

PHA Name : Brattleboro

PHA Code : VT002

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2022

PHA Program Type: Combined

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Over the last twenty-five years BHP has become known for innovations in programs, ability to face and solve large scale human and property challenges, and as a Statewide leader in housing for low-income Vermonters. Our leadership is well known for the ability to lead change by focusing on opportunities from planned and unexpected events. New programs and property development have resulted from a fierce belief within the agency that despite our small size, we can accomplish great things working with our residents, participants and the community. The entire agency has worked to develop data driven strategic plans and then concrete steps to implement them.

Our past record and high-performance status have allowed us to gain the designation as a HUD Moving to Work agency. With the flexibility that comes with this designation we will be able to implement common sense cost-savings measures and policy reforms to quickly respond to changing local economics and better serve our community and resident/participant needs.

The MTW designation was awarded in January 2021, and this is our first MTW Supplemental Plan. While we are submitting this plan of action for our short-term goals in Year One, we continue our planning for long term goals that will continue to move us toward better serving the housing needs of our community and the support that our residents need to improve the quality of their lives. As we do this planning, we make sure that any of our proposed activities accomplish at least one of the three statutory objectives established by Congress when it created MTW in 1996:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

The changes we will implement in our first year involve primarily internal administrative reforms that will allow us to be more cost effective and efficient with our staff time and resources. This will allow us to devote more time and resources to providing supportive services to our residents/participants and to working with unmet housing needs in the community.

In Year One, starting April 2022, we will make changes to our reexamination (recertification) schedules and required information, our application and wait list, and internal staff changes. We also anticipate completing a resident/participant needs survey during the first year that will inform our approach to modifying our resident services programs in Year Two (April 2023). As any changes are implemented in Year Two, we anticipate meeting the second and third Congressional goals by creating more opportunities for moving toward self-sufficiency and increasing housing options.

We are undertaking other internal changes that will complement these MTW changes that do not require MTW waivers – create a single application, modify our wait list, review our current housing stock for updates, etc.

YEAR ONE ACTIVITIES

Reexaminations

Alternative Reexamination Schedule for Households. Reexaminations for all households on fixed income will be conducted every three years. Interim examinations may be requested by the household when their income decreases or expenses increase by 10% or more. The staff time associated with this change will be reduced by about 10-12 weeks. This saved staff time will be able to be reallocated to providing more supportive services to residents/participants and to working with the community to assess and help meet identified housing needs. This change also reduces the burden on residents/participants who currently must spend time and perhaps money each year producing paperwork for the recertification process.

Asset Calculations

Currently we allow self-certification for assets over \$5,000. We will use the MTW waiver to increase that to \$50,000. Any assets under \$50,000 may be self-certified and there will be no imputed income from those assets. This applies to all households, not just those on fixed incomes.

HCV (section 8) Landlords

Alternate schedule for inspections will allow most units to be inspected every three years. Interim inspections will be done at the request of the tenant participant. This change will result in the ability to reallocate staff time to better meeting the needs of resident/participants and working with the community to assess and help meet other housing needs. This change does not allow for the alteration of any of the Housing Quality Standards, nor does it prohibit HUD from requiring an inspection at any time for health, safety and accessibility issues. This change recognizes landlords who are consistent in abiding by the HQS.

Comprehensive resident/participant survey

Although this survey does not require an MTW waiver, we will conduct it during Year One in anticipation of using the findings to apply for associated MTW waivers in Year Two (starting April 2023) to develop and implement changes to our self-sufficiency program that will better serve the needs of our residents/participants.

PLANNING FOR YEAR TWO

During Year One we will begin to review a number of changes that could be implemented in Year Two as we continue to learn from our residents/participants and the community. Changes will involve input from resident/participants and the community. It is our intent to conduct the survey and begin reviewing potential changes early in Year One to afford ample

time for comments, input and suggestions for specific changes.

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)	
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)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
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)
We plan to change from annual reexaminations to every three years for all household on fixed incomes. This will allow us to achieve a more efficient use of our limited staff time and resources. We estimate that wil will eliminate between 10-12 weeks of staff time each year. Put in the context of our larger MTW goals, this will allow more staff time to devote to activities that better support our residents and address larger community needs. Our residents will benefit by not having to go through the process every year – it will save them time, stress and headaches.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: 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
Not currently implemented
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.
Whenever a family/household income drops by more than 10% for a period of 30 days or whenever a family/household expenses increase by 10% or more for 30 days the family may request and will be given a reexamination.

