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E
2024-02	Local Project Based Voucher Program	2024	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choice for low-income families.	Attachment C Sections B.4, D.1.b., D.1.e., D.2.b., D.4., D.5., D.7.a., D.7.b., D.7.c., and D.7.d.



2014-02: Mobility Demonstration

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 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, 52 PH families with children have moved to properties located in low-poverty census tracts, 16 of whom are still participating in the demonstration. Overall, this activity has been successful with 42% or 22 families having successfully transitioned off housing assistance. One additional household is currently paying full contract rent, expected to become self-sufficient and move off the program in the coming year.

This activity will remain ongoing in FY 2025.

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.

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

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

This activity was approved and implemented in FY 2014. It was amended in FY 2024 to increase the minimum rent to \$100.

Description

Currently, 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.

In FY 2024, RHA raised the minimum rent from \$75 to \$100 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 2025.



Planned Changes

Similar to upcoming changes in income calculations based on new HOTMA regulations, RHA proposes to allow households with assets less than \$50,000 to submit a self-certification as to the value of the asset in FY 2025. Applicants will continue to be asked to provide a well-documented baseline asset value at the time of application or recertification, but RHA staff will only verify and calculate income on assets if the value totals more than \$50,000.

RHA does not anticipate any additional 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.

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

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

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. This activity was amended further in FY 2023 to allow for adjustments to the HCV payment standard to be applied to the family’s rent calculation once a rent increase is initiated by the participant’s landlord and processed by RHA.

Description

Elderly and/or disabled PH residents and HCV participants on fixed incomes now have recertifications on a triennial schedule rather than annually as the change in the amount of rent RHA receives from these stable income households from year to year is negligible. 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. Furthermore, any changes to RHA’s payment standards are now processed at the time a rent increase is initiated by the landlord rather than waiting for the household’s scheduled triennial recertification.

Status/Update

This activity will remain ongoing in FY 2025.

Planned Changes

RHA does not anticipate any additional 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

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

RHA reviews its simplified utility allowance schedules annually to ensure its feasibility with the changing rental market. As the region's rental market tightened, landlords began requiring tenants to pay more utilities such as water, sewer, and trash. To reduce the financial burden on HCV participants, RHA revised its simplified utility allowance schedule to cover the cost of these additional utilities.

This activity will remain ongoing in FY 2025.

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.

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

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 2025.

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.

2016-01: Simplification of medical deductions

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 2025.

Planned Changes

RHA reviews and adjusts the standardized medical deduction table frequently to determine its overall viability for program participants. After reviewing the Medicare premiums for 2023, RHA proposes to adjust only the annual income tier ranges for households receiving RHA’s standardized medical deduction in FY 2025. The following table reflects RHA’s updated income tiers and corresponding medical deductions based on the household’s total gross income:

Gross Annual Income Range	Proposed Annual Medical Deduction
\$1 - \$14,819	\$0
\$14,820 - \$19,919	\$1,700
\$19,920 +	\$2,915

RHA does not anticipate any additional 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

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” when allowing their admission from the waiting lists. By redefining near-elderly and allowing these households to be treated as “elderly” for admission, the affordable housing opportunities for these individuals increased.

Status/Update

This activity will remain ongoing in FY 2025.

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)

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 2025.

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

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 2025.

Planned Changes

If the policy change outlined in *2025-01: Reduce Interim Recertifications* is approved, RHA will no longer process interim recertifications when one of these eligible PH household members



reaches 21 years of age until the household's next annual recertification. As many of these households will no longer require an interim recertification based on an increase in income, this activity may be closed out in the FY 2024 Annual MTW Report.

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

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 2025.

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.



2017-01: Increase verified application data for HCV applicants

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 2025.

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

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 2025.

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

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

This activity was approved and implemented in FY 2019. It was amended in FY 2024, to allow for the automatic approval of a CRI without a rent reasonableness redetermination if the requested rent change amount does not exceed RHA's payment standards.

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 2023, RHA processed 1,379 rent change requests of which 371 or 27% 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 deemed necessary by RHA.

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 Zillow, the median rent price in Reno for all bedrooms and all property types for January 2024 is \$1,775⁹. This is \$320 less than January 2023. With current rental market conditions in mind, 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 2025.

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

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,

⁹ <https://www.zillow.com/rental-manager/market-trends/reno-nv/>



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 2025.

Planned Changes

If the policy change outlined in *2025-01: Reduce Interim Recertifications* is approved, RHA will no longer process interim recertifications. As a result, RHA will no longer require these households to self-certify increases to income.

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

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

RHA utilizes this activity for the development of affordable housing units in Washoe County. Use of MTW funding flexibility related to the following developments have been committed through a Resolution adopted by RHA's Board of Commissioners.



Carville Court Redevelopment

Carville Court is an existing RHA owned property consisting of three 2-unit duplexes located at 1245-1259 Carville Dr, Reno, NV. It was built in 1963 and purchased by RHA in 1997. Two of the three duplexes are currently occupied. Following the permanent relocation of existing tenants, the existing building will be demolished and replaced with a 2-story walk-up with 11 residential units (1BD/1BR), a community room, and on-site offices for property management and supportive services staff. The development budget as of September 2023 is \$4,649,491. The funding source is currently MTW Block Grant funds, but RHA is actively pursuing other funding and intends to close on the project with multiple sources. Construction is estimated to begin in January of 2025.

Redevelopment of the Carville Court property will enable RHA to bring more affordable housing units into the community. Additionally, RHA will project-base 11 Housing Choice Vouchers to ensure that the property is affordable to extremely low-income individuals and has been awarded \$278,000 in HOME-ARP funds to fund the salary of a full-time supportive service provider on-site through 2030. RHA projects the property's cash flow will allow for that position to be funded beyond 2030.

