

**Commonwealth of Massachusetts
Department of Housing & Community
Development**

**Moving To Work Program
Annual Plan for Fiscal Year 2011**

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Table of Contents

I. Introduction	3
Overview of Annual Goals and Objectives	4
II. General Operating Information	6
A. Housing Stock	6
B. Leasing Information - Planned	6
C. Waiting List Information	12
III. Non-MTW Information	13
Sources and Uses of Non-MTW Funds	13
Description of Proposed Non-MTW Activities	13
IV. Long Term MTW Plan	14
V. Proposed MTW Activities	15
Description of Proposed MTW Activities	15
VI. Ongoing MTW Activities	21
Description of Ongoing MTW Activities	21
VII. Sources and Uses of Funding	27
VIII. Appendices	28
Appendix A: Resolution Adopting Certification of Compliance	29
Appendix B: Evaluation	32
Appendix C: Proposed Amendment to MTW Agreement	33
Appendix D: Listing of Regional Administering Agencies	34
Appendix E: Public Hearing/Public Comment Materials	35

I. Introduction

On June 19, 2008, the Massachusetts Department of Housing and Community Development (DHCD) entered into an Amended and Restated Moving To Work Agreement (MTW Agreement) with the US Department of Housing and Urban Development (HUD). MTW is a demonstration program authorized by Congress, through which participating agencies are given the flexibility to waive certain statutes and HUD regulations in order to design and test approaches for providing housing assistance that:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and,
- 3) Increase housing choices for low-income families.

The three objectives listed above are referred to as “MTW statutory objectives”.

Through an earlier agreement between HUD and DHCD, DHCD has been a participant in the MTW program since 1999. From 1999 to 2008, the scope of DHCD’s MTW participation was limited to a small program that provided a financial assistance package of rent and stipends to participating low-income families. The program, which is ongoing and scheduled for expansion in FY 2011, involves a total of 183 families and is administered in the Boston area (61 families) by Metropolitan Boston Housing Partnership and in south Worcester County (122 families) by RCAP Solutions, Inc¹.

The 2008 MTW Agreement replaces the earlier agreement between HUD and DHCD. It provides DHCD with the flexibility to test out new approaches consistent with the MTW statutory objectives and to expand the MTW demonstration to include all tenant-based Housing Choice Vouchers administered by DHCD with certain exceptions. Those exceptions are vouchers under the 2008 (and all subsequent) Veterans Affairs Supportive Housing (VASH), Five-Year Mainstream, and Moderate Rehab programs - all of which are not covered under the MTW Agreement.

DHCD intends to amend the MTW Agreement to incorporate new flexibility offered to MTW agencies by HUD. Under the proposed amendment included as Appendix C to this Annual Plan, DHCD will be able to utilize MTW funds for activities that fall outside of Sections 8 and 9 of the US Housing Act of 1937 provided that the activities only serve households at or below 80% of Area Median Income and address one or more of the MTW statutory objectives.

Under the terms of the MTW Agreement, DHCD is required to prepare and submit to HUD an MTW Annual Plan and Annual Report. The required form and content of the Annual Plan and Report are defined by HUD in HUD Form 50900 “Elements for the Annual MTW Plan and Annual MTW Report”. For purposes of this document and the required submission to HUD, an “MTW activity” is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. This document is DHCD’s MTW Annual Plan for Fiscal Year 2011, i.e. the period from July 1, 2010 through June 30, 2011.

¹ DHCD subcontracts with eight regional administering agencies (RAA) and one local housing authority to administer its portfolio of vouchers, assuring that all 351 cities and towns in Massachusetts are served by its HCVP. A list of the RAAs is included in Appendix D.

Prior to submission to HUD, DHCD made the Annual Plan and the proposed MTW Agreement Amendment available for public review and comment. In addition, DHCD conducted a public hearing on March 26, 2010 in Boston and on March 29, 2010 in Springfield to allow opportunities for the general public and program participants to provide comments on the proposed Annual Plan and MTW Agreement Amendment. DHCD reviewed and considered all written and verbal comments received during the review period. Modifications to the plan were made based on comments received. Copies of public notices, sign-in sheets, written testimony and summary comments are included in Appendix E.

Overview of Annual Goals and Objectives

During Fiscal Year 2011, DHCD intends to undertake a range of MTW-related and other activities to promote the federal MTW statutory objectives and DHCD's overarching goals for the program which are: 1) to demonstrate that housing stabilization can be the foundation for life transformation for extremely and very low-income households; and, 2) to demonstrate that administrative costs savings can be redirected to provide meaningful assistance and, potentially, subsidies to additional program participants and owners. Highlights of planned activities summarized as follows:

- Through its existing network of RAAs, DHCD projects that it will subsidize a total of 19,319 units for extremely and very low-income households through the HCV program, which represents a 99% or greater utilization rate. Included in the above utilization figures are a total of 867 Project Based Voucher (PBV) units projected to be leased as well as the non-MTW components. Of this total, 87 are new PBV units projected to be under contract in Fiscal Year 2011.
- In FY 2011, DHCD plans to implement a new "MTW value voucher" initiative that is projected to provide a lower cost subsidy than a conventional voucher. These vouchers will be used in certain eligible privately assisted units (e.g. LIHTC, 236, certain state funded units) where the rents are generally at least 25% lower than current published FMRs but still not affordable to very low and extremely low income households. Partner agencies will include MassHousing, a quasi-public agency that promotes housing opportunities for low and moderate income households, and various management companies that have a solid track record of providing assisted units to vulnerable populations. Target population will include homeless households that will agree to work with a housing stabilization and employment counselor for at least 18 months once housed and clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities Services (DDS), who will be provided with continuing services and support from these two respective agencies.
- DHCD will also commence implementation of a new MTW initiative designed to encourage voucher holders to move to "opportunity neighborhoods", i.e. neighborhoods which provide significant educational, employment and service opportunities. Under this program, DHCD will provide additional case management and supportive service resources in one or more areas that are identified as providing significant advantages to low-income households. Research conducted by the Kirwan Institute for the Study of Race and Ethnicity at Ohio State University will help guide the selection of these opportunity neighborhoods.
- Using the flexible program guidelines described in the last Annual Plan, DHCD plans to expand the existing, small-scale MTW demonstration activities currently administered in the Boston area

by Metropolitan Boston Housing Partnership and in south Worcester County by RCAP Solutions, Inc. into additional regions of the state. The program will continue to focus on increasing economic self sufficiency for families with children using a program model involving housing supports, service stipends and case management. Program partners and target populations, including those who are homeless, will vary by region.