3.b. - Alternative Reexamination Schedule for Households (HCV)
We plan to change from annual reexaminations to every three years for all household on fixed incomes. This will allow us to achieve a more efficient use of our limited staff time and resources. We estimate that will eliminate between 10-12 weeks of staff time each year. Put in the context of our larger MTW goals, this will allow more staff time to devote to activities that better support our residents and address larger community needs. Our residents will benefit by not having to go through the process every year – it will save them time, stress and headaches.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: 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
Not currently implemented
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.

Any time a family/household income decreases by 10% or more over a 30 day period or the family/household expenses increase by 10% or more over a 20 day period the participant may request and will be given a reexamination.

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

Currently we allow self-certification for assets under \$5,000. We plan to change that to allow self-certification for assets under \$50,000 and there will be no imputed income from those assets. This will apply to all household, not just those on fixed incomes.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
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

Not currently implemented

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)

Currently we allow self certification of assets over \$5,000. Allowing participants to self certify assets up to \$50,000 will save both staff time and time and headache for participants. We have a larger initiative of reducing administrative duties that require time and effort but have little negative impact on the program or participants. This will allow our staff to devote more time to supporting participants and working with the larger community to solve our housing issues.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
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

Not currently implemented

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)

We will modify our inspection for HCV Units to be conducted every three years. This change will result in the ability to reallocate staff time to better meeting the needs of resident/participants and working with the community to assess and help meet other housing needs. Units must be inspected at least every three years. Tenants and/or landlords will be able to request an inspection at any time. This change does not allow any alteration of the Housing Quality Standards, nor does it prohibit HUD from requiring an inspection at any time for health, safety and accessibility issues. This change will save staff time thus allowing staff to devote more time to supporting participants and the housing issues in the larger community.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
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

Not currently implemented

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.

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
2022	\$14,008	\$0	\$14,008	2022-12-31
2021	\$135,811	\$135,659	\$152	2021-12-31

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	1
	49%-30% Area Median Income	3
	Below 30% Area Median Income	22
	Total Local, Non-Traditional Households	26

*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 As our first year as a MTW agency we have not yet redesigned any rent reform initiatives. As we move forward in subsequent years this will be part of our planning.	

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	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
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.

I.	Evaluations.
	No known evaluations.

A hardship exists whenever a resident's income decreases by 10% or more over a thirty-day period or their expenses increase by 10% or more over a 30 day period. When either or these occur the resident may request a re-examination.

This policy will be explained at every lease-up for new residents and at every re-exam. If this request is denied the resident will be able to access BHP's grievance policy which is also explained at lease-up. The resident will be notified according to policy.

Three groups of current residents will be created and new admissions will be assigned on a rotating basis. This will allow us to conduct re-examinations on 1/3 of our residents every year. An evaluation will be conducted after years 1, 2, and 3 to determine whether or not we have achieved our goal and review any potential changes.

A record of all such requests for re-examination will be kept along with the outcomes. This will be open to review with appropriate personal information redacted.

There will be minimal impact on the agency's finances. Any impact will be positive as it will allow staff who currently are involved in this administrative duty an additional 10-12 weeks of time to work more closely with support for residents/participants.

The impact on the residents/participants will be positive. It will allow families to retain any increases in income for a longer period thus aiding in their goal of more self-sufficiency. The only impact it may have on the wait list is additional time that staff will have and could clean up wait lists more often thus aiding those who continue to wait by shortening that time.

It will have no impact on termination rate or current occupancy level.

Cost efficiency is one goal of this change. It will make better use of staff time and allow families to keep increases longer. The biggest impact on cost efficiency will be to allow staff to devote time to supportive services and other proactive duties rather than administrative duties.

BHP Responses to Public Comments

During year one BHP will focus on administrative changes that will result in the ability to reallocate staff resources to provide more support to residents/participants and to work with the larger community to address our housing issues.