Railyard Flats

Railyard Flats is a new affordable housing development at 419 10th Street, Sparks, Nevada. RHA purchased the land in 2023 utilizing ARPA funds from the State of Nevada. The project is a 3-story walk up on a 1/3 acre consisting of 15 units (nine 1-BR units and six 2-BR units). It will target households at or below 60% AMI with four of the units set aside for households at or below 30% AMI. All units will include energy-efficient and all-electric appliances. Finally, the project is in an area of significant economic investment and redevelopment in downtown Sparks. Future tenants will be within easy walking distance of a major public transportation hub as well as retail and employment opportunities.

The development budget as of September 2023 is \$6,810,836. The funding is coming from a variety of sources including, Home Means Nevada Initiative funds (American Rescue Plan Act SLFRF dollars), HOME-ARP, and MTW Block Grant funds. Construction is set to start in the 4th quarter of 2023 and is projected to be completed by 4th quarter of 2024.

Hawk View Apartments Redevelopment

Hawk View Apartments Redevelopment project involves the conversion of a 100-unit public housing site to a project-based Section 8 project under the demolition and disposition rules authorized by Section 18 of the U.S. Housing Act of 1937. The Hawk View Apartments are located on two parcels at 1500 Steelwood Lane and 2531 Tripp Drive, Reno, Nevada 89512. RHA plans to demolish all 28 buildings and rebuild the apartments to current standards. The new 3-story buildings would create an additional 100 multi-bedroom units (200 total units) in the redeveloped Hawk View Apartments complex. The project will be built using Home Means Nevada Initiative funds (American Rescue Plan Act SLFRF dollars), 4% Low Income Housing Tax Credit (LIHTC) equity, and tax-exempt bonds. Additionally, to ensure that the project can add as many new affordable housing units as possible, the RHA board has committed up to \$7,550,000 in MTW Block Grants to cover potential financial gaps. Construction is projected to start in July 2024 and be completed by January of 2026.

This activity will remain ongoing in FY 2025.



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

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

This activity will remain ongoing in FY 2025.

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.

2022-01: Workforce Development Program

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

This activity was approved and implemented in FY 2022. It was amended in FY 2023 to allow for any adult member of the household to sign a contract to participate.

Description

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 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.

Status/Update

This activity will remain ongoing in FY 2025.

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.
2024-01	2024	Time-Limited Workforce Development Vouchers	Create incentives for families to work, seek work or prepare for work.	Attachment C Sections D.1.b., D.1.c., D.2.d., D.4. and Section E
2024-03	-	Alternative Reasonable Cost Limits	Increase housing choice for low-income families.	Attachment C Section C.16. and Attachment D Use of MTW Funds

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, 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.

2024-01: Time-Limited Workforce Development Vouchers

Description

In FY 2024, RHA received approval to assist Washoe County’s younger population who have



successfully completed a community-based education or life-skills program and are at risk of long-term housing instability. Following implementation of this activity, RHA will allow at least 15 tenant-based vouchers to be earmarked to house youth who want to achieve self-sufficiency. Currently, this population is largely unassisted by the agency's traditional housing programs and due to waitlist preferences in place, are very unlikely to receive a traditional voucher. Through this activity, RHA proposes to expand the services already provided to these youth with a structured, goal-oriented program that provides ongoing self-sufficiency support. Each applicant housed under this activity will receive a time-limited voucher of eight years and be required to participate in RHA's Workforce Development program.

Update/timeline for implementation

RHA will use a competitive process to solicit partnering agencies within the community. Currently a Request for Qualifications (RFQ) is being drafted and will be released in FY 2025.

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.

2024-03: Alternative Reasonable Cost Limits

Description

Federal regulations establish a Maximum Project Cost which represents the total amount of federal funds that may be used for a development project. The Total Development Cost (TDC) and Housing Construction Cost (HCC) limits, which make up the Maximum Project Cost, are updated and published by HUD periodically. As RHA developed budgets and scopes of work and moved to secure financing for development projects currently underway, it became clear that HUD's standard TDC and HCC limits for the region do not accurately reflect local marketplace conditions. Over the past few years, the Reno/Sparks area has seen significant increases in the cost to develop and rehabilitate new and existing properties. With the addition of this MTW activity, RHA proposed to develop alternative reasonable cost limits to the TDC and HCC for RHA's local non-traditional developments as well as other development/rehabilitation activities identified by staff and approved by RHA's Board of Commissioners.

With this activity RHA aims to decrease gaps in funding for smaller infill developments aimed at providing supportive housing for households below 30% AMI and/or affordable housing options for low-income households closer to areas of economic opportunity. Additionally, RHA also aims to strengthen its PH repositioning efforts by establishing market area hard construction costs in line with those communities included on HUD's List of High-Cost Cities. This would allow RHA conversions to be eligible for a 20/80 RAD/Section 18 blend if the hard construction costs for the project exceed 90% of the market area HCC.

Update/timeline for implementation

This activity was proposed in an amendment to the approved FY 2024 Annual MTW Plan. It was submitted to HUD on January 24, 2024 and will be implemented following HUD approval of the plan amendment.



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)
2014-01	2014	2023	Assign PBVs to RHA owned/controlled units without competitive process	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections D.2.b. and D.7.a.
2014-03	2014	2019	Rent Reform Controlled Study	Create incentives for families to work, seek work or prepare for work <i>and</i> 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.
2014-08	2014	2023	Partner with local nonprofit to provide special needs housing	Increase housing choice for low-income families and reduce costs <i>and</i> create incentives for families to work, seek work or prepare for work.	Attachment C Sections B.4., D.1.b., and D.7.a.
2015-03	2015 amended 2017	2023	Eliminate Caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties	Reduce costs and achieve greater cost effectiveness <i>and</i> increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.7.a.



Activity #	FY Implemented	FY Closed	Activity Name	Statutory Objective(s)	Authorization(s)
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 <i>and</i> reduce costs and achieve greater cost effectiveness <i>and</i> 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
2016-04	2016	2023	Allow HCV participants to lease units that exceed the 40% rent burden	Increase housing choices for low-income families.	Attachment C Section D.2.a.
2016-08	2016 amended 2019	2023	Expand Project Based Voucher Program	Increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.4.

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

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2014. It was closed out in FY 2023.

