



# MTW

Local • Innovative • Solutions



# 2026

# Annual Plan

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## **About**

Founded in October 1943, the Housing Authority of the City of Reno (RHA) owns and manages 501 units of Public Housing in six different locations in the City of Reno and the 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 3,200 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.

Housing Authority of the City of Reno  
1525 East Ninth Street  
Reno, NV 89512-3012  
[www.renoha.org](http://www.renoha.org)



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# Section I | Introduction





# I. Introduction

## A. Who we are

At its core, RHA is a housing solution for thousands of families, seniors, and people with disabilities in the Truckee Meadows. At its heart, RHA’s programs are driven by the desire to serve our community. At its essence, RHA assists low-income members in securing housing, allowing seniors and disabled households to age-in-place, and fostering an environment where families can pursue economic opportunities and raise their children.

Since 1943, RHA has provided low-income families with housing options in diverse communities throughout Washoe County. Initially, RHA’s housing programs provide a sense of stability, but with a robust workforce development program, that includes youth and seniors, residents can pursue education or employment opportunities as they work toward becoming self-sufficient. RHA’s programs encourage engaging with neighbors, enjoying retirement, and embracing opportunities to improve their quality of life.

While there is still not enough affordable housing for all of our community members who need it, RHA continues to look for new opportunities that will preserve affordable housing within our community. Current programs are being refined, and promising new partnerships will continue to be cultivated to support of the agency’s mission. RHA is positioned to lead the conversation on the housing challenges that face our community and proud to help thousands of Nevadans have a safe, secure, and affordable place to call home.

## B. What is MTW?

MTW is a demonstration program, established by Congress in 1996, that offers a limited number of “high performing” Public Housing Authorities (PHAs) the opportunity to propose and test innovative, locally designed approaches to administering housing programs and self-sufficiency strategies. The program permits PHAs to combine federal funds from the 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

### 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.



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.

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

After a national competition was held in 2012, RHA was selected and designated as one of four new MTW agencies in 2013. The MTW agreement between RHA and HUD was executed on June 27, 2013. 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. On March 8, 2024, Congress passed H.R. 4366, the Consolidated Appropriations Act of 2024. Passage of this legislation provided initial MTW agencies, including RHA, with a 10-year extension of the MTW agreement, which has now been extended through FY 2038.

### **D. FY 2026 MTW Annual Plan overview**

FY 2026 (i.e., the period from July 1, 2025, through June 30, 2026) will be RHA's thirteenth 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 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 2026 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 2025. Public review and comments are solicited prior to consideration and approval by RHA's Board of Commissioners. Following approval from the Board of Commissioners, RHA's FY 2026 MTW Annual Plan is submitted to HUD for review.<sup>1</sup>

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

During its twelve 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

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



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 sought innovative activities that are designed to streamline resident requirements and increase overall efficiency. To identify ways that approved MTW activities could be improved upon, staff continue to monitor activities following implementation to gauge its continued viability.

***RHA's proposed/amended FY 2026 MTW activities***

RHA is proposing the following new MTW activities in FY 2026:

- *Direct Rental Assistance*  
Partnering with the Housing Solutions Lab at the NYU Furman Center, RHA proposes to design and evaluate a Direct Rental Assistance (DRA) pilot that will study the impacts of paying rental assistance directly to individuals and families for housing costs rather than the landlord.
- *Alternative inspection policy for newly constructed or substantially rehabilitated properties*  
RHA will reduce the number of inspections required at newly constructed or substantially rehabilitated properties by foregoing an initial inspection on every unit prior to allowing HCV participants to move-in.
- *Basic Payment Standard for LIHTC assisted units*  
To avoid additional rent burdens being placed on HCV participants and reduce the amount of HAP being paid, RHA proposes to limit all Low-Income Housing Tax Credit (LIHTC) properties to RHA's Basic Payment Standard when determining affordability and subsidy amount to be paid for a household.
- *Direct referral to waiting list*  
RHA will allow individuals and families currently living in temporary or short-term tenant-based housing to be placed on the waiting list even during times that the waiting list is closed to other applicants if they are referred directly through Continuum of Care (CoC) partners.

In addition, RHA is amending the following activity in FY 2026 that was previously approved by HUD:

- *Simplify rent calculations and increase the minimum rent*  
To streamline the recertification process for assisted households, RHA will allow PH residents and HCV participants to self-certify the amount of income received directly from family members rather than using HUD's hierarchy of verification.



**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.

Based on information provided through a capital needs assessment, RHA identified ways to sustain its housing portfolio over time. As such, the repositioning of Silverada Manor and Hawk View Apartments is currently underway. Repositioning options continue to be considered for RHA’s six other PH sites. In FY 2026, RHA will apply to reposition Essex Manor, John McGraw Court, and Stead Manor using RAD or RAD/Section 18. Including these three properties, the following repositioning strategies are being considered for RHA’s remaining PH properties:

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

In December 2023, RHA’s Board of Commissioners identified the following five overarching goals that the agency will continue to pursue in the coming year:

- 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.

The following highlight is provided as one step RHA has taken to increase opportunities for HCV participants to break the cycle of poverty:

- RHA has extended many of the flexibilities of its MTW program to increase opportunities for Foster Youth to Independence (FYI) participants. This includes participation in its Workforce Development (WFD) Program, a program designed to assist participants in increasing their



level of education, workforce skills, and employment earnings. Once FYI voucher holders sign a Contract of Participation (CoP) with WFD, they can extend their assistance from 36 months to 60 months. Furthermore, they will work closely with one of RHA's WFD Coordinators as they receive participant focused resources, workforce training, and employment services.

***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:

- Continue to 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.
- Increase 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 II

# General Operating Information

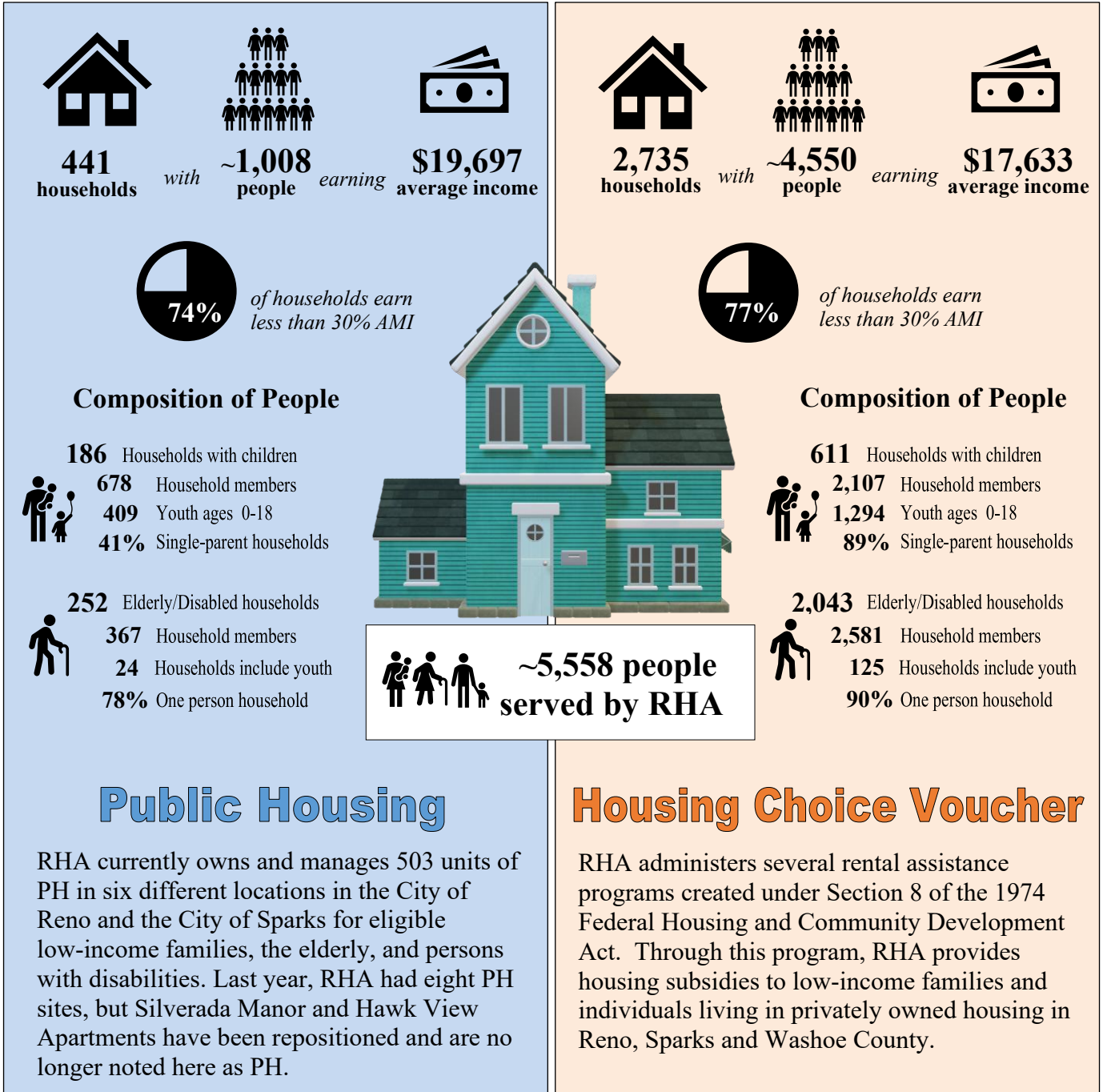




## II. General Operating Information

### Overview of RHA's Housing Assistance Programs

On January 1, 2025, RHA was providing housing assistance to 3,176 active households through its PH and HCV programs.<sup>2</sup>



### Public Housing

RHA currently owns and manages 503 units of PH in six different locations in the City of Reno and the City of Sparks for eligible low-income families, the elderly, and persons with disabilities. Last year, RHA had eight PH sites, but Silverada Manor and Hawk View Apartments have been repositioned and are no longer noted here as PH.

### 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.

<sup>2</sup> Number of active households indicated here also includes VASH, FYI and EHV participants.



In addition to the PH complexes noted, RHA owns one LIHTC property providing 44 units of affordable housing to seniors, one 12-unit complex that provides permanent supportive housing for low-income veterans and a new 15-unit affordable housing development in Sparks targeting households at or below 60% AMI. 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. RHA also owns nine unaided multi-family housing properties that provide an additional 376 affordable housing units, many of which 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 2026.

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0 Bdm	1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 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

<b>Total Public Housing Units to be Added in the Plan Year:</b>	<b>0</b>
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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 applied, and received approval, for RAD/Section 18 repositioning of Silverada Manor and Section 18 repositioning of Hawk View Apartments. In FY 2026, RHA plans to submit a RAD application to reposition John McGraw Court and Stead Manor. Furthermore, a RAD/Section 18 blend will be pursued to reposition Essex Manor.

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

In FY 2026, RHA plans to remove the following PH units:

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
NV39P001018 John McGraw Court	34	PH general occupancy site that is currently undergoing substantial rehabilitation. Once complete, RHA plans to apply to reposition this site under RAD.
NV39P001009 Essex Manor	105	RHA plans to apply to reposition this PH general occupancy site using RAD/Section 18 Demolition/Disposition.
NV39P001006 Stead Manor	67	PH general occupancy site that is currently undergoing substantial rehabilitation. Once complete, RHA plans to apply to reposition this site under RAD.
<b>TOTAL:</b> Public Housing Units to be removed in the Plan Year	<b>206</b>	



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

In FY 2026, RHA anticipates project-basing the following properties pursuant to the agency's repositioning strategies and competitive process outlined in the Administrative Plan for Housing Choice Voucher and Project Based Voucher Programs (Admin Plan). 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	Former PH general occupancy site that is being repositioned through Section 18 Demolition/Disposition. RHA will apply for 99 TPVs with notification regarding the number of vouchers awarded once the property is closer to lease-up.
John McGraw Court	34	Y	PH general occupancy site that will be repositioned using RAD.
Silver Sage Court	16	N	Affordable housing property adjacent to John McGraw Court. The property is currently undergoing moderate rehabilitation.
Essex Manor	105	Y	PH general occupancy site that will be repositioned using RAD/Section 18 Blend.
Stead Manor	67	Y	PH general occupancy site that will be repositioned using RAD.
VASH PBV	65	N	Privately owned property awarded HUD-Veterans Affairs Supportive Housing (VASH) PBVs based a competitive process.
<b>TOTAL:</b> Planned new Project-Based Units in the Plan Year			<b>386</b>



**iv. Existing Project-Based Vouchers**

RHA is currently project-basing the following tenant-based vouchers in the Plan Year. These include only those in which at least an AHAP or HAP is already in place at the beginning of the Plan Year.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Silverada Manor	149	Leased/Issued	Yes	PH general occupancy site that is being repositioned using RAD PBV/Section 18 Blend. RHA has issued 60 RAD PBVs and 89 TPV PBVs at this site.
Mobility Demonstration	18	Leased/Issued	No	PH tenants in good standing are allowed to move to RHA's scattered site properties with a PBV.
Mobility Demonstration	9	Committed	No	PH tenants in good standing are allowed to move to RHA's scattered site properties with a PBV.
Single-Family Home Project-Based Vouchers	13	Leased/Issued	No	RHA has several single-family homes which are shifted to a PBV if/when the unit becomes vacant.
Yorkshire Terrace	12	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	46	Leased/Issued	No	Privately owned properties being assigned PBVs through a competitive process.
Privately Owned Partnerships	8	Committed	No	Privately owned properties being assigned PBVs through a competitive process.
Pilgrims Rest	7	Leased/Issued	No	Privately owned senior complex managed by RHA.
Railyard Flats	4	Committed	No	New affordable housing complex targeting households at or below 60% AMI.
VASH PBV	43	Leased/Issued	No	RHA and privately owned properties have been assigned HUD-Veterans Affairs Supportive Housing (VASH) PBVs.
VASH PBV	30	Committed	No	Privately owned properties have been assigned HUD-Veterans Affairs Supportive Housing (VASH) PBVs.
<b>TOTAL:</b>				
Planned Existing Project-Based Vouchers		<b>363</b>		

\* 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, changes to designated housing plans and/or accessibility features of developments or units, etc.

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

To ensure the longevity of RHA’s PH properties for years to come, staff began pursuing viable repositioning strategies for each of the properties in its PH portfolio. RAD and Section 18 were both identified as strategies that RHA would utilize first to reposition Silverada Manor and Hawk View Apartments. RHA applied to reposition Silverada Manor utilizing a RAD/Section 18 blend that includes a substantial rehabilitation of this property. Similarly, RHA applied to HUD for Section 18 Demolition and/or Disposition for Hawk View Apartments and began holding units at this site once they became vacant. Keeping units vacant rather than leasing them to another eligible household was done intentionally to decrease RHA’s relocation expense. Although RHA has completed the permanent relocation of all residents at Hawk View Apartments in preparation for demolition of the site, an unexpected delay in closing has resulted in a construction start date several months later than anticipated.