Many of the comments supported this move to both more support and to work with the community around housing. These will help as we begin our initial thinking in planning for year two. From these initial comments we will continue the involvement of all the groups and individuals who are interested.

MTW COMMUNITY ADVISORY COMMITTEE

October 27,2021

Attending: Dart Everett, local landlord; Rebecca Burns, Brattleboro Memorial Hospital, Community Initiatives Director; Chloe Leary, Winston Prouty Early Education ED; Sue Graff, State of Vermont Agency of Human Services Field Services Director; Sue Fillion, Town of Brattleboro, Planning Director; Liz Harrison, BHP Board of Commissioners; David Deangelis, BHP Section 8 and Grants Manager; Christine Hazzard, BHP ED; Jeanette White, BHP, Special Projects.

Introduction

Christine started the meeting by giving a short history of Moving to Work and where BHP is in the process. The narrative of the Supplemental Plan had previously been sent to all participants.

Explaining the activities planned for year one:

Changing the annual reexamination schedule for residents/participants from every year to every three years. The estimate is that this would probably affect about 90% of residents/participants. This will save much staff time that can then be reallocated to other more productive activities. There will be a hardship policy so that anyone whose income decreases by 10% or more over a 30 day period or whose expenses increase by 10% or more over a 30 day period can request an interim exam and it will be granted. It will also remove the burden from residents/participants from going through the process every year.

Changing the self-certified assets from a cap of \$5,000 to \$50,000. Very few residents/participants have such assets but for those who have assets over \$5,000 it is very labor intensive to input the income from those assets and in the end does not have much of an impact on the rent paid. The staff time will be better used in other activities.

Changing HCV unit inspections to three years from the current two. This will also be staff time and resource savings. At any time a resident/participant or a landlord may request an inspection. This does not change the Housing Quality Standards.

Although this does not need an MTW waiver, it was explained that BHP will do a comprehensive survey of residents/participants and community partners in year one that will help inform potential activities in year two. Q – what type of changes do you anticipate? A – not sure but a couple examples – currently no incentive for 18 year olds still in school to have a job as it is reflected in the family rent, more education/training/help with homemaking skills, landlord incentives, more flexibility in the FSS requirements.

Q – is there are menu of waiver options? A – there is an extensive menu that can be applied for but there is also the possibility of applying for an agency specific waiver if it can be justified.

Q – is there a cap on the number of waivers that be applied for? A- no but want to go slow especially at beginning as each change needs to be measured to make sure it is a success. It allows changes to be tried and changed if they don't work.

Q – what is the alignment with your SASH (Support And Services at Home) for elderly/non elderly disabled. A – they are aligned in purpose and any reorganization will make sure that they are also aligned around staff responsibilities and support to resident/participants.

What Does BHP Do Well? Who are We? What is our Job in the Community?

Provide housing for the most needy and those with the least resources. Proved affordable housing with a capital A.

Provide “case management” – help with what needs to be done to keep housing.

Significant provider of elderly housing.

Act as advocate for residents/participants.

A multi generational approach – providing life span support for people in the community.

Collaborate with others in the community.

Creating and responsive to needs – not stagnant.

What Doesn't Work? What Are we not Doing Well?

People are reluctant to get off Section 8 once on it.

Work with next step of where folks go after PH or Section 8 – some sort of transition plan (acknowledging that with the housing shortage that is tough)

Better communication with the community about understanding of details of HUD and vouchers.

What is BHP place in the housing continuum?

Uneven attention to the maintenance of all properties. Some seem to be better kept than others.

More direct resident communication to the community at large. Build leaders from within.

Suggestions for Improvement

Some staff are invaluable – have built up relationships, landlords have trust that issues will be dealt with, accessible. Need to institutionalize this so that with retirement of staff it isn't lost. Landlords need to know there is someone they can rely on.

Perhaps participate in a collaborative to have an interagency person help people navigate housing issues.

Support for families before they get in a bind, or help them understand what has lead them to having a problem and offer support to help them resolve the issues long term.

Demographics are changing. BHP needs to embrace the diversity and be seen as an organization that is welcoming and supportive to all.

BHP could go to larger community more often when it sees problems that need addressing – ask for the input.

