



**DELAWARE STATE HOUSING AUTHORITY** 

# MOVING TO WORK ANNUAL REPORT FY 2016

Initial Submission Date: September 22, 2016

# MOVING TO WORK FY2016 ANNUAL REPORT

# TABLE OF CONTENTS

## 1.0 INTRODUCTION (page 5)

- 1.1 Programs covered in the MTW Demonstration and included in this report
- 1.2 Overview and goals of MTW program
- 1.3 Status of MTW program and accomplishments to date
- 1.4 Long-term goals for the current report year
- 1.5 Resident Programs
- 1.6 Homeownership Programs
- 1.7 Security
- 1.8 Hardship Policy

#### 2.0 GENERAL HOUSING AUTHORITY OPERATING INFORMATION (page 21)

## A. MTW Report: Housing Stock Information

- New Housing Choice Vouchers that were Project-Based During the Fiscal Year
- Other Changes to the Housing Stock that Occurred During the Fiscal Year
- General Description of Actual Capital Fund Expenditures During the Plan Year
- Overview of Other Housing Owned and/or Managed by the PHA at Fiscal Year End

#### B. MTW Report: Leasing Information

- Overview of Other Housing Owned and/or Managed by the PHA at Fiscal Year End
- Reporting Compliance with Statutory MTW Requirements: 75% of Families Assisted are Very Low-Income
- Reporting Compliance with Statutory MTW Requirements: Maintain Comparable Mix
- Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End
- Number of Households Transitioned To Self-Sufficiency by Fiscal Year End

- C. MTW Report: Wait List Information
  - Wait List Information at Fiscal Year End
  - What's Happening at our Sites
- 3.0 PROPOSED MTW ACTIVITIES (page 38)
  - In their own words...
- 4.0 (A.) APPROVED MTW ACTIVITIES: IMPLEMENTED ACTIVITIES (page 40)
  - Elimination of Utility Reimbursement Payments
  - Time Limit Housing Assistance for MTW Participants
  - MTW Tier I- Mandatory Employment and/or Education Requirements
  - MTW Tier II Work Requirement
  - Alternative Re-Certification Schedule for Elderly and Disabled Residents
  - MTW Savings Account and Disbursements
  - MTW Case Management Services
  - Removal of Barriers to Self-Sufficiency
  - 500 Unit Set-Aside for MTW Eligible Families
  - Resident Homeownership Program (RHP)
  - Renovation of Wexford Village using MTW Housing Choice Voucher Reserves
  - (B.) NOT YET IMPLEMENTED
  - (C.) ACTIVITIES ON HOLD
  - (D.) CLOSED OUT ACTIVITIES
- 5.0 SOURCES AND USES OF MTW FUNDS (page 122)
  - A. Actual sources and uses of MTW funding for the Fiscal Year
  - B. Local asset management plan
  - C. MTW Report: Commitment of unspent funds
- 6.0 ADMINISTRATIVE (page 124)
  - Resolution signed by the Director adopting the Annual Plan Certification of Compliance

- Descriptions of any planned or on-going Agency-directed evaluations of the demonstration, as applicable
- Annual statement/performance and evaluation report

ATTACHMENT A - Annual Statement/Performance and Evaluation Report (page 125)

• Moving to Work Local Asset Management Plan

**ATTACHMENT B - General Order and Certification Statement (page 132)** 

ATTACHMENT C – Appendix/ Additional Information (page 134)

#### 1.0 INTRODUCTION

This document serves as the Delaware State Housing Authority's (DSHA) Moving To Work (MTW) Annual Report for FY2016, which starts July 1, 2015 and ends June 30, 2016. On April 8, 2008, DSHA adopted and signed an Amended and Restated MTW Agreement with the U.S. Department of Housing and Urban Development (HUD) that extended the program until June 30, 2018. On April 15, 2016, HUD extended the MTW agreements until 2028. This is a standardized agreement that HUD presented to all MTW agencies and allows DSHA to continue all current initiatives and retain the present funding allocation of the existing contract.

# 1.1 PROGRAMS COVERED IN THE MTW DEMONSTRATION AND INCLUDED IN THIS REPORT

The DSHA MTW Demonstration includes the following programs:

- A. Low Rent Public Housing
- B. Housing Choice Vouchers
- C. Capital Fund Program
- D. Resident Homeownership Program

#### 1.2 OVERVIEW AND GOALS OF MTW PROGRAM

The three statutory objectives of the MTW Program continue to be A) to reduce costs and achieve greater cost effectiveness; B) to give incentives to families to obtain employment and become economically self-sufficient; and C) to increase housing choices for low-income families. Due to the cycle of the waiting list and preferences, DSHA's goal is to serve up to 500 families each year in the program. Upon review, DSHA identified an increase in the number of MTW exempt families, elderly and disabled, especially in the Housing Choice Voucher Program. DSHA instituted changes to the resident selection process to help increase the total number of MTW participants during FY2011. This includes limiting MTW exempt applicants to the first type of housing assistance available and applying time limits to market rent residents.

In the FY2012 MTW Annual Plan, DSHA expanded the MTW program from a five (5) year term limit and a Safety-Net Program, to a seven (7) year term limit, with two separate tiers of participants and the Safety-Net was eliminated. During the initial five (5) years of the program, residents will participate under MTW Tier I. Tier I participants will receive case management services with an emphasis on overcoming

barriers to self-sufficiency, education, financial literacy, and increasing their potential earning income and employability. During the final two (2) years of the program, residents will be under MTW Tier II. Tier II participants will continue to receive case management services, but with an emphasis on job placement and retention and becoming ready to move out of subsidized housing by year seven (7). A Hardship Panel was created to review cases that request housing assistance beyond year seven (7) due to extenuating circumstances and went into effect in August of 2012.

The goals and objectives under the DSHA MTW Program are outlined as follows:

- A. To reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:
  - 1. Combine the waiting lists for PH and Housing Choice Voucher Program with preferences consistent between the two programs.
  - 2. Increase the residents' share of the total tenant payment to 35% of adjusted gross income.
  - 3. Time-limit housing assistance for MTW participants.
  - 4. During the actual time a family is housed, it may not apply for an alternative form of subsidy.
  - 5. Enhance the quality of life and standard of living for residents participating in MTW by assisting residents in the removal of barriers to self-sufficiency (obtain driver's license, purchase vehicle, and coordinate child care).
  - 6. Increase earned income of participating families enabling them to pay more towards their rent and requiring fewer subsidies.
- B. To give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:
  - 1. Amend waiting list preferences to include working families.
  - 2. To make work pay, cap rent, with all funds over the cap up to the 35% limit placed in a savings account for the MTW participant.
  - 3. All MTW participants continuously participate in case management and are offered services and/or resource referrals including job training and

placement services, computer experience, educational opportunities and transportation stipends, as funds allow.

- C. To improve housing choices for our residents by offering or coordinating the following resources:
  - 1. Homeownership counseling and assistance.
  - 2. Budget counseling.
  - 4. Assistance obtaining a Low Income Housing Tax Credit Unit.
  - 5. MTW Savings Account as income increases.
  - 6. Counseling to repair credit problems.
  - 7. Financial Literacy Education.
  - 8. Individual Development Account referral for approved participants.
  - 9. Resident Homeownership Program.

#### 1.3 STATUS OF MTW PROGRAM AND ACCOMPLISHMENTS TO DATE

The accomplishments and status are cumulative from the date that the MTW Program started.

- A. Holly Square added to the PH stock on March 1, 2000.
- B. Certificate and Voucher Programs were combined into one Housing Choice Voucher Program.
- C. Rents were increased to 35% of adjusted income for all MTW participants.
- D. PH and Housing Choice Voucher Program waiting lists were combined.
- E. Working preference added.
- F. Case management services were established and contracts signed with two nonprofit counseling agencies for all Housing Choice Voucher Program MTW participants. All PH residents are assigned DSHA case managers at the time they enter the Program. Effective July 1, 2008, all case management is done by DSHA Resident Service Staff.

- G. Report established to identify and monitor needs of the MTW participants.
- H. Agencies have been identified and contacts established that may provide services for unmet needs.
- I. All funds are block granted.
- J. MTW participants continue to be evaluated as they enter the program, and DSHA constantly networks with potential service providers and organizations to bring needed services to the participants and/or refer participants to services.
- K. An Individual Development Account (IDA) Program has been implemented and completed in September 2006 to help qualified MTW participants develop assets. Thirty-six families completed their goals with 28 buying homes, five opening a business and three pursuing educational goals. The IDA program is now available from several outside organizations.
- L. The Resident Homeownership Program (RHP) began accepting applications in FY 2004. The RHP was revised in FY2011 to create a more realistic program and better prepare new participants to assume full homeownership responsibilities in seven (7) years. There are four families now participating in the program.
- M. Although DSHA's contract with NCALL has ended, we continue to provide referrals for credit repair, budget counseling, housing counseling and RHP homeownership counseling for PH MTW participants. The contract was completed in 2006 and services are available through local nonprofit organizations.
- N. DSHA completed an automated MTW case management system which tracks all statistical information for both PH and Housing Choice Voucher Program MTW participants. This system also includes an automated list that ensures timely compliance with quarterly reviews and completion of annual Resident Action Plans (RAP).
- O. DSHA amended the RAP to include a certification by MTW participants that they understand the requirement that they must be employed at least 20 hours per week earning no less than minimum wage, or in a training or educational program for at least 20 hours per week. (For residents moving in on or after July 1, 2007, requirements will be increased to 25 hours per week beginning with their third year in the MTW program and 30 hours per week for the fourth and any subsequent years in the MTW program.)
- P. DSHA has awarded **158** educational scholarships from the MTW budget.

- Q. DSHA purchased an Adult Basic Education/GED computer program for each of its PH sites to assist residents working toward educational goals.
- R. Since MTW implementation in August 1999, <u>875</u> families have successfully completed the MTW Program. Two hundred and fifty-four (254) have purchased homes and 621 have either begun paying the full rent at their current unit or moved to another unit and paid the full rent. Though some of those families would undoubtedly have been successful without MTW, we feel that the majority became successful by taking advantage of the counseling and resident services made available through the program as well as the savings they accumulated while in the program. (See Tables 1 & 2)
- S. DHSA created a time limit safety-net feature in FY2005. This was for families who have **not** been able to increase their incomes to the level where 40% of their monthly adjusted income equals or exceeds the lower of their Housing Choice Voucher Program gross rent or Voucher payment standard, or the fair market rent for their PH unit, are being transferred to safety-net status. Their total tenant payment would revert to 30% and they forfeited the money in their MTW savings account. The condition for the family to retain the rental subsidy is that they must maintain employment of at least 20 hours per week, be involved in a full-time educational program or a combination of both which equals at least 20 hours.

Families whose monthly-adjusted incomes are at or above the safety-net threshold are having their subsidy terminated. Housing Choice Voucher Program families will begin paying the full market rent to their current landlord, while Public Housing families are required to move out of the subsidized unit. All families who have remained in compliance with MTW requirements will be given the money in their savings accounts at this time. DSHA discontinued the safety-net feature effective September 1, 2011. DSHA integrated families previously in the Safety Net into the MTW program as Tier II participants. These existing residents were given one (1) year from the date of their next annual recertification to complete the revised MTW Tier II program. After the end of this 1 year period, the family stops receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period. By September 1, 2014, all of these previously integrated Safety Net families reached the end of their subsidy unless they were given a short-term extension by the Hardship Panel. DSHA had 3 remaining Safety Net families on Hardship

Panel extensions but as of January 2015 their extensions had been exhausted. DSHA has no remaining Safety Net families utilizing subsidy and the component is closed out.

- T. Funds from the Housing Choice Voucher Program Reserves were used to provide security fencing at two of the PH sites. After discussions with local police, it was determined that fencing along the side and rear perimeters of the sites would be the most effective and efficient way to assist city police to control and deter crime at those two sites and include cameras at Clarks Corner, Liberty Court, and Burton Village.
- U. Effective September 1, 2014, DSHA implemented the 500 unit set-aside option previously approved by HUD in the FY2011 Annual Plan. DSHA did not implement the set-aside option in FY2012 or FY2013 because of the integration of Safety Net families into the MTW program in FY2012. The 500 unit set-aside option allows DSHA to increase the overall number of MTW participants and create greater turnover of the waiting list.
- V. During FY2016, DSHA completed the substantial renovation of Wexford Village, a 60 unit Low Income Housing Tax Credit (LIHTC) property, in Laurel, Delaware.

Renovations at Wexford Village Apartments were originally scheduled to begin in May/June 2013, but were delayed after bids for the construction came in significantly higher than anticipated. DSHA revised the scope of renovations and also obtain additional funding through the HOME Program to proceed with a moderate renovation plan. The project was rebid in November 2013 and work was started in April 2014. Renovations were fully completed as of April 2015 on schedule. The project based vouchers began utilization and the project was finished per the timeline above. DSHA had 21 households on the waiting list with only 20 PBV slots available.

Since Wexford Village was renovated with the use of some Federal HOME funds, we are not allowed to charge the Project Based Voucher residents 35%. DSHA can only have these residents pay 30% of their adjusted gross income towards rent. Because of this, Wexford Village MTW residents will not be contributing to any escrow account and DSHA policies regarding escrow are not applicable to them. Since DSHA still wants these residents to have the opportunity to grow self-sufficient through the MTW program, they will still participant in the MTW case management, financial literacy, etc. They just will not be contributing to an escrow account.

#### 1.4 LONG-TERM GOALS FOR THE CURRENT REPORT YEAR

A. DSHA has been issued a Commitment to enter into a Housing Assistance Payments (CHAP) for the Rental Assistance Demonstration Program (RAD) on November 20, 2015. The CHAP is for five (5) public housing developments (four AMP#'s) including: Liberty Court (DE004000012); McLane Gardens (DE004000005); Peach Circle and Holly Square (DE004000019); and Mifflin Meadows (DE004000003) with a total of 260 units.

During FY2016/2017 DSHA will be splitting the CHAP into two groups, one for just Liberty Court and the second for the remaining properties including McLane Gardens, Peach Circle/Holly Square and Mifflin Meadows. Under this plan, DSHA will be applying for Low Income Housing Tax Credits (LIHTC) for Liberty Court and proceeding with renovations (if tax credits are awarded). The RAD conversion for the remaining properties would be completed after the Liberty Court renovations are completed.

At Liberty Court, there will be a change in total rental units, from 108 units to 100 units. This will include twenty-five one bedroom units, sixty-three two bedroom units and twelve three bedroom units. Eight two bedroom units will not be replaced in the renovations. Once the RAD conversion is completed, the property will convert to Project Based Vouchers (PBV). The PBV's will be governed by the same eligibility, admission, selection and preferences that the current Housing Choice Voucher program utilizes, within the regulatory parameters allowed under the RAD PBV program. During the renovations, no residents are to be permanently displaced, but some residents may be temporarily relocated until renovations are completed. There will be no transfer of assistance at the time of conversion, and DSHA is not under any voluntary compliance agreement, consent order, decree or judgment.

DSHA certifies that the RAD conversion complies with all applicable site selection and neighborhood reviews and standards and all appropriate procedures are being followed. During the FY2017 Annual Plan process in March 2016, DSHA held public hearings to notify the public of the current and future Capital Fund Program Grants Budgets will be reduced as a result of any projects converting to RAD. As part of the FY2017 Annual MTW Plan, and the need for possible subsequent significant amendments, DSHA will exclude the following items:

- 1. Changes to the Capital Fund Budget produced as a result of each approved RAD conversion; regardless of whether the proposed conversion will include use of additional Capital Funds;
- 2. Changes to the construction and rehabilitation plan for each RAD conversion, and
- 3. Changes to financing structure for each RAD Conversion.

- B. DSHA's long-term vision for the MTW Program will be to expand and evolve current activities, specifically to increase the successful completion rate for MTW participants, encourage homeownership and to utilize operating efficiencies. DSHA will be looking at the following areas:
  - 1. Create additional incentives to encourage MTW participants to meet self-sufficiency goals, overcome self-sufficiency barriers and move from assisted housing in less than five years.