In the coming months, RHA will begin to apply for the repositioning of John McGraw Court and Stead Manor using RAD as well as a RAD/Section 18 blend at Essex Manor.

In December 2024, RHA finished construction on Railyard Flats, an affordable housing complex consisting of 15 brand new units in the City of Sparks. This housing infill project is set to provide affordable housing for extremely low to low-income households. Full lease of the property is expected by February 2025.

There were no additional changes to the MTW housing stock, however, RHA continues to look for single family homes, duplexes, and condominiums to expand its affordable housing options. All properties acquired/developed will be used to provide additional housing choice for low-income families and individuals throughout the Truckee Meadows.

**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**

In FY 2026, RHA anticipates CFP funds will be used to fund the soft costs, hard costs, and administrative costs of various renovation activities throughout six PH properties, which include Stead Manor and John McGraw Court. Hard costs may include exterior improvements that include landscaping and irrigation or upgrades to exterior lighting. Soft costs may include architecture and engineering consultants required for due diligence related activities. MTW funds may also be used to fund capital expenditures at LNT or PBV units for items that could include energy efficiency measures or other critical need projects.



## 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	5,856	488 <sup>3</sup>
MTW Housing Choice Vouchers (HCV) Utilized***	37,224	3,102 <sup>4</sup>
Local, Non-Traditional: Tenant-Based <sup>^</sup>	480	40 <sup>5</sup>
Local, Non-Traditional: Property-Based <sup>^</sup>	648	54
Local, Non-Traditional: Homeownership <sup>^</sup>	0	0
<b>Planned Total Households Served:</b>	<b>44,208</b>	<b>3,684</b>

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

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

\*\*\* "Housing Choice Vouchers (HCV) Utilized" includes SPVs within the MTW PHA's portfolio.

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	2026-01: Direct Rental Assistance	480	40
Property-Based	2021-01: Affordable Housing Acquisition, Rehabilitation and Preservation	132	11
Property-Based	2021-03: Partnership to Assist Homeless Youth	516	43
Homeownership	N/A	0	0

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

<sup>3</sup> Following the repositioning of Hawk View Apartments and Silverada Manor, RHA has 503 ACC units. Lease up is not anticipated to drop below 488 units, or 97% of these 503 units.

<sup>4</sup> RHA has 2,703 Housing Choice Vouchers and 675 Special Purpose Vouchers (SPV) including VASH, FYI and EHV. Although our goal is 100% of the established MTW baseline of 2,638 and 100% of the allocated 675 SPVs, RHA anticipates leasing this program at 92% in the coming year.

<sup>5</sup> The number of LNT: Tenant-Based units assumes approval of Activity 2026-01: Direct Rental Assistance with lease up beginning by September 2025.



**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>At the end of CY 2024, RHA's occupancy rate for this program was at 74.70% across all sites. Units were initially held at several locations to accommodate relocation of residents from Silverada Manor and Hawk View Apartments. RHA is also completing substantial rehabilitation at two additional PH complexes, Stead Manor and John McGraw Court. The rehabilitation at both complexes has also required residents to be temporarily relocated. Although RHA has completed the permanent relocation of all residents at Hawk View Apartments in preparation for demolition of the site, a delay in closing has led to these units remaining in RHA's occupancy rate. With these units removed from RHA's PH portfolio, RHA's PH occupancy rate would have increased to 89.40%.</p> <p>For units that are not being held, common leasing issues typically involve tenant preferences being requested, which if not provided, result in the tenant's refusal to lease a unit. These preferences often include the size of the unit being offered, the location of the property, or the lack of desired amenities. Compounding the longer leasing times are the normal vacancy issues that delay the turn of the unit including tenant damage and the disposal of personal property in accordance with Nevada Revised Statutes (NRS). 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.</p>
MTW Housing Choice Voucher	<p>Washoe County continues to experience a strengthening housing market that resulted in an overall shortage of affordable housing units. With limited inventory and an influx in population due to the relocation of several tech companies to the region, the need for additional housing stock continues.</p> <p>RHA will continue to monitor its payment standards to ensure they accurately reflecting local market conditions, promote its Landlord Incentive Program, and continue implementation of a "lease in place" preference. In November 2022, RHA also adopted Exception Payment Standards for specific zip codes throughout the Truckee Meadows where rents were unaffordable based on RHA's traditional payment standards. The adoption of these small area payment standards has facilitated leasing in low-poverty neighborhoods and increased housing choice for RHA's voucher holders. RHA's Landlord Liaison continues to assist with the lease-up of this program by serving as the primary point of contact for landlords. The agency is continuously working to promote the HCV program to new landlords and retain existing landlords throughout Washoe County.</p>



Local, Non-Traditional	On August 1, 2020, RHA began providing LNT assistance to Eddy House, a local non-profit serving homeless youth, ages 12-24. Although RHA does not anticipate any leasing issues related to this assistance, the very transient nature of this at-risk population makes it difficult to anticipate leasing issues that may be encountered.
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**iii. Unique Households Served (Optional)**

Number of unique households served annually through local, non-traditional rental services program such as short-term assistance, rapid rehousing, emergency housing, etc.

<b>UNIQUE HOUSEHOLDS SERVED</b>
RHA is not currently offering a LNT rental services program.



**C. Wait List Information**

The following table reflects RHA’s wait list information as of January 6, 2025.

**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 (indicating whether the waiting list is site-based or agency-wide for public housing) and the population(s) served.

<b>WAITING LIST NAME</b>	<b>DESCRIPTION</b>	<b>NUMBER OF HOUSEHOLDS ON WAITING LIST</b>	<b>WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED</b>	<b>PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR</b>
Essex2BR	Site-Based, General Occupancy PH 2 bedrooms	1,679	Closed	If needed
Essex3BR	Site-Based, General Occupancy PH 3 bedrooms	593	Closed	If needed
HCV	Housing Choice Voucher	4,775	Closed	If needed
McGraw1BR	Site-Based, General Occupancy PH 1 bedroom	1,807	Closed	If needed
Mineral1BR	Site-Based, General Occupancy PH 1 bedroom	2,278	Closed	If needed
Mineral2BR	Site-Based, General Occupancy PH 2 bedrooms	1,719	Closed	If needed
Mineral3BR	Site-Based, General Occupancy PH 3 bedrooms	637	Closed	If needed
Mineral4BR	Site-Based, General Occupancy PH 4 bedrooms	108	Closed	If needed
Myra2BR	Site-Based, General Occupancy PH 2 bedrooms	1,447	Closed	If needed
PB1BR	Project Based Voucher, 1 bedroom	1,994	Closed	If needed
PB2BR	Project Based Voucher, 2 bedrooms	910	Closed	If needed
PB3	Project Based Voucher, Homeless Partnerships	13	Closed	If needed
PB3BR	Project Based Voucher, 3 bedrooms	279	Closed	If needed
PB4BR	Project Based Voucher, 4 bedrooms	64	Closed	If needed
PBPR	Project Based Voucher, Senior/Disabled	26	Closed	If needed
PBSILV	Project Based Voucher, Silverada Manor	1,706	Closed	If needed
PBWJWP	Project Based Voucher, Willie J Wynn	3	Closed	If needed
SILV0BR	Site-Based, General Occupancy, 0 bedroom	548	Closed	If needed
SILV1BR	Site-Based, General Occupancy 1 bedroom	429	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
SILV2BR	Site-Based, General Occupancy 2 bedrooms	137	Closed	If needed
Stead2BR	Site-Based, General Occupancy PH 2 bedrooms	1,635	Closed	If needed
Stead3BR	Site-Based, General Occupancy PH 3 bedrooms	600	Closed	If needed
Tom0BR	Site-Based, General Occupancy PH 0 bedroom	1,457	Closed	If needed
Tom1BR	Site-Based, General Occupancy PH 1 bedroom	2,013	Closed	If needed
Tom2BR	Site-Based, General Occupancy PH 2 bedrooms	804	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 accounts for some duplications of applicants across waiting lists, however, at the time of application, clients may apply for all open waiting lists. As a result, the number of households reported here will 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.
McGraw1BR	RHA will apply to reposition this property using RAD in the coming months. Once the RAD conversion is finalized, waitlists for the property will be changed to accommodate the switch to PBV.
Essex2BR & Essex3BR	RHA will apply to reposition this property using a RAD/Section 18 blend in the coming months. Once the conversion is finalized, waitlists for the property will be changed to accommodate the switch to PBV.
Stead2BR & Stead3BR	RHA will apply to reposition this property using RAD in the coming months. Once the RAD conversion is finalized, waitlists for the property will be changed to accommodate the switch to PBV.

Section III

# Proposed Activities





### III. Proposed MTW Activities

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This section describes RHA's proposed MTW activities for the coming year. Information is included on which MTW statutory objective(s) will be achieved, the anticipated impact of the proposed activity on the stated objective(s) and the anticipated schedules for achieving the stated objective(s).

In FY 2026, RHA is proposing the following new MTW activities:

#### 2026-01: Direct Rental Assistance

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##### A. Activity Description

In 2016, Nevada's leaders remapped the state's economic development plan as the City of Reno, the City of Sparks, and Washoe County embraced the future as a tech and manufacturing hub for some of Fortune's highest-ranked companies. The population influx that followed altered the community's rental market as vacancy rates quickly decreased and rents steadily increased. A shortage of affordable housing units was at the forefront as HCV participants had an increasingly harder time finding units and RHA's lease-up success rate decreased to 56% in July 2018.

Washoe County's population has continued to steadily increase as a result, up from 453,616 in 2016 to an estimated 498,022 in 2023<sup>6</sup> and the Nevada State Demographer estimates that this is expected to increase to 547,891 by 2028.<sup>7</sup> An ongoing volatile rental market left 52% of renter-occupied households rent-burdened in 2023, paying more than 30% of their income on rent.<sup>8</sup> Although the market has recently shown signs of stabilizing, RHA's HCV participants still struggle to secure affordable units and RHA's lease-up success rate has increased only slightly, currently sitting at 60%.

In addition to the tight rental market experienced locally, a study conducted by the Office of Policy Development and Research (PD&R) also shed light on the challenges faced by voucher recipients nationally.<sup>9</sup> Notably, the study found that searching for housing with a voucher was time consuming and frustrating with clear evidence of outright denial. On the other hand, research has also shown that housing vouchers are a cost-effective policy<sup>10</sup> that can effectively reduce rent burdens, overcrowding, and homelessness.<sup>11</sup> However, persistent implementation challenges continue to limit the ability of

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<sup>6</sup> Annual Estimates of the Resident Population for Counties in Nevada: April 1, 2020 to July 1, 2023 (CO-EST2023-POP-32).

<sup>7</sup> Annual Report on the Projected Population of Counties in the State of Nevada from July 1, 2024, to July 1, 2028.

<sup>8</sup> U.S. Census Bureau, U.S. Department of Commerce. "Selected Housing Characteristics." American Community Survey, ACS 1-Year Estimates Data Profiles, Table DP04, 2023, [https://data.census.gov/table/ACSDP1Y2023.DP04?q=housing in washoe county, nv&t=Housing Units:Owner/Renter \(Householder\) Characteristics&y=2023](https://data.census.gov/table/ACSDP1Y2023.DP04?q=housing%20in%20washoe%20county,%20nv&t=Housing%20Units:Owner/Renter%20(Householder)%20Characteristics&y=2023).

<sup>9</sup> HUD's Office of Policy Development and Research (PD&R), "A Pilot Study of Landlord Acceptance of Housing Choice Vouchers".

<sup>10</sup> Olsen, Edgar O. (2003). "Housing Programs for Low-Income Households." In *Means-Tested Transfer Programs in the United States*. Ed. Robert A. Moffitt. University of Chicago Press, 365-442.

<sup>11</sup> Jacob, Brian A., and Jens Ludwig (2012). "The Effects of Housing Assistance on Labor Supply: Evidence from a Voucher Lottery." *American Economic Review*, 102(1): 272-304; Ellen, Ingrid Gould (2020). "What Do We Know About Housing Choice Vouchers?" *Regional Science and Urban Economics*, 80. <https://doi.org/10.1016/j.regsciurbeco.2018.07.003>.



recipients to benefit from vouchers and, nationally, only 61% of households offered vouchers can successfully use them, with even lower rates in tighter markets.<sup>12</sup> Overall, landlords frequently object to housing quality inspections, delays in leasing, and overall bureaucratic inefficiency in the HCV program.<sup>13</sup> Locally, Washoe County faces similar challenges for families in the voucher program and Nevada has no source of income protections in place.

In November 2024, RHA administered a survey of current HCV landlords where they were asked about their experience navigating the HCV program. Of those who responded, 50% indicated that rent reasonableness and inspections were the most challenging aspects of the HCV program. In fact, one survey respondent even noted that an “easier process for rent increases” would be an ideal re-lease bonus rather than identifying a specific dollar amount. Furthermore, 60% of these landlords agreed that the time between finding a voucher tenant and receiving the first rental payment from RHA was too long.

In 2023, as housing costs continued to rise in the Truckee Meadows, RHA began exploring alternative ways to increase the number of affordable housing units available to lower-income families without focusing entirely on new construction and/or development. As emerging research from several guaranteed income pilot programs began demonstrating the effectiveness of cash assistance in helping households secure housing and pay for basic household needs, RHA started to explore how similar assistance could be provided in Washoe County. Staff questioned whether the housing problems for some of these rent-burdened households could be alleviated if they were provided with cash-based rental assistance rather than a traditional HCV tenant-based voucher. Could affordable housing options increase for these households if a subsidy were provided directly to them rather than the landlord, as doing so would mimic the steady income requirements of market rate renters? Would the number of landlords willing to house lower-income families increase based on reduced bureaucratic red tape? Will the geographical spread of these families widen, or will the quality of housing chosen by these families change, if they are simply provided with more of a choice on where they spend their rental assistance dollars?

Amid growing interest to inform HUD's voucher assistance program and work toward finding an answer to many of these questions, RHA is proposing to implement a Direct Rental Assistance (DRA) pilot program as a Local Non-Traditional (LNT) activity in FY 2026. RHA's DRA program design will rigorously study whether participants can overcome some of the challenges often cited by voucher holders by simply changing the way the subsidy is delivered. To do this, RHA proposes a DRA model that is similar to HUD's HCV tenant-based assistance, with two key differences intended to remove administrative burdens for participants, landlords, and RHA. First, the rental subsidy payment from RHA will be made directly to the renter and the renter will be responsible for paying their rent to the landlord in full and on time. Any subsidy received through participation in the DRA study must be used to support the household's rent. Second, RHA's proposed model will allow for

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<sup>12</sup> Ellen, Ingrid Gould, Katherine O'Regan, and Sarah Stochak (2021). Using HUD Administrative Data to Estimate Success Rates and Search Durations for New Voucher Recipients. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, December 2021. [https://www.huduser.gov/portal/sites/default/files/pdf/Voucher-Success\\_Rates.pdf](https://www.huduser.gov/portal/sites/default/files/pdf/Voucher-Success_Rates.pdf)

<sup>13</sup> Garboden, Philip, Eva Rosen, Meredith Greif, Stefanie DeLuca, and Kathryn Edin. Rep. *Urban Landlords and the Housing Choice Voucher Program: A Research Report*, May 30, 2018. <https://www.huduser.gov/portal/publications/UrbanLandlords.html>



remote video inspections of units rather than waiting for a physical inspection to be scheduled, which both research and HUD have identified as particularly challenging for landlords in tight housing markets.<sup>14</sup> To help ensure that units meet quality standards, RHA will educate and empower residents to select appropriate units.