- In FY 2011, DHCD will begin implementation of a biennial recertification program for households on fixed incomes, an initiative designed to promote administrative efficiency. For all households, DHCD will also implement an asset self-certification program for households with assets valued up to \$50,000.
- DHCD will also begin implementation of a biennial inspection process in lieu of annual inspections along with self-certification of routine repairs applicable to high quality units and units where both the tenant and owner have an excellent track record of responsible maintenance of units. This efficiency measure will help to free up inspector time to conduct owner outreach, training and other activities in support of program goals.
- DHCD will implement an MTW pilot program to extend the current eighteen-month time limit for youth aging out of foster care participating in the Family Unification Program (FUP). Current youth participants who are making progress toward their education and employment goals will be eligible to participate for an extended period of time.
- DHCD will continue implementation of its previously approved MTW initiative to transition waiting list intake and management functions to some or all PBV project owners, consistent with existing multi-family industry practice. Extensive planning has been conducted over the past year including development of owner policies and procedures.
- DHCD will continue implementation of its previously approved MTW Landlord Incentive Fund to be piloted in Berkshire County. This pilot program is designed to provide incentives to landlords in support of DHCD and Commonwealth goals including: expanding housing opportunities in underserved areas; improving the quality of housing units under lease; and, increasing the number of units accessible to households with disabled members.
- To more expeditiously respond to reasonable accommodation requests and expand housing choice options in “low-poverty, high-opportunity” neighborhoods, DHCD will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval.
- DHCD will continue to meet the income selection requirements for the HCVP by assuring that 75% of all applicants selected for assistance each fiscal year are extremely low income, i.e. have incomes that do not exceed 30% of area median income.

Proposed program changes that require MTW flexibility to implement are more fully described in Chapter V and VI below. Non-MTW changes are summarized in Chapters III below. As appropriate, the proposed changes will be incorporated into a revised HCV Administrative Plan.

II. General Operating Information

A. Housing Stock

DHCD is currently authorized to lease a total of 19,194 HCV vouchers. DHCD does not administer a federal public housing program. Table 1 indicates the inventory of both MTW and non-MTW vouchers by category.

Table 1: Voucher Inventory

MTW	Voucher Inventory
HCV Tenant Based*	18,871
FUP*	87
MTW Sub-Total	18,958
Non-MTW	
VASH**	105
Five Year Mainstream	75
Enhanced Vouchers	56
Non-MTW Sub-Total	236
TOTAL ALL PROGRAMS	19,194

*Includes 87 FUP vouchers awarded to DHCD in 2009 pursuant to the 2008 FUP NOFA

**Includes 35 additional VASH vouchers awarded to DHCD in 2009.

B. Leasing Information - Planned

During Fiscal Year 2011, DHCD projects that it will achieve the leasing targets shown in Table 2 below, subject to the award of sufficient HUD funding. HCV Tenant Based figures include Project Based Vouchers. Under the MTW category, DHCD also has projected lease up of MTW value vouchers and other units under the expanded RCAP/MBHP Pilot Program as further discussed below. See also additional PBV detail in Table 3:

Table 2: Leasing Projection for FY 2011

MTW	Vouchers Allocated	Projected Leased on 6/30/11**	Percentage Leased
HCV Tenant Based*	18,871	18,871	100%
Other Vouchers (Value, RCAP/MBHP Expanded Pilot, FUP Aging Out)	325	228	70%
MTW Sub-Total	19,196	19,099	99%
Non-MTW			
VASH**	105	89	85%
Five Year Mainstream	75	75	100%
Tenant Protection Vouchers***	56	56	100%
Non-MTW Sub-Total	236	220	93%
TOTAL ALL PROGRAMS	19,432	19,319	99%

** Total includes PBV vouchers that are detailed in Table 3*

*** Assuming adequate veteran referrals from the Bedford, MA Veterans Affairs Medical Center, DHCD's partner for its VASH 2008 program*

**** Tenant Protection vouchers will be moved into the MTW program after the first year.*

In FY 2010, DHCD received 87 FUP vouchers, 56 Tenant Protection vouchers and 35 additional VASH vouchers which are reflected in Tables 1 and 2. DHCD has applied for up to 100 additional units under the 2009 Family Unification Program NOFA that are not reflected in the above tables.

The projected overall leasing rate of 99% of authorized units highlights the success that DHCD has had in effectively managing and maximizing utilization through its network of Regional Administering Agencies.

Utilizing its Tenant Based vouchers, DHCD operates a statewide Project Based Voucher program. Table 3 provides information on PBV developments under lease in FY 2010 and new PBV developments projected to be under lease during FY 2011. In total, DHCD projects that 867 PBV units will be leased by the end of FY 2011, of which 87 are newly contracted units. Note that actual PBV inventory fluctuates based on various factors including financing availability, construction schedules and modifications to existing PBV HAP contracts.

Table 3: Project Based Voucher Inventory Projection for FY 2011

PBV Developments Under HAP in FY 2010										
RAA	Project	Community	AHAP Date	HAP Start Date	HAP End Date	Elderly or Disabled	Family	Description Homeless Individuals	Supp. Services	Total PBVs
HAC	885C State Highway	Eastham	N/A	9/1/2002	9/30/2012		1			1
HAP	451-459 Main St	Holyoke	N/A	10/7/2002	10/6/2012		12			12
MBHP	32 Kent Street	Somerville	N/A	11/1/2002	10/31/2012	2	6			8
MBHP	1129 Dorchester Ave	Dorchester	N/A	11/19/2002	10/31/2012	6	2			8
MBHP	14 Roach St	Dorchester	N/A	11/19/2002	10/31/2012		1			1
MBHP	20 Roach St	Dorchester	N/A	11/19/2002	10/31/2012		1			1
MBHP	16 Roach St	Dorchester	N/A	11/19/2002	10/31/2012		3			3
MBHP	24 Roach St	Dorchester	N/A	11/19/2002	10/31/2012		2			2
MBHP	22 Roach St	Dorchester	N/A	11/19/2002	10/31/2012		1			1
MBHP	1285 -1291 Mass Ave	Dorchester	N/A	11/19/2002	10/31/2012		4			4
BHDC	YMCA	Pittsfield	N/A	12/16/2002	12/15/2012	28		2		30
RCAP	220 Orchard Hill Dr	Oxford	N/A	1/1/2003	12/31/2012	8	17			25
MBHP	48 Water St	Wakefield	N/A	4/1/2003	3/31/2013			6		6
HAC	979 Falmouth Rd Founders Court	Hyannis	N/A	4/18/2003	4/17/2013		2			2
BHDC	140 East St	Great Barrington	N/A	5/1/2003	4/28/2013	2				2
CTI	Twelve Summer St	Man.by the Sea	N/A	5/1/2003	4/30/2013		4			4
MBHP	430-436 Dudley St	Roxbury	N/A	8/1/2003	7/31/2013			3		3
MBHP	28 Mount Pleasant St	Roxbury	N/A	8/1/2003	7/31/2013			2		2
MBHP	1202 Commonwealth Ave	Allston	N/A	8/1/2003	7/31/2013			6		6
HAP	Westfield Hotel	Westfield	9/1/2002	9/1/2003	8/31/2013				5	5
MBHP	82 Green St	Jamaica Plain	N/A	9/1/2003	8/31/2013			10		10
MBHP	Russell Terrace	Arlington	N/A	10/1/2003	9/30/2013			2		2
MBHP	4-6 Ashland St	Medford	N/A	10/1/2003	9/30/2013			3		3
MBHP	19 Hancock St	Everett	N/A	10/1/2003	9/30/2013			3		3
MBHP	1740 Washington St	Boston	N/A	10/10/2003	9/30/2013			8		8
HAC	32 Old Ann Page Way	Provincetown	N/A	11/1/2003	10/31/2013	1	1			2
CTI	Salem Heights	Salem	N/A	12/1/2003	11/30/2013		72			72