TABLE 1

Moving to Work Savings – Participants with Savings Accounts

Outputs as of June 30, 2016

Program	Current Participants*	Total MTW Savings Accounts**	Average MTW Savings Balance
Public Housing	221	196	\$3456.98
Housing Choice Vouchers	105	72	\$2575.68
Total	326	268	\$3220.21

TABLE 2

Moving to Work Successful Move-outs

# Total Successful Move-outs since 1999 = 875

# Outputs from 8/1/99 through 6/30/16:

Program	Homeownership	Unsubsidized Rental
Public Housing	155	307
Housing Choice Vouchers	99	314
Total	254	621
Percentage	29.02%	70.98%

#### 1.5 RESIDENT PROGRAMS

From July 1999 to the date of this Report, DSHA has funded, partnered, obtained or coordinated annual and ongoing activities, events and programs to enhance the quality of life for our residents. One unit at two sites has been provided for activities due to space and scheduling conflicts in the community buildings at those sites.

- A. Holiday Parties Each community has appropriate holiday celebrations in which the residents take the lead on planning and organizing the event.
- B. Computer access and instruction for youth and adults DSHA provides computers with Internet access at all sites. The computer labs are monitored by volunteers from DSHA staff, outside agencies, GED instructors or other nonprofit organizations. DSHA purchased an assortment of educational software and board games (funded by Lightspan/Discover) for its sites. The games and software target youth and adults.
- C. Student Award Program for Honor Roll, Perfect Attendance and College Acceptance Each year DSHA hosts a Student Award Luncheon to recognize students who make the extra effort to succeed. Winners receive a backpack filled with age-appropriate school supplies and are treated to lunch with DSHA's Director and Management staff. A guest speaker is invited to address the group. This event has been very successful and a positive motivation for the students and parents at our sites.
- D. DSHA has signed MOUs with the Boys and Girls Club of Delaware to provide after-school programs, including pregnancy prevention, at one site. Youth from other sites have access to Boys and Girls Clubs located at facilities nearby. Funding is provided through grants from the Division of Public Health and the United Way.
- E. DSHA has signed an MOU with the University of Delaware to provide 4-H programs at five sites. Services include after-school homework assistance and recreation. DSHA is working with 4-H staff to develop programs for other sites.
- F. DSHA has awarded <u>158</u> Scholarships to MTW participants and expects to continue this service from MTW Budget funds.
- G. DSHA signed a Memorandum of Understanding with Sussex Tech to provide Adult Basic Education and GED classes for two communities.

- H. Children and Families First Provides pregnancy testing, family planning material, STD testing, treatment and counseling; and also organizes resources for grandparents and relatives raising someone else's children. They currently offer support groups at two sites and are planning to offer Family Enrichment programs at 2-3 additional sites in the fall.
- I. Even Start Offers parenting classes to families with children under the age of eight. Activities involve both parent and child(ren) at two sites.
- J. Child, Inc. Provides one-on-one case management services upon request or referral and offers parenting classes.
- K. Consumer Credit Counseling provides financial counseling and assists with budgeting and establishing credit.
- L. Rental Assistance/Other financial assistance Peoples Place II and First State Community Action Agency, Catholic Charities, Salvation Army, Casa San Francisco, State Service Centers and local churches.
- M. First State Community Action Agency Provides limited financial assistance, administers the Summer Food Service Program for Sussex County sites and offers employment training at a center in Georgetown.
- N. Department of Labor Provides all aspects of employment training, including assistance preparing resumes and applications and improving interviewing skills and workplace training. DSHA serves on the Workforce Investment Board for Delaware. This board administers the state's requirements and initiatives for employment and job training.
- O. Delaware Technical and Community College, Kent County Poly-Tech, Sussex Tech, Delaware State University All institutions have various courses available for general education as well as specific job training. They require a minimum number of participants to come to DSHA sites, but individuals can go to the schools for classes. Many courses are free of charge, based on income, or have a small fee.
- P. DSHA has installed GED tutorial software at multiple sites. The program is used by instructors giving group instruction and by residents who study independently.
- Q. In a partnership with DSHA's Clarks Corner Public Housing site, Lake Forest School District, University of Delaware Cooperative Extension, Greater Milford

Area Boys and Girls Club and Kidz Kottage received a 21<sup>st</sup> Century Grant of \$335,000 to provide a variety of youth and family programs including educational and social activities. The 4-H Club is actively seeking grants to continue the program.

- R. DSHA participates on the Interagency Council for Adult Literacy. This is a group from various agencies that are working to address literacy issues for Delaware. The group meets regularly and continues to develop and coordinate adult literacy programs for DSHA residents.
- Since December 2012, DSHA Resident Service's section has published a quarterly newsletter for residents in our public housing communities. The newsletter provides residents with DSHA updates, recipes, crafts, community happenings and articles about various life skill topics.

DSHA consistently evaluates both the individual families and communities to determine the services and programs that are needed. Additionally, all MTW families are reviewed and assessed quarterly for progress on their RAP. Each year at the recertification, the family prepares a RAP for the next year. These quarterly and annual reviews/contacts enable DSHA to make current, accurate plans and recommendations for appropriate services.

The statistics from the MTW Program are reviewed and evaluated regularly to determine trends, progress and compliance with the Program and to make recommendations for possible changes to MTW.

#### 1.6 HOMEOWNERSHIP PROGRAMS

MTW participants are able to take advantage of several DSHA Homeownership Programs as they move out of a rental situation and into their first home. The programs include first mortgage financing and down payment assistance at below-market interest rates for both low- and moderate-income borrowers.

DSHA implemented a Resident Homeownership Program (RHP) in 2004. This program allows qualified participants from either the Public Housing or Housing Choice Voucher program to use a Housing Choice Voucher subsidy toward the mortgage for up to 15 years on a first home. To date, four (4) families have successfully purchased homes in the program.

In FY2011, DSHA made changes to the RHP program to reduce the duration of the subsidy from the 15 year period (for non-disabled, non-elderly families), and revise the calculation formula used to determine the amount of voucher assistance. These changes provide a more realistic program for the homeowner as they will be better prepared to assume all

responsibility for the mortgage at the end of the subsidy period. Families that currently participate in the RHP program will be grandfathered under the existing subsidy calculation.

After FY2011, the Resident Homeownership Program (RHP) duration is seven (7) years. Those participants prior to FY 2011 are grandfathered in at the previous 15 year duration, except elderly/disabled who can receive assistance as long as they continue to qualify.

The subsidy calculation is as follows:

<u>Homeownership Assistance Payment</u>: Homeownership Assistance Payment ("HAP") is the monthly amount paid to the lender by DSHA. The HAP check is issued to the participant as a co-payee with the master servicer. The HAP amount will be the monthly mortgage payment (including principal, interest, tax and insurance escrows) less the greater of:

The amount left after subtracting the applicable utility allowance, from a percentage of the monthly gross income of the family ( $30\%-1^{st}\&2^{nd}$  years,  $32\%-3^{rd}\&4^{th}$  years  $34\%-the5^{th}\&6^{th}$  years and 34% for the  $7^{th}$  year), or;

A percentage of the mortgage payment (including principal, interest, tax and insurance escrow),  $40\%-1^{st}$   $2^{nd}$  years,  $50\%-3^{rd}$   $4^{th}$  years,  $60\%-5^{th}$   $6^{th}$  years and 70% during the  $7^{th}$  year.

<u>Total Family Payment ("TFP")</u>: is that portion the family must pay towards the actual mortgage amount. The TFP will be the <u>greater</u> of:

The amount left after subtracting the applicable utility allowance, from a percentage of the monthly gross income of the family  $(30\%-1^{st}\&2^{nd})$  years, 32%-3<sup>rd</sup>& 4<sup>th</sup> years 34%-the 5<sup>th</sup>& 6<sup>th</sup> years and 34% for the 7<sup>th</sup> year), or;

A percentage of the mortgage payment (including principal, interest tax and insurance escrows),  $40\%-1^{st}$ &  $2^{nd}$  years,  $50\%-3^{rd}$ &  $4^{th}$  years,  $60\%-5^{th}$ &  $6^{th}$  years and 70% during the  $7^{th}$  year.

DSHA MTW participants, who have established a savings account under the program, have access to those funds for homeownership. Participants must provide verification of moving into non-subsidized housing in order to be eligible for these funds.

#### 1.7 SECURITY

As the Public Housing Drug Elimination Program is no longer available, DSHA is consistently seeking resources to continue security services. Limited funds are available from the MTW Budget and reserves, and lighting upgrades have been have been completed at two DSHA sites during FY2011. Security cameras have been installed and are operational at three (3) sites. During FY2012, security cameras were installed at two (2) additional sites, McLane Gardens and Mifflin Meadows. DSHA meets with all local law enforcement agencies to provide some security and to participate in site prevention activities. In addition, DSHA has a "One-Strike" Policy and, through reports received from the police, DSHA tracks arrests made on DSHA properties.

Through strong lease enforcement, DSHA is able to create a standard of pride and care that greatly inhibits drug and criminal activity.

DSHA plans to use funds from CFP to continue extra duty police security, even though funding for the PHDEG has been discontinued. DSHA's Policy & Planning Section reviews federal, state and foundation requests for proposals that could assist with this need.

#### 1.8 HARDSHIP POLICY:

#### A. MTW PARTICIPANTS

During FY2012, the time limit for the MTW program increased from five (5) to seven (7) years, with two levels of participation; MTW Tier I for the first five (5) years and MTW Tier II for the final two (2) years. The Safety-Net program was eliminated. After the seventh (7<sup>th</sup>) year of participation, the participant stops receiving housing assistance. A participant may request that their case be reviewed by a Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period. The three (3) person Hardship Panel is comprised of one (1) DSHA staff member, one (1) non-DSHA member and one (1) member from another State agency or housing advocate organization. Requests to have cases reviewed by the Hardship panel must be made at least six (6) months prior to the end of participation in the MTW program during the seventh (7<sup>th</sup>) year. All recommendations made by the Hardship Panel will be forwarded to the Housing Management Program Administrator for review.

Extenuating circumstances that may be considered include:

- Health and/or medical issues:
- Job availability and/or under-employment issues;

- Past performance of participant and adherence to MTW program requirements;
- o Previous participation in DSHA sponsored or referred services and programs;
- Personal initiative of participant in achieving self-sufficiency; and
- Other extenuating circumstances.

#### B. DSHA MINIMUM RENT HARDSHIP EXCEPTIONS POLICY

Existing families affected by the elimination of Utility Reimbursement payments, specifically in cases where the utility allowance is greater than the Total Tenant Payment (TTP), and may request an exemption from the policy when one or more of the following financial hardships exist:

- 1. The family has lost eligibility or are waiting for an eligibility determination for a Federal, State or local assistance program;
- 2. The income of the family has decreased because of significant change in circumstances, including loss of employment, which are beyond their control;
- 3. The death of a household member has occurred affecting a major source of income for the family; and/or
- 4. Other circumstances determined by DSHA or HUD.

The hardship policy is only for existing residents. New Public Housing and Housing Choice Voucher residents that are housed after the effective date of the Utility Reimbursement Elimination Policy will not be eligible for the hardship policy.

Requests for a hardship exemption from the Utility Reimbursement Elimination Policy must be received by DSHA in writing. The resident must provide documentation with the request showing that the loss of the utility reimbursement would have a significant impact on their ability to abide by the terms of the lease.

Requests for an exemption to the Utility Reimbursement Elimination Policy will be reviewed by the Section 8 Supervisor and Housing Management Program Administrator for Housing Choice Vouchers and the Housing Manager and Regional Manager for Public Housing.

If a hardship exemption is granted, the family will be eligible to receive utility reimbursement payments no greater than \$50.00 per month. The resident would be required to re-verify the need for a hardship exemption at any annual certification or interim re-certification.

An exemption may not be provided if the hardship is determined temporary. DSHA will request reasonable documentation of hardship and also documentation of whether it is temporary or long term.

# DSHA'S ANNUAL PUBLIC HOUSING STUDENT AWARD LUNCHEON

The annual luncheon has been a tradition at DSHA for more than 22 years and serves as a way to recognize the children's successes and highlight the importance of a support system. In order to receive an award, students must achieve honor roll for at least two marking periods or have perfect attendance for the entire school year. Also, DSHA recognizes students continuing onto college upon high school graduation.

While children may still be in the summer vacation state of mind, DSHA rewards their hard work by giving them a head start on back-to-school shopping with necessary, age-appropriate school supplies as well as some other high-quality items including brand new L.L. Bean backpacks.

Delaware's Governor Jack Markell made remarks, praising the hard work and achievement of the  $\underline{79}$  students receiving awards for the  $\underline{2015/2016}$  school year.



Delaware's Governor Jack Markell and DSHA Director Anas Ben Addi with a few of the students recognized at the award ceremony.













# Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

#### **Attachment B**

# (II) General Housing Authority Operating Information

# **Annual MTW Report**

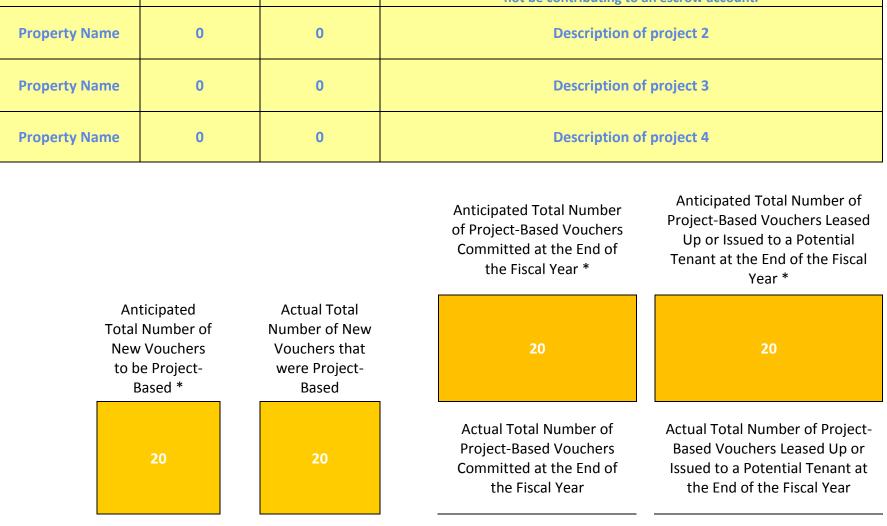
# II.4.Report.HousingStock

# A. MTW Report: Housing Stock Information

# New Housing Choice Vouchers that were Project-Based During the Fiscal Year

Property Name	Anticipated Number of New Vouchers to be Project- Based *	Actual Number of New Vouchers that were Project- Based	Description of Project
Wexford Village	20	20	During FY2016, DSHA completed the substantial renovation of Wexford Village, a 60 unit Low Income Housing Tax Credit (LIHTC) property, in Laurel, Delaware. The project based vouchers began utilization and the project was finished per the timeline. DSHA had 21 households on the waiting list with only 20 PBV slots available. Since Wexford Village was renovated with the use of some Federal HOME funds, we are not allowed to charge the Project Based Voucher residents

Property Name	0	U	Description of project 4			
Property Name	0	0	Description of project 4			
Property Name	0	0	Description of project 3			
<b>Property Name</b>	0	0	Description of project 2			
			35%. DSHA can only have these residents pay 30% of their adjust gross income towards rent. Because of this, Wexford Village MTW residents will not be contributing to any escrow account and DSHA policies regarding escrow are not applicable to them. Since DSHA still wants these residents to have the opportunity to grow self-sufficient through the MTW program, they will still participant in the MTW case management, financial literacy, etc. They just will not be contributing to an escrow account.			



18

\* From the Plan

# Other Changes to the Housing Stock that Occurred During the Fiscal Year

DSHA submitted an application for the Rental Assistance Demonstration Program (RAD) on July 6, 2015 for five (5) public housing developments (four AMP#'s) including: Liberty Court (DE004000012); McLane Gardens (DE004000005); Peach Circle and Holly Square (DE004000019); and Mifflin Meadows (DE004000003) with a total of 268 units. The application was based on significant renovations needed at Liberty Court and minimal renovations at the other developments. Due structural damage with 8 Liberty Court Units, the application submitted by DSHA for RAD will include 100 units versus 108 units. HUD issued a Commitment to enter into a Housing Assistance Payments (CHAP) on November 20, 2015. DSHA is in the process of completing the required steps necessary to complete the conversion to RAD.

Description of other changes to the housing stock during the fiscal year

Description of other changes to the housing stock during the fiscal year

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

# **General Description of Actual Capital Fund Expenditures During the Plan Year**

Additional information available in the Appendix of this report.