Reason for close out

In FY 2024 RHA received approval to create a Local Project Based Voucher Program (*Activity 2024-02*) to consolidate all current PBV activities within its MTW program into one. The authorizations and outcomes related to this activity will continue to be reported under the new FY 2024 activity.

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

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

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.

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

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2014. It was closed out in FY 2023.

Reason for close out

In FY 2024 RHA received approval to create a Local Project Based Voucher Program (*Activity 2024-02*) to consolidate all current PBV activities within its MTW program into one. The authorizations and outcomes related to this activity will continue to be reported under the new FY 2024 activity.

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

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2015. It was closed out in FY 2023.

Reason for close out

In FY 2024 RHA received approval to create a Local Project Based Voucher Program (*Activity 2024-02*) to consolidate all current PBV activities within its MTW program into one. The authorizations and outcomes related to this activity will continue to be reported under the new FY 2024 activity.



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

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

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.

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

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2016. It was closed out in FY 2023.

Reason for close out

RHA began implementing this activity in FY 2016. Overall, this activity was relatively ineffective at increasing housing choice among HCV participants. Rather than continue with this activity, staff began exploring ways the agency could not only increase voucher utilization but also assist HCV participant who want to move to low poverty, high opportunity neighborhoods within the region. Rather than place the increased rent burden on the participants, RHA implemented Exception Payment Standards for 12 specific zip codes throughout the Truckee Meadows where rents were unaffordable based on RHA's traditional payment standards to allow for more upward mobility.



2016-08: Expand Project Based Voucher Program

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2016 and expanded upon in FY 2019. It was closed out in FY 2023.

Reason for close out

In FY 2024, RHA received approval to create a Local Project Based Voucher Program (*Activity 2024-02*) to consolidate all current PBV activities within its MTW program into one. The authorizations and outcomes related to this activity will continue to be reported under the new FY 2024 activity.

SECTION 5

**PLANNED APPLICATION
OF MTW FUNDS**





V. Planned Application of MTW Funds

This section includes summary budget information for FY 2025 including planned sources and uses for MTW funds.

A. 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	\$3,538,804
70600	HUD PHA Operating Grants	\$27,189,316
70610	Capital Grants	\$1,235,870
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$30,123
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$327,499
70000	Total Revenue	\$32,321,612

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	\$4,759,655
91300+91310+92000	Management Fee Expense	\$1,345,227
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$388,406
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$723,232



93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,037,550
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$297,901
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$826,460
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$21,745,059
97400	Depreciation Expense	\$1,312,396
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$33,435,886

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

RHA populates the amounts in the preceding table directly from our most recent FDS submission whether unaudited, as is typically the case, or audited. RHA has not experienced a change in the number of Public Housing units, nor any recent material change in HAP revenue or HAP expense resulting in losses that are fairly consistent year over year. According to the FY 2023 unaudited FDS submission, expenses exceeded revenue in the amount of \$1,084,394.

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

In FY 2025, RHA will begin to reposition Hawk View Apartments and Silverada Manor through Section 18 Demolition/Disposition and a RAD PBV/Section 18 Blend. Through this repositioning, RHA plans to utilize MTW single fund flexibility to augment RAD rents, provide relocation services to affected residents, fund predevelopment and development costs, and increase replacement reserves at each property converted. In addition, funding flexibility will be used to establish ongoing tenant participation funds for continued Resident Council involvement at sites repositioned through Section 18 Demolition/Disposition.

RHA's Board of Commissioners once again identified the expansion of resident services programs as a priority goal for the agency in the coming year. Beyond the Workforce Development Program, RHA will continue to use MTW single fund flexibility to provide additional services to the people we serve and expand upon the services offered to all residents through this department. These expanded services will include offerings to RHA's senior/disabled residents, and the activities/programs made available to RHA's youth.

RHA will continue to use single fund flexibility to pay administrative and operating costs that are not covered by the administrative fee in the HCV program or operating subsidy within the PH program. RHA will report these expenses in VMS utilizing the MTW Other field.

RHA does not anticipate any additional uses 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*	\$15,438,120	\$14,176,101
HCV Admin Fee	\$1,557	\$1,557
PH Operating Subsidy	\$(1,262,019)	\$0
TOTAL	\$14,177,658	\$14,177,658

* 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

By taking advantage of RHA's single fund flexibility, Fiscal Year unspent balances will be utilized to support shortfalls in PH Operating Subsidy and RHA's other MTW-approved activities.

Additionally, RHA's Board of Commissioners has obligated HUD Held-Reserves for the following Local Non-Traditional development activities:

- Carville Court Redevelopment - \$4,650,000
- Hawk View Apartments Section 18 Gap Financing - \$7,500,000
- Paradise Plaza Resident Services Hub (Activity #2022-01) - \$950,000
- Railyard Flats Development - \$4,565,263

The redevelopment project, Carville Court Redevelopment, will consist of the demolition of an existing six-unit complex (three duplexes) that was purchased by RHA using unrestricted funds in the late 1990's. RHA plans to redevelop the site to include up to 12 new supportive housing units for individuals experiencing homelessness or who are at risk of homelessness. RHA plans to partner with a local community service agency who is currently providing a six-month transitional housing program. Their program is aimed at stabilizing homeless individuals by building life skills and providing medical and mental health stabilization. RHA's preliminary budget for this redevelopment project is \$4.8 million.

Hawk View Apartments is a Public Housing complex with a pending Section 18 application for demolition/disposition. The project will include the demolition of the existing 100 units of Public Housing and the redevelopment of up to 200 new affordable housing units. The project funding gap is estimated to be \$7,500,000. Low-Income Housing Tax Credits and bonds will be used as the primary funding for this project.

Paradise Plaza Resident Services Hub includes the renovation of a donated building that will serve as RHA's Resident Services Hub within the community. RHA's currently approved MTW activity #2022-01 provides use of single fund flexibility to assist in the renovation of this space.