RHA's pilot will pull applicants, excluding those whose primary source of income is fixed (i.e. Social Security), directly from the current HCV waiting list. These households will be briefed on details of the DRA pilot program and provided with an opportunity to opt-in before being placed in a pool to randomly receive either DRA assistance or traditional HCV tenant-based assistance.<sup>15</sup> Households randomly selected to receive traditional HCV tenant-based assistance following the briefing will serve as the study's control group.

RHA's proposed DRA pilot program will emphasize eliminating or streamlining the identified administrative processes that make it hard to use vouchers as these processes oftentimes create challenges for housing authorities, landlords, and households alike. To rigorously study this new approach to housing assistance, RHA has partnered with the Housing Solutions Lab at the NYU Furman Center<sup>16</sup> and proposes to put the following design elements in place:

### Subsidy Amounts and Rent Reasonableness

Subsidy amounts will largely mirror those in the HCV program, but will incorporate a "shopping incentive" that motivates households to seek cost-effective units and reduce the need for a bureaucratic procedure to ensure rent reasonableness. In the HCV program, subsidies are calculated based on the difference between 30% of the household's monthly adjusted income and the payment standard or the unit's actual rent, whichever is lower. This formula means that a household has no incentive to lease a unit whose rent is below the payment standard, as the subsidy amount will be lowered accordingly. The DRA subsidy will similarly be the difference between 30% of the household's monthly adjusted income and RHA's current payment standards for the HCV program. While the subsidy will be capped at the unit's gross rent, it will not be reduced if a household chooses

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<sup>14</sup> Garboden, P., Rosen, E., DeLuca, S., and Edin, K. (2018). "Taking Stock: What Drives Landlord Participation in the Housing Choice Voucher Program," *Housing Policy Debate* 28 (6): 979–1003; Greenlee, A. (2014). "More Than Meets the Market? Landlord Agency in the Illinois Housing Choice Voucher Program," *Housing Policy Debate* 24 (3): 500–524; Zuberi, A. (2019). "The Other Side of the Story: Exploring the Experiences of Landlords in Order to Improve Housing Opportunity for Low-Income Households." Working paper. New York: New York University, Furman Center; Stegman, M., and Shea, D. (2024). "Reforming the Inspections Process: A Necessary Step for a Stronger Housing Choice Voucher Program." Research Report. Urban Institute. [https://www.urban.org/sites/default/files/2024-03/Reforming\\_the\\_Inspections\\_Process.pdf](https://www.urban.org/sites/default/files/2024-03/Reforming_the_Inspections_Process.pdf)

<sup>15</sup> Households choosing to opt out of the DRA study following their initial briefing will be placed back on the waiting list and possibly held there until this study is fully leased. Although RHA works through its waiting lists more rapidly than many PHAs, the typical household local to Washoe County spends approximately 18-24 months on the waiting list with non-local applicants waiting longer.

<sup>16</sup> With support from the Abdul Latif Jameel Poverty Action Lab (J-PAL) and other funders, and in partnership with RHA, the Housing Solutions Lab at the NYU Furman Center will undertake a rigorous, mixed-methods evaluation that harnesses the random selection of households from RHA's voucher waitlist to receive either a voucher or DRA to measure the impact of receiving DRA on lease-up, rent payment, housing quality, housing stability, mobility to high-opportunity neighborhoods, landlord participation, and administrative burdens. The evaluation will draw on administrative data collected by RHA as well as qualitative data gathered from treatment and control households and from landlords.



a unit with a gross rent lower than the payment standard. This incentivizes households to “shop” for a cost-effective unit, just as an unsubsidized renter would. A more detailed illustration of this shopping incentive has been included within Attachment 3: DRA Supporting Documentation.

The shopping incentive described above creates housing search conditions that more closely resemble those of unassisted tenants in the private market. These conditions will naturally help ensure both DRA assisted households and RHA do not overpay for housing<sup>17</sup>. RHA has already been experimenting with ways to streamline the rent reasonableness procedure. In response to the area’s rental market, RHA began waiving the requirement for a rent reasonableness determination for most contract rent increases in FY 2024.<sup>18</sup> Rather, the agency has opted to automatically approve a rent increase request without requiring a rent reasonableness redetermination if the amount requested does not exceed RHA’s payment standards. RHA proposes to extend this policy change to DRA assisted households. Based on this policy, rent reasonableness requirements for initial rents will not be required if the requested rent does not exceed RHA’s applicable payment standards. This shift will empower participants in the study to control their own budgets and allow them to choose units the same way unassisted households do while ensuring that neither the DRA assisted household nor RHA overpay for housing.

To provide additional support for waiving the rent reasonableness requirement, RHA looked at households who moved onto its traditional HCV program between July 1, 2023, and December 31, 2024. During this time, RHA moved 114 households onto its traditional HCV program of which 60 would have been found eligible to participate in the proposed DRA study. Of the 60, 23% failed to meet the rent reasonableness test and were found not rent reasonable at initial Request for Tenancy Approval (RFTA) submission. However, upon reviewing each of the households who experienced hurdles related to rent reasonableness, 62.3% were properties where income/rent restrictions were already in place. Further analysis revealed that 71.4% were units managed by the same large property management company.

Once DRA participants locate a unit that they opt to lease, RHA will not require a RFTA submittal. Rather, RHA will require DRA participants to schedule a remote video inspection of the unit, and once the unit passes inspection, submit a copy of their executed lease agreements to establish tenancy and determine subsidy amounts.<sup>19</sup> The amount of subsidy the family will receive will be finalized based on the executed lease agreement and provided to the family via direct deposit within two weeks of lease receipt. Once finalized, this subsidy amount will not change for 12 months. As part of RHA’s proposed study, within one year of tenants leasing units in the DRA pilot RHA will conduct an evaluation to determine if the units would have met the rent reasonableness standards during the lease up process. Should RHA determine one or more unit(s) would not have passed this test RHA will determine how much rent has been overpaid to the landlord(s). RHA will then enter into a

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<sup>17</sup> If needed, RHA can provide DRA assisted households with a range of rents that recently passed the rent reasonableness test throughout the local area as they begin shopping. Recognizing that this amount will vary based on the specific unit, if provided, this data would only serve as a guide to give participants a general understanding of the amount of rent approved within a specific zip code/area that they may be considering.

<sup>18</sup> Throughout FY 2024, only 3% of the 1,343 requested rent increase amounts were not approved by RHA based on this rent reasonableness policy.

<sup>19</sup> Like the voucher program, RHA will not require that DRA participants sign a one-year lease agreement, however, an executed lease must be submitted and on file with RHA for continued assistance.



repayment agreement with the HUD Voucher Office's Quality Assurance Division (QAD) for any overpayments of rent relative to the rent reasonableness determination. This process will be repeated unless RHA decides to discontinue this element of the policy.

At the one-year anniversary, RHA will recertify changes to household income and recalculate subsidy levels based on documented rent increases occurring as leases are renewed. The only exception to this calculation/recertification schedule occurs if the household changes units within that 12-month timeframe.

### Inspections

Just as the National Standards for the Physical Inspection of Real Estate (NSPIRE) sets inspection standards that prioritize health, safety, and functional and structural defects, Nevada law also provides for tenant protections that require landlords to maintain the dwelling unit in a habitable condition putting focus on the areas that impact residents the most. Under Nevada Revised Statute (NRS) 118A.290, a dwelling unit is not habitable if it violates provisions for codes concerning the health, safety and sanitation of the dwelling or if it lacks the basic minimum requirements needed for habitation.<sup>20</sup> In addition to NRS, Washoe County's building codes provide oversight and regulation that ensure safety, habitability, and compliance with local construction and fire codes for all rental properties. While these building codes are primarily designed to ensure structural soundness and safety for all occupants, they also protect tenants indirectly by setting standards for habitable rental properties. An overview of Washoe County's code in relation to HUD HQS/NSPIRE standards is provided within Attachment 3: DRA Supporting Documentation.

To honor DRA participants' own decision-making, RHA proposes to allow remote video inspections of DRA assisted units prior to lease up. To help streamline the selection of quality units, RHA will provide DRA participants with the education they need to select an appropriate unit during the initial briefing session. This will include providing them with a self-inspection checklist already in use at RHA and materials on life-threatening conditions that must be corrected within 24 hours. RHA will ensure all training materials clearly demonstrate what participants should look for and what would or would not pass an NSPIRE inspection and emphasize that the unit must pass inspection, and any life-threatening conditions must be remedied, prior to lease execution. Once a unit is selected, DRA participants will be required to schedule a remote video inspection with RHA staff to ensure that the unit is safe, decent, sanitary, and in good repair. Participants will be provided with a letter explaining the need and the process for scheduling and conducting the inspection prior to executing a lease. They will also have access to an "inspection kit" on loan. This kit will contain the necessary equipment to effectively serve as the proxy for the NSPIRE inspection. To continue to provide a sense of autonomy, the decision on who will be attending the remote video inspection and serving as proxy will be a mutual decision between the DRA participant and their prospective landlord. If, for any reason, a DRA participant is unable to conduct a remote video inspection, the participant must schedule a physical inspection with RHA staff prior to lease-up.

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<sup>20</sup> NRS 118A.290 Habitability of dwelling unit; prohibition against fees or other charges for performance of repairs, maintenance tasks or other work that is duty of landlord.  
<https://www.leg.state.nv.us/nrs/nrs-118a.html#NRS118ASec050>



When reviewing the 60 households who leased up under the HCV program between July 1, 2023, and December 31, 2024, RHA found that 43% failed at initial inspection. Of these failed inspections, 56% were units located within income restricted properties and 60% were managed by two large property management companies. Following the initial failed inspection, all noted items were corrected with a passing inspection being issued within 10 days on average suggesting the initial reason for the failed inspection was not a major structural deficiency, mold or insect infestation, or other issue that would take more than 10 days to resolve.

After further reviewing this data from inspections between July 1, 2023, and December 31, 2024, one of RHA's inspectors was asked about the results to gauge whether any nuance to the quantitative data collected existed. The inspector, who has four years of inspecting experience with RHA, explained that those two management companies that experienced higher percentages of initial failures were mainly due to three factors. The first two being that these management companies experience a lot of maintenance staff turnover and, as a result, do not always hire the most qualified individuals to perform maintenance on their properties. The third factor mentioned involved pre-inspection, which these management companies typically do not do. RHA provides plenty of notice prior to unit inspection and will continue to recommend that management pre-inspect their own units before scheduling an inspection with RHA. By not conducting pre-inspections themselves, properties managed by these companies experience a higher-than-average initial inspection fail rate.

Based on these findings, RHA does not anticipate that many DRA assisted units will fail during the initial remote video inspection. Rather, RHA wants to put procedures in place to ensure that DRA participants do not miss the opportunity to lease a quality unit of their choosing while waiting for an inspection to be completed. Currently, within the HCV program, it can take up to three weeks to complete an NSPIRE inspection on a unit prior to a voucher holder being able to lease up. This gap can often lead to frustration for the landlord and confusion for the HCV participant on the appropriate time to provide any required move-out notice. As DRA participants will not be subject to the Request for Tenancy Approval (RFTA) process and can schedule a remote video inspection directly with RHA staff, it is anticipated that this scheduling gap will be reduced exponentially. Recently, several members of RHA's staff received training on NSPIRE inspections and are qualified to oversee any scheduled remote video inspection. Considering RHA's proposed onboarding schedule of four DRA households monthly, it is anticipated that remote video inspections for these units will be scheduled within two to five days.

Following lease-up, should a landlord fail to maintain a dwelling unit in a habitable condition as required in NRS 118A.290, DRA participants have the same protections as unsubsidized renters. As a HAP contract will not be executed between RHA and the landlord, RHA has secured a letter of intent to enter into an Memorandum of Understanding (MOU) with Northern Nevada Legal Aid to resolve any tenant/landlord issues that may arise surrounding housing quality.<sup>21</sup> Nevada law, NRS 118A.355, does have provisions that allow tenants to terminate rental agreements immediately or withhold any rent that becomes due without incurring late fees, charges for notice or any other charge or fee authorized by the rental agreement until the landlord has remedied, or has attempted in good

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<sup>21</sup> A letter of intent from Northern Nevada Legal Aid to execute an MOU with RHA to provide legal assistance regarding the resolution of habitability issues is attached at the end of this plan as DRA Supporting Documentation (see Attachment 3).



faith to remedy, the failure to maintain a dwelling unit in habitable condition.<sup>22</sup> Although RHA does not anticipate the need to refer DRA participants to legal aid for habitability issues within the unit, should an issue arise, it is understood that the process can be intimidating and confusing for some. RHA's executed MOU with Northern Nevada Legal Aid will help ensure that representation is in place to protect both DRA participants and their landlords.

Washoe County's housing stock is relatively new, with nearly 65% of units built after 1980,<sup>23</sup> as a result households face less risk of exposure to poor housing quality and lead safety issues than in many other localities. The U.S. Climate Vulnerability Index created an Old Housing Stock national vulnerability percentile, consisting of housing built between 1940 and 1996, to compare housing stock throughout the United States. The lower the vulnerability percentile, the younger the housing stock is in that area. Nevada ranks 51 out of 51 states/districts in the United States for old housing stock, meaning Nevada has some of the newest housing stock in the United States. Washoe County is in the 4<sup>th</sup> percentile, or in the lowest vulnerability category for housing stock. The Climate Vulnerability Index shows that Washoe County has an average build year of 2015-2019 for the current housing stock in the area.<sup>24</sup> With this information, RHA believes that a scarce number of properties built before 1978 may be leased to participants in the DRA pilot study. During the briefing, RHA will educate potential participants on issues related to renting a unit that was built prior to 1978. Should a family with children under the age of six (6) consider leasing one of these older units, RHA will require that a physical inspection of the unit be conducted rather than utilizing the remote video inspection option.

This approach to inspections will allow the pilot to explore whether housing quality goals can be met in this context with a lighter, participant-driven approach. The evaluators will draw on inspection checklists, photos, and survey responses provided by pilot participants to closely track quality outcomes during the pilot period.

### Tenant Protections/Hardship Policy

Currently, the HCV program provides guidance regarding tenant protections through a briefing prior to voucher issuance. RHA's DRA program will mirror this approach. As such, tenant protections such as VAWA and Fair Housing will be included in this onboarding session.