The following are descriptions of the expenditures made during the fiscal year and a status report on Capital Budget activities during FY 2016: 1.) Roof replacements for all apartment buildings at Hickory Tree during FY2016.

Overview of Other Housing Owned and/or Managed by the PHA at Fiscal Year End						
Housing Program *	Total Units	Overview of the Program				
Huling Cove & Huling Cove Annex	65	DSHA owns and manages two (2) Section 8 new construction developments, Huling Cove and Huling Cove Annex in Lewes, Delaware. Both developments provide housing for the elderly and persons with disabilities, but have adopted a preference for elderly applicants in accordance with Subtitle D of the Title VI of the Housing and Community Development Act of 1992. Huling Cove has 24, one-bedroom units, and Huling Cove Annex has 41, one-bedroom units. Both sites were substantially renovated during FY 2008-2009.				
Housing Program 2 *	0	Overview of the program				
Housing Program 3 *	0	Overview of the program				

Total Other Housing Owned and/or Managed

Port-In Vouchers (not absorbed)

65

\* Select Housing Program from: Tax-Credit, State Funded, Locally Funded, Market-Rate, Non-MTW HUD Funded, Managing Developments for other non-MTW Public Housing Authorities, or Other.

If Other, please describe:

**Description of "other" Housing Program** 

# **II.5.Report.Leasing**

# **B. MTW Report: Leasing Information**

## Actual Number of Households Served at the End of the Fiscal Year

# Housing Program: Planned Actual Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs \*\* Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs \*\*

# **Total Projected and Actual Households Served**

0

0

\* Calculated by dividing the planned/actual number of unit months occupied/leased by 12.

\*\* In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of Households served.

## **Housing Program:**

Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs \*\*\*

Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs \*\*\*

Port-In Vouchers (not absorbed)

**Total Projected and Annual Unit Months Occupied/Leased** 

# Unit Months Occupied/Leased\*\*\*\*

Planned	Actual
0	0
0	0
0	0
0	0

Explanation for differences between planned and actual households served

\*\*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of households served.

\*\*\*\* Unit Months Occupied/Leased is the total number of months the housing PHA has occupied/leased units, according to unit category during the year.

	Average Number of Households Served Per Month	Total Number of Households Served During the Year
Households Served through Local Non-Traditional Services Only	0	0

# Reporting Compliance with Statutory MTW Requirements: 75% of Families Assisted are Very Low-Income

HUD will verify compliance with the statutory objective of "assuring that at least 75 percent of the families assisted by the Agency are very low-income families" is being achieved by examining public housing and Housing Choice Voucher family characteristics as submitted into the PIC or its successor system utilizing current resident data at the end of the agency's fiscal year. The PHA will provide information on local, non-traditional families provided with housing assistance at the end of the PHA fiscal year, not reported in PIC or its successor system, in the following format:

Fiscal Year:	2011	2012	2013	2014	2015	2016	2017	2018
Total Number of Local, Non- Traditional MTW Households Assisted	0	0	0	0	0	0	0	0

Number of Local, Non- Traditional MTW Households with Incomes Below 50% of Area Median Income	0	0	0	0	0	0	0	0
Percentage of Local, Non- Traditional MTW Households with Incomes Below 50% of Area Median Income	0	0	0	0	0	0	0	0

# Reporting Compliance with Statutory MTW Requirements: Maintain Comparable Mix

In order to demonstrate that the statutory objective of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the PHA will provide information in the following formats:

# **Baseline for the Mix of Family Sizes Served**

Family Size:	Occupied Number of Public Housing units by Household Size when PHA Entered MTW	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW	Non-MTW Adjustments to the Distribution of Household Sizes *	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained	
1 Person	78	131	366	282	20	
2 Person	210	262	572	563	40	
3 Person	148	334	319	422	30	
4 Person	41	35	79	113	8	
5 Person	7	2	8	28	2	
6+ Person	0	0	0	0	0	
Totals	484	764	1344	1408	100	

Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized

Chart shows bedroom sizes not person size due to lack of historical data from 1999. DSHA has implemented a 500-Unit Set-Aside to increase the number of MTW participants which will also result in a redistribution of unit sizes.

# Mix of Family Sizes Served

	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained **	20	40	30	8	2	0	100
Number of Households Served by Family Size this Fiscal Year ***	367	545	312	72	11	0	1308
Percentages of Households Served by Household Size this Fiscal Year ****	27	42	24	6	1	0	100

Percentag Change	7%	3%	-6%	-2%	1%	0	99
---------------------	----	----	-----	-----	----	---	----

Justification and
Explanation for Family
Size Variations of
Over 5% from the
Baseline Percentages

One bedroom increased 7% due to increased number of HCV participants that are elderly and disabled.

- \* "Non-MTW adjustments to the distribution of family sizes" are defined as factors that are outside the control of the PHA. Acceptable "non-MTW adjustments" include, but are not limited to, demographic changes in the community's population. If the PHA includes non-MTW adjustments, HUD expects the explanations of the factors to be thorough and to include information substantiating the numbers used.
- \*\* The numbers in this row will be the same numbers in the chart above listed under the column "Baseline percentages of family sizes to be maintained."
- \*\*\* The methodology used to obtain these figures will be the same methodology used to determine the "Occupied number of Public Housing units by family size when PHA entered MTW" and "Utilized number of Section 8 Vouchers by family size when PHA entered MTW" in the table immediately above.
- \*\*\*\* The "Percentages of families served by family size this fiscal year" will reflect adjustments to the mix of families served that are directly due to decisions the PHA has made. HUD expects that in the course of the demonstration, PHAs will make decisions that may alter the number of families served.

# Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End

### **Housing Program**

## **Description of Leasing Issues and Solutions**

**Public Housing** 

During FY2016, the Public Housing occupancy rate averaged 96% vacancy rate. The high turnover rates experienced at some sites are the result of DSHA'S strict enforcement of rent payment, anti-crime policies and the 7 year time limit. Also this rate was impacted by the eight (8) unit vacancies at Liberty Court due to building safety issues.

**Housing Choice Voucher** 

DSHA's Housing Choice Voucher lease utilization rate at the end of FY2016 was 92%. The financial utilization rate (actual HAP expenditures vs. budget amount) was 97% as of June 30, 2016. Lease-up figures for the past 12 months show that 75% of families on the waiting list successfully leased a unit within 120 days after receiving their new voucher.

**Housing Program 3** 

Description of specific leasing issues and possible solutions (if applicable)

# Number of Households Transitioned To Self-Sufficiency by Fiscal Year End

Activity Name/#	Number of Households Transitioned *	Families who increase their incomes to the level where 40% of their monthly gross income equals or exceeds the fair market rent for the unit they are currently renting or a non-subsidized unit they contract to lease, and move into unsubsidized rental housing or homeownership.	
MTW Tier I	20		
MTW Tier II	9	Same as above.	
Activity Name/#	Number of Households Transitioned *	Agency Definition of Self Sufficiency	
Activity Name/#	Number of Households Transitioned *	Agency Definition of Self Sufficiency	
Households Duplicated Across Activities/Definitions	0	* The number provided here should match the outcome reported where metric SS #8 is used.	
ANNUAL TOTAL NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	29		

# II.6.Report.Leasing

# C. MTW Report: Wait List Information

Wait List Information at Fiscal Year End					
Housing Program(s) *	Wait List Type **	Number of Households on Wait List	Wait List Open, Partially Open or Closed ***	Was the Wait List Opened During the Fiscal Year	
Federal MTW Public Housing Units and Federal MTW Housing Choice Voucher Program	Merged (Combined Public Housing and Voucher Wait List)	7,427	Open	N/A	
Wexford Village PBV	Site-Based	0	Open	Yes	
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No	

- \* Select Housing Program: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.
- \*\* Select Wait List Types: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).
- \*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Housing Program and Description of the populations for which the wait list is open

Housing Program and Description of the populations for which the wait list is open

Housing Program and Description of the populations for which the wait list is open

If Local, Non-Traditional Program, please describe:

Name and Description of "Local, Non-Traditional" Housing Program

Name and Description of "Local, Non-Traditional" Housing Program

Name and Description of "Local, Non-Traditional" Housing Program

If Other Wait List Type, please describe:

For the Wexford Village project based vouchers, 18 out of 20 vouchers are currently being utilized. Once all 20 have been leased then the waiting list process will begin.

Name and Description of "other" wait list type

Name and Description of "other" wait list type

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

Effective April 1, 2014, DSHA implemented the 500-Unit Set-Aside option previously approved by HUD in the FY 2011 Annual Plan. The 500-Unit Set Aside option allows DSHA to increase overall MTW participations and create greater turnover on the waiting list.

## WHAT'S HAPPENING AT OUR SITES!









A new mural was unveiled at DSHA's Burton Village in Rehoboth Beach, Delaware. It was created as a collaboration with artist Catherine C. Czerwinski, CAMP Rehoboth, Delaware State Housing Authority and the residents of the Burton Village public housing development. In September, Czerwinski had asked children who participate in the site's 4-H program to make some drawings. The children's drawings were the inspiration for her design.







In May 2016, a group of DSHA employees volunteered to perform some site beautification activities at our Hickory Tree public housing site.

The employees spent the day doing some landscaping work, including weeding, planting and mulching!

## 3.0 PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

as 'A	as 'Approved Activities'.		

All proposed activities that are granted approval by HUD are reported on in Section IV

#### IN THEIR OWN WORDS....

A resident of our public housing site, Mifflin Meadows, who successfully completed the MTW Program:

To Delaware State Housing Authority:

After a little bit over 5 years being a resident at Mifflin Meadows in Dover, Delaware and successfully reaching our goal with the wonderful program the Delaware State Housing Authority has in place, The Moving to Work Program. We would like to share our experience and say how grateful we are. When we filled out an application we were looking for suitable housing at an affordable price. After our application was accepted we later learned about the details of the program we were about to enter with the Delaware State Housing Authority which in turn would make it possible for our family to buy another home with funds that were set aside for that purpose of homeownership or the ability to find a reasonable rental after the five year mark.

In 2010 we lost our home to foreclosure due to job loss. After going through that bad experience we never thought of buying a home again. We were more than content just having a rental that was affordable for our family which was very helpful for us getting on our feet again. I must say thanks to the Delaware State Housing Authority and the Moving to Work Program we are now homeowners again. The opportunity to accomplish our goal is definitely appreciated and this was such a wonderful program and we are more than thankful with the State for allowing our family to be a part of it. We couldn't of have done it without the State of Delaware Housing Authority. Many thanks to all that assisted in helping our dream of homeownership a reality.

Sincerely,

The Rivera Family

### 4.0 (A.) APPROVED MTW ACTIVITIES: IMPLEMENTED ACTIVITIES

### **REQUIRED ELEMENTS FOR APPROVED ACTIVITIES**

# ACTVITY NAME: ELIMINATION OF UTILITY REIMBURSEMENT PAYMENTS ACTIVITY NUMBER: A-1

PROPOSED PLAN YEAR: FY 2013 EFFECTIVE DATE: January 1, 2013

STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV)

ACTIVITY DESCRIPTION: Effective January 1, 2013, DSHA eliminated utility reimbursement checks to Public Housing and Housing Choice Voucher residents. Previously, residents whose utility allowance for the unit was greater than Total Tenant Payment (TTP) received a utility reimbursement payment. Under this activity, residents in this situation no longer receive a utility reimbursement payment. These residents who would normally receive a utility reimbursement, would no longer receive this payment, but would pay no rent.

HARDSHIP POLICY: Existing families affected by the elimination of Utility Reimbursement payments, specifically in cases where the utility allowance is greater than the Total Tenant Payment (TTP), may request an exemption from the policy when one or more of the following financial hardships exist:

- 1. The family has lost eligibility or are waiting for an eligibility determination for a Federal, State or local assistance program;
- 2. The income of the family has decreased because of significant change in circumstances, including loss of employment, which are beyond their control;
- 3. The death of a household member has occurred affecting a major source of income for the family; and/or
- 4. Other circumstances determined by DSHA or HUD.

The hardship policy is only for existing residents. New Public Housing and Housing Choice Voucher residents that are housed after the effective date of the Utility Reimbursement Elimination Policy will not be eligible for the hardship policy.

Requests for a hardship exemption from the Utility Reimbursement Elimination Policy must be received by DSHA in writing. The resident must provide documentation with the request showing that the loss of the utility reimbursement would have a significant impact on their ability to abide by the terms of the lease.

The requests for an exemption will be reviewed by the Section 8 Supervisor and Housing Management Program Administrator for Housing Choice Vouchers and the Housing Manager and Regional Manager for Public Housing.

If a hardship exemption is granted, the family will be eligible to receive utility reimbursement payments no greater than \$50.00 per month. The resident would be required to re-verify the need for a hardship exemption at any annual certification or interim re-certification.

An exemption may not be provided if the hardship is determined temporary. DSHA will request reasonable documentation of hardship and also documentation of whether it is temporary or long term.

IMPACT: By eliminating the accounts payable utility check, DSHA saved approximately \$20,444 monthly or \$245,328 annually, during FY2013, not including staff time. As a result of the changes made by HUD to the required standard metrics, DSHA is establishing a benchmark and projected outcome for time savings (Metrics CE#2) effective for FY2015. These crucial funds will be reallocated to (a) supplement costs to provide current residents and their children with critical educational and financial literacy programs necessary to end the cycle of poverty or (b) fund upgrades to public housing sites.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: CE#1, CE#2, CE#3 and CE#5.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

#### NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY

- 1) Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 11. Rent Policies and Term Limits. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(I) of the 1937 Act and 24 C.F.R 5.603,5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan.
- 2) Attachment C, Section D. Authorizations Related to Housing Choice Vouchers Only, Paragraph 2(a) and 2(d). Rent Policies and Term Limits. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R 982.508,982.503 and 982.518 A as necessary to implement the Agency's Annual MTW Plan.

# Form 50900: Elements for the Annual MTW Plan and Annual MTW Report Attachment B

# Standard HUD Metrics for DSHA Activity A-1 Elimination of Utility Reimbursement Payments

# Cost Effectiveness

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	FY2012 = \$245,328	Task Implemented on 1/1/13; Estimate 10 hardship cases annually at \$50 monthly = \$6,000 annually	No new hardship cases from 7/1/2015 thru 6/30/2016; 3 Total Hardship cases since implementation; Total Actual Annual Utility Reimbursement from 7/1/2015 thru 6/30/2016 = \$0	Outcome did not meet benchmark.

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	FY2012 = 15-20 hours monthly	Task Implemented on 1/1/13; Estimate 10 hardship cases annually at 1 hour each case per month	No new hardship cases from 7/1/2015 thru 6/30/2016; Total of 3 hardship cases since implementation; Total Actual Annual Utility Reimbursement staff time from 7/1/2015 thru 6/30/2016 = 0 hours	Outcome did not meet benchmark

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Calculation was completed by computer program and checks processed from computer program computation.	0%	0%	0%	N/A

No error rate was anticipated.		

CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$0	\$0	\$0	N/A

## **ACTVITY NAME: Time Limit Housing Assistance for MTW Participants**

**ACTIVITY NUMBER: A-2** 

PROPOSED PLAN YEAR: FY 2012

EFFECTIVE DATE: September 1, 2012

STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV)

ACTIVITY DESCRIPTION: Time-limit housing assistance for MTW participants to seven (7) years (proposed FY2012). This included an initial five (5) year period, with a two (2) year extension. The initial five (5) year period will be called MTW Tier I and the two (2) year extension will be called MTW Tier II. The previous time limit was five (5) years, with a potential one (1) year extension. #1. This improves the overall cost effectiveness of the housing programs by #2. Moving families into self-sufficiency and nonsubsidized housing, and #3. Allowing another eligible family in need of housing to participate in the MTW program.

<u>Definition of Self-Sufficiency</u>: Families who increase their incomes to the level where 40% of their monthly gross income equals or exceeds the fair market rent for the unit they are currently renting or a non-subsidized unit they contract to lease, and move into unsubsidized rental housing or homeownership.

Effective September 1, 2012, DSHA implemented the MTW activity time-limiting housing assistance for MTW participants to 7 years. DSHA is currently providing intensive case management and individualized financial literacy to assist residents formally in the Safety Net as they transition from the MTW program to either FMR or homeownership.