Lastly, Railyard Flats is a new development of 15-units on land acquired utilizing funds awarded to RHA by the State of Nevada. RHA anticipates serving households at this complex whose income is at or below 60% of the Area Median Income (AMI). The preliminary budget for this development project is \$6.27 million.

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
RHA submitted an application for RAD/Section 18 blend for Silverada Manor. A RAD Significant Amendment was previously included in the FY 2024 MTW Annual Plan.

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 6

ADMINISTRATIVE





VI. Administrative

A. Board Resolution and Certifications of Compliance

Board Resolution 2024-03-03 RH approving the content and submission of the FY 2025 MTW Annual Plan and the Certifications of Compliance (see Attachment 1).

B. Documentation of Public Process

- The FY 2025 MTW Annual Plan was discussed at multiple Resident Advisory Board and Resident Council meetings beginning in January 2024. The plan continued to be discussed at meetings of the Resident Councils through March 2024. Resident sign in sheets from each of the above-mentioned meetings are available upon request.
- The FY 2025 MTW Annual Plan is being made available for public review and comment on RHA's website and at RHA's Administrative Office beginning January 26, 2024 through March 26, 2024.
- Proof of Publication Notice (see Attachment 2). The FY 2025 MTW Annual Plan was advertised in the Legal Notices section of the Reno Gazette-Journal as follows:

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD

The Housing Authority of the City of Reno (RHA) is requesting public comments and conducting a public hearing on the proposed MTW Annual Plan for Fiscal Year (FY) 2025.

RHA's FY 2025 MTW Annual Plan for the period July 1, 2024 - June 30, 2025, is available for public review and comment beginning January 26, 2024 through March 26, 2024, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at www.renoha.org. Copies of the FY 2025 MTW Annual Plan may also be obtained by contacting Kim Anhalt, MTW Coordinator at (775) 329-3630; TDD (385) 770-7166 or by email at kanhalt@renoha.org.

The public may provide oral comments by attending the public hearing described below and/or submitting written comments during the comment period. Written comments on RHA's draft FY 2025 MTW Annual Plan can be mailed to the address noted above and must be received by close of business on Monday, March 25, 2024.

A public hearing to answer questions and receive comments will be held at 6:00 PM on Thursday, March 7, 2024, in Silverada Manor's Community Room, 1400 Silverada Blvd., Reno, NV 89512.

- A public hearing for the FY 2025 MTW Annual Plan was held at 6:00pm on Thursday, March 7, 2024. All comments received were positive and the only questions asked surrounded around how soon the proposed activities would be implemented.



C. Planned and Ongoing Evaluations

(see Attachment 3)

D. Lobbying Disclosures

Certification of Payments to Influence Federal Transactions and Disclosure of Lobbying Activities (see Attachment 4).

ATTACHMENT 1
BOARD RESOLUTION AND
CERTIFICATIONS OF
COMPLIANCE



Attachment 1: Board Resolution and Certifications of Compliance

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 24-03-03 RH

A RESOLUTION APPROVING THE CONTENT AND SUBMISSION OF THE AUTHORITY'S FY 2025 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 2025 MTW Annual Plan and invited public comment beginning on January 26, 2024 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 28, 2024 and January 30, 2024; and


WHEREAS, a public hearing was held on March 7, 2024 to receive comments on the Authority's plan;


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 2025 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 26th DAY OF March, 2024.

ATTEST:


CHAIRPERSON *on behalf of Dave Piazza*


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 (07/01/2024), 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)*

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- (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.

Housing Authority of the City of Reno
MTW PHA NAME

NV001
MTW PHA NUMBER/HA CODE

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

Hilary Lopez, Ph.D.
NAME OF AUTHORIZED OFFICIAL

Executive Director / Secretary of the Board
TITLE


SIGNATURE

4/10/24
DATE

* 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.

ATTACHMENT 2

PROOF OF PUBLICATION





Attachment 2: Proof of Publication



P.O. Box 677345, Dallas, TX 75267-7345

PROOF OF PUBLICATION

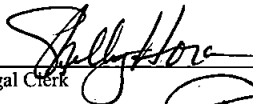
Reno Housing Authority
1525 E 9Th St
Reno NV 89512-3012

STATE OF WISCONSIN, COUNTY OF BROWN


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 hereto annexed was Published in said newspapers in the issue:

01/28/2024, 01/30/2024

and that the fees charged are legal.
Sworn to and subscribed before on 01/30/2024



Legal Clerk



Notary, State of WI, County of Brown
10-25-24

My commission expires
Publication Cost: \$261.24
Order No: 9768293 # of Copies: 0
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Please do not use this form for payment remittance.

RYAN SPELLER
Notary Public
State of Wisconsin



RHA MTW Legal Notice
NOTICE OF PUBLIC
HEARING AND PUBLIC
COMMENT PERIOD

The Housing Authority of the City of Reno (RHA) is requesting public comments and conducting a public hearing on the proposed MTW Annual Plan for Fiscal Year (FY) 2025.

RHA's FY 2025 MTW Annual Plan for the period July 1, 2024 - June 30, 2025, is available for public review and comment beginning January 26, 2024 through March 26, 2024, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at www.renoha.org. Copies of the FY 2025 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.

The public may provide oral comments by attending the public hearing described below and/or submitting written comments during the comment period. Written comments on RHA's draft FY 2025 MTW Annual Plan can be mailed to the address noted above and must be received by close of business on Monday, March 25, 2024.

A public hearing to answer questions and receive comments will be held at 6:00 PM on Thursday, March 7, 2024, in Silverada Manor's Community Room, 1400 Silverada Blvd., Reno, NV 89512.

January 28, 30 2024
LNVS0054049

ATTACHMENT 3

EVALUATION OF THE DEMONSTRATION





Attachment 3: Evaluation of the Demonstration

Mobility Demonstration Study Analyses and Results as of August 25, 2023

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 most participants moved from public housing to a PBV unit in 2014. In 2022, a new survey was administered to capture additional household outcomes. The survey gathers information about physical and mental health, safety, finances and wealth accumulation, employment and education, child well-being, and neighborhood and housing preferences over the last year. Eighteen households that have moved into a PBV unit have participated in the survey within the last year. Descriptive statistics are provided for the survey responses.