PBV Developments Under HAP in FY 2010

RAA	Project	Community	AHAP Date	HAP Start Date	HAP End Date	Elderly or Disabled	Family	Description Homeless Individuals	Supp. Services	Total PBVs
CTI	Reviviendo	Lawrence	N/A	12/30/2003	11/30/2013			3		3
HAC	40A Nelson Ave	Provincetown	Existing	2/2/2005	1/1/2015		3			3
HAC	58 Harry Kemp Way	Provincetown	N/A	4/1/2005	3/31/2015		4			4
HAP	Hillside Village	Ware	N/A	4/28/2005	4/27/2015		16			16
SMOC	The Preserve	Walpole	N/A	6/1/2005	5/31/2015		30			30
MBHP	Boston YWCA	Boston	N/A	7/14/2005	6/30/2015			20		20
CTI	Conant Village	Danvers	N/A	10/1/2005	9/30/2015		15			15
MBHP	Zelma Lacey Mishawum	Charlestown	N/A	11/1/2005	10/31/2015				20	20
MBHP	Marshall Place Apts	Watertown	N/A	11/17/2005	10/31/2015	8				8
SMOC	Bethany School Apts	Framingham	N/A	12/1/2005	1/30/2015		10			10
SSHDC	Acushnet Commons	New Bedford	N/A	12/19/2005	12/18/2015		3			3
CTI	Stonybrook	Westford	12/30/2004	1/6/2006	12/31/2016		4			4
HAP	Westhampton Senior	Westhampton	Existing	2/1/2006	1/31/2016	3				3
MBHP	Amory St	Roxbury	N/A	2/1/2006	1/31/2016		10			10
SSHDC	Westport Village Apts.	Westport	N/A	2/1/2006	1/31/2016	12				12
MBHP	Pelham House	Newton	N/A	3/1/2006	2/28/2016	3				3
MBHP	Ruggles Assisted Living	Roxbury	N/A	3/1/2006	2/28/2016				35	35
CTI	Winter Street	Haverhill	9/13/2005	9/1/2006	8/31/2016	13				13
HAP	Paradise Pond Apts	Northampton	N/A	12/8/2006	12/7/2016		8			8
MBHP	Harbor Cove '63 Washington Ave.	Chelsea	8/31/2005	12/21/2006	11/30/2016				24	24
HAP	Earle Street	Northampton	11/30/2005	1/1/2007	12/31/2017		3		12	15
MBHP	The Moorings Squantum Gardens	Quincy	12/20/2005	3/7/2007	2/28/2017	39				39
CTI	Cordovan at Haverhill Station	Haverhill	2/10/2006	3/26/2007	3/25/2017		8			8
CTI	Fina House	Lawrence	N/A	4/1/2007	3/31/2017		7			7
CTI	Whipple School Annex	Ipswich	2/6/2006	4/1/2007	3/31/2017	8				8
HAP	Village at Hospital Hill	Northampton	N/A	4/13/2007	4/12/2017	8				8
MBHP	Casa Familias Unidas	Roxbury	6/9/2006	5/14/2007	4/30/2017				8	8
MBHP	Four Addresses in Arlington	Arlington	N/A	6/25/2007	5/31/2012		4			4

PBV Developments Under HAP in FY 2010

RAA	Project	Community	AHAP Date	HAP Start Date	HAP End Date	Elderly or Disabled	Family	Description Homeless Individuals	Supp. Services	Total PBVs
HAC	Morgan Woods Pennywise Path	Edgartown	6/12/2006	8/1/2007	7/31/2017		6			6
SMOC	Baker St	Foxboro	8/16/2006	8/1/2007	7/31/2017		20			20
CTI	Layfayette Housing	Salem	N/A	8/15/2007	8/14/2017		8			8
SSHDC	Bliss School	Attleboro	N/A	9/1/2007	8/31/2017		8			8
MBHP	Janus Highlands	Chelsea	8/4/2006	11/1/2007	10/31/2017		8			8
BHDC	Pine Woods	Stockbridge	N/A	2/1/2008	1/31/2013	3	2			5
MBHP	TILL Building	Chelsea	5/26/2006	5/1/2008	4/30/2018		5			5
CTI	St Joseph's Apts	Lowell	8/1/2007	8/1/2008	7/31/2018		4			4
MBHP	Grandfamilies	Roxbury	N/A	9/1/2008	8/31/2018				8	8
CTI	Sirk Bld	Lowell	N/A	11/1/2008	10/31/2018		8			8
HAP	Prospect Hill	Westfield	11/15/2007	1/1/2009	12/31/2019		4			4
RCAP	9 May Street	Worcester	9/20/2007	1/30/2009	1/29/2024	5	3			8
HAP	46-48 School St	Northampton	9/14/2007	2/1/2009	1/31/2019		2			2
MBHP	Doe House*	Mission Hill	N/A	2/1/2009	1/31/2019			5		5
RCAP	5 Benefit St	Worcester	N/A	2/10/2009	2/9/2024		4			4
HAP	Village at Hospital Hill II*	Northampton	3/20/2008	2/11/2009	2/10/2019	8				8
CTI	48-64 Middlesex St	Lowell	N/A	3/1/2009	2/29/2018		6			6
CTI	Salem Point LP	Salem	N/A	3/10/2009	3/9/2019		7			7
HAP	Sanford Apts*	Westfield	1/7/2008	3/10/2009	3/9/2019		2		3	5
MBHP	The Coolidge*	Watertown	11/27/2007	3/30/2009	3/29/2010	4				4
HAC	Barnstable Senior* Lombard Farm	W. Barnstable	3/12/2008	5/15/2009	5/14/2024	8				8
CTI	Loring Towers*	Salem	N/A	7/1/2009	6/30/2019		8			8
HAC	Barnstable Family* Kimber Woods	W. Barnstable	3/12/2008	7/1/2009	6/30/2025		7			7
MBHP	Granite St Housing	Quincy	7/25/2008	7/1/2009	6/30/2019				5	5
MBHP	St. Polycarp*	Somerville	1/2/2008	7/1/2009	6/30/2019	2	6			8
SMOC	High Rock Homes*	Needham	N/A	7/1/2009	6/30/2024		8			8
SSHDC	Residences at Lakeville Station*	Lakeville	7/30/2007	7/7/2009	7/6/2024		8			8
BHDC	Hillside Avenue*	Gt. Barrington	3/18/2008	7/13/2009	7/12/2024	2	3			5