Notes from Resident Advisory & Communications Committee

Meeting September 29, 2021

There should be more thorough background check on applicants. Keep out trouble makers.

Eliminate unnecessary rules. There are too many that are made because of specific people but end up punishing or limiting everyone. Too many of the rules end up creating “low income community”. Allow more individuality – e.g. painting apartments, upgrades, sprinklers in summer, baby pools, grills. Perhaps a reward system for this. Will create more pride in home and less just like everyone else.

Better enforcement of the rules that exist – guests staying in apartments, no smoking, open containers, etc.

The pink complaint slips are a waste of time. It was better when there was direct communication with the staff about complaints. There needs to be better follow up when complaints are made. Never know if there has been action taken or not.

Fall clean up should be reinstated. People are leaving junk all over.

Pay as you go trash bags are too expensive. Better system for recycling – too much trash.

More hands on classes for residents: first aid, CPR, budgeting, parenting.

Maybe information sessions on issues facing the community such as COVID, homelessness, hunger.

More staff presence at the sites – know that COVID has had impact but it is good to see people there – and not just in office but walking around.

Better information about new hires, etc.

Staff need to all wear their badges.

Better communications in general – maybe tailored to sites. There are too many hand outs, people don't read. Maybe better place to post and then just give site information in handouts.

18 years olds who are still in school should not have income counted toward rent. Acts as disincentive and parents end up having to pay.

NOTES FROM EXTERNAL STAKEHOLDER INTERVIEWS

September 28- October 7

Interviewed were the following agencies/entities: Groundworks Collaborative (agency that addresses homelessness), WindhamWindsor Housing Trust, Brattleboro Fire Department, Winston Prouty (early childhood and family education and support), Senior Solutions, EverNorth (housing developer)

What Does BHP do well/what works?

- Good property management – housing stock well taken care of
- Respond quickly to residents needs during crisis – flooding, fires, deaths, etc
- Always concerned with well being of residents
- Valued member of the housing community
- SASH program is just what is needed

What doesn't work as well?

- General issue in the community – often residents are living alone when they should have more support – not enough housing options
- Adhering to HUD regulations often creates challenges and inflexibilities when trying to address problems or concerns
- Some of the older sites are deteriorated – the best maintenance in the world can't change that – they need renovations
- Concentrated housing that has inflexible rules creates stigma and lack of pride by residents
- Not enough accessible units
- Should have more visibility in the community
- Have more resident educational programs especially around renting, etc
- Perhaps could have more involvement in meeting housing needs of specialized populations – sober housing, youth aging out of foster care, assisted living, more single level housing, etc
- Re-envision staff/organizational structure
- More pathways to leadership for residents through resident advisory groups
- They have no ability to do major fund raising as do most housing entities
-

COMMENTS FROM RESIDENT SURVEY AS AFFECTING POTENTIAL MTW ACTIVITIES

October 2021

The survey was done by residents at all of the BHP properties. While it was not specific to MTW there were some comments/suggestions that have a bearing on the MTW initiative. Many focused on the need for more staff presence. This supports the initiative to reallocate staff time from purely administrative duties.

- 1, Allow more flexibility in one's one space, both inside and outside the apartments. For example allow residents to paint walls, decorate doors, decorate outside of apartment. Also allow more flexibility outside – allow kiddie pools, small grills, decorating, etc. Don't require everything to be put away all the time – bikes, toys, etc. Let residents make the units reflect who they are and take some ownership responsibility.
2. More presence of staff at the sites. Need to be more present in order to see what really goes on. Someone should walk through the grounds and buildings at least once a week. And more consistent presence at the office and on site so there is more personal contact.
3. We need more activities for the kids. There is little for them to do. Perhaps have people come in to do classes with them, like Art in the Neighborhood does, and people like police, fire, etc. Also more information sessions for kids – education on drugs would be good.
4. It would be good to have a staff person, or an outside person, act as a mediator or referee to help with clashes between residents. It would give people the chance to be heard and respected. Because we all live so close to each other it is often hard to work it out alone.
5. There is way too much paperwork required.
6. Too many inflexible rules that are established because of a few bad apples. And many are hard to enforce so they are there but ignored.

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

Secretary

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

1/14/2022

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.*