Effective July 1, 2013, DSHA expanded the portability definition for incoming families from another PHA in order for the policy requirements to be consistent with those policies currently enforced to incoming families that are not porting—in from another PHA to the DSHA MTW Program. The DSHA portability policy did <u>not</u> previously require participants to provide proof that they had secured employment in order to meet the minimum work requirements of the DSHA MTW Program; had secured transportation to and from employment; and it did not restrict previous DSHA MTW participants from porting back in with a voucher from another PHA.

Effective July 1, 2013, any residents porting in from another Housing Authority must:

- Meet DSHA's definition of employment or be able to provide documentation that employment has been secured which will meet the minimum work requirements of DSHA's MTW Program.
- Have secured transportation to and from their place of employment.
- Not have previously participated in the MTW Program with DSHA. If a resident
  who previously participated in or completed the DSHA MTW Program obtains a
  new voucher from another Housing Authority, they will not be permitted to
  port back into DSHA.

Effective September 1, 2015, DSHA further defined our existing "temporary exemption" policy to be consistent with our time-limit policy. The "end date" for participation in the DSHA MTW Program is based on the date that the resident enters the program. That established end date will remain the same regardless of the number of and duration of "temporary exemptions" that the resident receives. The subsidy will end at the completion of seven years, unless the resident receives a hardship extension of a maximum of one (1) year in accordance with our current Hardship Policy.

IMPACT: Ability to serve more people with same amount of funding. Creates increased homeownership or Fair Market rental options with the use of MTW savings. Reduces recidivism on the waiting list.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: CE #1, CE#2, SS#1, SS#3, SS#4, SS#5, SS#6, SS#7 and HC#3

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

### **NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY**

- 1) Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 11. Rent Policies and Term Limits. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(I) of the 1937 Act and 24 C.F.R 5.603,5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan.
- 2) Attachment C, Section D. Authorizations Related to Housing Choice Vouchers Only, Paragraph 2(a) and 2(d). Rent Policies and Term Limits. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R 982.508,982.503 and 982.518 A as necessary to implement the Agency's Annual MTW Plan.

## Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

#### **Attachment B**

# Standard HUD Metrics DSHA Activity A-2 Time Limiting Housing Assistance for MTW Participants

# Cost Effectiveness

	CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
DSHA did not previously track staff time savings for this activity.	\$0	\$0	\$0	N/A	

<sup>\*</sup>Per HUD this metrics was requested based on restricting "port-outs" after 1999. DSHA does not have records prior to 1999 for establishing a baseline and does not have any way of measuring current cost savings for "port-outs".

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track staff time savings for this activity.	0	0	0	N/A

<sup>\*</sup>Per HUD, this metrics was requested based on restricting "port-outs" after 1999. DSHA does not have records prior to 1999 for establishing a baseline and does not have any way of measuring current time savings for "port-outs".

# Self Sufficiency

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Baseline established based on FY2012 = \$14,119	\$15,000	FY 2016= \$14,856	Outcome meets benchmark

# SS #3: Increase in Positive Outcomes in Employment Status

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other				
	Percentage of total workable households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.

Report the following information separately for each category:	Total MTW Participants for FY 2010 = 353	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY 2016 = 350	
(1) Employed Full- Time	Based on FY2010 = 141 households or 39.9 <u>%</u>	40% or greater	219 households or 67%	Outcome meets benchmark
(2) Employed Part- Time	Based on FY2010 = 168 households or 47%	45% or less	95 households or 29%	Outcome exceeded benchmark
(3) Enrolled in an Educational Program	Based on FY2010 = 12 households or 3%	3% or greater	20 households or 6%	Outcome meets benchmark
(4) Enrolled in Job Training Program	Based on FY2010 = 48 households or 14%	18% or greater	56 households or 17%	Outcome exceeded benchmark
(5) Unemployed	Based on FY2010 = 13 Households or 4%	6% or less	12 Households or 4%	Outcome exceeded benchmark
(6) Other (Temporary Exempt)	Based on FY2010 = 25 households or 7%	5% or less	16 households or 5%	Outcome did not meet benchmark

# SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track the number of families removed from TANF for this activity.	Based on FY2015 = 19 households out of 274 Tier I and 2 households out of 28 Tier II	Benchmark based on FY2015 results = 19 Tier I households and 2 Tier II households	FY2016 =19 Tier I households and 1 Tier II households	Outcome meets benchmark

SS #	SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.	
Number of households receiving services aimed to increase self-sufficiency (increase).	Baseline established based on FY 2008 = 393 MTW Participants	Benchmark based on 500-unit set-aside activity implemented April 1, 2014 = 500 MTW Participants	Actual for FY16 = 350 MTW Participants	Benchmark not achieved however with implementation of set-aside this number should increase	

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	Baseline established based on FY2011 = \$500.03 monthly	\$500.00 monthly	FY2016 = \$537.26 monthly	Outcome exceeded benchmark

	SS #7: Increase in Tenant Rental Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
	\$129.67	\$130.00	FY2016 = \$200.25 public housing and \$134.31 Section 8	Outcome exceeds benchmark for public housing and meets benchmark for Section 8	

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.
DSHA defines self- sufficiency for the purpose of this metrics as transitioning from subsidized housing to either homeownership or fair market housing.	Baseline established based on FY208 transition to self- sufficiency actuals = 25 Households	35 Households Annually	FY2016= 29 Households	Outcome exceeds benchmark

# **Housing Choice**

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
Average applicant time on wait list in months (decrease).	FY2011 = 12-18 months for Public Housing and 30-42 months for Housing Choice Voucher	18 months for Public Housing and 42 months for Housing Choice Voucher	FY2016 = 18-24 months for Public Housing and 30-42 months for Housing Choice Voucher	Due to the number of households on the waiting list, the average wait time has remained constant.

# ACTIVITY NAME: MTW Tier I- Mandatory Employment and/or Education Requirements ACTIVITY NUMBER: A-3

PROPOSED PLAN YEAR: FY 2000

MODIFIED IN PLAN YEARS: FY 2008 and FY 2012

EFFECTIVE DATE: July 1, 2012

STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV)

ACTIVITY DESCRIPTION: MTW participants are required to be employed at least 20 hours per week earning no less than minimum wage, or in a training or educational program for at least 20 hours per week. (For residents moving in on or after July 1, 2007, requirements were increased to 25 hours per week beginning with their third year in the MTW program and 30 hours per week for the fourth and any subsequent years in the MTW program.) #1. This is to stimulate an increase in resident earning potential; #2. Create a stepped requirement leading to self-sufficiency; and #3. Reduce the subsidy needed for the participant. Initially implemented in FY2000 Annual Plan, revised in the FY2008 Annual Plan.

Effective July 1, 2012 (FY2013), DSHA time-limited compliant school, education or training program participation to Tier I participants must begin school, education or training within years 1 through 3 of MTW participation in order for the time to be considered toward hourly work compliance. For MTW Tier II participants, compliance will be based on work hours only.

Effective July 1, 2013, DSHA further defined "employment" as working 20 hours or more weekly for a business paying federal, state and local taxes or a documented self-employed contractor providing a 1099 form.

IMPACT: Ability to serve more people with same amount of funding. Creates increased homeownership or Fair Market rental options with the use of MTW savings. Reduces recidivism on the waiting list.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#1, SS#3, SS#4, SS#5, SS#6, SS#7 and SS#8.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

#### NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY

Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 2, Local Preferences and Admission and Continued Occupancy Policies and Procedures. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.

# Form 50900: Elements for the Annual MTW Plan and Annual MTW Report Attachment B

# Standard HUD Metrics DSHA Activity A-3 MTW Tier 1- Mandatory Work and/or Education Requirement

# Self Sufficiency

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Baseline established based on FY2012 = \$14,119	\$15,000	FY 2016= \$14,856	Outcome meets benchmark

	SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.	
	Percentage of total work-able households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.	
Report the following information separately for each category:	Total MTW Participants for FY 2010 = 353	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY 2016 = 350		

(1) Employed Full- Time	Based on FY2010 = 141 households or 39.9%	40% or greater	219 households or 67%	Outcome exceeded benchmark
(2) Employed Part- Time	Based on FY2010 = 168 households or 47%	45% or less	95 households or 29%	Outcome exceeded benchmark
(3) Enrolled in an Educational Program	Based on FY2010 = 12 households or 3%	3% or greater	20 households or 6%	Outcome exceeded benchmark
(4) Enrolled in Job Training Program	Based on FY2010 = 48 households or 14%	18% or greater	56 households or 17%	Outcome slightly under benchmark
(5) Unemployed	Based on FY2010 = 13 Households or 4%	6% or less	12 households or 4%	Outcome exceeded benchmark
(6) Other (Temporary Exempt)	Based on FY2010 = 25 households or 7%	5% or less	16 households or 5%	Outcome meets benchmark

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track the number of families removed from TANF for this activity.	Based on FY2015 = 19 households out of 274 Tier I	Benchmark based on FY2015 results = 19 Tier I households	FY2016 = 19 households	Outcome meets benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Number of households receiving services aimed to increase self-sufficiency (increase).	Baseline established based on FY 2008 = 393 MTW Participants	Benchmark based on 500-unit set-aside activity = 500 MTW Participants	Actual for FY16 = 326 MTW Tier I Participants	Benchmark not achieved however with implementation of set-aside this number will increase
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SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	Baseline established based on FY2011 = \$500.03 monthly	\$500.00 monthly	FY2016 = \$537.26 monthly	Outcome exceeds benchmark

SS #7: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$129.67	\$130.00	FY2016 = \$200.25 public housing and \$134.31 Section 8	Outcome exceeds benchmark for public housing and meets benchmark for Section 8

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number	Households transitioned to self- sufficiency (< <pha definition of self- sufficiency&gt;&gt;) prior to implementation of the activity (number). This number may be zero.</pha 	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (<< PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

should also be provided in Section (II) Operating Information in the space provided.				
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Baseline established based on FY2008 transition to self- sufficiency actuals = 25 Households	30 Households Annually	FY2016= 20 Tier I Households	Outcome does not meet benchmark

### **ACTVITY NAME: MTW Tier II Work Requirement**

**ACTIVITY NUMBER: A-4** 

PROPOSED PLAN YEAR: FY 2012 EFFECTIVE DATE: July 1, 2012

STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative

reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV)

ACTIVITY DESCRIPTION: Participants who do not successfully complete the MTW program within five (5) years (under MTW Tier I) will continue to be required to work at least thirty(30) hours per week, earning no less than minimum wage, for the remaining two (2) years while under the MTW Tier II. This requirement increases the earned income of MTW Tier II participants enabling them to pay more towards their rent and requiring less overall subsidy.

Previously, the participants who did not successfully complete the MTW Program within five (5) years were eligible to continue receiving housing subsidy under a Safety-Net Program for an indefinite period. The Safety-Net has been renamed MTW Tier II and the entire program time-limited to seven years (five (5) years under MTW Tier I and two (2) years under MTW Tier II).

Effective in FY2013, MTW Tier II participant compliance is based on work hours only. School, education or training program hours will not be counted toward the work hour compliance requirement.

Effective July 1, 2013, DSHA further defined "employment" as working 20 hours or more weekly for a business paying federal, state and local taxes or a documented self-employed contractor providing a 1099 form.

IMPACT: Ability to serve more people with same amount of funding. Creates increased homeownership or Fair Market rental options with the use of MTW savings. Reduces recidivism on the waiting list. By continuing the work requirement in Tier II, the resident will require fewer subsidies and will continue to work to achieve self-sufficiency.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#1, SS#3, SS#4, SS#5, SS#6, SS#7 and SS#8.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

### **NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY**

Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 2, Local Preferences and Admission and Continued Occupancy Policies and Procedures. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.

# Form 50900: Elements for the Annual MTW Plan and Annual MTW Report Attachment B

# **Standard HUD Metrics DSHA Activity A-4 MTW Tier II Work Requirement**

# Self Sufficiency

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track based on Tier II status for this activity until the FY2015 reporting period. DSHA will establish baseline and benchmark with the FY2015 Annual Report.	FY2015 = \$17,841	Benchmark based on FY2015 results = \$17,000	FY2016 = \$16,855	Outcome meets benchmark

	SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.	
	Percentage of total work-able households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.	
DSHA did not previously track based on Tier II status for this activity until the FY2015 reporting period. DSHA will establish baseline and benchmark with the FY2015 Annual	Total MTW Tier II Participants for FY2015 = 28 households	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Tier II Participants for FY 2015 = 24 households		

Report.				
(1) Employed Full- Time	Based on FY2015 = 13 households or 46%	40% or greater	FY2015 = 13 households or 46%	Outcome meets benchmark
(2) Employed Part- Time	Based on FY2015 = 14 households or 50%	45% or less	FY2015 = 14 households or 50%	Outcome meets benchmark
(3) Enrolled in an Educational Program	Based on FY2015 = 0 households or 0%	In Tier II, education programs do not count toward the employment requirement.	FY2015 = 0 household or 0%	Outcome meets benchmark
(4) Enrolled in Job Training Program	Based on FY2015 = 0 households or 0%	18% or less	FY2015 = 0 household or 0%	Outcome meets benchmark
(5) Unemployed	Based on FY2015 = 1 Households or 4%	6% or less	FY2015 = 1 household or 4%	Outcome meets benchmark
(6) Other (Temporary Exempt)	Based on FY2015 = 0 households or 0%	5% or less	FY2015 = 0 household or 0%	Outcome meets benchmark

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track the number of families removed from TANF for this activity. Baseline and Benchmark established with FY2015 results.	FY2015 = 2 households out of 28 Tier II	Benchmark based on FY2015 results = 2 Tier II households	FY2016 =1 Households	Outcome meets benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

DSHA did not previously track based on Tier II status for this activity until the FY2014 reporting period which had not been compiled at time of this Annual Plan. DSHA will establish baseline and benchmark with the FY2014 Annual Report.	FY2014 = 33 households	40 households	FY2016 = 24 households	Outcome does not meet benchmark
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SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track based on Tier II status for this activity. DSHA will establish baseline and benchmark with the FY2016 Annual Report.	FY2016 = \$537.26	\$500 monthly	FY 2016 = \$537.26	Outcome exceeded benchmark

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$129.67	\$130.00	FY2016 = \$200.25 public housing and \$134.31 Section 8	Outcome exceeds benchmark for public housing and meets benchmark for Section 8

SS #8: Households Transitioned to Self Sufficiency						
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self- sufficiency (< <pha definition of self- sufficiency&gt;&gt;) prior to implementation of the activity (number). This number may be zero.</pha 	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (<< PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.		

DSHA did not previously track based on Tier II status for this activity until the FY2014 reporting period which had not been compiled at time of this Annual Plan. DSHA will establish baseline and benchmark with the FY2014 Annual Report.	FY2014 = 7 households	7 households	FY2016 = 9 households	Outcome exceeds benchmark
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ACTIVITY NAME: Alternative Re-Certification Schedule for Elderly and Disabled Residents
ACTIVITY NUMBER: A-5

PROPOSED PLAN YEAR: FY 2011

**EFFECTIVE DATE: FY 2011** 

STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV)

ACTIVITY DESCRIPTION: Adopt alternative re-certification schedules for elderly and disabled residents. For example, re-certifying residents on fixed incomes (fixed pensions, Social Security, SSI) every other year. For the Housing Choice Voucher Program, half of the approximately 650 elderly/disabled re-certifications would be performed during FY2011, and the remaining half would be completed during FY2012. For Public Housing, which has a significantly lower elderly/disabled population, all re-certification of these individuals would be done every other year starting FY2011.

Hardship Policy: If a resident has a significant change in income or allowable medical expenses, they can request an interim recertification be completed during the years when an annual recertification is not scheduled.

IMPACT: Reduce the total number of annual re-certifications processed by PH and HCV staff, thus creating administrative efficiencies (reduction in postage costs, time savings).

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: CE#1, CE#2 and CE#5.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

#### **NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY**

Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 4, Initial, Annual and Interim Income Review Process, Attachment C, Section D. Authorizations Related top Section 8 Housing Choice Vouchers Only, (1) Operational Policies and Procedures, Paragraph (c.). This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.

