

PHA Name : Brattleboro

PHA Code : VT002

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2023

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

In its MTW Supplemental Plan for 2022, BHP requested three waivers. 1) to conduct reexaminations every three years instead of every year (this would result in cost effectiveness and savings, 2) to allow self-certification for assets under \$50,000 and not impute income on them, 3) to conduct inspections every three years instead of every year (also with the goal of becoming more efficient and saving money). When the plan was approved by HUD in June, a number of factors made it difficult to implement those changes. Because of COVID many of our systems and processes had been put on hold or changed. We then experienced extensive medical leaves for a number of our senior staff. And finally we realized that we did not have the software to allow us to implement these changes with the desired effect and the very staff members who would research new software were on leave.

We now are almost fully staffed and will take on these three goals. That means that during our new plan year, April 2023-March 2024, we will be implementing these goals and working toward the implementation of the goals we are adding in this year's plan. The waivers that we are requesting in this plan are changes to the Family Self Sufficiency program (FSS) which addresses the second statutory goal of giving incentives to families to become more self-sufficient. The FSS program was designed by HUD to help people move toward self-sufficiency. We have found that the design as created by HUD does not fully address the needs of our population. It is too inflexible and therefore is not responsive to the differing needs of diverse individuals.

Our changes would allow us to require that all residents (excluding persons with disabilities) between the ages of 18-54 work with the Resident Service Coordinator to develop a three-year Goal Plan to help them move toward more self-sufficiency. The Plan will be developed by the participant with support from the FSS Coordinator and will reflect their own personal, financial and educational situation. At required quarterly meetings with the Coordinator, the Plan will be reviewed, resources identified, and support given to help the participant achieve their goals. At these check-ins the goals and timeline may also be changed or modified if needed. Incentives for achieving goals will be provided including credit toward rent payments and grants for items/services necessary to meet the goals. A hardship policy exists to allow the participant and the Coordinator to come to an agreement to change goals, put them on pause or make other modifications in light of changes in circumstances. These will be applied on a case-by-case basis. Details of the changes are found in the body of the application.

We are also requesting a waiver to allow us to eliminate the escrow provision under the FSS program and replace it with more immediate incentives to move toward self-sufficiency. The program has worked well for a handful of people but for most participants it is not a true incentive - it takes too long to realize, is too easy to have to forfeit and many need more immediate help in their struggles. Currently there are only two participants who are using the escrow provision successfully. Another 10 people have small amounts built up but are unable to successfully collect it every month. Of the successful ones, both are nearing the end of their COP and will graduate before the changes are fully implemented. The remaining will be given the option of continuing until the end of the COP or receiving their escrow balance and participating in the modified program.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Plan to Implement in the Submission Year
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Plan to Implement in the Submission Year
c.PH Alternative Family Selection Procedures (PH)	Plan to Implement in the Submission Year
c.HCV Alternative Family Selection Procedures (HCV)	Plan to Implement in the Submission Year
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
e.PH Policies for Addressing Increases in Family Income (PH)	Plan to Implement in the Submission Year
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Brattleboro Plans to Implement in the Submission Year or Is Currently Implementing**3.a. - Alternative Reexamination Schedule for Households (PH)**

This waiver was approved in our 2022 Supplemental Plan. As stated in the introductory narrative, due to COVID, medical leaves and staff shortages we were unable to implement this year. We will do so in 2023. We will do reexaminations for those with fixed incomes once every three years. This will relieve staff time from administrative duties and allow them to spend more time providing participant support. It will also eliminate angst and time for residents who are currently required to gather papers, fill out forms, have meetings every year. Most of those folks are elderly or have some disability and this process causes them a lot of stress. The change will contribute to an overall goal of freeing staff from unnecessary administrative duties thus giving them time to focus more on participant services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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

see above

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**Recertification Schedule is**

Once every three years

Household may request 2 or more interim recertifications per year.

If a family's household income decreases by 10% or more for a period of 30 days or more the family may request an interim reexamination and the new income will be used to calculate rent. Or if the family's expense increase by 10% or more for a period of 30 days or more, the family may request an interim reexamination and the new expense will be used to calculate rent. If the family's income increases the family will not be required to file a change and their rent will remain until their next reexamination.

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

This waiver was approved in our 2022 Supplemental Plan. As stated in the introductory narrative due to COVID, medical leaves and staff shortages we were unable to implement this year. We will do so in 2023. We will do reexaminations for those with fixed incomes once every three years. This will relieve staff time from administrative duties and allow them to

spend more time providing participant support It will also eliminate angst and time for participants who are currently required to gather papers, fill out forms, have meetings every year. Most of these folks are elderly or have some disability and this process causes them a lot of stress. The change will contribute to an overall goal of freeing staff from unnecessary administrative duties thus giving them time to focus more on participant services.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all properties with project-based vouchers

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

see above

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is

Once every three years

Household may request 2 or more interim recertifications per year.