Table 1. Variables

	Data Source	Data Type	Statistical Test
Household Characteristics			
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
Household Outcome Variables			
Employment Status	Administrative	Categorical	McNemar
Annual Household Income	Administrative	Continuous	Wilcoxon
Physical and Mental Health	Survey	Discrete	Descriptive Statistics
Safety	Survey	Likert Scale	Descriptive Statistics
Financial Security/Wealth Accumulation	Survey	Likert Scale	Descriptive Statistics
Employment and Education	Survey	Likert Scale	Descriptive Statistics
Child Well-being	Survey	Likert Scale	Descriptive Statistics
Housing and Neighborhood Preferences	Survey	Rank Order	Descriptive Statistics



Neighborhood Characteristics			
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 are included in the study so within-subject analyses over time can be conducted. This resulted in 48 households being included in the analyses. Households entered and exited the study at different times. There are 19 households that are currently enrolled in the study and 29 households that have exited the study (Table 2).

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

Participant Year	Count	Currently Enrolled	Exits
Year 1	48	0	8
Year 2	40	2	7
Year 3	31	2	5
Year 4	24	1	4
Year 5	19	3	2
Year 6	14	2	0
Year 7	12	0	2
Year 8	7	3	1
Year 9	6	6	0
Total		19	29

Of the 29 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 six years to reach this point. 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	10%
Transferred to VOO	7	24%
Voluntarily Left Program	3	10%
Paying Full Rent/Purchased Home	15	52%
Total	29	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 program 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=48)

		Count	Percent
Gender	Male	5	10.4%
	Female	43	89.6%
Race	White	38	79.2%
	Non-White	10	20.8%
Ethnicity	Hispanic or Latino	17	35.4%
	Non-Hispanic or Latino	31	64.6%
Marital Status	Married/Cohabiting	12	25.0%
	Single/Divorced/Widowed	36	75.0%
		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, there isn't any statistical difference in employment compared to baseline regardless of how long the household has participated in the program (Table 5).

Table 5. Employment Status

		Baseline Unemployed	Baseline Employed	p-value ¹
Year 1 (n=48)	Unemployed	16	4	0.388
	Employed	8	20	
Year 2 (n=40)	Unemployed	12	2	0.109
	Employed	8	18	
Year 3 (n=31)	Unemployed	9	1	0.070
	Employed	7	14	
Year 4 (n=24)	Unemployed	5	2	0.066
	Employed	9	8	



Year 5 (n=19)	Unemployed	4	3	0.501
	Employed	6	6	
Year 6 (n=14)	Unemployed	7	1	1.000
	Employed	1	5	
Year 7 (n=12)	Unemployed	4	0	----- ²
	Employed	3	5	
Year 8 (n=10)	Unemployed	3	1	0.625
	Employed	3	3	
Year 9 (n=6)	Unemployed	2	1	1.000
	Employed	1	2	

¹The exact *p*-value is calculated based on a binomial distribution because there are 25 or fewer records in at least one cell. ²No 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 8) for households that moved from public housing to PBV units except for Year 9 (Table 6). The median difference at Year 1 was only \$3,222 but at Year 8 is \$17,114. The median difference for Year 9 is greater than baseline but the sample size is small and two households in Year 9 have an annual household income lower than when they entered the program which is why Year 9 is not statistically significant.

Table 6. Annual Household Income

	Baseline Median	Comparison Year Median	Median Difference	Z
<i>Annual Household Income</i>				
Year 1 (n=48)	\$16,125	\$19,346	\$3,222	-2.819**
Year 2 (n=40)	\$15,738	\$19,990	\$4,253	-3.671**
Year 3 (n=31)	\$15,622	\$23,081	\$7,459	-3.381**
Year 4 (n=24)	\$16,125	\$22,950	\$6,826	-2.743**
Year 5 (n=19)	\$15,853	\$23,650	\$7,797	-2.173*
Year 6 (n=14)	\$14,612	\$21,463	\$6,852	-2.542**
Year 7 (n=12)	\$11,854	\$32,603	\$20,749	-3.059**
Year 8 (n=10)	\$11,854	\$28,968	\$17,114	-2.803**
Year 9 (n=6)	\$14,612	\$20,450	\$5,838	-0.734

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

In the last year, most households had no visits to a hospital or emergency room for physical health issues. Visits to a hospital or emergency room for mental health, behavioral health or emotional issues was rare with most households having no visits in the last year (Table 7).





Table 7. Physical and Mental Health Outcomes (n=18)

	Median	Range
Number times in the past year any member in the household visited a hospital or emergency clinic for <i>physical health</i> problems	0	0-10
Number times in the past year any member in the household visited a hospital or emergency clinic for <i>mental health, behavioral health, or emotional</i> problem	0	0-5



The survey asked households to rank the neighborhood amenities that were most and least important to them (Table 8). The most important neighborhood attribute is a low crime rate. This is followed by, being within close proximity to grocery stores, neighborhoods with sidewalks, and near restaurants and shopping and parks and recreation.

Table 8. Neighborhood Preferences (n=17)

A neighborhood that has a low crime rate.	 Most Important
A neighborhood close to grocery stores.	
A walkable neighborhood with sidewalks.	
A neighborhood close to restaurants and shopping.	
A neighborhood close to parks and recreation	  Least Important
A neighborhood with job opportunities nearby.	
A neighborhood with low population and dispersed housing density.	
A neighborhood that has a lot of diversity in terms of race, age, family type.	
A neighborhood accessible by public transportation.	
A neighborhood with low poverty rates.	
A neighborhood with a community center and/or community events.	
A neighborhood close to downtown.	

The survey asked households to rank the housing and neighborhood amenities most important for their children (Table 9). The most important attribute is each child having their own bedroom. Having a home that has a yard that is safe to children to play in and a low crime rate are also important to respondents.