RHA's DRA program is designed to allow participants to be more like unsubsidized renters while receiving a housing subsidy. As such, RHA's hardship policy is rather limited but allows for referral to RHA's community partners for assistance. On June 10, 2025, NV AB475 was signed by Nevada Governor Joe Lombardo and put in place for the state.<sup>25</sup> This bill appropriates funds from the Nevada

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<sup>22</sup> NRS 118A.355 Failure of landlord to maintain dwelling unit in habitable condition.  
<https://www.leg.state.nv.us/nrs/nrs-118a.html#NRS118ASec050>

<sup>23</sup> U.S. Census Bureau, U.S. Department of Commerce. "Physical Housing Characteristics for Occupied Housing Units." *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S2504*, 2023,  
<https://data.census.gov/table/ACSST5Y2023.S2504?q=housing+in+washoe+county,+nv&tp=false>. Accessed on March 6, 2025.

<sup>24</sup> [https://map.climatevulnerabilityindex.org/report/percent\\_of\\_housing\\_units\\_built\\_between\\_1940\\_1969/washoe-county-nevada?mapBoundaries=County&mapFilter=0&reportBoundaries=County&geoContext=State](https://map.climatevulnerabilityindex.org/report/percent_of_housing_units_built_between_1940_1969/washoe-county-nevada?mapBoundaries=County&mapFilter=0&reportBoundaries=County&geoContext=State)

<sup>25</sup> <https://www.leg.state.nv.us/App/NELIS/REL/83rd2025/Bill/12725/Overview>



State General Fund to three different entities for eviction diversion programs. The City of Reno was appropriated a sum of \$5,250,000 for such a program throughout Washoe County. Should a DRA participant notify RHA that they have experienced a loss of income or increased expenses that threaten their continued assistance, they will be referred to the City of Reno's eviction diversion program for assistance.

Pursuant to RHA's Admin Plan for the HCV program and prior to any loss of assistance, RHA will provide DRA participants with the opportunity to request an informal hearing. The informal hearing will be conducted by RHA staff in the presence of RHA's Hearing Officer. Determinations for continued assistance relating to the individual circumstances of the household will then be based on a preponderance of the evidence/documentation presented at this hearing. Beyond this process, there will be no additional hardship or grievance policies.<sup>26</sup>

### End of Study

Based on the results of this study, RHA may extend the direct payment option to participating households if the treatment is successful. Regardless, once the DRA participant has been on the program for 18 months, they will be provided with the option to apply for RHA's HCV waiting list, even if the waiting list is closed at that time or continue receiving DRA assistance if RHA continues with the treatment. To ensure households are able to remain assisted, if needed, DRA participants will be provided with a waiting list preference and rescreened for eligibility based on RHA's regular voucher program rules at that time.

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

RHA anticipates that this activity will increase housing choice for low-income families *and* reduce costs and achieve greater cost effectiveness in federal expenditures. By implementing DRA in the form of a randomized trial paired with a rigorous, mixed-methods evaluation, researchers from the Housing Solutions Lab at the NYU Furman Center propose to measure whether the intervention can increase lease-up, households' mobility to high-opportunity neighborhoods, and landlord participation, and reduce administrative burdens for all parties in ways that translate to cost savings.

#### *Anticipated impact of the proposed MTW activity on the stated statutory objective*

RHA anticipates that implementation of this activity will reduce costs and achieve greater cost effectiveness by decreasing many of the administrative burdens that accompany the voucher program and by attracting new landlords to the voucher program. Furthermore, DRA assisted households will be empowered to make decisions based on their specific housing needs as landlords will work directly with the household with limited involvement of RHA. One of the theories to be tested is whether this light interaction with RHA will increase housing choice for this study group allowing for faster lease up times and increased utilization rates.

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

Following approval of this activity, RHA will begin selecting eligible households from the current HCV waiting list. It is anticipated that the first group of DRA assisted households will be selected the fall of 2026 at the earliest. RHA's intent is to have approximately 200 households between the

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<sup>26</sup> The evaluators will examine eviction rates to understand whether and how they differ from those in the traditional HCV program.



control group and the DRA assisted group once fully implemented. Based entirely on RHA’s current attrition rate, and to ensure that households who may be excluded from participation in this DRA pilot program continue to be provided with assistance, RHA anticipates onboarding approximately eight households per month over the course of 24 months.<sup>27</sup> Each DRA assisted household will participate in the study for two years from the date that they receive their first subsidy payment. Based on this timeline, RHA expects to have a final evaluation of the study in late 2030 or early 2031.

*Will this proposed activity be applied to any Special Purpose Voucher (SPV) types?*  
RHA is not proposing to apply this activity to any SPV population types.

**B. Cost Implications**

*Describe whether the proposed activity will result in any cost implications (positive and/or negative), provide an estimate of the amount, and discuss how the surplus or deficit anticipated will be managed.*

As previously mentioned, between July 1, 2023, and December 31, 2024, RHA moved 114 households onto its traditional HCV program. Of these, 60 households would have been found eligible to participate in the proposed DRA study. Based entirely on this group of new move-ins and the proposed subsidy calculation, RHA anticipates an approximate DRA subsidy amount of \$1,346 per household per month. By comparison, the average amount of HAP paid to landlords for this same group at move-in was \$1,234 per household per month.

Following HUD approval, RHA will begin to randomly select households to participate in its DRA pilot program with subsidy amounts similar to those housed with a traditional HCV tenant-based voucher. As lease up will occur based on the agency’s attrition rate, staff does not expect this activity to increase costs significantly. Cost savings associated with decreases in administrative burdens, such as rent reasonableness, or other administrative steps involved in the initial lease up process will serve to offset any unforeseen expenses related to implementing this activity.

The following table estimates the cost implications of this study should RHA provide DRA subsidy to 100 households for two years based on current attrition rates:

<b>Estimated Annual Cost by FY<sup>28</sup></b>	
FY 2026	\$296,153
FY 2027	\$1,095,766.10
FY 2028	\$1,409,688.28
FY 2029	\$679,536.52
FY 2030	\$30,692.22
<b>TOTAL</b>	<b>\$3,511,836.12</b>

<sup>27</sup> This schedule may be altered based on available funding, future attrition rates, and/or voucher utilization rates.

<sup>28</sup> Cost estimates are based entirely on the data pulled from 60 new HCV move-ins between July 1, 2023, and December 31, 2024. RHA anticipates that the DRA study could begin enrollments on September 1, 2025, however, this date is completely reliant on HUD’s approval of this plan by July 1, 2025.



It is important to note that the table does not include those who will be housed with a traditional HCV voucher thus participating in the control group. These households will continue to receive assistance following the end of the study. The table does reflect costs associated with increasing the DRA study participants by four households per month and reducing the number of participants by four households per month following a two-year timeline. Although subsidy amounts for this study will remain relatively fixed, RHA will recalculate annual income and subsidy amounts annually with lease expiration/renewal. As such, the costs estimated above also assume a 10% contract rent increase following one year of tenancy.

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

*Cite the authorization(s) that allows for the flexibility to conduct the proposed activity and explain why the cited authorization(s) is needed.*

This activity requires the following authorizations to allow RHA to implement a Local Non-Traditional activity with single fund budget flexibility as well as hold households on the waiting list who may choose to opt out of participating. To avoid loss of assistance at the end of the two-year study, the authorization will allow participants to apply to RHA's waiting list at 18 months and be rescreened for eligibility based on current HCV program rules. It is also needed to provide DRA assisted households the option to apply to the waiting list even if the waiting list is closed and allow for a preference.

The use of the MTW block grant as outlined in PIH Notice 2011-45 (HA) is required for implementation of this activity. Furthermore, RHA's executed MTW agreement, Attachment D - Use of MTW Funds and Attachment C, Section D as indicated below.

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

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

#### **D.4. *Waiting List Policies***

The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime 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)(6), 8(o)(13)(J), and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F.*

Section IV

# Approved 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	Statutory Objective(s)	Authorization(s) Cited
2014-02	Mobility Demonstration	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	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	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	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	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.9.a. and D.5.
2016-01	Simplification of medical deductions	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2016-05	Eliminate Earned Income Disallowance (EID)	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2016-06	Disregard earned income of PH household members, age 18-20, who are not the head of household or co-head	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	Reduce costs and achieve greater cost effectiveness.	Attachment C Section D.1.a.
2017-01	Increase verified application data for HCV applicants	Reduce costs and achieve greater cost effectiveness <i>and</i> increase housing choices for low-income families.	Attachment C Section D.3.a.



Activity #	Activity Name	Statutory Objective(s)	Authorization(s) Cited
2017-02	Asset threshold to determine eligibility for admission	Increase housing choices for low-income families.	Attachment C Sections C.2., D.3.a., D.3.b., and D.4.
2018-01	Landlord Incentive Program	Increase housing choice for low-income families.	Attachment C Sections D.1.a. and D.1.d.
2019-01	Redetermination of rent reasonableness as a result of a change in contract rent	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	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	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	Increase housing choices for low-income families.	Attachment D Use of MTW Funds and MTW block grant outlined in PIH 2011-45 (HA)
2022-01	Workforce Development Program	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E
2024-02	Local Project Based Voucher Program	Reduce costs and achieve greater cost effectiveness <i>and</i> 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.
2025-01	Reduce Interim Recertifications	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.4., C.11., D.1.c., and D.2.a.



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

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

This activity was approved and implemented in FY 2014.

### **Description**

RHA's Mobility Demonstration allows qualified low-income PH families with children to move to neighborhoods where opportunities are more abundant within the surrounding area. To enable these families to move, RHA assigns 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.

### **SPV Population Types**

RHA is not applying this activity to any SPV population types.

### **Status/Update**

To date, 59 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 41% or 24 families having successfully transitioned off housing assistance.

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2014. It was amended in FY 2024 to increase the minimum rent to \$100 and again in FY 2025 to allow households with assets less than \$50,000 to submit a self-certification as to the value of the asset.

### **Description**

RHA is excluding all educational financial aid from income calculations and allowing self-certification of assets under \$50,000. Income received from assets less than \$50,000 is not calculated, verified, or included in rent calculations. 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. Implementation of this activity also raised RHA's minimum rent to \$100, not only saving HCV and PH operating subsidy but providing an incentive for participants to seek employment due to a higher rent contribution.

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types,



however, HUD-VASH participants are excluded from the minimum rent portion of this activity and subject to a minimum rent of \$0. The planned change noted below will also be applied to these same population types.

**Status/Update**

This activity will remain ongoing in FY 2026.

**Planned Changes**

In FY 2026, RHA will continue to exclude the full amount of student financial assistance paid directly to the student or to the educational institution from income calculations for PH residents as was the case prior to HOTMA. RHA's PH residents will continue to attend an institution of higher education without being penalized with an increase in rent due to any financial assistance that they may secure.

Current regulations require RHA to verify income for all assisted households based on HUD's hierarchy of verification, including family members who provide financial support to assisted household. This support can vary greatly from cash assistance, childcare or simply paying for monthly utility bills such as cell phones. Following HUD's hierarchy and requiring written verification from family members can often result in delays in the recertification process. To streamline this process, RHA will now require full verification of income during the Admissions process only. Once housed, clients receiving financial support from a family member will be allowed to provide self-certification of the amount of income received rather than going through HUD's hierarchy of verification.

RHA does not anticipate any additional non-significant or significant changes to this activity.

**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 2023, adjustments to the HCV payment standard began to be applied to the family's rent calculation once a rent increase was initiated by the participant's landlord and processed by RHA.

**Description**

Elderly and/or disabled PH residents and HCV participants on fixed incomes 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 Cost-of-Living Adjustment (COLA) increases being processed every third year.

**SPV Population Types**

RHA is currently applying this activity to EHV, NED, and HUD-VASH population types. The planned change noted below will also be applied to these same population types.



**Status/Update**

In FY 2025, RHA began allowing households with minors to be included in the triennial recertification schedule if the household meets both the elderly or disabled definition as defined by HUD and the stable income definition. Stable income sources include and are limited to: Social Security benefits, Supplemental Security Income (SSI), Social Security Disability (SSD), and pensions. There can be no earned income in the household.

This activity will remain ongoing in FY 2026.

**Planned Changes**

In order to maintain this triennial recertification schedule, households on the triennial schedule, who are eligible for income verifications using applicable safe harbor rules, will be required to continue to have annual income broken out by source.

RHA will continue to apply increased payment standards at the time of the household's annual recertification or during the processing of a contract rent increase initiated by the landlord. When HCV participants on a triennial recertification schedule have no interim recertification or change in gross rent/family share, increases to the payment standard will be processed outside of the 12-month window required by HUD.

RHA does not anticipate any additional non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2015.

**Description**

RHA's PH residents and HCV participants no longer receive negative rents due to utility allowances. Furthermore, RHA simplified the HCV utility allowances for all units by creating a flat utility allowance schedule based on structure type and authorized voucher bedroom size. The simplified utility allowances are reviewed annually and 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. With a tightening rental market, RHA noted an increase in the number of landlords who began requiring tenants to pay additional utilities such as water, sewer, and trash. To reduce the financial burden on HCV participants, RHA has established two simplified utility allowance schedules to cover the cost of these additional utilities.

**SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types, however, HUD-VASH participants continue to receive utility reimbursement payments.

**Status/Update**

This activity will remain ongoing in FY 2026.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.



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

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

This activity was approved and implemented in FY 2015.

### **Description**

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

### **SPV Population Types**

SPV population types are not applicable to this activity.

### **Status/Update**

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

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

### **Description**

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

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

### **Status/Update**

RHA reviews and adjusts the standardized medical deduction amounts annually to determine their overall viability for program participants. In FY 2026, RHA does not anticipate that any adjustments needed to the income tiers or corresponding medical deductions.

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.



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

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

This activity was approved and implemented in FY 2016.

**Description**

Earned Income Disallowance (EID) allows eligible tenants in the PH and HCV programs to increase their incomes through employment without triggering rent increases. In FY 2016, RHA eliminated the HUD-mandated EID from the calculation of rent.

**SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

**Status/Update**

This activity will remain ongoing in FY 2026.

**Planned Changes**

HUD issued guidance that as of January 1, 2024, all PHAs were required to stop enrolling families in EID as a result of the Housing Opportunity Through Modernization Act (HOTMA). As EID no longer applies to any family who was not eligible for and already participating in the disallowance as of December 1, 2023, RHA anticipates closing this activity in the FY 2025 MTW Annual Report.

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2016.

**Description**

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

In FY 2016, RHA began providing these adult children, ages 18-20 who live in PH and are not the head of household or co-head, with 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.

**SPV Population Types**

SPV population types are not applicable to this activity.

**Status/Update**

This activity will remain ongoing in FY 2026.



### **Planned Changes**

Currently, RHA is developing ways to ensure that this population is educated about, referred to, and participating in RHA's WFD Program prior to entering adulthood. RHA's WFD Program will specifically target this age group, providing or connecting them to available educational opportunities and job training that promotes economic independence and sustainable employment rather than continuing to exclude income received from jobs the youth may have had pre-graduation. Although this may result in an increased rent burden being placed on the household, RHA believes that the likelihood of these young adults becoming self-sufficient should they choose to participate in RHA's WFD Program, will also increase.