If a family's household income decreases by 10% or more for a period of 30 days or more the family may request an interim reexamination and the new income will be used to calculate rent. Or if the family's expense increase by 10% or more for a period of 30 days or more, the family may request an interim reexamination and the new expense will be

used to calculate rent. If the family's income increases the family will not be required to file a change and their rent will remain until their next reexamination.

3.c. - Self-Certification of Assets (PH)

Assets valued at \$50,000 or less will be self-reported and the income from them will not be imputed when calculating rent. This will contribute to being more cost effective as the staff time to impute this income and then use it in rent calculations results in less income to BHP than the cost of the staff time. It will also result in less time and work for the residents. The larger initiative that it will contribute to is that of eliminating unnecessary administrative duties so our staff can focus more on supporting our residents and looking at more creative ways of solving our area's housing shortage.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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

We will only be implementing this during 2023 FY.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is

\$50,000.

3.d. - Self-Certification of Assets (HCV)

Assets valued at \$50,000 or less will be self-reported and the income from them will not be imputed when calculating rent. This will contribute to being more cost effective as the staff time to impute this income and then use it in rent calculations results in less income to BHP than the cost of the staff time. It will also result in less time and work for the participants. The larger initiative that it will contribute to is that of eliminating unnecessary administrative duties so our staff can focus more on supporting our participants and looking at more creative ways of solving our area's housing shortage.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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

We will be implementing this during FY 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is

\$50,000.

5.d. - Alternative Inspection Schedule (HCV)

This waiver was approved in our 2022 Supplemental Plan. As stated in the introductory narrative due to COVID, medical leaves and staff shortages we were unable to implement this year. We will do so in 2023. The plan is to do inspections every three years. The Town of Brattleboro has a mandatory inspection for all rentals every three years. This is where our units are and where the bulk of our Section 8 units are. Their inspections are far more detailed than ours so to avoid duplicate inspections for residents, and to be more efficient, we will contract with them to certify to us their inspection results. In the few towns where we have Section 8 participants that do not have mandatory inspections, we will conduct them every three years and at initial move in if the tenant changes. The tenant and/or landlord can request an inspection any time they fell one is warranted regardless of the three-year schedule. This will decrease the work load on our staff considerably as we currently do 369 inspections every year, each taking one to two hours between scheduling, the inspection, etc.

This MTW activity serves the following statutory objectives:

Cost effectiveness

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

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

See above

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

10.b.PH - Alternative Structure for Establishing Program Coordinating Committee (PH)

Our area is one that has many boards, committees and groups that meet regularly. Our FSS Coordinator meets with most of these groups. Some are focused on education, some on employment, some on supportive services of various types . Because we are a relatively small community many of the people on these committees are the same. Our Coordinator has been working with them to the benefit of our residents and it has been very successful. Because of our over-organized community it is very difficult to convene yet another group. We will make use of these committees. This will make for a far more efficient use of not only the FSS Coordinator's time but that of our community partners. And it will make it easier to coordinate services. This change will allow the Coordinator more time to work with the families and will increase the likelihood of delivering services to the families more efficiently.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

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

We are only seeking the change this year and will begin implementation in FY 2023.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The following is how alternative structure is designed to secure local resources to support an MTW Self-Sufficiency program:

As stated above our town and general area is not heavily populated but is overly organized with committees and boards. Our FSS Coordinator meets regularly with area committees that focus on one or more of the following areas: education, training, employment, health, social services, housing, child care, transportation, mental health, etc. Many of the boards are composed of the same people representing area agencies and services. Because of the nature of our community, a tremendous amount of coordination happens during these meetings. They also make the personal contacts so important when making referrals for participants. We see this change as beneficial to the participants, the FSS coordinator and our community partners.

10.b.HCV - Alternative Structure for Establishing Program Coordinating Committee (HCV)

Our area is one that has many boards, committees and groups that meet regularly. Our FSS Coordinator meets with many of these groups. Some are focused on education, some on employment, some on supportive services of various types. Because we are a relatively small community many of the people on these committees are the same. Our Coordinator has been working with them to the benefit of our residents and it has been very successful. Because of our over-organized community it is very difficult to convene yet another group. We will make use of these committees. This will make for a far more efficient use of not only the FSS Coordinator's time but that of our community partners. And it will make it easier to coordinate services. This change will allow the Coordinator more time to work with the families and will increase the likelihood of delivering services to the families more efficiently.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies to all family types