# Standard HUD Metrics for DSHA Activity A-5 Alternative Re-Certification Schedule for Elderly and Disabled Residents

## Cost Effectiveness

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	Baseline established based on FY2011 total cost in postage and staff time = \$45,330	\$27,895 based on savings from postage and staff time	FY2016 = \$27,231	Outcome was slightly under benchmark

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Baseline established based on FY2011 = 1,955 staff hours saved	575 staff hours saved	FY2016 = 879 Hours	Outcome exceeds benchmark

	CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
	\$157.00	\$157.00	FY2016 = \$152.00	Outcome was slightly under benchmark	

#### **ACTIVITY DESCRIPTION**

ACTVITY NAME: Rent Simplifications and Asset/Income Verifications

#### **ACTIVITY NUMBER: A-6**

- A. ACTIVITY DESCRIPTION: DSHA will modify the current asset verification policy in an effort to 1) simplify rent calculations; 2) create administrative time savings and 3) significantly reduce the need for dependence of client supplied bank/financial records. The policy will not require the verification or inclusion of assets less than \$25,000. The resident/applicant will instead sign a certification form if they have assets less than \$25,000. Elimination of asset verification and inclusion in subsidy calculations will have little or no effect on subsidy for the vast majority of DSHA residents. It should also be noted the during the past five years, more financial institutions are no longer completing asset verifications or are charging resident/applicant to complete the verification forms. This initiative was approved in the FY2015 Annual Plan for implementation on January 1, 2015. Implementation was delayed due to resident notifications until July 1, 2015. DSHA will begin reporting on this activity in the FY2016 Annual Report.
- B. STATUTORY OBJECTIVE: Reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs (HCV).
- C. ANTICIPATED IMPACT: With the current asset verification procedure, DSHA spends approximately 432 staff hours on PH residents and 595 staff hours on HCV residents. By modifying the current asset verification procedure, DSHA anticipates reducing the amount of staff hours to 216 for PH residents and 298 for HCV residents.
- D. ANTICIPATED SCHEDULE: Original effective date was January 1, 2015 but implementation is now scheduled for July 1, 2015. Asset verification will be completed at initial and recertification.

#### **ACTIVITY METRICS INFORMATION**

- E. The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: CE#1, CE#2, and CE #3.
- F. The baseline performance levels are stated in the metric tables on the following page.
- G. The yearly benchmarks are stated in the metric tables on the following page.
- H. The final projected outcomes are stated in the metric tables on the following page.

I. The Easy Housing resident software will be utilized to track and identify performance levels and funding.

### NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY

Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 11. Rent Policies and Term Limits. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(I) of the 1937 Act and 24 C.F.R 5.603,5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan. Attachment C, Section D. Authorizations Related to Housing Choice Vouchers Only, Paragraph 2(a) and 2(d). Rent Policies and Term Limits. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R 982.508,982.503 and 982.518 A as necessary to implement the Agency's Annual MTW Plan.

# Standard HUD Metrics for DSHA Proposed Activity A-6 Rent Simplification and Asset/Income Verifications

# Cost Effectiveness

	CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
Total cost of task in dollars (decrease).	Staff time x \$17 = cost savings; 432 PH Hours x \$17 = \$7,344; 595 HCV hours x \$17 = \$10,115	216 PH hours x \$17 = \$3,672; 298 HCV hours x \$17 = 5,066	30 PH hours x \$17 = \$510.00; HCV 360 hours x \$17 =\$6,120	Outcome exceeded expectations for PH but did not meet for HCV	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	432 hours for PH residents annually; 595 staff hours for HCV residents annually	216 hours for PH residents annually; 298 staff hours for HCV residents annually	FY2016: 30 hours for PH residents; 360 staff hours for HCV residents	Outcome was exceeded for PH but did not meet for HCV

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
DSHA has not previously tracked an error rate for this activity. Tracking began in 2016	FY2016 = No errors	Less than 2%	FY2016 = No errors	Outcome meets benchmark

**ACTVITY NAME: MTW Savings Account and Disbursements** 

**ACTIVITY NUMBER: B-1** 

PROPOSED PLAN YEAR: FY2000

MODIFIED IN PLAN YEARS: FY2011 and FY2012

**EFFECTIVE DATE: FY2000** 

STATUTORY OBJECTIVE: MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency.

ACTIVITY DESCRIPTION: To make work pay, cap rent, with all funds over the cap up to the 35% limit placed in a savings account for the MTW participant. When a client reaches the end of the contract (5 years or less) if their income has increased to where 40% of their monthly gross income equals or exceeds the fair market rent for their unit they currently rent, or a non-subsidized unit they commit to lease or home ownership they will receive the balance of any monies in their savings account. If a client does not successfully complete the MTW Program, all savings account funds will be forfeited. Initiated in the FY2000 Annual Plan.

As of FY2011, this activity was modified to include provisions for the use of MTW saving funds. Successful MTW clients will be required to utilize at least 60% of the savings fund for homeownership/fair market rental related expenses. This includes: down payment, closing costs, security deposits, utility deposits, clearing credit issues and satisfying debt for medical bills, education and transportation. The remaining 40% of the MTW savings is distributed to the client for discretionary use. Initiated in the FY2011 Plan.

For FY2012, The MTW Savings Account was expanded to include individuals in years 6 and 7 of the program. For participants that successfully complete the program before or in the fifth (5<sup>th)</sup> year of the program (under MTW Tier I), they will be eligible to utilize 100% of their MTW savings account. Contributions to the MTW Savings will stop after the 5<sup>th</sup> year. For participants in their sixth (6<sup>th</sup>) and seventh (7<sup>th</sup>) year of the MTW Program (under the MTW Tier II), they will have access to only 60% of MTW Savings in year six and 40% of MTW Savings in year 7.

IMPACT: Encourage residents to work at capacity rather than least amount required. Provides participants with funds to repair credit, debt issues and/or move into homeownership upon successful completion of the MTW program.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: CE#1, CE#2, CE#3, CE#5, SS#1, SS#2, SS#3, SS#4, SS#5, SS#6, SS#7 and SS#8.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

1) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency. This authorization waives certain provision of Section 22 of the 1927 Act and 24 C F B 984 as passess by to implement the Agency's Applied MTW Plan.			
of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.			

# **Standard HUD Metrics DSHA Activity B-1 MTW Savings Account and Disbursements**

# Cost Effectiveness

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
DSHA disburses the savings account back to participants upon successful completion of the MTW Program as an incentive for residents to successfully complete the program. DSHA does not experience a cost savings on this activity. The dollar	\$0.00	\$190,000 disbursed	FY 2016 = \$221,447 disbursed to 29 successful families	Outcome exceeds benchmark

amount shown is the		
amount of rent money		
that DSHA did not		
keep as a result of		
disbursing back to		
resident, which is a		
loss of revenue to		
DSHA.		

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
DSHA does not experience a decrease in staff time as a result of this activity. It actually increases staff time for both our Case Managers and Finance Office. DSHA performs this activity as an incentive to our residents to successfully complete the MTW program by moving into homeownership or fair market housing.	0	0	0	N/A

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Not previously tracked so tracking began in FY2016	Baseline established based on FY2016 outcome of 0%	Less than 2%	0%	Outcome Exceeds Benchmark

CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$129.67	\$130.00	FY2016 =\$139.15	Outcome exceeds benchmark

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Baseline established based on FY2012 = \$14,119	\$15,000	FY 2016= \$15,308	Outcome was slightly under benchmark

SS #2: Increase in Household Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$2,700	FY2016 = \$3,220	Outcome exceeds benchmark.
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SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.	
	Percentage of total workable households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.	

Report the following information separately for each category:	Total MTW Participants for FY 2010 = 353	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY 2016 = 350	
(1) Employed Full- Time	Based on FY2010 = 141 households or 39.9%	40% or greater	219 households or 67%	Outcome exceeded benchmark
(2) Employed Part- Time	Based on FY2010 = 168 households or 47%	45% or less	95 households or 29%	Outcome exceeded benchmark
(3) Enrolled in an Educational Program	Based on FY2010 = 12 households or 3%	3% or greater	20 households or 6%	Outcome exceeded benchmark
(4) Enrolled in Job Training Program	Based on FY2010 = 48 households or 14%	18% or greater	56 households or 17%	Outcome slightly under benchmark
(5) Unemployed	Based on FY2010 = 13 Households or 4%	6% or less	12 Households or 4%	Outcome exceeded benchmark
(6) Other (Temporary Exempt)	Based on FY2010 = 25 households or 7%	5% or less	16 households or 5%	Outcome meets benchmark

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track the number of families removed from TANF for this activity.	Based on FY2015 = 19 households out of 274 Tier I and 2 households out of 28 Tier II	Benchmark based on FY2015 results = 19 Tier I households and 2 Tier II households	FY2016 = 19 Tier I households and 1 Tier II households	Outcome meets benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self- sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Number of households receiving services aimed to increase self-sufficiency (increase).  Baseline est based on FY 20 MTW Parts	008 = 393 500-unit set-aside activity	Actual for FY16 = 350 MTW Participants	Benchmark not achieved however with implementation of set-aside this number should increase
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SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	Baseline established based on FY2011 = \$500.03 monthly	\$500.00 monthly	FY2016 = \$537.26 monthly	Outcome exceeded benchmark

SS #7: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$129.67	\$130.00	FY2016 = \$200.25 public housing and \$134.31 Section 8	Outcome exceeds benchmark for public housing and meets benchmark for Section 8

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II)	Households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.

Operating Information in the space provided.  Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-	Baseline established				
sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	based on FY208 transition to self- sufficiency actuals = 25 Households	35 Households Annually	FY2016= 29 Households	Outcome did not benchmark	

### **ACTVITY NAME: MTW Case Management Services**

**ACTIVITY NUMBER: B-2** 

PROPOSED PLAN YEAR: FY2000

MODIFIED IN PLAN YEARS: FY2012, FY2013 and FY2015

**EFFECTIVE DATE: FY2000** 

STATUTORY OBJECTIVE: MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency.

ACTIVITY DESCRIPTION: All MTW participants (MTW Tier I and Tier II) continuously participate in case management and are offered services and/or resource referrals including job training and placement services, computer experience, financial literacy classes and transportation stipends, as funds allow. Initiated in the FY 2000 Annual Plan.

During FY2012, case management activities included not only the participants within their initial five (5) year period under MTW Tier I, but those participants that continue in the program for the remaining two (2) years under MTW Tier II.

Effective July 1, 2012 (FY2013), DSHA required all MTW program participants to complete a DSHA approved Financial Literacy training course within the first two years of Tier I. If they do not complete the training, then a strike may be issued for program non-compliance. Currently, MTW program participants must take a Financial Literacy course but they can do so whenever they want. DSHA has found that in order for residents to receive the optimal benefits of credit repair and Financial Literacy then they must complete the program early in MTW participation.

Effective January 1, 2015, DSHA will create a Fair Market Housing Track to compliment and expand the current Financial Literacy requirement. Residents will be required to complete within 3 years additional one-on-one Fair Market Housing counseling program through our partnership with NCALL. This will further educate residents on credit repair as well as what is needed to be a success homeowner or fair market renter. If they do not complete the training, then a strike may be issued for program non-compliance. No changes or modifications, or any additions to Attachment C/D authorizations for the changes noted above are required. This initiative is still being developed with NCALL and has been placed on hold until January 1, 2016.

IMPACT: Better prepares MTW participants to succeed in finding employment and overcoming barriers to self-sufficiency as they move toward Fair Market Housing or Homeownership.

DSHA will modify this activity effective January 1, 2015 to include a Fair Market Housing Track to compliment and expand current Financial Literacy requirements. Residents will be required to complete within 3 years additional one-on-one Fair Market Housing counseling program through our partnership with NCALL. This will further educate residents on credit repair as well as what is needed to be a successful homeowner or fair market renter. If they do not complete the training, then a strike may be issued for program non-compliance. No changes or modifications, or any additions to Attachment C/D authorizations for the changes noted above are required.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#1, SS#2, SS#3, SS#4, SS#5, SS#6, SS#7 and SS#8.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

- 1) Attachment C, Section B. Authorizations Related to Both Public Housing and Housing Choice Vouchers, Paragraph 1. Single Fund Budget with Full Flexibility. Section b. (iii). This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 982 and 990 as necessary to implement the Agency's Annual MTW Plan.
- 2) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

## **Standard HUD Metrics DSHA Activity B-2 MTW Case Management Services**

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Baseline established based on FY2012 = \$14,119	\$15,000	FY 2016= \$15,308	Outcome meets benchmark

	SS #2: Increase in Household Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$2,700	FY2016 = \$3,220	Outcome exceeds benchmark.	

SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.	

<ul><li>(4) Enrolled in Job</li><li>Training Program</li><li>(5) Unemployed</li><li>(6) Other</li></ul>				
	Percentage of total workable households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.
Report the following information separately for each category:	Total MTW Participants for FY 2010 = 353	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY 2016 = 350	
(1) Employed Full- Time	Based on FY2010 = 141 households or 39.9%	40% or greater	219 households or 67%	Outcome exceeded benchmark
(2) Employed Part- Time	Based on FY2010 = 168 households or 47%	45% or less	95 households or 29%	Outcome exceeded benchmark
(3) Enrolled in an Educational Program	Based on FY2010 = 12 households or 3%	3% or greater	20 households or 6%	Outcome exceeded benchmark

(4) Enrolled in Job Training Program	Based on FY2010 = 48 households or 14%	18% or greater	56 households or 17%	Outcome meets benchmark
(5) Unemployed	Based on FY2010 = 13 Households or 4%	6% or less	12 Households or 4%	Outcome exceeded benchmark
(6) Other (Temporary Exempt)	Based on FY2010 = 25 households or 7%	5% or less	16 households or 5%	Outcome meets benchmark

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA did not previously track the number of families removed from TANF for this activity.	Based on FY2015 = 19 households out of 274 Tier I and 2 households out of 28 Tier II	Benchmark based on FY2015 results = 19 Tier I households and 2 Tier II households	FY2016 = 19 Tier I households and 1 Tier II households	Outcome meets benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self- sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase self- sufficiency (increase).	Baseline established based on FY 2008 = 393 MTW Participants	Benchmark based on 500-unit set-aside activity = 500 MTW Participants	Actual for FY16 = 350 MTW Participants	Benchmark not achieved however with implementation of set-aside this number should increase

SS	SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	

Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	Baseline established based on FY2011 = \$500.03 monthly	\$500.00 monthly	FY2016 = \$537.26 monthly	Outcome meets benchmark
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SS #7: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$129.67	\$130.00	FY2016 = \$200.25 public housing and \$134.31 Section 8	Outcome exceeds benchmark for public housing and meets benchmark for Section 8

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.
DSHA defines self- sufficiency for the purpose of this metrics as transitioning from subsidized housing to either homeownership or fair market housing.	Baseline established based on FY208 transition to self- sufficiency actuals = 25 Households	35 Households Annually	FY2016= 29 Households	Outcome exceeds benchmark

**ACTVITY NAME: Removal of Barriers to Self-Sufficiency** 

**ACTIVITY NUMBER: B-3** 

PROPOSED PLAN YEAR: FY2000

**EFFECTIVE DATE: FY2000** 

STATUTORY OBJECTIVE: MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency.

ACTIVITY DESCRIPTION: Enhance the standard of living for residents participating in MTW by assisting residents in the removal of barriers to self-sufficiency (obtain employment, driver's license, purchase vehicle, coordinate child care, obtain GED, enroll for college courses, expunge criminal record, clear credit history). Initiated in the FY2000 Annual Plan.

DSHA MTW participants continue to be assisted in removing barriers to self-sufficiency in areas such as transportation, education and childcare.

IMPACT: Better prepares MTW participants to succeed in finding employment and overcoming barriers to self-sufficiency.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#3, SS#5 and SS#8.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

- 1) Attachment C, Section B. Authorizations Related to Both Public Housing and Housing Choice Vouchers, Paragraph 1. Single Fund Budget with Full Flexibility. Section b. (iii). This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 982 and 990 as necessary to implement the Agency's Annual MTW Plan.
- 2) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

## Standard HUD Metrics DSHA Activity B-3 Removal of Barriers to Self-Sufficiency

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.