Furthermore, implementation of the policy change outlined in *2025-01: Reduce Interim Recertifications* eliminates the need for household to report increases in income until their next annual recertification. As a result, these households will no longer have an automatic rent increase once the young adult turns 18. Based on this policy change and outreach to inform this age group about the opportunity to join RHA's WFD Program as they work toward their self-sufficiency goals, may result in RHA closing this activity in the FY 2025 Annual MTW Report.

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2016.

#### **Description**

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 additional HQS inspections. 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. 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.



**SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

**Status/Update**

This activity will remain ongoing in FY 2026.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2017.

**Description**

RHA's Admin Plan and federal regulations require that information submitted by each applicant be verified by staff to ensure that the data provided by the applicant that was used to determine eligibility, priority status, HAP to be paid and voucher size is true and complete. Per CFR §982.201(e), RHA must receive information verifying that an applicant is eligible for the HCV program within the period of 60 days prior to the issuance of a voucher to the applicant. Information not subject to change (i.e., date and place of birth) does not need to be re-verified. Information that is subject to change, which was verified more than 60 days prior, must be re-verified close to certification of the applicant's file. If there is a delay after the file has been certified and referred to the HCV program that will cause an applicant to not lease up, the voucher is suspended while the information is re-verified. If changes are reported late, the file will be returned to Admissions staff to obtain written verification and to determine their effect on eligibility, rent, and unit size.

The amount of time RHA staff spent following-up and tracking third-party verification requests 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 extended 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.

**SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

**Status/Update**

This activity will remain ongoing in FY 2026.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.



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

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

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

### **Description**

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

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

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

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

### **Status/Update**

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

## **2018-01: Landlord Incentive Program**

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

This activity was identified, 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. It was further expanded in FY 2025, to allow for a vacancy loss payment and to allow initial inspection results to be valid for 90 days.

### **Description**

Based on information received from landlords through a survey which noted barriers to their continued participation in the HCV program, RHA implemented a Landlord Incentive Program in FY 2018 that was expanded upon in FY 2020 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 2025, RHA extended the actual length of time that the initial inspection results are valid for, from 45 days to 90 days.

**SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

**Status/Update**

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 and budget availability.

During this same time, RHA expanded the Landlord Incentive Program to provide landlords with a \$500 re-lease bonus and a \$1,000 referral bonus. In FY 2025, RHA also included a vacancy loss payment if the unit passed HQS on the first inspection. The re-lease bonus, referral bonus, and vacancy loss payment have yet to be implemented by RHA but based on RHA's voucher utilization rate and future market trends, all three of these incentives may be offered in the future.

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, landlord educational sessions, and resources.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2019. 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.

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.



Expanding this further in FY 2024, RHA began allowing for automatic approvals without a rent reasonableness redetermination of any CRI as long as the requested rent change does not exceed RHA's payment standards.

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

### **Status/Update**

During FY 2024, RHA processed 1,343 rent change requests of which 620 or 46% sought a change of 10% or less. 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 one that is above the applicable payment standard, or any 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 December 2024 is \$1,900<sup>29</sup>. This is \$50 more than December 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 policy in place for the coming year.

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2019.

### **Description**

Many of RHA's families who increase their household earnings and begin to pay full contract rent also experience the "benefits cliff." For many of these families, an increase in earned income results in a loss of eligibility for certain public benefits such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), childcare subsidy and housing. As a result, it is not uncommon for households approaching the end of the six-month period of zero assistance to elect to reduce their income or lose employment in order to keep their housing assistance as many remain fearful of no longer having the safety net offered through assistance eligibility.

To ease this fear and increase the success rate of RHA's HCV households in becoming economically self-sufficient, RHA adopted a new policy in FY 2019 that extends the length of time a household can remain on the HCV program while receiving zero assistance. By lengthening

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<sup>29</sup> <https://www.zillow.com/rental-manager/market-trends/reno-nv/>



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, accumulates monthly for up to 12 months and is 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.

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, and NED population types.

### **Status/Update**

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2021.

### **Description**

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



### **SPV Population Types**

SPV population types are not applicable to this activity.

### **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. Following the permanent relocation of existing tenants, RHA plans to demolish and replace the existing buildings 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. In order to increase the number of units that can be built on the site, a Master Plan Amendment to current zoning must be approved by the City of Reno. As of June 2024, the development budget was \$5,594,427. Based on 2023 TDC limits, \$2,423,894 of the budget will be funded through MTW Block Grant funds. Additionally, RHA was awarded \$701,348 in HOME-ARP funds from the State of Nevada. The agency is continuing to pursue other funding opportunities to fill the project's funding gaps.

RHA anticipates this project to be a supportive housing project and is actively pursuing funding opportunities to support intensive case management at the property including partnering with Washoe County as a co-applicant for a Nevada Supporting Housing Development Fund grant. RHA was awarded \$278,000 in HOME-ARP funds to fund the salary of a full-time supportive service provider on-site through 2030. RHA projects that once occupied, the property's cash flow will allow for that position to be funded beyond 2030.

#### 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. In partnership with Brinshore Development, RHA will demolish all 28 buildings and build new 3-story buildings that will create an additional 199 units of modern low-income affordable housing on the site. 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, RHA's Board of Commissioners have committed up to \$7,550,000 in MTW Block Grants to cover potential financial gaps.

RHA contracted with HousingtoHome, a relocation services company, to provide relocation services to tenants. Tenants were offered a variety of resources and continued rental assistance to smoothly transition to another property and maintain housing stability. Resident relocation is now complete. Although RHA has experienced a delay in closing on this property, financial closing of the property was complete in early 2025 with construction scheduled to start soon after.

This activity will remain ongoing in FY 2026.



### **Planned Changes**

RHA anticipates RHA's Board of Commissioners to obligate HUD-Held Reserves for the following Local Non-Traditional development activities with details on obligation amounts and timelines to follow:

- 440 Reno Avenue
- 2026 I Street/John McGraw Court

RHA does not anticipate any non-significant or significant changes to this activity.

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

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

This activity was approved and implemented in FY 2021.

#### **Description**

In FY 2021, RHA partnered with Eddy House, a local 501(c)3 non-profit, that serves as the central intake and assessment facility in northern Nevada for homeless youth. 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.

#### **SPV Population Types**

SPV population types are not applicable to this activity.

#### **Status/Update**

This activity will remain ongoing in FY 2026.

#### **Planned Changes**

Although the amount RHA provides Eddy House may fluctuate based on occupancy, RHA has budgeted \$10 per bed per night. This is an annual expense of approximately \$175,200 for 43 beds. Eddy House has now taken on the essential role of providing both immediate shelter and long-term solutions for unaccompanied homeless youth, ages 18-24. Through emergency, transitional, and now independent living programs, Eddy House strives to equip youth with the tools to achieve sustainable independence. To accommodate rising costs, increased occupancy, and expanded services, RHA plans to review this activity in the coming months. Based on budget availability, RHA may consider increasing the number of beds allowed to be funded under this activity to no more than 80 and/or increasing the amount of funding being provided for each bed per night from \$10 to \$15.

RHA does not anticipate any additional non-significant or significant changes to this activity.

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

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#### **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.



### **SPV Population Types**

RHA is applying this activity to FYI and HUD-VASH population types.

### **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 WFD Program in FY 2019. Through this restructuring, RHA began providing 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 WFD 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 WFD Program began addressing the needs of the entire family - from one individual member, to parents, and youth.

### **Status/Update**

RHA is offering FYI voucher holders participation in its WFD Program. Should FYI eligible youth sign CoPs with RHA's WFD Program, RHA will extend the term of their voucher assistance for 24 months as long as they remain in compliance with program requirements.

In FY 2024, RHA indicated using funding flexibility to rehab a new office space which was donated to RHA's WFD Program by CIRE Equity. Rehabilitation of this site has now been delayed due to unforeseen issues within the building and may not occur at all. Should RHA determine it is best not to move forward with construction at this site, RHA may use single fund flexibility to acquire and/or develop a permanent office location for its Resident Services department.

This activity will remain ongoing in FY 2026.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

## **2024-02: Local Project Based Voucher Program**

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

This activity was approved and implemented in FY 2025.

### **SPV Population Types**

SPV population types are not applicable to this activity.

### **Description**

Throughout RHA's participation in MTW, the agency proposed and implemented several activities directly related to PBVs. These activities allowed for the assignment of PBVs to agency owned/controlled properties for ongoing partnerships, PBVs for privately owned properties, and the ability to assign PBVs to agency owned properties without going through a competitive process. Implementation of this activity combined all of RHA's PBV activities into one Local Project Based Voucher Program.



### **Status/Update**

This activity will remain ongoing in FY 2026.

### **Planned Changes**

In FY 2016, RHA began setting initial contract rents for units owned or managed by the agency at or below applicable low HOME rents rather than going through a state-certified appraiser and a HUD-approved independent agency. In FY 2026, RHA proposes to remove this language and allow initial contract rents to be set by RHA without the rent being tied to the area's established low HOME rents. RHA will conduct rent reasonableness for PBVs, including those related to any Operating Cost Adjustment Factor (OCAF) updates or changes, and will do so without having to go through a state-certified appraiser and/or HUD-approved independent agency.

RHA does not anticipate any additional non-significant or significant changes to this activity.

## **2025-01: Reduce Interim Recertifications**

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

This activity was approved and implemented in FY 2025.

### **SPV Population Types**

RHA is currently applying this activity to EHV, FYI, NED, and HUD-VASH population types.

### **Description**

In FY 2025, RHA implemented 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. RHA continues to process interim recertifications and rent redeterminations 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.

### **Status/Update**

While RHA no longer processes interim recertifications due to an increase in income, RHA has determined that PH residents or HCV participants should continue to report increases in household income during a transition period. During this time, RHA will not process the interim recertification but rather consider the update as informational only. Since RHA is not requiring PH residents or HCV participants to report changes in increased income, no interim recertifications are anticipated for these households unless requested under the previously identified circumstances. As assisted households are no longer required to report changes and RHA will not have knowledge of changes in household income, annual recertifications processed by RHA will use current income.



This activity will remain ongoing in FY 2026.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.



**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.

<b>MTW activities approved but not yet implemented</b>				
<b>Activity #</b>	<b>Plan Year Approved</b>	<b>Activity Name</b>	<b>Statutory Objective(s)</b>	<b>Authorization(s)</b>
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
2026-02	2026	Alternative inspection policy for newly constructed or substantially rehabilitated properties	Reduce costs and achieve greater cost effectiveness in federal expenditures.	Attachment C Section D.5.
2026-03	2026	Basic Payment Standard for LIHTC assisted units	Reduce costs and achieve greater cost effectiveness in federal expenditures.	Attachment C Section D.2.a.
2026-04	2026	Direct referral to waiting list	Increase housing choice for low-income families.	Attachment C Sections C.2. and D.4.

**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.

**SPV Population Types**

RHA may apply this activity to SPV population types.



**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.

**2024-01: Time-Limited Workforce Development Vouchers**

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**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 waiting list 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.

**SPV Population Types**

RHA is not applying this activity to any SPV population types.

**Update/timeline for implementation**

Although this activity was scheduled to begin in FY 2024, it is now unclear when this activity will be implemented. Once RHA's Resident Services Department is ready to implement this activity, RHA will undertake a competitive process to solicit partnering agencies within the community.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

**2026-02: Alternative inspection policy for newly constructed or substantially rehabilitated properties**

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**Description**

RHA anticipates that many voucher holders will opt to choose newly constructed or substantially rehabilitated units in and around the city. To accommodate larger complexes and allow HCV participants to secure units more quickly and easily, RHA proposed to reduce the number of inspections required at newly constructed or substantially rehabilitated properties by foregoing the initial inspection on every unit prior to allowing an HCV participant to move-in, if the following conditions have been met:

- RHA staff conduct an inspection on 10% of the units at the complex, or at a minimum, two inspections per bedroom size.



- Each of the units inspected pass during RHA's first inspection of the complex or, if there are failed items, the landlord certifies that those failed items noted during the inspection will be addressed in all uninspected units.
- The property must certify that the units have not been occupied since receiving the certificate of occupancy or upon completion of the substantial rehabilitation.

### **SPV Population Types**

RHA will apply this activity to Emergency Housing Voucher (EHV), FYI, NED (Non-Elderly Disabled) and HUD-VASH population types.

### **Update/timeline for implementation**

RHA received approval from HUD for this activity on March 2, 2026, and is working toward implementation.

### **Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

## **2026-03: Basic Payment Standard for LIHTC assisted units**

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### **A. Activity Description**

By definition, the Voucher Payment Standard is the maximum amount of subsidy RHA can pay toward each HCV participant's rent before subtracting the family's own contribution. In practice, payment standards play a fundamental role in calculating the amount of HAP made to landlords on behalf of participating families. As such, payment standards are set to ensure families have access to various rental options throughout the community, allowing for choice and flexibility.

RHA determines its voucher payment standards annually based on the FMRs established by HUD. As such, RHA typically sets these standards between 90% and 110% of HUD's published FMRs. To increase housing opportunities and encourage moves to lower poverty areas throughout the community, RHA adopted Exception Payment Standards at the zip code level based on Small Area Fair Market Rents (SAFMRs) in November 2022. Intended to reduce the potential rent burden for voucher holders residing in higher opportunity neighborhoods, Exception Payment Standards increase the amount of subsidy available to the family. To ensure these subsidies are competitive with the region's housing market, RHA's Exception Payment Standards are set between 90% and 110% of HUD's published SAFMR. While the higher payment standard has allowed HCV assisted families to find affordable units within these formerly out of reach areas, it also inadvertently resulted in some Low-Income Housing Tax Credit (LIHTC) properties establishing rents for HCV assisted families that exceed those of non-assisted families.

The LIHTC program is an indirect federal subsidy used to finance the construction and rehabilitation of low-income affordable rental housing. This program gives investors a dollar-for-dollar reduction in their federal tax liability in exchange for providing financing to develop affordable rental housing. Financed projects must meet eligibility requirements for at least 30



years and owners must keep the units rent restricted and available to low-income tenants.<sup>30</sup> Although these properties are required to remain affordable, current regulations allow HCV contract rents in LIHTC units to be greater than the rents being charged to non-voucher families as long as the tenant's portion of rent does not exceed the amount of rent being charged to non-voucher holders. Through this activity, RHA will reduce the amount of HAP being paid, and avoid additional rent burdens being placed on HCV participants, by limiting all LIHTC properties to the Basic Payment Standard regardless of the zip code the property is located in.

**SPV Population Types**

RHA is not applying this activity to any SPV population types.

**Update/timeline for implementation**

RHA received approval from HUD for this activity on March 2, 2026, however, it has been proposed in the FY 2027 MTW Annual Plan.