PBV Developments Under HAP in FY 2010

RAA	Project	Community	AHAP Date	HAP Start Date	HAP End Date	Elderly or Disabled	Family	Description Homeless Individuals	Supp. Services	Total PBVs
RCAP	470 Main St*	Fitchburg	1/30/2008	7/24/2009	7/23/2024	2	5			7
MBHP	Spencer Green*	Chelsea	3/3/2008	7/31/2009	7/30/2019	2	6			8
HAC	Residences at Canal Bluff*	Bourne	6/23/2008	8/3/2009	8/2/2024		3			3
MBHP	109 Gilman St*	Somerville	N/A	10/1/2009	9/30/2019		1			1
MBHP	447 Concord Road*	Bedford	1/7/2008	12/1/2009	11/30/2024		4			4
FY 2010 Total						177	410	73	120	780

**Indicates PBV developments projected to be under lease for the first time by end of FY 2010.*

PBV New Units Projected for FY2011

RAA	Project	Community	AHAP Date	HAP Start Date	HAP End Date	Elderly or Disabled	Family	Description Homeless Individuals	Supp. Services	Total PBVs
CTI	Palmer Cove	Salem	N/A			3	1		2	6
SMOC	Wilber School	Sharon	10/7/2008				8			8
CTI	Cabot St Homes	Beverly	9/21/2009			8				8
CTI	Hayes Building	Haverhill	7/1/2009			3	1			4
HAC	Main St Ext.- Thankful Chase Path	Harwich	2/1/2010			2	3			5
HAP	Reed House Annex	Westfield	9/15/2009			8				8
LHA	Washington Sq.	Lynn	in process				8			8
MBHP	Capen Court	Somerville	10/23/2008			8				8
MBHP	1060 Belmont Street	Watertown	6/1/2009			2	5			7
MBHP	Spencer Row	Chelsea	11/23/2009			3	5			8
RCAP	205-221 Spencer Ave Freedom Village	W. Boylston	8/7/2008			2	4			6
RCAP	Tritown Landing I	Lunenburg	2/5/2010				8			8
RCAP	1-7 Piedmont St	Worcester	12/5/2008			3				3
FY 2011 New Unit Total						42	43	0	2	87

C. Waiting List Information

As of April 8, 2010 there were 83,546 households on the Housing Choice Voucher Program waiting list as summarized in Table 4 below. This reflects an increase of over 10,000 applicants over last year's waiting list totals. DHCD anticipates that the total number of waiting list households will continue to increase substantially in FY 2011 due in part to statewide and national economic conditions.

As was described in the FY 2010 Annual Plan, DHCD is in the process of making changes to the waiting list methods used for Project Based Voucher (PBV) developments. The changes will allow PBV owners to maintain their own site-based waiting lists. Some or all PBV waiting lists may be closed during the transition period. DHCD will issue public notices of waiting list openings and closings.

Table 4:
Waiting List Information for DHCD Housing Choice Voucher Program (April 2010)

	# of applicants	% of total applicants
Waiting List Total	83,546	100%
Income (1)		
Extremely low income <30% AMI	75,794	90.7%
Very low income >30% but <50%	6979	8.4%
Low income >50% but < 80%	765	0.9%
Family Type		
Families with children (2)	54,099	64.8%
Elderly families (3)	3762	4.5%
Families with disabilities (3)	25,962	31.1%
Race/ethnicity (4)		
White/Hispanic	10,014	12.0%
White/non-hispanic	26,684	31.9%
White/no ethnicity specified	3633	4.3%
Black/African american/hispanic	1360	1.6%
Black/African american/non-hispanic	14,808	17.7%
Black/African american/no ethnicity specified	3519	4.2%
American Indian/Alaskan Native/hispanic	190	0.2%
American Indian/Alaskan Native/non-hispanic	937	1.1%
American Indian/Alaskan Native/no ethnicity specified	160	0.2%
Asian or Pacific Islander/hispanic	126	0.2%
Asian or Pacific Islander/non-hispanic	1428	1.7%
Asian or Pacific Islander/no ethnicity specified	419	0.5%
Native Hawaiian/Other Pacific Islander/hispanic	663	0.8%
Native Hawaiian/Other Pacific Islander/non-hispanic	509	0.6%
Native Hawaiian/Other Pacific Islander/no ethnicity specified	116	0.1%
Hispanic, no race specified	17,448	20.9%
Non-hispanic, no race specified	2285	2.7%
No race or ethnicity specified	1070	1.3%

(1) Based on HUD income limits effective of 3/19/09.

(2) This number represents households with more than one member

(3) Includes households with only one member

(4) Applicants may specify more than one race therefore an applicant may be counted more than once

III. Non-MTW Information

In Fiscal Year 2011, DHCD will continue to administer the VASH, Tenant Protection and Five Year Mainstream programs, which are not included in the MTW program. Tenant Protection vouchers will be moved into the MTW Program after the first year.

Sources and Uses of Non-MTW Funds

Table 5 provides a projection of Non-MTW sources and uses for Fiscal Year 2010. Note that HUD funding is based on calendar year 2010. The amounts listed below may change based on HUD funding allocations. Actual figures will be provided in the MTW Annual Report.