Table 9. Housing and Neighborhood Preferences for Children (n=16)

Each child has their own bedroom.	 Most Important
The home has a yard that is safe for children to play in.	
The neighborhood has low crime rates.	
The home is on a quiet street away from heavy traffic.	
The neighborhood has good schools/daycares.	  Least Important
The home is close to my child/children's school/daycare.	
The neighborhood has friendly neighbors that I can count on.	
The home is near a park or other recreational activities.	
There are other children in the neighborhood living close by.	

In the survey, households were asked why they might stay in their current home if they are paying full contract rent (Table 10). Respondents were given the option to select one or multiple reasons. The most common reason for households to remain in place is because the rent is affordable and many households



responded it is too expensive to move somewhere else. Other common reasons include liking the home and neighborhood. Several households wanted to remain in place because their current home is either close to their child’s school/daycare, work, or family/friends. A few households don’t have time to search for a new place or move. Two of the households plan to move as soon as they can pay the full contract rent.

Table 10. Reasons for Staying in Current Home (n=18)

	Frequency
The rent is affordable.	13
I like the neighborhood.	12
I like the home.	10
It is too expensive to move somewhere else.	9
I am close to work.	9
I don't want my child/children to go to a different daycare/school.	6
I am close to family/friends.	3
I don’t have time to search for a new place or move.	2
I plan to move as soon as I can pay the full contract rent.	2

The survey asked each household to envision their tenure situation in five years (Table 11). The majority believe they will own their own home or will be in the same home paying full contract rent. Less than half of the respondents believe they will still be receiving subsidized rent.

Table 11. Future Plans (n=18)

	Frequency	Percent
In the same home with subsidized rent.	8	44%
In the same home paying full contract rent.	3	17%
In a home that you own.	7	39%

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 10).



Table 10. Neighborhood Characteristics (n=48)

	Public Housing Median	PBV Median	Median Difference	Z
Percent high school graduate or higher	65.2%	91.2%	26.0%	-5.335***
Percent bachelor's degree or higher	15.0%	26.2%	11.3%	-5.191***
Unemployment rate	9.3%	5.3%	-4.0%	4.114***
Median household income	\$25,545	\$52,008	\$26,463	-4.627***
Percent of people in poverty	40.1%	12.9%	-27.2%	6.032***
Proportion of vacant housing units	9.2%	8.4%	-0.8%	4.547***
Proportion of single-family homes	45.0%	60.9%	15.9%	-3.519***
Owner occupancy rate	44.8%	53.4%	8.6%	-1.600
Median home value	\$100,800	\$164,450	\$63,650	-5.663***
Median gross rent	\$823	\$916	\$93	-1.985*
Percent White	68.5%	83.5%	15.0%	-4.370***
Percent Hispanic or Latino	51.6%	27.1%	-24.6%	4.709***

* 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 11). 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.

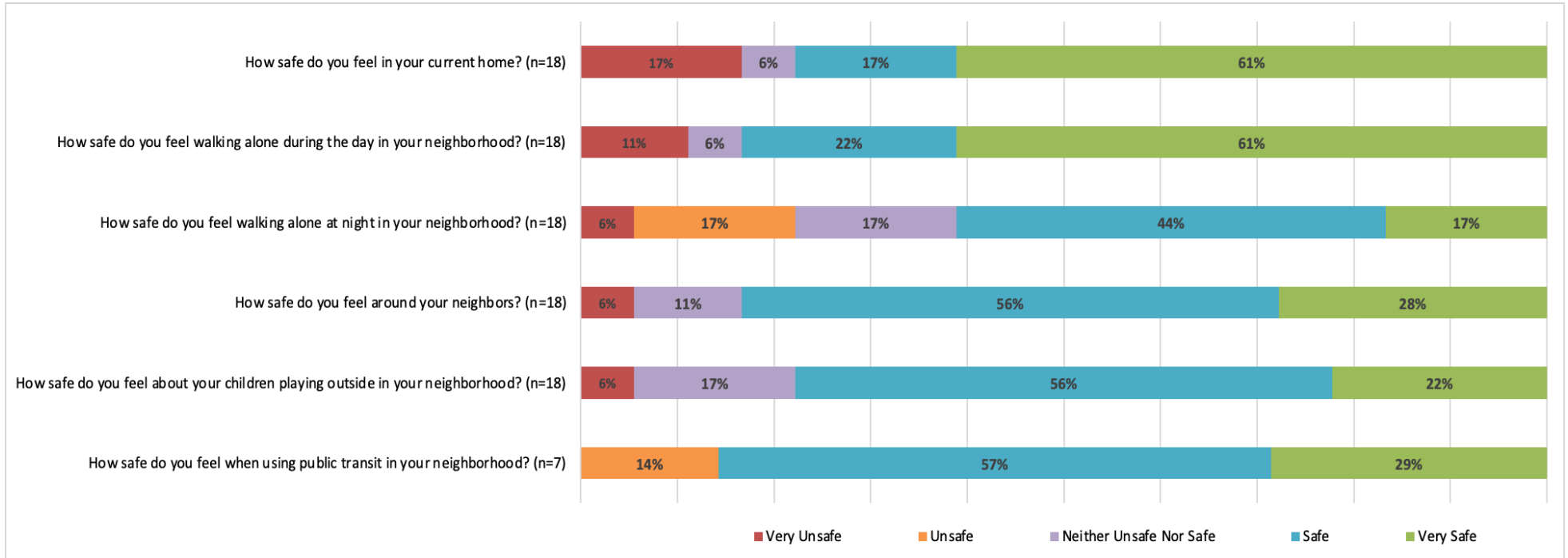
Table 11. Neighborhood Characteristics in PBV Neighborhoods Compared to Reno Metro Area (n=48)

	Reno	PBV Units
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	\$916
Percent White	84%	83.5%
Percent Hispanic or Latino	23.4%	27.1%



Most households feel safe in their home, neighborhood, and around their neighbors. The majority also feel safe when their children are playing outside in their neighborhood. Most survey respondents even feel safe walking alone in their neighborhood at night. The few households that use public transit also consider it to be generally safe.