The MTW activity applies to all properties with project-based vouchers

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

not yet implemented, will do so in 2023

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The following is how alternative structure is designed to secure local resources to support an MTW Self-Sufficiency program:

Textbox

10.c.PH - Alternative Family Selection Procedures (PH)

The changes we are requesting will require that all residents/participants between the ages of 18-54 must participate. Elderly and/or disabled residents and those who are the primary care giver for a blind or disabled person, will not be required to participate but if they choose to do so they must comply with all the regulations. They will be treated as any other participant in meeting the requirements and eligibility for the benefits. They will have one opportunity to leave the program but then cannot re-enter. However, their plan may be put on pause under the hardship policy as with all participants.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

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

Just being implemented this year.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Over the years that we have had an FSS Program we have found that the way it is currently designed does not provide an incentive for participation. We firmly believe that in order for individuals and households to become more self-reliant, they must achieve the following - housing stability, wellness and healthy relationships, education and training, financial management, and employment. Our guiding principles are that each resident determines their own goals, that BHP is supportive of those goals, that appropriate resources are available and that there be incentives for working toward and achieving goals. While economic independence is the primary objective of this redesigned FSS program, we recognize that economic independence and programmatic success vary greatly from one person to another based upon each participant's education, social, profession, and economic foundations and challenges. And we recognize that every resident will benefit from participation and support, not just heads of households. In fact, as more household members are successful so is their whole household. So we have designed a program and contract that will better serve our residents.

10.c.HCV - Alternative Family Selection Procedures (HCV)

The changes we are requesting will require that all residents/participants between the ages of 18-54 must participate. Elderly and/or disabled residents and those who are the primary care giver for a blind or disabled person will not be required to participate but if they choose to do so they must comply with all the regulations. They will be treated as any other participant in meeting the requirements and eligibility for the benefits. They will have one opportunity to leave the program but then cannot re-enter. However, their plan may be put on pause under the hardship policy as with all participants.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

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

have not implemented yet.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Display Textbox

10.d.PH - Modify or Eliminate the Contract of Participation (PH)

The HUD Certificate of Participation does not reflect eh changes we are seeking in this supplemental plan. We believe that by making the COP more personal and carefully reflecting our program it will become more meaningful to the participants. The essential parts of the contract will remain – start/end dates, responsibilities of family and BHP, requirements for participants, penalties for nonparticipation, compliance with HUD regulations the Goal Action Plan (ITSP) and the appropriate signatures.

After receiving housing assistance, each person will meet with the Coordinator who will provide serve coordination and case management/coaching to help the individual understand and remove barriers interfering with their move toward self-reliance.. The participant and Coordinator will work together to develop a three-year Goal Action Plan (GAP) that reflects their own personal, financial and education situation. As assessment will be completed to help the person develop the GAP. The plan includes actionable goals, timelines and milestones toward achievement of the goals. Once a three year GAP has been completed, a new plan will be developed. The GAP is a living document and goals, timelines and milestones may shift according to the needs of the person.

The requirements for participation mean that every participant develop and implement a GAP and meet/check in once every quarter (four meetings a year) with the Coordinator to review progress, change goals if needed and pursue resources to help achieve the goals. Attendance is mandatory. If the head of household misses four meetings in a row without rescheduling, the household may lose its housing assistance (see hardship policy). Should this happen, the participant and family may ask for a hearing under BHP's grievance policy. Incentives for meeting goals will be provided, including rent credits and grant to help meet goals.

All participants, both head of household and non head of household, will be eligible for the development grants. If a non head of household misses four meetings without rescheduling, they will not be eligible for the development grant and the family will not be eligible for rent credits.

This policy change contributes to the larger initiative of helping all of our resident move toward self-sufficiency.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

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

Will be implementing this year

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)

The HUD Certificate of Participation does not reflect eh changes we are seeking in this supplemental plan. We believe that by making the COP more personal and carefully reflecting our program it will become more meaningful to the participants. The essential parts of the contract will remain – start/end dates, responsibilities of family and BHP, requirements for participants, penalties for nonparticipation, compliance with HUD regulations the Goal Action Plan (ITSP) and the appropriate signatures.

After receiving housing assistance, each person will meet with the Coordinator who will provide serve coordination and case management/coaching to help the individual understand and remove barriers interfering with their move toward self-reliance.. The participant and Coordinator will work together to develop a three-year Goal Action Plan (GAP) that reflects their own personal, financial and education situation. As assessment will be completed to help the person develop the GAP. The plan includes actionable goals, timelines and milestones toward achievement of the goals. Once a three year GAP has been completed, a new plan will be developed. The GAP is a living document and goals, timelines and milestones may shift according to the needs of the person.