Table 5: Non-MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – VASH	\$724,000
HUD Subsidy – FUP FY 2008 and 2009	\$925,128
HUD Subsidy – Five Year Mainstream	\$715,000
HUD Subsidy Enhanced Vouchers	\$616,211
HUD Administrative	\$306,600
Non-MTW Sources Total	\$3,286,939
Uses	
HAP Payments	\$2,980,339
Administrative	\$306,600
Non-MTW Uses Total	\$3,286,939

Description of Proposed Non-MTW Activities

Non-MTW activities include special purpose programs not included in the MTW program, i.e. VASH, Enhanced Vouchers, Mainstream, as well as any other activity that does not require MTW flexibility to implement. Tenant Protection Vouchers are classified as Non-MTW during the first year. The following non-MTW activities are proposed for implementation in FY 2011:

Project Based Voucher Program – DHCD will continue to implement an ongoing statewide Project Based Voucher program. In addition to other priorities, DHCD intends to prioritize projects that will further Commonwealth of Massachusetts affordable housing goals related to reduction and prevention of homelessness, promoting family economic self-sufficiency, assisting those with disabilities and the other goals.

IV. Long Term MTW Plan

The MTW Agreement and the proposed “broader uses of authority” amendment offer a unique and important opportunity to improve and enhance the HCV program. Building on lessons learned and successes of the existing small-scale MTW demonstration programs, DHCD intends to utilize MTW flexibility to test out the efficacy of new approaches in support of MTW statutory objectives and the Commonwealth’s housing goals.

DHCD intends to fully explore the potential benefits of MTW: 1) to demonstrate that housing stabilization can be the foundation for life transformation for extremely and very low-income households; and, 2) to demonstrate that administrative costs savings can be redirected to provide meaningful assistance and, potentially, subsidies to additional program participants and owners. DHCD believes that affordable housing can provide the foundation that allows extremely and very low-income households to access good jobs and education and to enter the economic mainstream. Maximizing the value of limited federal program dollars to help families achieve life goals, and then move on so that program dollars can help serve additional families is a key goal.

Additional principles that guide MTW planning for the long term include:

- All MTW activities must relate to one or more of the three MTW statutory objectives, i.e. reducing cost and/or promoting administrative efficiency, increasing housing choice, and supporting families in achieving economic self-sufficiency.
- MTW flexibility will be utilized to promote tighter linkages and synergy between the HCV program and other related Commonwealth programs and policy goals such as preventing or reducing homelessness, supporting self-sufficiency and welfare to work initiatives; supporting project-based affordable housing for extremely low income households; supporting those who have one or more disabilities and stabilizing neighborhoods.
- By identifying and addressing administrative efficiency opportunities, MTW flexibility will be used wherever feasible to increase the number of extremely and very low-income households served and the overall quality of leased housing units.
- New MTW program initiatives will be developed to respond to differences among regional and local housing markets.
- In addition to expanding and improving the existing MTW demonstrations being implemented by Metropolitan Boston Housing Partnership and RCAP Solutions, Inc., a series of small and large scale initiatives will be implemented over time.

In order to explore the feasibility of various MTW initiatives, DHCD convened a series of planning meetings in FY 2010. Working groups focused on various issues including identifying opportunities for administrative efficiency, improving the HQS inspection process and expanding the existing MBHP/RCAP pilot program models to other regions of the Commonwealth. The new initiatives proposed in the FY 2011 Annual Plan reflect the input of the working groups. In the future, DHCD will continue to provide opportunities for broad-based input both from its regional administering agencies and outside stakeholders to inform the design of DHCD’s MTW initiatives.

V. Proposed MTW Activities

Beginning in FY 2011, DHCD proposes to implement a range of new MTW activities as described below. As required by HUD, for each activity, the following information is provided:

- Description of MTW activity
- Relationship to MTW statutory objective
- Projected impact
- Baseline, benchmarks and metrics
- Data collection process
- MTW authorization
- Rent reform hardship policies and other information, if applicable

Ongoing, previously approved MTW activities are described in Chapter VI.

Description of Proposed MTW Activities

Activity 2011-1

Description of MTW activity: In FY 2011, DHCD plans to implement a new “MTW value voucher” targeted to the homeless and those with disabilities. This initiative will provide a lower cost subsidy than a conventional voucher. Participants will be offered units in privately assisted housing developments where the rental costs are lower (generally by 25% or more) than current HUD published FMRs but still not affordable to very-low and extremely low-income households. These would be units in LIHTC, 236, and certain state funded developments, for example, where rents are generally set at or below 60% of AMI. For these units, the rent reasonableness determination process will consist of verification of the regulated rent amount, which will always be at or below the Payment Standard. Other HCV program rules may also be waived for these vouchers. The value voucher would make up the difference between the rent and 30% of the tenant’s adjusted income. Partner agencies will include MassHousing, a quasi- public agency that promotes housing opportunities for low and moderate income households, and various management companies that have a solid track record of providing assisted units to vulnerable populations. MassHousing will make units available to clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities (DDS) under their 3% set-aside program for this target population in effect since 1978. Participating homeless households must agree to work with a housing stabilization and employment counselor for at least 18 months once housed. Clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities Services (DDS) will be provided with continuing services and support from these two respective agencies. DHCD’s partnership with MassHousing and certain private management companies will make it possible for the participants to live in good quality housing. DHCD will work with its partner agencies to establish realistic time limits for these vouchers within the time permitted by its MTW Agreement with HUD, currently in effect until June 2018.

Relationship to MTW statutory objective: This activity addresses the statutory objectives to expand housing choice and to reduce costs and achieve greater cost effectiveness in federal expenditures.

Projected impact: The new policy will expand housing choice by providing affordable decent, safe and good quality housing to eligible households who are homeless and/or have a mental health and/or developmental disability. It is also projected to result in lower HAP costs for these vouchers.

Baseline, benchmarks and metrics: DHCD plans to measure the number of low-income households served under this program and the average subsidy level. The current baseline of households served under this program is zero. DHCD has established a benchmark of up to 75 households to be served under this initiative during the first year of operation. The current average HAP statewide is \$887 with a high of \$1090 in greater Boston and a low of \$512 in Berkshire County. DHCD will establish a benchmark of achieving a 20% decrease in the average subsidy paid for value vouchers compared to the average HAP cost in the regions where the units are leased. The average subsidy cost decrease is projected to occur during the first year.

Data collection process: DHCD will utilize internal reporting systems to collect and analyze data on the number of households served, income levels of households served and the average/median subsidy levels. This information will be reviewed and analyzed as part of the Annual Report process.

MTW authorization: MTW Agreement, Proposed Amendment on Broader Uses of Authority; Attachment C, paragraphs B.2, D.1.a, D.2.a, D.2.b, D.4.