**2026-04: Direct referral to waiting list**

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**Description**

While emergency shelters and temporary or short-term tenant-based housing programs can meet the immediate needs of homeless families and individuals; they don't always result in long-term stable housing. Acknowledging that assisting people experiencing homelessness is a community-wide effort and that those experiencing homelessness face unique barriers in applying for, securing, and maintaining housing assistance, RHA proposed a direct referral option for those currently living in a temporary or short-term tenant-based rental assistance program. Working closely with the Continuum of Care (CoC), RHA will allow households to be placed on RHA's waiting lists, even during times the waiting lists are closed to other applicants. To be eligible for a direct referral, each household must be referred directly from a community partner participating in the CoC, and each partner must be actively reporting eligible household data in the Homeless Management Information System (HMIS).

**SPV Population Types**

RHA is not applying this activity to any SPV population types.

**Update/timeline for implementation**

RHA received approval from HUD for this activity on March 2, 2026, and is working toward implementation.

**Planned Changes**

RHA does not anticipate any non-significant or significant changes to this activity.

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<sup>30</sup> <https://www.novoco.com/resource-centers/affordable-housing-tax-credits/about-lihtc>



**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	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.
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.



Activity #	FY Implemented	FY Closed	Activity Name	Statutory Objective(s)	Authorization(s)
2016-02	2016	2024	Redefine near-elderly person	Increase housing choices for low-income families.	Attachment C Sections C.2. and D.4.
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	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**

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

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

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

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

**Reason for close out**

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Reason for close out**

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

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

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

This activity was approved and implemented in FY 2016. It was closed out in FY 2024.

### **Reason for close out**

In FY 2016, RHA proposed this activity to increase the number of eligible families referred to RHA's senior/disabled units without raising concerns with current residents regarding potential lifestyle conflicts. Newly defined near elderly households were treated as elderly to allow for their admission from the wait list to one of RHA's senior PH complexes or PBV sites, which define elderly as 55 years of age and older. In FY 2024, all RHA's PH complexes were designated as "general occupancy." As a result of this change in designation, the near-elderly definition is no longer being used during the admissions process. This activity was closed in FY 2024 and is no longer being reported on.

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

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

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

### **Reason for close out**

In FY 2014, RHA began issuing vouchers limited to five years as part of a Rent Reform Controlled Study (Activity 2014-03) within the HCV program. RHA partnered with an outside institution to evaluate the continuing effects and changing statuses of families participating in the Rent Reform Controlled Study. The purpose of the evaluation was to properly gauge whether increases in income that do not affect a household's rent and whether limiting vouchers to five years was incentive enough for families to become self-sufficient. As RHA worked through the lessons learned from the Rent Reform Controlled Study and current rental market conditions, staff determined that implementation of this activity on all non-elderly/non-disabled HCV participants would result in undue stress on participating families. This activity was closed in FY 2020 and is no longer being reported on.



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

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### **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 specific zip codes throughout the Truckee Meadows where rents were unaffordable based on RHA's traditional payment standards to allow for more upward mobility. Based on this transition, this activity was closed in FY 2023 and is no longer being reported on.

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

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### **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**

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 V

# Sources and Uses of Funds





## V. Sources and Uses of Funds

This section includes summary budget information for FY 2026 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	\$3,249,564
70600	HUD PHA Operating Grants	\$35,499,535
70610	Capital Grants	\$671,377
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$46,941
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$590,417
<b>70000</b>	<b>Total Revenue</b>	<b>\$40,057,834</b>

#### ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year are identified here; unspent funds that the MTW PHA is not planning during the plan year **should not be** 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	\$8,100,064
91300+91310+92000	Management Fee Expense	\$1,317,525
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$518,232
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$768,842



93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$1,993,959
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$287,796
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$3,701,343
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$24,937,987
97400	Depreciation Expense	\$1,537,455
97500+97600+97700+97800	All Other Expense	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$43,163,203</b>

**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. In FY 2024 RHA had not experienced a change in the number of PH units, nor any recent material change in HAP revenue. However, HAP expenses increased based on the use of exception payment standards resulting in losses that have exceeded previous years. According to the FY 2024 unaudited FDS submission, expenses exceeded revenue in the amount of \$3,105,369.

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

MTW agencies have the flexibility to apply fungibility across three core funding programs’ funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. 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 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 funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.



### PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

In FY 2025, RHA began repositioning Hawk View Apartments and Silverada Manor through Section 18 Demolition/Disposition and a RAD PBV/Section 18 Blend. RHA utilized MTW funding flexibility to assist with relocation and predevelopment expenses at both sites. Through this repositioning, RHA plans to utilize MTW single fund flexibility to augment RAD rents, increase replacement reserves at each property converted, and provide gap financing for Hawk View Apartments. In addition, funding flexibility may be used to establish ongoing tenant participation funds for continued Resident Council involvement at repositioned PH sites as well as a part-time resident services position to assist with ongoing Resident Council related activities, if needed.

In FY 2026, RHA may use MTW funding flexibility, including MTW HUD Held Reserves, to fund the development of low-income housing on I Street in the City of Sparks. The I Street complex will consist of 12 units and may be bundled with the repositioning of McGraw Court, a 34-unit PH site also located in the City of Sparks. In addition, RHA recently acquired a site within the City of Reno located on Reno Avenue. RHA plans to develop 44-units utilizing 9% tax credits with HUD Held Reserves being identified for gap financing of this project.

RHA's Board of Commissioners continue to identify the expansion of Resident Services as a priority goal for the agency in the coming year. Beyond the WFD Program, RHA will continue to use MTW single fund flexibility to provide additional services to the people served by the department and expand upon the services offered to all residents. These expanded services will include offerings to RHA's senior/disabled residents, and the activities/programs made available to RHA's youth. RHA will also consider utilizing MTW HUD Held Reserves to acquire and/or develop a permanent location to house its Resident Services department including RHA's WFD Program, Start Smart programs, and staff.

Recently, RHA conducted a survey of current HCV landlords to gauge their interest in several areas including landlord incentives and Ready to Rent certifications. Of those surveyed, 80% indicated that they would be more likely to rent to low-income and/or homeless individuals if they were a certified graduate of a Ready to Rent or similar program. The goal of a Ready to Rent program at RHA would be to provide tenant readiness training to RHA's HCV participants and PH residents. In FY 2026, RHA may use single fund flexibility to cover the cost for staff to complete Ready to Rent's Instructor Certification Training and establish a Ready to Rent program at RHA.

Staff continues to explore additional technology that can be used to keep RHA's HCV participants and PH residents informed. Applications that allow for direct messaging to clients regarding upcoming appointment reminders, available classes, events, office closures, etc. are currently being used by the Resident Services department, but may be expanded for use amongst all RHA departments. If needed, RHA may use single fund flexibility to advance the implementation of these or other identified communication and/or messaging platforms.

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 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, 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 has been identified.

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$17,978,274	\$5,675,000
HCV Admin Fee	\$1,033,362	\$1,033,362
PH Operating Subsidy	\$(1,822,667)	\$0
<b>TOTAL</b>	<b>\$17,188,969</b>	<b>\$6,708,362</b>

- \* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.
- \*\* HUD’s approval of the MTW Plan does not extend to a PHA’s planned usage of unspent funds amount entered as an agency’s operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

Description
<p>By taking advantage of RHA’s single fund flexibility, FY unspent balances will be utilized to support shortfalls in PH Operating Subsidy and RHA’s other MTW-approved activities and administrative expenses.</p> <p>Additionally, RHA’s Board of Commissioners has obligated HUD-Held Reserves for the following Local Non-Traditional development activities for FY25-26:</p> <ul style="list-style-type: none"> <li>• Carville Court Redevelopment - \$4,650,000</li> <li>• Hawk View Apartments Redevelopment Gap Financing - \$7,500,000</li> </ul> <p>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 1990s. 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.</p> <p>Hawk View Apartments is a PH complex with a pending Section 18 application for demolition/disposition. The project will include the demolition of the existing 100 units of PH 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.</p>



RHA also anticipates RHA's Board of Commissioners to obligate HUD-Held Reserves for the following Local Non-Traditional development activities with details on obligation amounts and timelines to follow:

- 440 Reno Avenue
- 2026 I Street/John McGraw Court
- Resident Services Office Location Acquisition and/or Development

**v. Local Asset Management Plan**

YES/No

a. Is the MTW PHA allocating costs within statute?

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 received approval to reposition Silverada Manor using a RAD/Section 18 blend. In the coming months, RHA will apply to reposition 67 units at Stead Manor and 34 units at John McGraw Court using RAD. Both properties were included in RHA's RAD Significant Amendment submitted as part of its FY 2024 MTW Annual Plan. This Amendment also identified a RAD conversion as its repositioning strategy for 105 units at Essex Manor. After further review, staff have determined that a RAD/Section 18 blend will allow the repositioning of the property to move forward. As such, the application requesting this repositioning strategy will be submitted in FY 2026.



- b. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

Yes/NO

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

N/A

# Section VI | Administrative





## VI. Administrative

### A. Board Resolution and Certifications of Compliance

Board Resolution 2025-03-05 RH approving the content and submission of the FY 2026 MTW Annual Plan and the Certifications of Compliance (see Attachment 1).

### B. Documentation of Public Process

- The FY 2026 MTW Annual Plan was discussed during a Resident Advisory Board meeting in January 2025. The Plan was also discussed at multiple meetings of each of the Resident Councils in February 2025 and March 2025. Resident sign in sheets and minutes from each of the above-mentioned meetings are available upon request.
- The FY 2026 MTW Annual Plan is being made available for public review and comment on RHA's website and at RHA's Administrative Office beginning January 29, 2025, through March 25, 2025.
- Proof of Publication Notice (see Attachment 2). The FY 2026 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) 2026.

RHA's FY 2026 MTW Annual Plan for the period July 1, 2025 - June 30, 2026, is available for public review and comment beginning January 29, 2025, through March 25, 2025, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at [www.renoha.org](http://www.renoha.org). Copies of the FY 2026 MTW Annual Plan may also be obtained by contacting Kim Anhalt, MTW Initiatives & Housing Policy Manager at (775) 329-3630; TDD (385) 770-7166 or by email at [kanhalt@renoha.org](mailto: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 2026 MTW Annual Plan can be mailed to the address noted above and must be received by close of business on Monday, March 24, 2025.

A public hearing to answer questions and receive comments will be held at 6:00 PM on Thursday, March 6, 2025, in Mineral Manor's Community Room, 1525 E. 9<sup>th</sup> St., Reno, NV 89512.

- A public hearing for the FY 2026 MTW Annual Plan was held at 6:00pm on Thursday, March 6, 2025. It was attended only by staff with one written comment received from the City of Reno in support of the changes detailed in the proposed plan.



**C. DRA Letter of Intent**

(see Attachment 3)

**D. Planned and Ongoing Evaluations**

(see Attachment 4)

**E. Lobbying Disclosures**

Certification of Payments to Influence Federal Transactions and Disclosure of Lobbying Activities (see Attachment 5).



## Attachment 1

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# Board Resolution & Certifications of Compliance





# Attachment 1: Board Resolution and Certifications of Compliance

## HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 25-03-05 RH

A RESOLUTION APPROVING THE CONTENT AND SUBMISSION OF THE AUTHORITY'S  
FY 2026 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**, on December 23, 2024, HUD provided notification that pursuant to Section 241 of Title II of the Consolidated Appropriations Act, 2024, the Authority's MTW Agreement was modified and extended through the end of FY 2038; 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 2026 MTW Annual Plan and invited public comment beginning on January 29, 2025 allowing for a 30-day comment period; and

**WHEREAS**, comments were solicited through notices posted on the Authority's website, and through legal notice publications in the *Reno Gazette-Journal* on January 26, 2025, and January 29, 2025; and

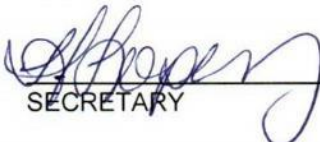
**WHEREAS**, a public hearing was held on March 6, 2025, to receive comments on the Authority's plan;

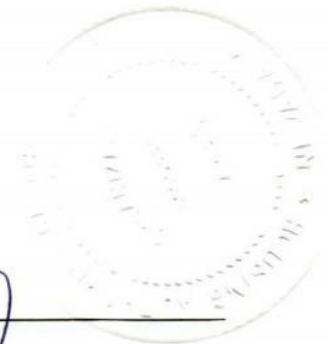
**NOW, THEREFORE, BE IT HEREBY RESOLVED** by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

1. That the Board of Commissioners hereby authorizes and directs the Executive Director to submit the Authority's FY 2026 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 25 DAY OF March, 2025.

  
\_\_\_\_\_  
CHAIRPERSON

ATTEST  
  
\_\_\_\_\_  
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 (07/01/2025), 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 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.
- (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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)( 2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.



OMB Approval No. 2577-0216 (exp. 08/31/2027)

- (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, 31 U.S.C. § 1352.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.334 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 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.
- (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 and should be made available electronically, upon request.

Housing Authority of the City of Reno

NV001

MTW PHA NAME

MTW PHA NUMBER/PHA 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).

Kathleen Taylor

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

3/27/2025

SIGNATURE

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

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# Proof of Publication





# Attachment 2: Proof of Publication



P.O. Box 632098, Cincinnati, OH 45263-2098

### AFFIDAVIT OF PUBLICATION

Colleen Montgomery-Beltran  
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:

01/26/2025, 01/29/2025

and that the fees charged are legal.  
Sworn to and subscribed before on 01/29/2025

\_\_\_\_\_  
Legal Clerk

\_\_\_\_\_  
Notary, State of Wisconsin, County of Brown

10-25-26

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### 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) 2026. RHA's FY 2026 MTW Annual Plan for the period July 1, 2025 - June 30, 2026, is available for public review and comment beginning January 29, 2025, through March 25, 2025, at RHA's Administrative Office, 1525 E. Ninth St., Reno, NV 89512 or on RHA's website at [www.renoha.org](http://www.renoha.org). Copies of the FY 2026 MTW Annual Plan may also be obtained by contacting Kim Anhalt, MTW Initiatives & Housing Policy Manager at (775) 329-3630; TTY (385) 770-7166 or by email at [kanhalt@renoha.org](mailto: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 2026 MTW Annual Plan can be mailed to the address noted above and must be received by close of business on Monday, March 24, 2025.

A public hearing to answer questions and receive comments will be held at 6:00 PM on Thursday, March 6, 2025, in Mineral Manor's Community Room, 1525 E. Ninth St., Reno, NV 89512.

### AVISO DE AUDIENCIA PÚBLICA Y PERÍODO DE COMENTARIOS PÚBLICOS

La Autoridad de Vivienda de la Ciudad de Reno (RHA, por sus siglas en inglés) está solicitando comentarios públicos y llevando a cabo una audiencia pública sobre el Plan Anual de MTW propuesto para el año fiscal (FY) 2026.

El Plan Anual MTW del año fiscal 2026 de RHA para el periodo comprendido entre el 1 de julio de 2025 y el 30 de junio de 2026 está disponible para revisión y comentarios públicos a partir del 29 de enero de 2025 hasta el 25 de marzo de 2025, en la Oficina Administrativa de RHA, 1525 E. Ninth St., Reno, NV 89512 o en el sitio web de RHA en [www.renoha.org](http://www.renoha.org). También se pueden obtener copias del Plan Anual de MTW para el año fiscal 2026 comunicándose con Kim Anhalt, Gerente de Iniciativas y Políticas de Vivienda de MTW al (775) 329-3630; TTY (385) 770-7166 o por correo electrónico al [kanhalt@renoha.org](mailto:kanhalt@renoha.org).