	Percentage of total work-able households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.
Report the following information separately for each category:	Total MTW Participants for FY 2010 = 353	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY 2016 = 350	
(1) Employed Full- Time	Based on FY2010 = 141 households or 39.9 <u>%</u>	40% or greater	219 households or 67%	Outcome exceeded benchmark
(2) Employed Part- Time	Based on FY2010 = 168 households or 47%	45% or less	95 households or 29%	Outcome exceeded benchmark
(3) Enrolled in an Educational Program	Based on FY2010 = 12 households or 3%	3% or greater	20 households or 6%	Outcome exceeded benchmark
(4) Enrolled in Job Training Program	Based on FY2010 = 48 households or 14%	18% or greater	56 households or 17%	Outcome meets benchmark

(5) Unemployed	Based on FY2010 = 13 Households or 4%	6% or less	12 Households or 4%	Outcome exceeded benchmark
(6) Other (Temporary Exempt)	Based on FY2010 = 25 households or 7%	5% or less	16 households or 5%	Outcome meets benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase self-sufficiency (increase).	Baseline established based on FY 2008 = 393 MTW Participants	Benchmark based on 500-unit set-aside activity = 500 MTW Participants	Actual for FY16 = 350 MTW Participants	Benchmark not achieved however with implementation of set-aside this number should increase

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.
DSHA defines self- sufficiency for the purpose of this metrics as transitioning from subsidized housing to either homeownership or fair market housing.	Baseline established based on FY208 transition to self- sufficiency actuals = 25 Households	35 Households Annually	FY2016= 29 Households	Outcome does not meet benchmark

### **ACTVITY NAME: 500 Unit Set-Aside for MTW Eligible Families**

**ACTIVITY NUMBER: B-4** 

PROPOSED PLAN YEAR: FY2012 EFFECTIVE DATE: April 1, 2014

STATUTORY OBJECTIVE: MTW activities to give incentives to families who are employed or seeking

employment and self-sufficiency.

ACTIVITY DESCRIPTION: To create a 500 unit set-aside for eligible MTW participants. The set-aside will be administered for both Public Housing and the Housing Choice Voucher Programs to increase the overall number MTW participants. To reach the goal of having 500 participants enrolled in the MTW program, two of every three available units/vouchers will be offered to MTW eligible applicants. Once the set-aside is reached and maintained, public housing units and vouchers would be offered based on preference and date of application.

DSHA had anticipated activating the 500 unit set-aside effective January 1, 2014. However due to resident notification issues, DSHA activated the previously approved 500 unit set-aside for eligible MTW participants effective on September 1, 2014. DSHA did not initiate the activity during FY2012 or FY2013 due to increases in MTW eligible participants with the re-integration of Safety- Net participants into the program with the restructuring of the time-limit feature. Since the majority of the re-integrated Safety-Net families will have completed their subsidy by January 1, 2014, the number of active MTW participants will have decreased thereby necessitating the activation of the 500 unit set-aside.

IMPACT: Increase the overall number of MTW participants and create greater turnover of the waiting list as successful participants complete the five (5) year MTW program.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#5.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

- 1) Attachment C, Section C. Authorizations Related to Public Housing, Paragraph (2). This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.
- 2) Attachment C, Section D. Authorizations Related to Section 8 Housing Choice Vouchers Only, Section 3. Eligibility of Participants, Paragraph (4), Waiting List Policies. Use of Public Housing as an Incentive for Economic Progress. This authorization waives certain provisions of Section 8 (o)(6),8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R 982 subpart E, 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

## DSHA Chosen Metrics for Activity B-4 500 Unit Set-Aside for MTW Eligible Participants

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase self-sufficiency (increase).	Baseline established based on FY 2008 = 393 MTW Participants	Benchmark based on 500-unit set-aside activity = 500 MTW Participants	Actual for FY16 = 350 MTW Participants	Benchmark not achieved however with implementation of set-aside this number should increase

**ACTVITY NAME: Resident Homeownership Program (RHP)** 

**ACTIVITY NUMBER: C-1** 

PROPOSED PLAN YEAR: FY2004 MODIFIED IN PLAN YEAR: FY2011

**EFFECTIVE DATE: FY2004** 

STATUTORY OBJECTIVE: MTW activities to improve housing choices for our residents.

ACTIVITY DESCRIPTION: A Resident Homeownership Program (RHP) was created to provide eligible DSHA Housing Choice Voucher and Public Housing residents the ability to participate in a program to own a home by utilizing Housing Choice Voucher rental assistance towards the payment of a mortgage. The flexibility of the MTW program has been used to make the program accessible to Public Housing residents and other non-MTW participants, including elderly and disabled families, in addition to Housing Choice Voucher residents.

Initiated in the FY2004 Annual Plan.

In FY2011, DSHA made changes to the RHP program to reduce the duration of the subsidy from the 15 year period (for non-disabled, non-elderly families), and revise the calculation formula used to determine the amount of voucher assistance. These changes provide a more realistic program for the homeowner as they will be better prepared to assume all responsibility for the mortgage at the end of the subsidy period. Families that currently participate in the RHP program will be grandfathered under the existing subsidy calculation.

IMPACT: To be able to utilize Housing Choice Voucher to assist eligible participants to purchase a home through this program, especially elderly/disabled (non-MTW) that do not have the opportunity to participate in MTW.

DSHA does not anticipate any changes or modifications to this activity in the upcoming Plan year.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#6, SS#7, SS#8, HC#4 and HC#5.

The baseline performance levels are stated in the metric tables on the following page.

The yearly benchmarks are stated in the metric tables on the following page.

The final projected outcomes are stated in the metric tables on the following page.

The Easy Housing resident software will be utilized to track and identify performance levels and funding.

#### **NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY**

Attachment C, Section D. Authorizations Related to Housing Choice Voucher Only, Paragraph 8. Homeownership Program (a) and (b), This authorization waives certain provisions of Section 8(o)(15) and 8(y) of the 1937 Act and 24 C.F.R 982.625 through 982.643 inclusive as necessary to implement the Agency's Annual MTW Plan.

## **Standard HUD Metrics DSHA Activity C-1 Resident Homeownership Program**

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	\$466	\$386	FY2016 = \$70.00 monthly or \$840 annually	Outcome exceeds benchmark

SS #7: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Baseline and benchmark established based on FY2014 results.	\$401	\$413	FY2016 = \$412	Outcome meets the benchmark

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self- sufficiency (< <pha definition="" of="" self-="" sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.
	0	1 within 7 years	0	N/A

# Housing Choice

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	0	1 after 7 years	0	Not until 2020

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	5	5	Outcome meets benchmark

#### REQUIRED ELEMENTS FOR APPROVED ACTIVITIES

# ACTVITY NAME: WEXFORD VILLAGE PROJECT BASED VOUCHER MTW PARTICIPATION

**ACTIVITY NUMBER: C-2** 

PROPOSED PLAN YEAR: FY2013
IMPLEMENTED PLAN YEAR: FY2015

EFFECTIVE DATE: April 2015

STATUTORY OBJECTIVE: MTW activities to improve housing choices for our residents.

ACTIVITY DESCRIPTION: In FY2013, DSHA proposed to renovate Wexford Village, a 60 unit Low Income Housing Tax Credit (LIHTC) property, in Laurel, Delaware. The property was in the extended use period of a LIHTC agreement and owned by Wexford Village Housing Corporation, a wholly owned nonprofit corporate affiliate of DSHA. DSHA had \$2.4 million in the Housing Choice Voucher Reserves. In addition to the amount from MTW HCV Reserves, DSHA issued a grant of \$582,702 in non-MTW funds, provided a low-interest loan of \$500,000 to the property and arranged for the current deferred mortgage (\$2,036,583) to be interest-free. In addition, twenty (20) existing tenant-based Housing Choice Vouchers (HCV) would be project-based at the property upon completion of renovations and the remaining units will be offered to households with annual incomes between 60% and 80% of area median income. DSHA insured that the terms of PIH Notice 2011-45 in the implementation of this activity. Below is the timeline for the renovations:

#### **Wexford Village Timeline**

- Resident Meeting November 5, 2013-Completed
- Bid Opening November 7, 2013-Completed
- Contract and all paperwork- Completed April 9, 2014
- Notice to Proceed- Completed April 21, 2014
- Construction Period- Completion date end of April 2015

Project was completed per the timeline above.

As a result of the Wexford Village construction completion in April of 2015, this activity has been modified from RENOVATION OF WEXFORD VILLAGE USING MTW HOUSING CHOICE VOUCHER RESERVES to WEXFORD VILLAGE PROJECT BASED VOUCHER MTW PARTICIPATION per HUD guidance in the FY2017 Annual Plan comments. The 20 project-based vouchers at Wexford Village will participate in and required to complete all of the requirements of the DSHA MTW Program. However, Wexford Village Project Based Voucher participants will pay 30% of their adjusted gross income towards rent and utilities instead of 35% like the other DSHA MTW participants. As a result, due to HOME Program requirements at Wexford Village, participants receiving assistance through the Project Based Voucher are not required or capable of contributing to an escrow account since these HOME funds do not allow rent to be calculated over the 30% level. DSHA policies regarding escrow are not applicable to them. Since DSHA still wants these residents to have the opportunity to grow self-sufficient through the MTW program, they will still participant in the MTW case management, financial literacy, etc.

IMPACT: By improving housing choices for our residents, DSHA achieved one of the statutory objectives of the MTW program. After the renovation, Wexford Village added an additional 60 units

of affordable housing to DSHA's MTW portfolio, insuring that the apartment community will continue to remain affordable and financially viable for many years to come. In addition, DSHA provides a unique opportunity for mixed-income housing in the community by project-basing 20 existing Housing Choice Vouchers and leasing the remaining 40 units to nonsubsidized families with incomes between 60% and 80% of area median income. This enabled more families to be served by DSHA's MTW program, over and above the 508 public housing units currently owned and managed by DSHA and the 955 vouchers currently administered by the agency.

DSHA finished construction and lease-up of vouchers is in process.

#### **ACTIVITY METRICS INFORMATION**

The following "Standard HUD Metrics" will be used to quantify the changes/results expected from this activity: SS#1, SS#2, SS#3, SS#4, SS#5, SS#6, SS#7 and SS#8.

Due to voucher lease-up, insufficient program participation time and necessary modifications to the Easy Housing resident software for tracking, DSHA is unable to establish accurate baseline performance levels in the FY2016 Annual Report as previously expected. DSHA will establish performance baseline levels in the FY2017 Annual Report.

Due to voucher lease-up, insufficient program participation time and necessary modifications to the Easy Housing resident software for tracking, DSHA is unable to establish accurate yearly benchmarks in the FY2016 Annual Report as previously expected. DSHA will establish benchmarks in the FY2017 Annual Report.

The final projected outcomes will be established in the FY2017 Annual Report.

The Easy Housing resident software and manual tracking methods will be utilized to track and identify performance levels and funding.

#### NEED/JUSTIFICATION/AUTHORIZATIONS FOR MTW FLEXIBILITY

- 1) Attachment C, Authorizations Related to Section 8 Housing Choice Vouchers Only, Section 1, paragraph e. Authorization waives certain provisions of Section 8(0)(13) of the 1937 Act and 24C.F.R 983 as necessary to implement the Agency's annual MTW Plan.
- 2.) Attachment C, Authorization D.7.a, Establishment of an Agency MTW Section 8 Project-Based Program Authorization waives certain provisions of Section 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan.

# Form 50900: Elements for the Annual MTW Plan and Annual MTW Report Attachment B

## **Standard HUD Metrics DSHA Activity C-2 Wexford Village MTW Participation**

## Self Sufficiency

	SS #1: Increase in Household Income					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.		
Average earned income of households affected by this policy in dollars (increase).	Due to voucher lease-up, insufficient program participation time and necessary modifications to the Easy Housing resident software for tracking, DSHA is unable to establish accurate baseline performance levels and benchmarks in the FY2016 Annual Report as previously expected. DSHA will establish performance baseline levels and benchmarks in the FY2017 Annual Report.					

	SS #2: Increase in Household Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.		
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Due to HOME Program fund participants at Wexford do not p result, Wexford Village MTW		djusted gross income. As a			

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job	Head(s) of households in < <category name="">&gt; prior to implementation of the activity (number). This number may be zero.</category>	Expected head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Actual head(s) of households in < <category name="">&gt; after implementation of the activity (number).</category>	Whether the outcome meets or exceeds the benchmark.

Training Program (5) Unemployed (6) Other				
	Percentage of total workable households in < <category name="">&gt; prior to implementation of activity (percent). This number may be zero.</category>	Expected percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Actual percentage of total work-able households in < <category name="">&gt; after implementation of the activity (percent).</category>	Whether the outcome meets or exceeds the benchmark.
Report the following information separately for each category:	Total MTW Participants for FY	*Expected # of households will vary based on MTW participation total. DSHA is able to set % benchmark.	Total MTW Participants for FY	
(1) Employed Full- Time	Due to voucher lease-up, insufficient program participation time and necessary modifications to the Easy Housing resident software for tracking, DSHA is unable to establish accurate baseline performance levels and benchmarks in the FY2016 Annual Report as previously expected. DSHA will establish performance baseline levels and benchmarks in the FY2017 Annual Report.			
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				

(4) Enrolled in Job Training Program		
(5) Unemployed		
(6) Other (Temporary Exempt)		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
DSHA established benchmark based on baseline for FY2016 since implementation occurred in FY2015	FY2016 = 2 households currently receiving TANF; unknown how many received TANF prior	2 households	FY 2016 = 2 households	Outcome meets the benchmark

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase self-sufficiency (increase).	FY 2016 = 11 out of 20 possible PBV voucher households at Wexford Village are receiving MTW services	20 Wexford Village Households	FY 2016 = 11 out of 20 possible PBV voucher households at Wexford Village are receiving MTW services	Outcome does not meet benchmark

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	Due to voucher lease-up, insufficient program participation time and necessary modifications to the Easy Housing resident software for tracking, DSHA is unable to establish accurate baseline performance levels and benchmarks in the FY2016 Annual Report as previously expected. DSHA will establish performance baseline levels and benchmarks in the FY2017 Annual Report.	
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	SS #7: Inc	crease in Tenant Rent :	Share	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rent share in dollars (increase).	Tenant rent share prior to implementation of the activity (in dollars).	Expected tenant rent share after implementation of the activity (in dollars).	Actual tenant rent share after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	necessary modifications DSHA is unable to est benchmarks in the FY203	e-up, insufficient program p to the Easy Housing reside ablish accurate baseline po 16 Annual Report as previc aseline levels and benchma Report.	ent software for tracking, erformance levels and ously expected. DSHA will	

	SS #8: Househo	lds Transitioned to Sel	f Sufficiency	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) prior to implementation of the activity (number). This number may be zero.</pha>	Expected households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Actual households transitioned to self-sufficiency (< <pha definition="" of="" self-sufficiency="">&gt;) after implementation of the activity (number).</pha>	Whether the outcome meets or exceeds the benchmark.
DSHA defines self- sufficiency for the purpose of this metrics as transitioning from subsidized housing to either homeownership or fair market housing.	necessary modifications DSHA is unable to es benchmarks in the FY2	e-up, insufficient program s to the Easy Housing resid tablish accurate baseline p 2016 Annual Report as pre ance baseline levels and be Annual Report.	ent software for tracking, erformance levels and viously expected. DSHA	

#### 4.0 (B.) Not Yet Implemented

DSHA does not have any previously approved activities that have "not yet been implemented".

#### 4.0 (C.) Activities On Hold

DSHA does not have any previously approved activities that are "on hold".

#### 4.0 (D.) Closed Out Activities

DSHA does not have any previously approved activities that are "closed out".

#### **Annual MTW Report**

#### V.3.Report.Sources and Uses of MTW Funds

#### A. MTW Report: Sources and Uses of MTW Funds

#### **Actual Sources and Uses of MTW Funding for the Fiscal Year**

PHAs shall submit their unaudited and audited information in the prescribed FDS format through the Financial Assessment System - PHA (FASPHA), or its successor system

#### Describe the Activities that Used Only MTW Single Fund Flexibility

PHAs shall provide a thorough narrative of each activity that used only the Single Fund Flexibility in the body of the Report. In the narrative, PHAs are encouraged to provide metrics to track the outcomes of these programs or activities. Activities that use other MTW waivers in addition to Single Fund Flexibility do not need to be described in this section because descriptions of these activities are found in either Section (III) Proposed MTW Activities or Section (IV) Approved MTW Activities.

#### V.4.Report.Local Asset Management Plan

#### **B. MTW Report: Local Asset Management Plan**

Has the PHA allocated costs within statute during the plan year?
Has the PHA implemented a local asset management plan (LAMP)?

No

No

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

<u>Yes</u>
<u>Yes</u>

or



In the body of the Report, PHAs should provide a narrative updating the progress of implementing and operating the Local Asset Management Plan during the fiscal year.