Activity 2011-2

Description of MTW activity: DHCD will establish an “Opportunity Neighborhood” program in one or more selected neighborhoods in different regions throughout the Commonwealth. The majority of academic research and literature indicates that where a person lives determines (to various degrees), the opportunities afforded to them. In 2009, the Kirwan Institute completed an extensive mapping project of the geography of opportunity areas in Massachusetts. They looked at 19 different indicators of opportunity from three different categories of opportunity: educational, economic and neighborhood/housing. The purpose of DHCD’s “Opportunity Neighborhood” MTW initiatives to provide significant supports and encouragement to existing voucher participants and/or new voucher holders who wish to move to areas with empirically-documented improved educational systems, job opportunities, social services and other opportunities in the expectation that over time their need for housing and other subsidies will abate or diminish. Existing participants and/or voucher holders moving into these areas will be provided with case management support both before and after the move through the participating regional administering agencies. Other incentives may be provided based on family needs and budget availability such as transportation assistance, child care referrals, training stipends, etc. Families will be encouraged or required to develop a family plan to access opportunities in their new neighborhoods with a special focus on positive outcome educational programs for children and available jobs for adults. Where appropriate, participants will also be encouraged to participate in the Family Self Sufficiency Program. DHCD will identify Opportunity Neighborhoods using a framework developed by the Kirwan Institute for the Study of Race and Ethnicity at Ohio State University and other research and literature.

Relationship to MTW statutory objective: This activity addresses the statutory objectives to expand housing choice and promote economic self sufficiency among families with children.

Projected impact: This initiative is projected to expand housing choice by providing supports to low-income households who elect to move to areas with higher educational and job opportunities. The program is also projected to improve educational attainment of children and to increase household income by improving access to better paying jobs.

Baseline, benchmarks and metrics: DHCD proposes to measure the number of households moving and/or residing in opportunity neighborhoods, the increase in household income and the increase in educational attainment. The current baseline of households served under this program is zero. DHCD has established a benchmark of 30 current participating voucher households to be served under this initiative during the first year of operation. If DHCD cannot identify current participants, it will work with its partners in the targeted neighborhood to identify prospective families, in which case these households would be served under DHCD’s broader use authority. Individual household baseline information will be collected upon move-in to the opportunity neighborhood. Benchmarks related to educational attainment of household youth and household income will be established.

Data collection process: DHCD will utilize information collected by case managers along with internal reporting systems to collect and analyze data on the number of households served, income levels of households served and educational attainment of household youth. This information will be reviewed and analyzed as part of the Annual Report process.

MTW authorization: MTW Agreement, Attachment C, paragraphs B.1.iii, D.2.a, D.4; Broader Uses of Authority amendment.

Activity 2011-3

Description of MTW activity: DHCD will modify its inspection policies and procedures to: 1) allow biennial inspections of units that are “A” and “B” grade, subject to a review of tenant and owner history, and, 2) allow for owner/tenant self-certification of routine repairs in lieu of a re-inspection. Units inspected biennially will be subject to quality control audits, and owners and tenants may elect to have annual inspections upon request. Self-certification of low-risk or in-progress repairs will be allowed at the discretion of the inspector, and the self-certification form must be signed by both the owner and the tenant. Further verification that repairs were completed will be done at the next scheduled annual or biennial inspection. In tandem with these initiatives, DHCD intends to expand the use of inspectors to provide tenant and landlord training related to HQS standards, unit upkeep, and other related maintenance matters. A key driver for this initiative is to more firmly establish DHCD’s statewide inspection staff as a valuable and accessible resource to property owners in their respective regions that will result in new owner participation and a continued listing of quality housing for program participants.

Relationship to MTW statutory objective: This activity addresses the statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures by reducing the amount of time spent by inspection staff on these activities.

Projected impact: DHCD projects that these two inspection-related initiatives will result in administrative efficiencies that will continue to ensure HQS compliance while expanding pro-active landlord and tenant training efforts and improve housing choice for tenants in good quality units.

Baseline, benchmarks and metrics: DHCD proposes to measure reductions in the amount of time spent by inspectors on conducting annual inspections and routine violation re-inspections. The current baseline for an annual inspection and re-inspections is 65 minutes per unit. DHCD has established a benchmark of 4000 units to be subject to this new policy, resulting in a projected reduction of 4333 hours of inspector time over a three year period. DHCD also proposes to measure the number of owners and tenants who are provided with training on HQS issues. The current baseline is zero. The proposed benchmark is 1500 owners and tenants that will have received training as a consequence of the inspectors’ freed up time over a three year period.

Data collection process: DHCD will utilize internal reporting systems to collect and analyze data on the number of inspections completed, the estimated time savings as a result of the new policy over current inspection practices, and the number of owners and tenants who receive HQS-related training.

MTW authorization: MTW Agreement, Attachment C, paragraph D.5.

Activity 2011-4

Description of MTW activity: DHCD will modify its initial and annual recertification policies to: 1) allow biennial recertifications for households on fixed incomes, i.e. households whose only source of income is Social Security, SSI, retirement pensions, or some combination of the three; and, 2) allow household self-certification of assets valued up to \$50,000. Applying the passbook rate to assets valued at \$50,000 results in asset income of \$500. At the present time, only 37 (less than .001%) of DHCD's current participants (n=18,969) report assets at greater than \$50,000.

Any household that believes they would benefit by an annual recertification is free to request an annual income recertification.

Relationship to MTW statutory objective: This activity addresses the statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures by reducing the amount of time spent by staff on these activities.

Projected impact: DHCD projects that these initiatives will result in administrative efficiencies for staff as well as time and cost savings for participants.

Baseline, benchmarks and metrics: DHCD proposes to measure reductions in the amount of time spent by staff performing certifications. DHCD has established a benchmark of 6,690 households who are subject to the new biennial recertification schedule and 18,969 (all households) who are subject to the new asset verification policy. The transition to this new process will occur over a two year period.

Data collection process: DHCD will utilize internal reporting systems to collect and analyze data on the number of households impacted and the estimated time savings achieved. DHCD will also work with the RAAs to develop a baseline of the time spent on average recertifications under the annual certification system. DHCD will also utilize relevant data on recertification processing times as published by the Cambridge Housing Authority in their 2007 MTW Annual Report.

MTW authorization: MTW Agreement, Attachment C, paragraph D.1.c.

Activity 2011-5

Description of MTW activity: Among the most often cited concerns for youth aging out of foster care is the lack of adequate and affordable housing. Youth who lack housing may have difficulty staying in school and/or maintaining employment. These youth are expected to succeed on their own long before a vast majority of their peers. By the time they receive their FUP voucher, they have already experienced more challenges than many people experience in a lifetime.