The requirements for participation mean that every participant develop and implement a GAP and meet/check in once every quarter (four meetings a year) with the Coordinator to review progress, change goals if needed and pursue resources to help achieve the goals. Attendance is mandatory. If the head of household misses four meetings in a row without rescheduling, the household may lose its housing assistance (see hardship policy). Should this happen, the participant and family may ask for a hearing under BHP's grievance policy. Incentives for meeting goals will be provided, including rent credits and grant to help meet goals.

All participants, both head of household and non head of household, will be eligible for the development grants. If a non head of household misses four meetings without rescheduling, they will not be eligible for the development grant and the family will not be eligible for rent credits.

This policy change contributes to the larger initiative of helping all of our resident move toward self-sufficiency.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

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

Just implementing this year

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

10.e.PH - Policies for Addressing Increases in Family Income (PH)

The traditional FSS program addresses increased income by establishing the escrow program. While this allows participants to save, any increases are immediately applied to the rent calculation. We are approaching this in a different way. We would eliminate the escrow program and in its place offer more immediate incentives – rent credits and development grants to start and hopefully more in the future. These will be tied to the individual's Goal Action Plan. During the three year term of the GAP there will be no income increases applied to the rent calculation. At the end of the three years the individual's rent will be recalculated based on income at that time.

Our rationale for moving to the process rather than escrow is multiple. First, it does not meet the needs of our residents/participants. The rewards are simply not immediate enough. In general we know that for most people, that immediate gratification is more motivating. Over the years of administering FSS we have had only a handful who have successfully used escrow. Moving away from escrow to our new incentive program will better serve our population.

Second – by not immediately raising rent upon increased income, there is more of an incentive to increase the income. Some may choose to save any increase, but we believe most will use it to improve their quality of life. While residents pay 30% of their income, for many that leaves little to cover all the other expenses; health, car, food, phones, etc. We believe this is a positive impact on our residents and allows them to more adequately cover their needs.

This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

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

Just implementing this year

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following is how increased earnings is treated:

Increased earnings will not be applied to the tenant's rent calculation until the end of each three year contract/goal plan.

10.e.HCV - Policies for Addressing Increases in Family Income (HCV)

The traditional FSS program addresses increased income by establishing the escrow program. While this allows participants to save, any increases are immediately applied to the rent calculation. We are approaching this in a different way. We would eliminate the escrow program and in its place offer more immediate incentives – rent credits and development grants to start and hopefully more in the future. These will be tied to the individual's Goal Action Plan. During the three year term of the GAP there will be no income increases applied to the rent calculation. At the end of the three years the individual's rent will be recalculated based on income at that time.

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This MTW activity serves the following statutory objectives:

Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

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

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

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

implementing this year for first time

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Brattleboro MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following is how increased earnings is treated:

Increased earnings will not be considered in the tenant rent calculation until the end of each three year contract.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$135,811	\$135,659	\$0	2027-09-30
2022	\$149,086	\$121,621	\$27,465	2030-09-30
2023	\$13,299	\$0	\$13,299	2031-09-30

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

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

G.2	Establishing Reasonable Rent Policy.
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency No plans at the present time.	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	No known evaluations.

Resident Advisory & Communications Committee (RACC) Minutes 11/28/2022

Attendance: BHP Staff (Lorelei, Matt), Ashley, Bridgette, Tina

1. Review Current Board packets-

- Questions & Answers- None

2. RACC Role-

- New member suggestions- in person meetings hopefully in the new year
- If you are unable to attend the meeting, call or text 802-246-1545 and I will make note that it is an excused absence.

3. New or Updated Topics-

- Property Items-
 - What you would like to see on your properties
 - ✓ FSS Program- Matt presented the potential changes to the FSS program under MTW- one member expressed that she was opposed to eliminating escrow because she is earning towards buying a house and she would like it if the people who are earning had a choice to continue with their escrow for at least the remainder of their contract
 - ✓ Playground status- Fundraising still in process
 - ✓ Banners- Contest for all ages for new Hate has no Home here banners or relevant topics

4. Property Updates- *will be emailed as the meeting time ran out.*

- **Red Clover Commons- *No attendance***
- **Moore Court-**
 - What are allowable holiday decorations
 - Broken picnic table/get a new one?
 - Replace playground mulch in the spring
 - Covered roof over entrance doors?
- **Ledgewood-**
 - Nothing to add
- **Hayes Court, AW Richards- *No current members***

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

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

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

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

Brattleboro Housing Authority VT-002
 MTW PHA NAME MTW PHA NUMBER/HA CODE

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

Christine Hazzard
 NAME OF AUTHORIZED OFFICIAL

Executive Director
 TITLE

Christine Hazzard
 SIGNATURE

1-9-2023
 DATE

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