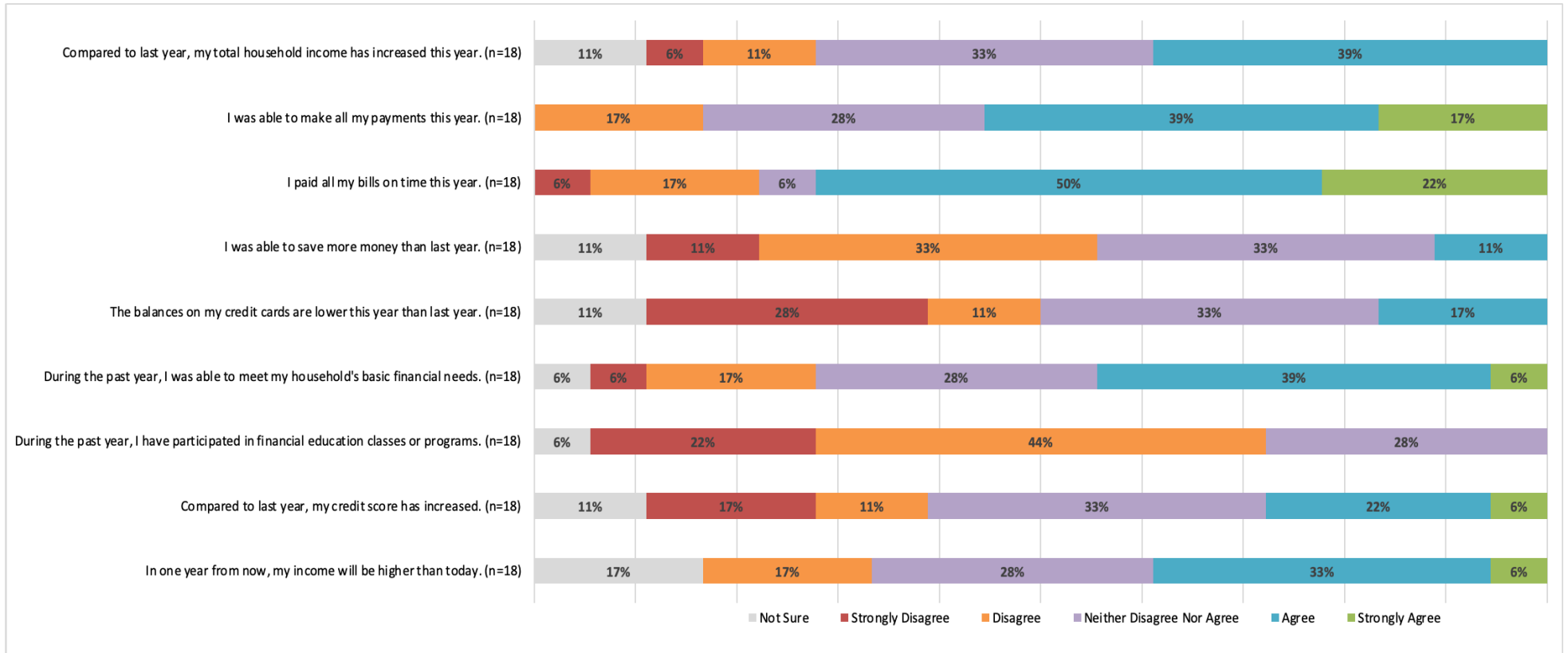
Figure 1. Safety





39% of households report that their household income has increased from the previous year and 45% of households stated that their basic financial needs were met. At least half of the respondents were able to make all their payments on time over the year and had lower balances on their credit cards compared to the previous year. However, the majority of households were unable to increase their credit score and report that they were unable to save more money than the previous year. Respondents did not participate in financial education classes or programs this last year. The response regarding future income is mixed and only 39% of the households believe that their income will be higher in a year from now.

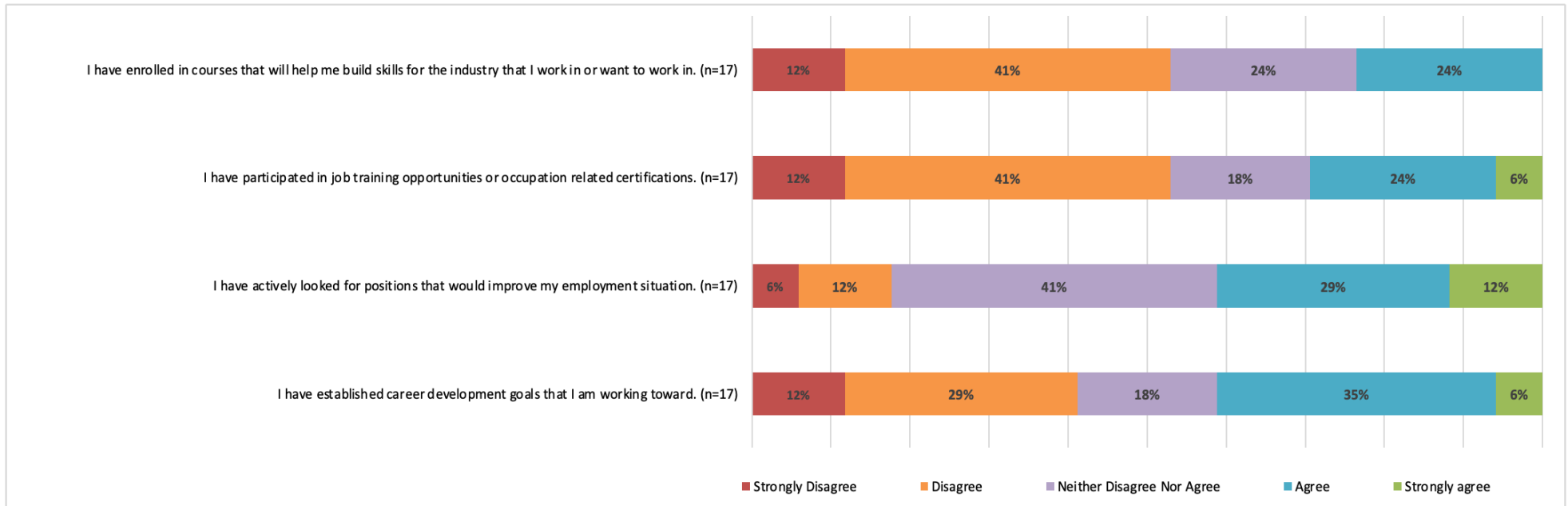
Figure 2. Financial Security and Wealth Accumulation





Within the last year, although some households have established career development goals that they are working toward, less than one-third of respondents have taken advantage of job training opportunities or occupation related certificates. 41% of the respondents are actively looking for a position that would improve their employment situation.