DHCD, through its MTW program intends to design and implement a time-limited pilot program to provide continued support to and build upon the successes of youth currently participating in its Family Unification Program Aging Out of Foster care program that are facing the current 18 month expiration date. Designed similarly to the current stipend program DHCD currently administers in MBHP and RCAP's region, this initiative will provide a shallow short-term and time-limited subsidy, supportive services funds for education, training and employment related expenses, an escrow account and case management. Up to 25 current participants in good standing who are no longer eligible for a FUP voucher, are making progress toward their education and employment goals will be eligible to participate.

Relationship to MTW statutory objective: This activity will support the statutory objective of promoting economic self-sufficiency.

Projected impact: Helping youth to become stable and productive citizens will produce substantial social and economic benefits and would reduce the potentially substantial costs to the Commonwealth if these youth do not succeed.

Baseline, benchmarks and metrics: DHCD will establish and track appropriate benchmarks in order to assess program effectiveness. The activities, staff, and programs and the available financial resources will ultimately determine the specific metrics that are appropriate for this program. Examples of the type of data to be collected may include: employment status; income levels; savings; educational attainment; etc.

Data collection process: RAAs and case managers will collect all relevant participant data to measure benchmarks.

MTW authorization: MTW Agreement, Attachment C, paragraphs D.1.a, D.1.b, D.1.c, D.2.d, D.3.b, D.4; Broader Uses of Authority amendment.

VI. Ongoing MTW Activities

This section of the MTW Annual Plan provides information and updates on MTW activities that have been previously approved by HUD.

Description of Ongoing MTW Activities

Activity 2000-1

Description/Update of MTW Activity: DHCD's original MTW Agreement and Plan focused on implementation of a small-scale program administered in the Boston area by Metropolitan Boston Housing Partnership (MBHP) and in Worcester County by RCAP Solutions, Inc. (RCAP). This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Families exercise considerable decision-making in the utilization of the funds, within some guidelines. Case management and program coordination is provided by designated MTW Advisors at each agency, MBHP and RCAP, with target caseloads of 61 per advisor. Families may select any housing unit which they deem affordable and appropriate for their needs and which meets the occupancy requirements of the local Board of Health and Massachusetts Lead Laws where applicable. There is no HUD Housing Quality Standards inspection or rent-reasonableness test.

Eligibility is targeted to low-income working families who meet the following criteria:

- 1) Receive, or have received in the past 12 months, public assistance: TAFDC, EA, Supplemental Nutritional Assistance Program (SNAP, formerly known as "foodstamps"), and
- 2) Are committed to maintaining employment and agree to provide information to assess the effectiveness of the program, and
- 3) In the Boston component only, are currently homeless in a shelter, hotel, or motel placement.

Families participating in the south Worcester County component (122 families) receive the following:

- Financial assistance package of \$5,500 per year, of which up to \$250/month can be applied toward the rent and, in some cases security/upfront costs, for the apartment (paid directly to owner), up to \$158/month is available for work-related, utility, or emergency expenses, and \$50/month is set aside in an escrow account that is receivable upon successful program completion.
- Case management support to assist the family in addressing employment, housing, or other issues.
- Financial literacy training and homebuyer preparation workshops.
- Support and resources to assist in home-buying, where desired and appropriate.

Families participating in the Boston component (61 families) receive the following:

- Financial assistance package of \$10,000 per year, of which up to \$700/month can be applied toward the rent and, in some cases, security/upfront costs for the apartment (paid directly to owner), up to \$83/month is available for work-related, utility, or emergency expenses, and \$50/month is set aside in an escrow account that is receivable upon successful program completion. Assistance levels may be slightly higher for very large families.
- Case management support to assist the family in addressing employment, housing, or other issues.
- Financial literacy training.
- Support and resources to assist in home-buying, where desired and appropriate.

Participating families recertify once annually, and participation is limited to three years of stipend assistance, or fewer if a family exceeds the low-income limit for the Boston MSA (80% of area median income), fails to meet ongoing program requirements, or the demonstration is concluded by HUD.

In FY 2010, DHCD made a number of changes to the program design:

- The term of participation will be increased from the current three-year maximum to an initial three-year term with up to two one-year extensions, for a total possible term of five years.
- The number of participating households and the amount of subsidy/stipend levels will be reviewed on an on-going basis throughout the calendar year and may, at DHCD's option, be increased or decreased.
- If the contract rent for the unit is less than the shallow rent subsidy provided, the participant must pay 30% of their adjusted income toward rent. The participant can opt to pay an increased amount for rent and transfer the remaining subsidy amount to their escrow account.
- Homeownership matching funds will be provided through August 30, 2009. Beginning September 1, 2009, DHCD will fund a one-time \$500 first-time homebuyer grant for eligible participants provided DHCD has available funds.
- The program may be expanded to include additional regions of the state.

Initial Plan Year: 2000

Proposed Changes to Activity: DHCD will authorize one or more RAAs to implement small scale programs using the approved program model summarized below. Target population, subsidy and stipend levels, services offered and partnerships will vary from region to region.

Evaluation: As part of its last Annual Plan, DHCD provided HUD with a copy of an interim evaluation report on this initiative prepared by a graduate student. Going forward, DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: Prior approval granted by HUD. Authorizations cited include MTW Agreement, Attachment C, paragraph D.1, D.2, D.3, D.4, D.5. The Broader Uses of Authority amendment was retroactively applied to this activity through HUD's letter of January 28, 2010.

Activity 2010-1

Description/Update of MTW Activity: Owner/managers of PBV developments authorized by DHCD will be responsible for all PBV waiting list intake and management functions. Generally, DHCD will require PBV owners to assume and manage these functions; however, exceptions may be made at DHCD's option. Under the new system, applicants will contact the owner/manager of a specific development in order to file an application. Application files and the waiting list itself will be maintained at the development site. Owner/managers will be responsible for contacting and screening applicants who come to the top of the waiting list, collecting all needed information from the applicant, and then forwarding the applicant to the RAA for eligibility determination and processing.

For existing PBV developments, all current applicants will maintain their waiting list places; however, the waiting list will be updated prior to transitioning to the owner/managers. During the transition period, waiting lists may be temporarily closed. DHCD will either use existing staff or contract with a Fair Housing organization to conduct periodic reviews of the system to ensure compliance with DHCD's approved tenant selection plan for each respective project and conformance to fair housing guidelines.

All PBV developments utilizing the new waiting list management methods will be required to modify their tenant selection plans and other documents as needed. DHCD will modify its PBV Administrative Plan as well.