#### **V.5.Report.Unspent MTW Funds**

#### **C. MTW Report: Commitment of Unspent Funds**

In the table below, provide planned commitments or obligations of unspent MTW funds at the end of the PHA's fiscal year.

Account	Planned Expenditure	Obligated Funds	Committed Funds
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Туре	Description	0	0
Total O	bligated or Committed Funds:	0	0

In the body of the Report, PHAs shall provide, in as much detail as possible, an explanation of plans for future uses of unspent funds, including what funds have been obligated or committed to specific projects.

<u>Note</u>: Written notice of a definition of MTW reserves will be forthcoming. Until HUD issues a methodology for defining reserves, including a definition of obligations and commitments, MTW agencies are not required to complete this section.

#### 6.0 ADMINISTRATIVE

• Resolution signed by the Director adopting the Annual Plan Certification of Compliance:

See Attachment B for General Order and Certification

• Descriptions of any planned or on-going Agency-directed evaluations of the demonstration, as applicable; and

A resident satisfaction survey has been developed and is sent to Public Housing residents every year.

ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT (HUD 50075.1)

See Attachment A

## **Attachment A**

# Annual Statement/Performance And Evaluation Report



U.S. Department of Housing and Urban Development

Philadelphia Office The Wanamaker Building 100 Penn Square East Philadelphia, Pennsylvania 19107-3380

April 13, 2016

Mr. Anas Ben Addi Executive Director Delaware State Housing Authority 18 The Green, Dover, DE 19901

Dear Mr. Addi:

Enclosed is a fully executed original of the ACC for the Authority's FY 2016 Capital Fund Program funding, Grant #DE01P00450116 in the amount of \$722,948.00.

You are reminded that the Authority cannot begin to undertake, obligate or expend capital funds on physical activities or other choice-limiting actions until the Environmental Review Requirements have been met. Once this has been completed, you may begin to obligate FY 2016 Capital Funds.

Once again, particular attention must be given to expediting the obligation and expenditure of capital funds. This office has approved an implementation schedule for your authority not to exceed April 12, 2018 for the obligation and April 12, 2020 for expenditure of these funds.

If you have any questions, please contact Edward Williams, Revitalization Specialist, at 215-861-7609 or via email at <a href="mailto:edward.williams@hud.gov">edward.williams@hud.gov</a>. Our text telephone number for the hearing impaired is (800) 877-8339.

Sincerely,

Monica A. Hawkins, MBA

Director

Office of Public Housing

Enclosure

www.hud.gov

espanol.hud.gov

#### 2016 Capital Fund

# Capital Fund Program (CFP) Amendment To The Consolidated Annual Contributions

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Contract (form HUD-53012)	
Whereas, (Public Housing Authority)  Delaware State Housing Authority  and the United States of America, Secretary of Housing and Urban Development	DE004 (herein called the "PHA")
Contract(s) ACC(s) Numbers(s) P-4520 dated 2/13/1996	The control of the co
Whereas, HUD has agreed to provide CFP assistance, upon execution of this purpose of assisting the PHA in carrying out development, capital and manage such projects continue to be available to serve low-income families. HUD rese PHA. HUD will provide a revised ACC Amendment authorizing such additional	ment activities at existing public housing projects in order to ensure that rves the right to provide additional CFP assistance in this FY to the
\$ \$722,948.00 for Fiscal Year 2016 to be referred to unc	der Capital Fund Grant Number <u>DE01P00450116</u> Imber: On File
Whereas, HUD and the PHA are entering into the CFP Amendment Number _	
Now Therefore, the ACC(s) is (are) amended as follows:  1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).  2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling	assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.  8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund
units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.	Annual Statement of the Annual PHA Plan. In such case, the PHA shall only
The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must compty with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital	incur additional costs with HUD approval.  9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s). (mark one): Yes No
Fund Five Year Action Plan.  4. For cases where HUD has approved a Capital Fund Financing Amendment	10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.	I1. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements.
5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP another the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.	For <u>fotal conversion</u> of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing projects(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For <u>partial conversion</u> , the PHA shall continue to operate
6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.	each non-converted public housing project as low-income housing in accordance with paragraph 7.  12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time
7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP	period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.
The parties have executed this CFP Amendment, and it will be effective on 4/13 the PHA for obligation.	/2016. This is the date on which CFP assistance becomes available to
By ABPA THE BEAUTY OF HOUSING and Unan Development BR: 1 3 201	PHA (Executive Director or authorized agent)  By Date:
Title	Ange Pen Addi Divector DSUA
Previous versions obsolete	Anas Ben Addi, Director DSHA form HUD-52840-A 03/04/2003

form HUD-50075.1 (07/2014)

Annual St Capital Ft Capital F	Annual Statement/Performance and Evaluation Report Capital Fund Program, Capital Fund Program Replacement Housing Factor and Capital Fund Financing Program	tor and		U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226	g and Urban Development Public and Indian Housing OMB No. 2577-0226
Part I: Summary	ımmary				Expires 06/30/2017
PHA Name: Delaware St	Capital Fund Program Grant No: DE01P00450116 Replacement Housing Authority Replacement Housing Factor Grant No: Date of CFFP.	9116		773	FFY of Grant: FY2016 FFY of Grant Approval:
Type of Gr	Type of Grant  Original Annual Statement  Periormance and Evaluation Report for Period Ending:		Revised Annual Statement (revision no:	on no: )	
Line	Summary by Development Account	Tot	Total Estimated Cost		Total Actual Cost
	1 1 110	Original	Revised <sup>2</sup>	Obligated	Expended
	lotal non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) 3				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
2	1411 Audit				
9	1415 Liquidated Damages				
7	1430 Fees and Costs				
∞	1440 Site Acquisition				
6	1450 Site Improvement				
10	1460 Dwelling Structures				
=	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	722,948			
16	1495.1 Relocation Costs				
17	1499 Development Activities 4				

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.
<sup>4</sup> RHF funds shall be included here.

form HUD-50075.1 (07/2014)

Part B. Summary   Part B. Su	nual St oital Fu oital Fu	Annual Statement/Performance and Evaluation Report Capital Fund Program, Capital Fund Program Replacement Housing Factor and Capital Fund Financing Program			U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 06/30/2017	d Urban Development ic and Indian Housing OMB No. 2577-0226 Expires 06/30/2017
Grant Type and Number Capital Fund Program Clant No: DE01900450116  Capital Fund Program Clant No: DE01900450116  Date of CFFF:	t I: Su	nmary		O JO ALL	rant: FV2016	
Original Annual Statement Original Annual Statement Performance and Evaluation Report To Period Ending:   Prof.   Prof	A Name laware S using Au			FFY of G	rant Approval:	
PHA  Total Estimated Cost  Original Revised Pobligated  Original Revised Dobligated  Signatures  Signatures  Additional Report.  Total Estimated Cost  Revised Poblic Housing Director:  Date  Measures  Additional Statement.  Measures  Measures  Additional Statement.	pe of Gr	Annual Statement		Revised Ann	nal Statement (revision no: nance and Evaluation Report	
1501 Collateralization or Debt Service paid by the PHA     1502 Contingency (may not exceed 8% of line 20)	Perfo	mance and Evaluation Report for Period Ending:	Total Estimated	1 6	l Actual Cost	ended
1901 Collateralization or Debt Service paid by the PHA	30	Sullillady by Development recession	Original	Kevised -		
1502 Contingency (may not exceed 8% of line 20)     1502 Contingency (may not exceed 8% of line 20)     1502 Contingency (may not exceed 8% of line 20)     Amount of line 20 Related to USP Activities     Amount of line 20 Related to Security - Hard Costs     Amount of line 20 Related to Security - Hard Costs     Amount of line 20 Related to Security - Hard Costs     Amount of line 20 Related to Security - Hard Costs     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Measures     Amount of line 20 Related to Energy Conservation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and Evaluation Report or a Revised Annual Statement.     To be completed for the Performance and E	62	1501 Collateralization or Debt Service paid by the PHA				
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Amount of line 20 Related to Security - Soft Costs  Amount of line 20 Related to Security - Hard Costs  Amount of line 20 Related to Security - Hard Costs  Amount of line 20 Related to Energy Conservation Measures  Am		Amount of line 20 Related to LBP Activities				
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Amount of line 20 Related to Energy Conservation Measures  Amount of Line 20 Related to Energy Conservation Measures  To be completed for the Performance and Evaluation Report.  To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  PHAs with under 250 units in management may use 100% of CFP Grants for operations.  **RHF funds shall be included here.**	4	Amount of line 20 Related to Security - Hard Costs				
Anas Ben Addi Maria Mari	5	Amount of line 20 Related to Energy Conservation Measures		D. P. Blie Housing	Date	
1 To be completed for the Performance and Evaluation Report. 3 To be completed for the Performance and Evaluation Report or a Revised Annual Statement. 3 Pp HAs with under 250 units in management may use 100% of CFP Grants for operations. 4 RHF funds shall be included here.	Signatu	Anas Ben Addi	S/11/16 Signature	of Public Housing	Le	1 3 2016
		1 To be completed for the Performance and Evaluation Report. 2 To be completed for the Performance and Evaluation Report or a Revised 3 To be completed for the Performance and Evaluation Report or a Revised 9 P.H.As with under 250 units in management may use 100% of CFP Grants 4 R.H.F funds shall be included here.	Annual Statement.	2		*

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 06/30/2017

Annual Statement/Performance and Evaluation Report Capital Fund Program, Capital Fund Program Replacement Housing Factor and Capital Fund Financing Program

Vork. Development Quan Account No.
1492
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<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement. <sup>2</sup> To be completed for the Performance and Evaluation Report.

Page4

form HUD-50075.1 (07/2014)

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tatement/Performance and Evaluation Report	und Program, Capital Fund Program Replacement Housing Factor and	und Financing Program
Annual Statement	Capital Fund Prog	Capital Fund Fina

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 06/30/2017

	La Franchisto Fund	Financing Program			
Part III: Implementation Schedule for Capital Fund Financing 105 Emm. PHA Name: Delaware State Housing Authority	Housing Authority	r mancing a rogimis			Federal FFY of Grant: FY2016
					Reasons for Revised Target Dates
Development Number Name/PHA-Wide	All Fund (Quarter E	All Fund Obligated (Quarter Ending Date)	All Funds (Quarter El	All Funds Expended (Quarter Ending Date)	Notable 101 to 100 to 1
Activities	Original Obligation End	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
DSHA-DE004	4/13/2018		4/13/2020		
×					
j					

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

## **Attachment B**

**General Order** 

And

**Certification Statement** 

#### **GENERAL ORDER NO. 640**

#### CERTIFICATION OF COMPLIANCE WITH STATUTORY REQUIREMENTS OF THE MOVING TO WORK ANNUAL REPORT FOR FY2016

- WHEREAS, The Delaware State Housing Authority (DSHA) entered into a Moving to Work Restated and Amended Agreement with HUD; and
- WHEREAS, The Moving to Work Restated and Amended Agreement requires that the Delaware State Housing Authority submit an Annual Report; and
- WHEREAS, The Moving to Work Restated and Amended Agreement requires certification that DSHA has met the three statutory requirements for the Moving to Work Program; and
- WHEREAS, The Annual Report shall describe the activities and sources and uses of funding that Delaware State Housing Authority is undertaking through the Moving to Work Program.

#### NOW THEREFORE BE IT ORDERED AS FOLLOWS:

The Delaware State Housing Authority certifies that it has met the following three statutory requirements of;

- Assuring that at least 75 percent of the families assisted by the Agency are very low-income families, and
- Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- Maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

DELAWARE STATE HOUSING AUTHORITY

Anas Ben Addi, Director

## **Attachment C**

## **Section II:**

**General Housing Authority Operating Information** 

WAIT LIST EXPLAINATIONS/ HISTORICAL TABLES,
SOURCES AND USES OF FUNDS NARRATIVE

#### • SIGNIFICANT CAPITAL EXPENDITURES BY DEVELOPMENT-FY2016

This section compares FY2016 budgeted capital work with the actual FY2016 Capital Expenditures by property.

ACTIVITY	COMMUNITIES	ORIGINAL	REVISED	EXPENDED
		BUDGET	BUDGET	
Architect Fees- Re-Paving Parking Lot	Laverty Lane	16,000.00	17,700.00	10,900.00
Architect Fees- Kitchen Replacements	Laverty Lane	18,000.00	19,100.00	7,872.50
Architect Fees- Re-Roofing	Hickory Tree	16,000.00	18,373.90	14,967.28
Re-Roofing	Hickory Tree	721,528.00	738,810.00	738,810.00
Re-Roofing	Holly Square	1,000.00	1,000.00	1,000.00
Management Improvements – Printing	Various Sites	2,080.37	2,080.37	2,080.37
& Bid Advertising				
Administrative Costs	Authority Wide	66,462.77	66,462.77	66,462.77
Capital Program Totals:		841,071.14	863,527.04	842,092.92

#### • DISCUSSION OF THE CAPITAL EXPENDITURE AMOUNTS:

The following are descriptions of the expenditures made during the fiscal year and a status report on Capital Budget activities during FY 2016:

1. Re-Roofing – Roof replacements for all apartment buildings were completed at Hickory Tree during FY2016.

#### 2.0 (C) WAITING LIST INFORMATION

#### WAITING LIST INFORMATION

 Number and characteristics of households on the waiting lists (all housing types) at the end of the plan year:

The waiting list is a <u>combined list</u> for Housing Choice Voucher Program Vouchers and Public Housing. MTW applicants are provided the type of housing that is available when their name comes to the top of the list. The waiting list has been open since 1991, and DSHA anticipates that it will remain open. Prior to the commencement of MTW, the wait for housing ranged from about 8 months for some bedroom sizes in Public Housing, to about 22 months for a Housing Choice Voucher. Currently, the wait for those with an MTW preference and the elderly/disabled is approximately 18 to 24 months for Public Housing and 30-42 months for the Housing Choice Voucher Program.

During FY2016, the actual waiting list decreased by 4%. DSHA updates the waiting list on a monthly basis, sending annual update letters to applicants based on the month the application was originally received. During an average month, 400 to 500 updates are mailed, with a response rate of less than 50%. The majority of applications removed from the waiting list include those submitted by individuals living outside DSHA's jurisdiction.

DSHA has a web-based application process. This system has made applying for housing more accessible to the general public and has increased the number of out-of-jurisdiction applications.

Number of Households on the Waiting List by Bedroom Size on June 30, 2016

Combined Public Housing and Housing Choice Voucher Waiting List							
	Total Households		June 2015				
	June 2015         June 2016         1 BR         2 BR         3 BR         4 BR         5 -				5 + BR		
Family	5,119	4,779	1,216	1,817	1,294	371	80
Elderly/Disabled	2,589	2,649	1,810	495	251	81	12
Total 7,708 7,427 3,026 2,312 1,545 452 92							

Race of households on Waiting List being served as of June 30, 2016

Combined Public Housing and Housing Choice Voucher Waiting Lists						
	Total White Black Alaskan/ Native Asian Pacific American Islander					
Number	7,427	2,450	4,754	148	75	0
Percent	100%	33%	64%	2%	<1%	<1%

Ethnicity of households on Waiting List as of June 30, 2016

Combined Public Housing and Housing Choice Voucher Waiting Lists							
	Total Households Hispanic Non-Hispanic						
Number	7,427	223	7,204				
Percent	100%	3%	97%				

Income of households on the Waiting List as of June 30, 2016

Public Housing and Housing Choice Voucher Waiting Lists						
Total Households Less than 30-50% AMI 50-80% AMI Greater than 80% AMI						
Number of Households	7,427	5,719	1,188	446	74	
Percent	100%	77%	16%	6%	1%	

#### V.3.Report.Sources and Uses

# A. MTW Report: Sources and Uses of MTW Funds for the Fiscal Year 2016

#### **ACTUAL SOURCES OF MTW FUNDS**

FY16 was the 16th year of DSHA's MTW Demonstration. MTW revenue sources for the Delaware State Housing Authority consist of Total Tenant Rental, HUD PHA Operating Grants - Public Housing and Housing Choice Voucher, Capital Grants, Interest Income, and Other Income. Discussed below are the budgeted revenue sources in the FY16 MTW Annual Plan versus actual receipts for the year.