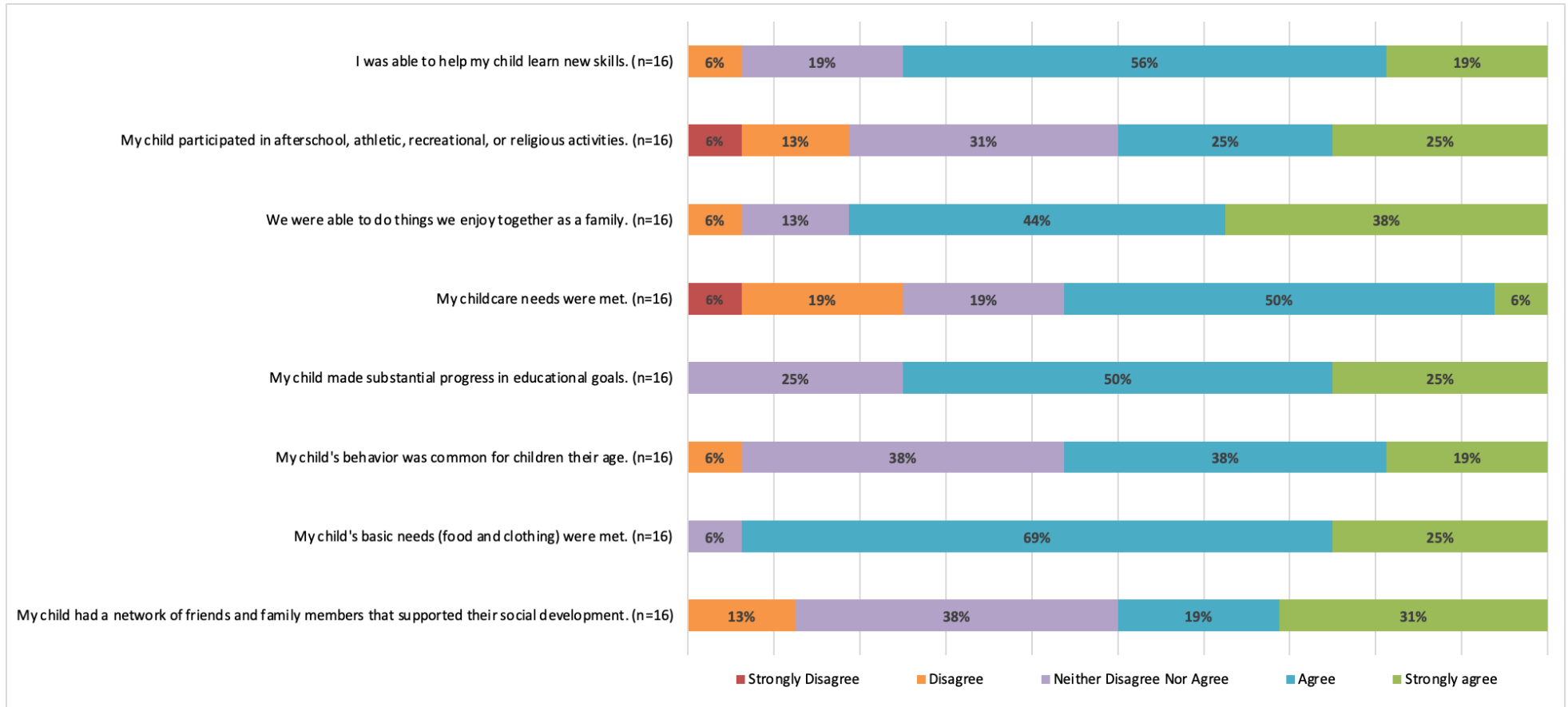
Figure 3. Employment and Education





Most households responded positively regarding their child's well-being. Respondents reported being able to help their child learn new skills, thought their child's basic needs were met, saw substantial progress in educational goals, and were able to do things together as a family. Most households also reported having a network of friends and family members that supported the social development of their child and that they were able to provide the opportunity for their child to participate in after school, athletic, recreational, or religious activities. Childcare needs were met for more than half of the households although there are a few households that reported this was a challenge.

Figure 4. Child Well-Being



ATTACHMENT 4

LOBBYING DISCLOSURES





Attachment 4: Lobbying Disclosures

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, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. 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. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

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

Hilary Lopez, Ph.D.

Title

Executive Director

Signature

Date (mm/dd/yyyy)

4/10/24

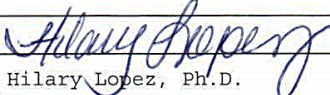
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form HUD 50071 (01/14)



DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See Reverse for public burden disclosure.)

1. Type of Federal Action: <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	2. Status of Federal Action: <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: NV-02		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:
6. Federal Department/Agency: Department of Housing and Urban Development	7. Federal Program Name/Description: Moving to Work Demonstration Program CFDA Number, if applicable:	
8. Federal Action Number, If known:	9. Award Amount, If known: \$	
10. a. Name and Address of Lobbying Registrant <i>(If individual, last name, first name, MI):</i> N/A	b. Individuals Performing Services <i>(Including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> N/A	
11. 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 reported to the Congress semi-annually and 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 that \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: Hilary Lopez, Ph.D. Title: Executive Director Telephone No.: (775) 329-3630 Date: 4/10/24	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)