Transition activities began in July 2009. Procedures manuals and training materials are currently under development. DHCD intends to roll out the new program in FY 2011.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.4

Activity 2010-2

Description/Update of MTW Activity: DHCD may approve any documented and reasonable exception to payment standards as a reasonable accommodation for HCV households with disabled household members without HUD approval. This policy is utilized without regard to the percentage increase requested over the payment standard.

Additionally, DHCD may approve other documented and reasonable exceptions to payment standards without seeking HUD approval if such requests will support participants' ability to find suitable rental housing in "low poverty, high-opportunity" neighborhoods, and clearly achieve the statutory objectives of the MTW program.

Implementation is ongoing.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2010-3

Description/Update of MTW Activity: An Owner Incentive Fund pilot program will be established to promote upgrades to the housing stock in areas of the state with a large percentage of older, deteriorated housing stock. When this type of housing is the prevailing housing available to HCV participants in a community/region, it has several undesirable consequences including: 1) limiting the tenants' ability to secure better quality housing in neighborhoods of lower concentrations of poverty; 2) resulting in inefficient use of the HCV inspection staffs' time by continually having to re-inspect units that frequently fall out of compliance; 3) resulting in few, if any, handicapped accessible units; and 4) discouraging new owners with better quality housing from making their units available to HCV households.

The program goals for this activity are: leasing higher quality units including incentivizing owners to upgrade existing housing at least one grade level, i.e. from a "C" to a "B" grade, or from a "B" to an "A" grade; increasing the number of units that are accessible to persons with disabilities; expanding the number of units leased in currently underserved neighborhoods, and encouraging new owner participation.

Initially, the program will be piloted in Berkshire County and, depending on the results achieved, DHCD may elect to expand it to other parts of the state. Participating owners will be eligible for a flat fee financial incentive (initially established at \$1,200) payable in 4 quarterly installments over the first year of the HAP contract. At the end of the first year under HAP contract, owners would be eligible for an additional one-time payment (initially established at \$500) if one or more of the following applied: the owner had not previously been part of the HCV program; the unit had not previously been under contract to an HCV participant; the unit was new construction or substantial rehabilitation; or, the unit was a foreclosed property prior to leasing and at least a "B" grade level, *and*, the tenant remains in occupancy, or the owner has agreed to lease to another HCVP referral from the RAA.

In order to be eligible for incentive payments, the unit must be compliant with HQS at all times during the HAP term. An agreement will be signed certifying that the incentive payments are not part of the monthly rent to owner.

DHCD will establish an overall cap on the number of units eligible for the Owner Incentive Fund, including a cap on the number of units for individual owners. DHCD will adjust the program criteria and payment amounts as needed to respond to local market conditions.

Detailed policies and procedures for this initiative are under development. Implementation activities will occur throughout FY 2011.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2010-4

Description/Update of MTW Activity: Required HCV program forms will be modified as needed to streamline processing, utilize “plain language”, and address local housing market features. New forms will be rolled out as they are completed. A DHCD-RAA working group will review all existing HUD HCV forms, identify and vet proposed changes, and implement new forms. The forms to be evaluated for modification will include: Voucher, HAP Contract, RFTA and others. As required under the MTW Agreement, any changes to the HAP form will include language noting that funding for the contract is subject to the availability of appropriations.

This activity will be phased beginning in 2010, and will occur over a 2-3 year period.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.1.

VII. Sources and Uses of Funding

DHCD's operates an MTW program that involves only Housing Choice Vouchers. Table 6 below provides a projection of sources and uses for the MTW program for Fiscal Year 2011. Note that HCV funding is allocated on a calendar year (CY) basis. While DHCD has been notified of its CY 2010 funding, no information is available on CY 2011 funding. Thus, the amounts listed below are likely to change based on actual funding levels. DHCD will provide information on actual source and use amounts as part of the MTW Annual Report.

Table 6: MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – MTW Tenant Based *	\$206,341,101
Administrative	\$19,193,000
MTW Sources Total	\$225,534,101
Uses	
HAP Payments	\$203,341,101
Other Authorized MTW Activities**	\$3,000,000
Administrative	\$19,193,000
MTW Uses Total	\$225,534,101

**Includes all PBV units*

*** This line item includes the cost of Value Voucher initiative, Owner Incentive Fund pilot, and expansion of MTW Activity 2000-1 to additional RAA sites.*

VIII. Appendices

Appendix A is the required signed Resolution adopting the FY 2010 MTW Annual Plan Certification of Compliance.

Appendix B provides a description of DHCD's planned and ongoing MTW evaluation efforts

Appendix C is the proposed Amendment to the MTW Agreement between DHCD and HUD.

Attachment D provides a listing of each DHCD regional administering agency.

Attachment E includes the public hearing notice, sign-in sheets, written testimony and summary comments received as part of the MTW Annual Plan and proposed Amendment to the MTW Agreement public hearing process.

Appendix A: Resolution Adopting Certification of Compliance see attached

Annual Moving to Work Plan 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 Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2010, 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 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 PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment 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 PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The 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.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the 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.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The 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.

18. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Mass. Dept. of Housing and Community Development
PHA Name

MA901
PHA Number/HA Code

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

Tina Brooks
Name of Authorized Official

Undersecretary
Title

Signature

Date

Appendix B: Evaluation

DHCD, in collaboration with its network of Regional Administering Agencies, utilizes internal resources to track and monitor performance of proposed and ongoing MTW activities. At the present time, no third party evaluation is planned. DHCD has previously submitted information on an evaluation of the small-scale 183 unit pilot program completed by a graduate student as a thesis project. This information was also presented at HUD's April 2009 MTW conference.

Appendix C: Proposed Amendment to MTW Agreement

As part of the MTW Annual Plan public notice and hearing processes, DHCD provided the public with the opportunity to review and comment on the proposed First Amendment to Attachment D of the MTW Agreement. The proposed Amendment was forwarded to DHCD on January 28, 2010 by letter from HUD's Deputy Secretary Dominique Blum. DHCD received no comments or objections to the proposed amendment at the public hearings conducted on March 26 and 29, 2010 or during the public notice period.

Appendix D: Listing of Regional Administering Agencies see attached

Appendix E: Public Hearing/Public Comment Materials see attached

DHCD published notices and made available the MTW Annual Plan for Fiscal Year 2011 for a thirty day comment period. DHCD conducted two public hearings on the MTW Annual Plan on March 26 and March 29, 2010. Based on input received during the public comment period and the public hearings, DHCD made modifications to the Annual Plan. Copies of relevant materials are included in this attachment: public notice; public hearing sign-in sheets; and, summary of comments received.