El público puede proporcionar comentarios orales asistiendo a la audiencia pública que se describe a continuación y/o enviando comentarios por escrito durante el periodo de comentarios.

Los comentarios por escrito sobre el borrador del Plan Anual MTW para el año fiscal 2026 de RHA pueden enviarse por correo a la dirección indicada anteriormente y deben recibirse antes del cierre de operaciones del lunes 24 de marzo de 2025.

El jueves 6 de marzo de 2025, a las 6:00 p.m., se llevará a cabo una audiencia pública para responder preguntas y recibir comentarios en el Salón Comunitario de Mineral Manor, 1525 E. Ninth St., Reno, NV 89512.

No.10971974 January 26, 29, 2025



## Attachment 3

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# DRA Supporting Documentation





### Attachment 3: DRA Supporting Documentation

#### DRA Shopping Incentive Illustration

DRA subsidy amounts will be very similar to the HCV subsidy amounts with subsidy amounts capped at gross rent. The shopping incentive occurs within that cap when subsidy amounts are not reduced if a household chooses a unit with a gross rent lower than the payment standard.

The following scenario is provided to illustrate the shopping incentive:

The Smith family has a monthly income of \$1,000, 30% of which is \$300. The payment standard of the area in which they are searching for an apartment is \$1,100. Under both the HCV program and in the DRA pilot, if the Smith family finds a unit whose rent is exactly equal to the payment standard, their subsidy will be \$800. If the Smith family finds a unit that costs only \$900 per month, under the HCV program, their subsidy will decrease to \$600. By contrast, the DRA subsidy would remain \$800, and they will be paying less out of pocket i.e. receiving a shopping incentive.

<b>HCV vs DRA Subsidy Amounts</b>				
Gross Rent of Unit	<b>\$1,100</b>	<b>\$900</b>	<b>\$800</b>	<b>\$700</b>
<b>HCV</b>				
Subsidy Amount	\$800	\$600	\$500	\$400
Tenant Portion	\$300	\$300	\$300	\$300
<b>DRA</b>				
Subsidy Amount	\$800	\$800	\$800	\$700
Tenant Portion	\$300	\$100	\$0	\$0

As the table demonstrates, the Smith family will access a maximum subsidy of \$800 under both the HCV and DRA approaches. However, if the household chooses a unit with a gross rent below \$1,100, the HCV subsidy is reduced. The household does not benefit from choosing a lower-cost unit and RHA sees the savings. If the Smith family chooses a less expensive unit and they are participating in the DRA study, this savings offsets a portion of their rent contribution. The Smith family’s DRA subsidy does not change for any unit with a gross rent between \$800 and \$1,100. However, the DRA subsidy structure also offers no benefit for them to choose a unit below \$800.<sup>31</sup>

<sup>31</sup> Joice, P., O’Regan, K., and Ellen, I. G. (2024). “Direct Rental Assistance: Returning to the Roots of Housing Allowances.” Cityscape, 26(2): 275-292. <https://www.huduser.gov/portal/periodicals/cityscape/vol26num2/ch15.pdf>



## DRA Inspections: HUD HQS/NSPIRE Standards and Washoe County Building Code

### 1. Scope and Purpose

Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code
<b>Purpose</b>	Ensure rental housing meets minimum standards for health and safety for tenants receiving HUD assistance.	Ensure safety, habitability, and compliance with local construction and fire codes for all rental properties.
<b>Scope</b>	Focuses on habitability, safety, sanitation, and essential services (heating, plumbing, electricity). Less focused on construction details.	Covers structural, mechanical, electrical, plumbing, fire safety, and emergency egress requirements in line with the International Building Codes and local amendments.

### 2. Structural Safety

Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code
<b>Building Structure</b>	Requires that the building be free of hazards such as structural deterioration, holes, or unsafe stairs; must be weather-tight.	Requires adherence to International Building Code (IBC) and Residential Code (IRC) for safe construction, alterations, and repairs. (100.101.2.2, 100.101.2.3, 100.101.2.4)
<b>Egress</b>	Requires safe and adequate means of egress (doors, windows) without obstruction.	Requires emergency escape windows and emergency ladders for bedrooms above ground floor; battery-powered emergency lighting near exits. Based on IRC requirements. (U.B.C./I.R.C. R310.1)

### 3. Fire and Life Safety

Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code (Chapter 60)
<b>Smoke Detectors</b>	Smoke detectors required in each sleeping area and on each level of the unit.	Mandatory smoke detectors in all bedrooms and hallways outside sleeping rooms. Receive primary power from the building's electrical wiring with a battery backup. (I.F.C 907.2, Washoe County 60.260)



Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code (Chapter 60)
<b>Carbon Monoxide Detectors</b>	Required where fuel-burning appliances are present or attached garages exist.	Required near sleeping areas and in the immediate vicinity of bedrooms with fuel fired appliances or attached garages. Required on every occupiable level. (I.R.C R315)
<b>Fire Extinguishers</b>	Not specifically required but encouraged for safety.	Adopted International Fire Code (IFC). Required in Residential and Transient residential buildings. (60.240, I.F.C. 508.51)

**4. Utilities and Mechanical Systems**

Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code
<b>Plumbing</b>	Functional hot and cold running water, safe waste disposal, no leaks.	Compliance with Uniform Plumbing Code and International Plumbing Code; functional and safe plumbing systems required. (P2717.1, M1411.3, IRC Chapter 2407, M2003, I.R.C P2801.5, 2801.5.2)
<b>Electrical</b>	Safe electrical outlets and wiring, functioning lighting fixtures.	Compliance with National Electrical Code (NEC) and International Electric Code; requires safe, grounded electrical systems. (I.R.C chapter 39, E3601.6.2, E3705.7, E3901.2, E3703.3, E3902.7, E4002.14, E3703.2, E3901.4, E3902.6, E3803.1)
<b>Heating and Cooling</b>	Adequate heating during cold months; cooling not required unless needed for health reasons.	Mechanical systems must comply with International Mechanical Code or Uniform Mechanical Code; heating must be provided and safe. (E3703.1, E3901.12)

**5. Permits, Inspections, and Enforcement (Chapter 125)**

Aspect	HUD HQS/NSPIRE Standards	Washoe County Building Code
<b>Enforcement</b>	Non-compliance can lead to loss of HUD subsidies or termination of rental assistance contracts.	Local code enforcement with potential fines and penalties. (125.050)



**Summary:**

- **Washoe County codes** are detailed, technical, and aligned with modern building codes covering **construction quality, fire safety systems, and emergency egress**, reflecting a broader and deeper regulatory framework.
- **HUD HQS/NSPIRE standards** focus primarily on **minimum habitability and safety conditions** for tenants in assisted housing, without specifying construction details or requiring permits.
- Washoe County's requirements for **fire extinguishers, emergency lighting, and detailed installation of detectors** are more prescriptive than HQS/NSPIRE.
- Both require **functional plumbing, electrical, and heating**, but Washoe County requires strict adherence to building and mechanical codes.
- For landlords participating in HUD programs in Washoe County, compliance with **both** Washoe County building codes and HUD HQS/NSPIRE standards is mandatory.

**Resources:**

[https://www.washoecounty.gov/building/Files\\_2020/2018-NNICC-Amendments-Final-Document-11-2-18.pdf](https://www.washoecounty.gov/building/Files_2020/2018-NNICC-Amendments-Final-Document-11-2-18.pdf)

[https://www.hud.gov/sites/dfiles/PIH/documents/NSPIRE\\_Checklist.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/NSPIRE_Checklist.pdf)

[https://www.washoecounty.gov/building/Files/washoe\\_co\\_window\\_egress\\_2012.pdf](https://www.washoecounty.gov/building/Files/washoe_co_window_egress_2012.pdf)

<https://www.washoecounty.gov/building/Files/Files/Handouts/2018-Warning-Sheet---Nov-2019.pdf>

[https://www.washoecounty.gov/building/Files/cofo\\_min\\_requirements.pdf](https://www.washoecounty.gov/building/Files/cofo_min_requirements.pdf)

[https://librarystage.municode.com/nv/washoe\\_county/codes/code\\_of\\_ordinances?nodeId=CH100BUCO](https://librarystage.municode.com/nv/washoe_county/codes/code_of_ordinances?nodeId=CH100BUCO)



## DRA Letter of Intent



Compassion for Our Clients and Passion for Their Interests

January 7, 2025

**Via Email only:**

Jamie Newfelt, V.P.M.  
Director of Rental Assistance  
Reno Housing Authority  
1525 East Ninth Street  
Reno, NV 89512  
[JNewfelt@renoha.org](mailto:JNewfelt@renoha.org)

Kimberly Anhalt  
MTW Initiatives & Housing Policy Manager  
Reno Housing Authority  
1525 East Ninth Street  
Reno, NV 89512  
[KAnhalt@renoha.org](mailto:KAnhalt@renoha.org)

**Re: Direct Rental Assistance Program – Letter of Intent**

Dear Ms. Newfelt and Ms. Anhalt:

Thank you for reaching out to Northern Nevada Legal Aid (NNLA) with respect to the Direct Rental Assistance Program by Reno Housing Authority (RHA). Our two organizations work closely to ensure that the needs of our community’s most vulnerable tenants and families are met by providing both rental assistance and legal assistance with respect to a variety of issues, including habitability issues and evictions. It is our understanding that RHA seeks to coordinate a new program, the Direct Rental Assistance Program, to increase tenants’ chances of successfully maintaining stable housing in our community.

With the DRA Program in place, RHA has shared that program participants may face housing quality issues that may need legal assistance. One of the many legal services that NNLA provides to its clients is the resolution of habitability issues, on both an emergency and continuing basis. In order to protect tenants and advance our program goals, NNLA is willing to enter into a memorandum of understanding with RHA to provide legal services to DRA program participants who meet eligibility under grant funding, with the understanding that NNLA retains the discretion to determine the acceptance of clients and extent of legal services provided by NNLA attorneys and staff in compliance with our legal and ethical responsibilities.



Ms. Jamie Newfelt  
Ms. Kimberly Anhalt  
January 7, 2025  
Page 2

We are excited to continue our partnership with RHA to provide and protect housing rights of tenants in the Reno-Sparks community. Should you need additional information, please do not hesitate to contact Sarah M. Molleck via email at [smolleck@nnlegalaid.org](mailto:smolleck@nnlegalaid.org) or directly at 775-321-2064.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'SM', written over a horizontal line.

SARAH M. MOLLECK, ESQ.  
Supervising Attorney,  
Consumer & Housing Unit,  
Senior Law Center

cc: Alexander Cherup ([acherup@nevadalegalservices.org](mailto:acherup@nevadalegalservices.org))



## Attachment 4

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# Ongoing Evaluation

## Mobility Demonstration





## Attachment 4: Ongoing Evaluation - Mobility Demonstration

### Analyses and Results as of August 9, 2024

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, survey, 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. Eighteen households that have entered the Mobility Demonstration have participated in the new survey and descriptive statistics are provided for their initial responses.

Table 1. Variables

	Data Source	Data Type	Statistical Test
<b><i>Household Characteristics</i></b>			
Gender	Administrative	Categorical	Descriptive Statistics
Race	Administrative	Categorical	Descriptive Statistics
Ethnicity	Administrative	Categorical	Descriptive Statistics
Years in Public Housing	Administrative	Discrete	Descriptive Statistics
Head of Household Age	Administrative	Discrete	Descriptive Statistics
Household Size	Administrative	Discrete	Descriptive Statistics
Number of Adults in Household	Administrative	Discrete	Descriptive Statistics
Number of Children in Household	Administrative	Discrete	Descriptive Statistics
<b><i>Household Outcome Variables</i></b>			
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



<b>Neighborhood Characteristics</b>			
Percent high school graduate or higher	ACS	Continuous	Wilcoxon
Percent bachelor's degree or higher	ACS	Continuous	Wilcoxon
Unemployment rate	ACS	Continuous	Wilcoxon
Median household income	ACS	Continuous	Wilcoxon
Percent of people in poverty	ACS	Continuous	Wilcoxon
Proportion of vacant housing units	ACS	Continuous	Wilcoxon
Proportion of single-family homes	ACS	Continuous	Wilcoxon
Owner occupancy rate	ACS	Continuous	Wilcoxon
Median home value	ACS	Continuous	Wilcoxon
Median gross rent	ACS	Continuous	Wilcoxon
Percent White	ACS	Continuous	Wilcoxon
Percent Hispanic or Latino	ACS	Continuous	Wilcoxon

Only households that have been enrolled for at least one year are included in the study so within-subject analyses over time can be conducted. This results in 51 households being included in the analyses. Households entered and exited the study at different times. There are 14 households that are currently enrolled in the study and 37 households that have exited (Table 2).

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

<b>Participant Year</b>	<b>Count</b>	<b>Currently Enrolled</b>	<b>Exits</b>
Year 1	51	3	8
Year 2	40	0	8
Year 3	32	1	6
Year 4	25	1	4
Year 5	20	1	3
Year 6	16	2	0
Year 7	14	2	2
Year 8	10	0	3
Year 9	7	1	3
Year 10	3	3	0
<b>Total</b>		<b>14</b>	<b>37</b>

Of the 37 exits, 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 rent in full on their own, while on the other hand, it took other households over six years or more 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

<b>Reason</b>	<b>Count</b>	<b>Percent</b>
Deceased	1	2.7%
Program/Lease Violation	4	10.8%
Transferred to VOO	9	24.3%
Voluntarily Left Program	5	13.5%
Paying Full Rent/Purchased Home	18	48.7%
<b>Total</b>	<b>37</b>	<b>100%</b>



Many households in the study are White, non-Hispanic, and female-headed 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-five with the youngest householder when transferring to a PBV unit 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=51)

		Count	Percent
Gender	Male	5	9.8%
	Female	46	90.2%
Race	White	40	78.4%
	Non-White	11	21.6%
Ethnicity	Hispanic or Latino	19	37.3%
	Non-Hispanic or Latino	32	62.7%
Marital Status	Married/Cohabiting	13	25.5%
	Single/Divorced/Widowed	38	74.5%
		Median	Range
Years in Public Housing		4	1 - 17
Head of Household Age		35	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 <sup>1</sup>
Year 1 (n=51)	Unemployed	17	4	0.388
	Employed	8	22	
Year 2 (n=40)	Unemployed	12	2	0.109
	Employed	8	18	
Year 3 (n=32)	Unemployed	9	1	0.070
	Employed	7	15	
Year 4 (n=25)	Unemployed	5	2	0.065
	Employed	9	9	
Year 5 (n=20)	Unemployed	4	3	0.344
	Employed	7	6	



Year 6 (n=16)	Unemployed	7	1	1.000
	Employed	2	6	
Year 7 (n=14)	Unemployed	5	1	0.625
	Employed	3	5	
Year 8 (n=10)	Unemployed	3	1	0.625
	Employed	3	3	
Year 9 (n=7)	Unemployed	2	1	1.000
	Employed	2	2	
Year 10 (n=3)	Unemployed	1	0	----- <sup>2</sup>
	Employed	0	2	

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

Annual household income is statistically significantly higher from baseline compared to every year recorded after baseline through the first eight years for households that moved from public housing to PBV units (Table 6). The median difference at Year 1 was only \$3,272 but in later years doubled, and in some years tripled, compared to the difference observed in Year 1. While the annual household income in Years 9 and 10 is not statistically significantly higher than the baseline, the median difference remains substantial and continues to trend in line with prior years. The small sample size for these two years may account for the lack of statistical significance. It's important to note that the annual household income figures are not adjusted for inflation, as there is no consistent base year for such adjustments, given that households begin the program at various times.

Table 6. Annual Household Income

	Baseline Median	Comparison Year Median	Median Difference	Z
<i>Annual Household Income</i>				
Year 1 (n=51)	\$16,396	\$19,668	\$3,272	-3.176**
Year 2 (n=40)	\$15,738	\$19,990	\$4,253	-3.671**
Year 3 (n=32)	\$15,738	\$23,889	\$8,151	-3.506**
Year 4 (n=25)	\$15,853	\$22,819	\$6,966	-2.839**
Year 5 (n=20)	\$16,125	\$23,339	\$7,215	-2.315*
Year 6 (n=16)	\$14,612	\$21,463	\$6,852	-2.379*
Year 7 (n=14)	\$14,612	\$32,603	\$17,992	-2.605**
Year 8 (n=10)	\$11,854	\$28,968	\$17,114	-2.803**
Year 9 (n=7)	\$13,370	\$21,252	\$7,882	-1.183
Year 10 (n=3)	\$15,853	\$22,935	\$7,082	-1.604

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

As reported in the baseline survey which is taken within the first year a household enters the program, 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 (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	
A neighborhood with job opportunities nearby.	  Least Important
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 for children to play in and a low crime rate are also important.

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)

	<b>Frequency</b>
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)

	<b>Frequency</b>	<b>Percent</b>
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 median gross rent. 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 owner occupancy. 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 12).



Table 12. Neighborhood Characteristics (n=51)

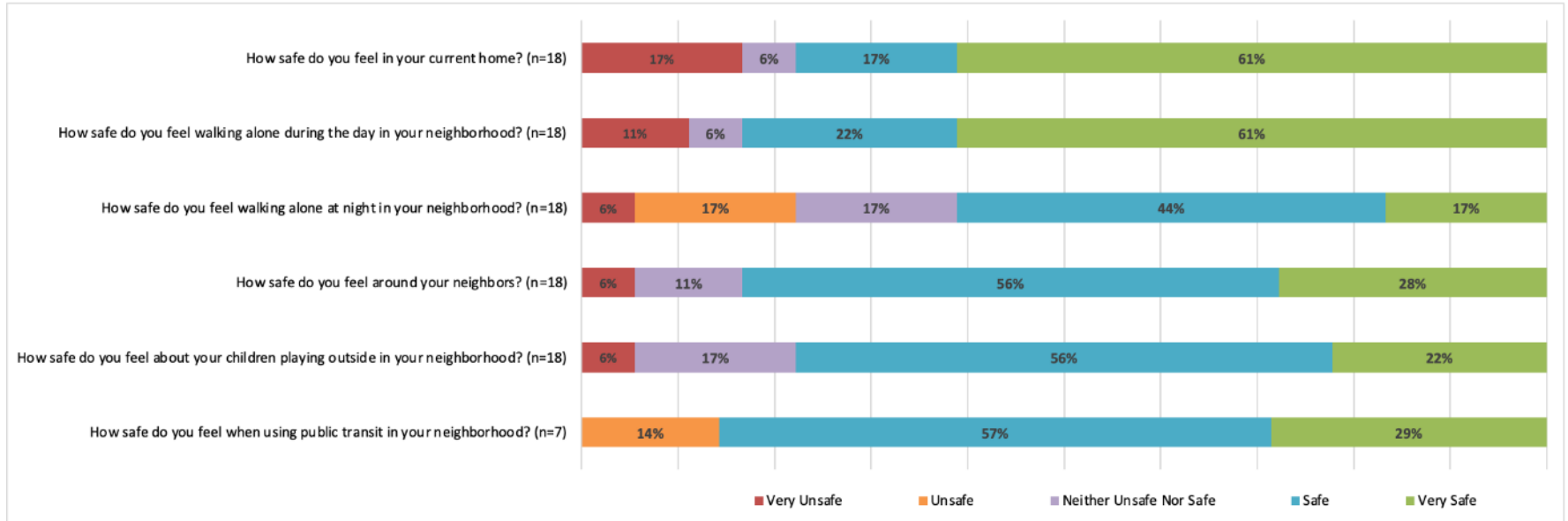
	<b>Public Housing Median</b>	<b>PBV Median</b>	<b>Median Difference</b>	<b>Z</b>
Percent high school graduate or higher	65.2%	91.2%	26.0%	-5.578**
Percent bachelor's degree or higher	14.2%	24.1%	9.9%	-5.447**
Unemployment rate	8.3%	5.3%	-3.0%	4.111**
Median household income	\$25,545	\$52,008	\$26,463	-4.931**
Percent of people in poverty	40.1%	12.9%	-27.2%	6.216**
Proportion of vacant housing units	8.6%	8.4%	-0.2%	4.520**
Proportion of single-family homes	45.0%	60.9%	15.9%	-3.863**
Owner occupancy rate	44.8%	53.4%	8.6%	-2.119*
Median home value	\$100,800	\$164,100	\$63,300	-5.878**
Median gross rent	\$823	\$833	\$10	-1.186
Percent White	69.3%	82.4%	13.1%	-4.660**
Percent Hispanic or Latino	51.6%	26.3%	-25.3%	5.006**

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



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.

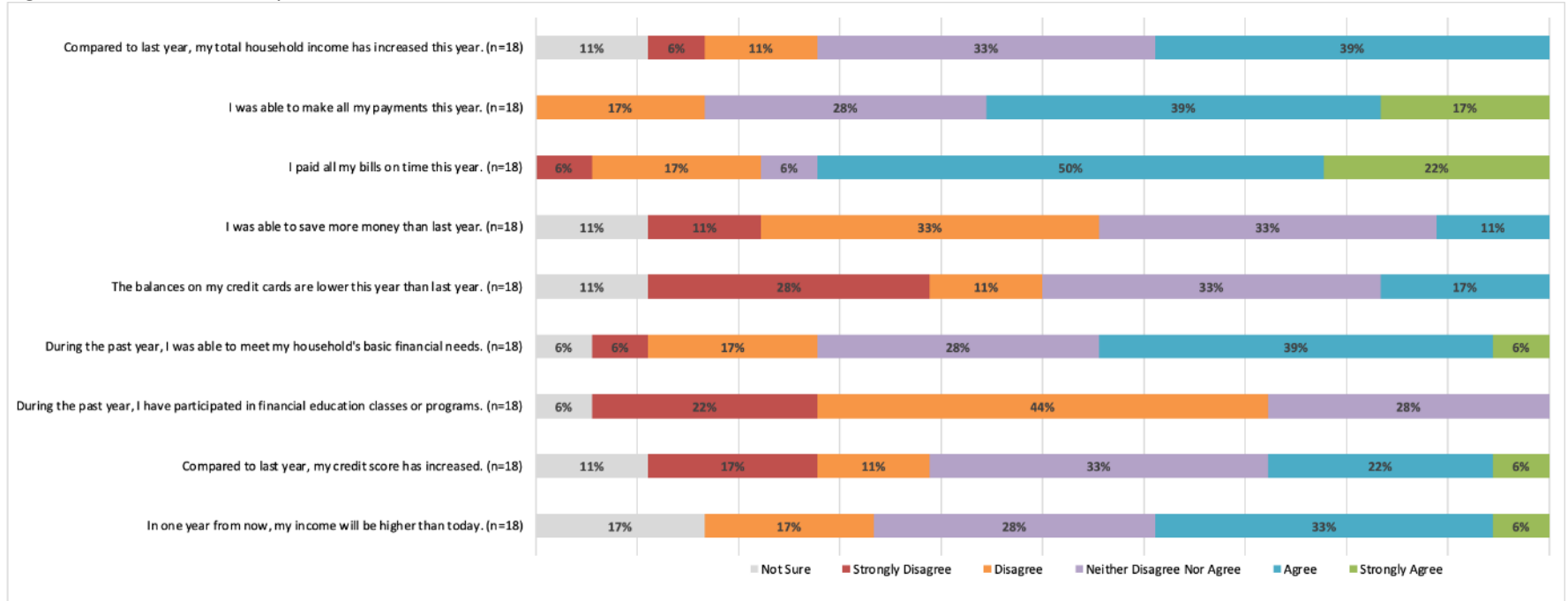
Figure 1. Safety





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. 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





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.

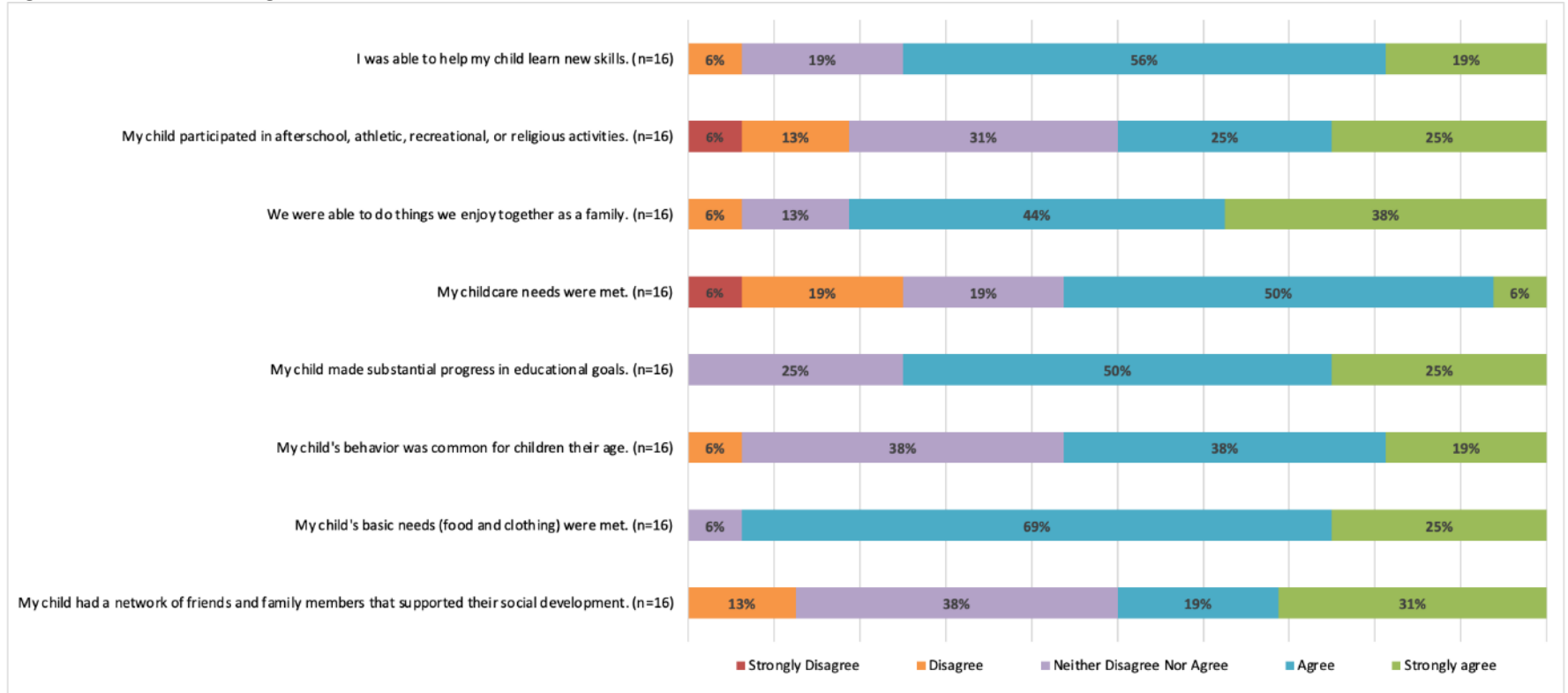
Figure 3. Employment and Education





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 childcare is a challenge.

Figure 4. Child Well-Being





## Attachment 5

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# Lobbying Disclosures





# Attachment 5: Lobbying Disclosures

## DISCLOSURE OF LOBBYING ACTIVITIES

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

OMB Number: 4040-0013  
Expiration Date: 02/28/2025

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: <input type="text" value="Housing Authority of the City of Reno"/> * Street 1: <input type="text" value="1525 East 9th St"/> Street 2: <input type="text"/> * City: <input type="text" value="Reno"/> State: <input type="text" value="NV: Nevada"/> Zip: <input type="text" value="89512"/> Congressional District, if known: <input type="text" value="NV-02"/>		
<b>5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:</b>   		
<b>6. * Federal Department/Agency:</b> <input type="text" value="US Dept. of Housing &amp; Urban Development"/>	<b>7. * Federal Program Name/Description:</b> <input type="text" value="Fiscal Year 2026 Moving to Work (MTW) Block Grant"/> Assistance Listing Number, if applicable: <input type="text"/>	
<b>8. Federal Action Number, if known:</b> <input type="text"/>	<b>9. Award Amount, if known:</b> \$ <input type="text"/>	
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix <input type="text"/> * First Name <input type="text" value="N/A"/> Middle Name <input type="text"/> * Last Name <input type="text" value="N/A"/> Suffix <input type="text"/> * Street 1 <input type="text"/> Street 2 <input type="text"/> * City <input type="text"/> State <input type="text"/> Zip <input type="text"/>		
<b>b. Individual Performing Services</b> (including address if different from No. 10a) Prefix <input type="text"/> * First Name <input type="text" value="N/A"/> Middle Name <input type="text"/> * Last Name <input type="text" value="N/A"/> Suffix <input type="text"/> * Street 1 <input type="text"/> Street 2 <input type="text"/> * City <input type="text"/> State <input type="text"/> Zip <input type="text"/>		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact, upon which reliance was placed by the tier above when the 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 than \$10,000 and not more than \$100,000 for each such failure.		
* Signature: * Name: Prefix <input type="text"/> * First Name <input type="text" value="Hilary"/> Middle Name <input type="text"/> * Last Name <input type="text" value="Lopez"/> Suffix <input type="text" value="PHD"/> Title: <input type="text" value="Executive Director"/> Telephone No.: <input type="text" value="(775) 329-3630"/> Date: <input type="text" value="03/28/2025"/>		
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)



### 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

Fiscal Year 2026 Moving to Work (MTW) Block Grant

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)

03/28/2025

Previous edition is obsolete

form HUD 50071 (01/14)