**Total Tenant Rental.** Rental income was budgeted at \$699,600 but actual income was \$753,351. The increase is attributed to the minimum rent being increased to \$50 effective 7/1/2015.

**HUD PHA Operating Grants.** The HUD PHA Operating Grants consists of Public Housing Operating Grant and Housing Choice Voucher.

The agency receives an operating grant for its Public Housing units based on prior year PUM levels increased by inflation rates and utility rates with consumption estimates per DSHA's MTW agreement. The approved subsidy for CY15 was \$2,962,090 and the estimated subsidy for CY16 \$3,159,673. FY16 is funded by 50% from each of CY15 and CY16. The FY16 actual subsidy revenue receipts of \$3,055,629 were in line with the budgeted anticipated subsidy revenue of \$3,053,700.

The grant calculation received each fiscal year for the Housing Choice Voucher Program is described in the MTW Agreement. The HUD approved grant amount for CY15 and CY16 was \$7,526,407 and \$7,402,489 respectively. FY16 is funded by 50% from each of CY15 and CY16. The FY16 budget annualized January & February 2016 actual receipts at 92% proration which equaled \$7,035,992 while actual budget authority was \$7,510,100. FY16 budget authority was more than anticipated with HUD approving funding for CY15 at 101.249% and for CY16 at 99.582%. FY16 actual funding based on VMS HAP expenses and administrative expenses was \$6,254,817 due to leasing less than 904 vouchers.

**Capital Grants.** In accordance with new guidelines under GAAP, the revenue reported as budgeted is the amount that the agency actually anticipates receiving for all years funded, not the amount that the agency anticipates being awarded in new funds in FFY16. In FY16, revenue received to cover contractual obligations was \$842,093. This is more than the budgeted amount of \$570,590.

**Investment Income.** In FY16, Investment Income earned totaled \$901 due to MTW Reserves being held in an interest bearing money market account.

**Other Income.** Total other income for the MTW program was \$546,758 which is more than the budgeted amount of \$409,870. Public Housing's other income in the amount of \$189,079 includes \$69,678 in laundry and telephone receipts and maintenance, court, return check and late fees received from tenants. Also included are forfeited MTW escrow savings in the amount of \$85,951, \$16,650 from Daycare Centers located at Laverty Lane and Hickory Tree and \$16,800 in community building rental at Holly Square.

The Section 8 Voucher Program other income of \$357,679 includes \$306,161 portable income, \$5 for restitution payments, and \$51,513 for forfeitures of MTW escrow savings. Other income was more than anticipated this year due to a portion of the MTW accounts forfeiting a portion of their balance upon entering Year 6 or Year 7, Tier II status, of their MTW contract. Forfeitures occur when a tenant voluntarily leaves the MTW Program, does not complete the COMP (Contract of Mutual Participation), is dismissed from the Program, ends their MTW contract with the MTW Program unsuccessfully, or enters Year 6 or 7 of their contract when they are only eligible for a portion of their balance.

#### **ACTUAL USES OF FUNDS**

MTW program expenses for FY16 consist of Total Operating – Administrative, Total Tenant Services, Total Utility, Labor, Total Ordinary Maintenance, Total Insurance Premiums, Total Other General Expenses, HCV Housing Assistance Payments and Capital Grant Expenses. A broad overview of budget versus actual expenditures is listed below.

**Total Operating - Administrative.** The Public Housing Program has administrative expenses to include salaries, legal, staff training/travel, auditing fees, supplies and postage where appropriate. The Public Housing and Capital Fund programs direct charges all salaries pertaining to the program. Administrative expenses in the amount of \$759,709 are greater than the budget amount of \$723,920 due to higher than anticipated Court Fees in the amount of \$25,677.

The Housing Choice Vouchers Program has administrative expenses to include salaries, legal, staff training/travel, auditing fees, supplies and postage where appropriate. Administrative expenses in the amount of \$821,288 are more than the budget amount of \$796,200 due to higher than anticipated training expenses.

**Total Tenant Expenses.** The Public Housing Total Tenant expense budget in the amount of \$45,830 includes funding for educational and recreational activities for children, self-sufficiency training, internet access at all sites, computer training programs and funding for organized tenant council expenses. There were no tenant council expenses in FY16. However, Total Tenant Expenses totaled \$64,959 due to DSHA paying a portion of Summer Camps provided by University of Delaware. Financial counseling for Public Housing and Section 8

residents is provided in house by DSHA staff.

**Total Utility.** FY16 utilities were budgeted at \$467,180. FY16 utility expenses of \$461,810 were slightly lower than the budget amount.

**Labor.** Labor consists of maintenance salaries of public housing site personnel. FY16 labor was budgeted at \$563,010. FY16 labor expenses of \$503,242 were less than the budgeted amount by 11%.

**Total Ordinary Maintenance.** Total Ordinary Maintenance includes materials/supplies, and contractual costs including trash pickup, grass cutting, exterminating and routine painting of empty units at all sites are combined in this category. FY16 ordinary maintenance was budgeted at \$1,064,590. FY16 ordinary maintenance expenses of \$1,271,425 were more than budgeted due to higher than budget contractual services. Housing Choice Voucher costs of \$47,155 were higher than the budgeted amount of \$28,830 due to higher than anticipated employment services expenses.

**Total Insurance Premiums.** Total Insurance Premiums includes insurance coverage costs for Public Housing and Housing Choice Voucher personnel and properties. Public Housing insurance costs of \$181,870 were higher than the budgeted amount of \$158,320 due to increased Workers Compensation expense. Housing Choice Voucher insurance costs of \$2,360 were higher than the budgeted amount of \$1,550.

**Total General Expenses.** Grouped in this area are payments in lieu of taxes to counties and school districts, employee benefit contributions, and collection loss. Expenses were higher than budgeted amount.

**HCV Housing Assistance Payments.** Housing Assistance Payments in the amount of \$5,402,461 were 101% of the budgeted amount of \$5,364,510 due to increasing vouchers issued and increasing per voucher HAP costs.

**Capital Grant Expenses.** Funds from the Capital Fund Program were used for salary and fringe benefit costs for 1 employee, repaving and kitchens at Laverty Lane, and roofing at Holly Square and Hickory Tree.

# Actual Sources and Uses of Non-MTW Federal Funds for the Fiscal Year 2015

#### **ACTUAL SOURCES OF NON-MTW FEDERAL FUNDS**

Non-MTW revenue sources for the Delaware State Housing Authority consist of Family Unification

Program (FUP) Funds. In FY16, DSHA received \$332,631 in FUP funds.

#### **ACTUAL USES OF FUNDS**

Non-MTW funds were used to pay Family Unification Program (FUP) expenses in the amount of \$310,781.

#### Describe the Planned vs. Actual Uses of MTW Single-Fund Flexibility

The ability to combine Public Housing and Housing Choice Voucher funding into a single, block grant funding source has allowed DSHA the flexibility to utilize Housing Choice Voucher reserves for capital improvements up to and above the amount of funding provided by Public Housing Capital Funds. This includes the installation of air conditioning and replacement of heaters in most public housing units and the installation of security cameras at several public housing sites. It has also allowed DSHA to properly maintain and operate its public housing communities in years when overall program funding has been reduced. Additionally, many MTW activities such as resident case management, housing and credit counseling, and other resident services have been provided using combined Public Housing and Housing Choice Voucher funds. Identified and Implemented in initial plan of FY2000.

The utilization of the fungibility of funds available to DSHA through the MTW Agreement was not used in FY2016.

#### V.4.Report.Local Asset Management Plan

#### **B. MTW Report: Local Asset Management Plan**

<u>Purpose</u>: This Local Asset Management Plan has been established pursuant to the requirements of Section 6 of the First Amendment to the MTW Agreement.

<u>Project-Based Management</u>: DSHA has always operated its Public Housing sites utilizing the principles of project-based management. This means that DSHA has a decentralized management of its Public Housing sites with managers and maintenance staff assigned to each and responsible for each site so assigned. The manager at each site therefore has the responsibility for the maintenance of all the facilities through approvals of maintenance work orders and of outside contractors when these need to be called in. Managers are evaluated based upon REAC scores, unit turnovers, tenant account receivables, and other performances measures designed to ensure each site is managed to the highest standards.

<u>Project-Based Budgeting</u>: DSHA has strengthened the role of the Public Housing Managers in the process of establishing budgets for each site. Draft project-based accounting budget vs. actual from the prior fiscal year and tentative allocations for the coming fiscal year (based upon the expected level of HUD subsidy distributed on a per unit basis) are provided to each manager for their review.

Each budget line and its assumptions are scrutinized, and then each project budget is reviewed in a meeting with the DSHA Director, the Housing Management Program Administrator, and senior financial staff. After this meeting the project budgets are finalized, which are then rolled into the budget for the MTW Plan submission.

<u>Project-Based Accounting</u>: Project-based accounting reports are provided to managers on a quarterly basis, with monthly expenditure reports provided throughout the year. The quarterly project-based accounting reports and any variance of 10 percent or more are reviewed with senior management staff. Because the mix of families participating in the MTW savings program negatively affects the cash flow of each site, reducing the available revenue through sweeps to MTW savings account, the budgeting process holds site managers harmless with the respect to decreased revenue from this source.

<u>Financial Management</u>: With respect to financial management, DSHA's cost accounting and financial reporting methods are in conformance with OMB Omni-Circular and Generally Accepted Accounting Practices (GAAP). These are no exceptions to HUD guidance. The cost approach for each of the three federal funding sources under MTW is noted below for FY15 and FY16:

	<u>FY15</u>	<u>FY16</u>
Public Housing	Direct charge	Direct charge
Sec. 8 Voucher	Direct charge	Direct charge
Capital Fund	Direct charge	Direct charge

Although DSHA has an approved Indirect Cost Allocation Plan covering the three programs under MTW, it is choosing to direct charge these programs at this time.

## **Attachment D**

# **RAD Significant Amendment**

(DSHA successfully applied for RAD during FY2016)

#### Rental Assistance Demonstration (RAD) Significant Amendment

The Delaware State Housing Authority (DSHA) amended its FY2017 Annual MTW Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD) during FY2016. As a result, DSHA will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices.

Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17; These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, DSHA certifies that it is currently compliant with all fair housing and civil rights requirements,

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing DSHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that DSHA may also borrow funds to address their capital needs.

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

#### Development #1

NAME:	PIC #	Conversion Type::	No Transfer of
Liberty Court	DE004000012	PBV	Assistance
UNIT COUNT:	Unit Type-Pre RAD:	Unit Type-Post RAD	Cap. Fund:
108 Units	Family Housing	Family Housing	\$153,698
Bedrooms Types:	# Units Pre Conv. 108	# Units Post Conv. 100	Change in # Units: 8 (2BR) units to be removed due to condition of units and economic cost to renovate and restore
	0.5		8 units
One Bedroom	25	25	
Two Bedroom	71	63	
Three Bedroom	12	12	

# Development #2

NAME:	PIC#	Conversion Type::	No Transfer of
McLane Gardens	DE004000005	PBV	Assistance
UNIT COUNT:	Unit Type-Pre RAD:	Unit Type-Post RAD	Cap. Fund:
50 Units	Family Housing	Family Housing	\$71,156
Bedrooms Types:	# Units Pre Conv.	# Units Post Conv.	Change in # Units:
	50	50	N/A
One Bedroom	12	12	
Two Bedroom	18	18	
Three Bedroom	12	12	
Four Bedroom	7	7	
Five Bedroom	1	1	

# Development #3

NAME:	PIC#	Conversion Type::	No Transfer of
Mifflin Meadows	DE004000003	PBV	Assistance
UNIT COUNT:	Unit Type-Pre RAD:	Unit Type-Post RAD	Cap. Fund:
54 Units	Family Housing	Family Housing	\$76,,849
Bedrooms Types:	# Units Pre Conv.	# Units Post Conv.	Change in # Units:
	54	54	N/A
One Bedroom	6	6	
Two Bedroom	8	8	
Three Bedroom	24	24	
Four Bedroom	12	12	
Five Bedroom	4	4	

# Development #4

NAME:	PIC#	Conversion Type::	No Transfer of
Peach Circle/Holly	DE004000019	PBV	Assistance
Square			
UNIT COUNT:	Unit Type-Pre RAD:	Unit Type-Post RAD	Cap. Fund:
56 Units	Senior/Disabled	Senior/Disabled	\$79,695
Bedrooms Types:	# Units Pre Conv.	# Units Post Conv.	Change in # Units:
1 BR Units	56	56	N/A
One Bedroom	56	56	

# Changes in Policies that Govern eligibility, admissions, resident selection and occupancy of units:

When conversion is completed for the developments noted above, all residents will have project based vouchers (PBV) and their continued eligibility will be based on the Housing Choice Voucher guidelines and requirements currently in use at DSHA.

- 1. Admission: The waiting lists will be based on a centrally located list maintained by our exiting Waiting List Office. Currently both the Public Housing and Housing Choice Vouchers lists are combined and centrally administered. As each development is converted, a separate list will be maintained for these properties. DSHA applications will be revised to indicate the availability to apply for a project based voucher. The Waiting List Office shall also screen applicants for criminal history, landlord references, debts owed to HUD programs and income/family eligibility. Home Visits will be conducted by the Management Staff from each development.
- Occupancy of Units: As noted above, applications for units will be processed and screened by the Waiting List Office. Once a client has been screen and accepted, their file will be referred to the development where the client is eligible for housing and there is a vacancy.
   Management Staff from each development will conduct home visits, and schedule move-in's with the applicants.
- 3. **Annual Inspections/Re-certifications**: The existing DSHA Housing Choice Voucher Office will conduct annual inspections for all units and perform annual re-certifications for residents. Elderly & Disabled residents will be re-certified biennially.
- 4. **Resident Rights:** Converted developments will be managed in accordance with state law under the Delaware Landlord-Tenant Code. In reference to their Project Based Voucher, they will receive the same rights and obligations as any other Housing Choice Voucher participant, including termination of assistance criteria and hearings.

# Resident Rights, Participation, Waiting List and Grievance Procedures If converting to PBV:

PIH Notice 2012-32, REV-2 Section 1.6.C & Section 1.6.D

## 1.6 C-PBV Resident Rights and Participation.

- 1. No Re-screening of Tenants upon Conversion. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.24 Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.
- **2. Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.
- 3. Renewal of Lease. Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

#### Three Year Phase-in:

**Year 1**: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP

**Year 2:** Year 2 Annual Recertification (AR) and any Interim Re-certification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP

**Year 3:** Year 3 AR and all subsequent re-certifications

#### Full standard TTP Five Year Phase in:

**Year 1:** Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP

**Year 2:** Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP

**Year 3:** Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP

**Year 4:** Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

*Please Note*: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this

# 5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs: Not Applicable

- <u>6. Resident Participation and Funding.</u> In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
- **7.** Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
- i. **Termination Notification**. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
- a. A reasonable period of time, but not to exceed 30 days:
- i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or ii. In the event of any drug-related or violent criminal activity or any felony conviction;
- b. 14 days in the case of nonpayment of rent; and
- c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
  a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
- i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
- ii. For any additional hearings required under RAD, the Project

Owner will perform the hearing.

- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

- 8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.
- <u>9. Jobs Plus.</u> Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant re-location and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.
- **10.** When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment.

HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.27 In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident.

Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 sub-module in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

11. Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

#### 1.6-D. PBV: Other Miscellaneous Provisions

# 1. Access to Records, Including Requests for Information Related to Evaluation of

<u>Demonstration</u>. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

- <u>2. Additional Monitoring Requirement.</u> The PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.
- <u>3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).</u> This section has been moved to 1.4.A.13 and 1.4.A.14.

- **4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
- i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.
- **ii.** Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.
- iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list.

In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the

population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

To implement this provision, HUD is specifying alternative requirements for 24 CFR

§ 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

- <u>5. Mandatory Insurance Coverage.</u> The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- **<u>6. Agreement Waiver.</u>** This section has been moved to 1.6.(B)(7).

funding for converted units during this time.

**7. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

# 8. Administrative Fees for Public Housing Conversions during Transition Period.

For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee

For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV

RAD units. After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

**9. Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance. If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy,

HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community.

Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan. To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

**10. Reserve for Replacement**. The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement.

For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines and as directed by HUD.

## Joint Housing/PIH Notice H-2014-09/ PIH-2014-17

Subject: Relocation Requirements under the Rental Assistance Demonstration (RAD) Program,
Public Housing in the First Component

#### 1. Purpose

This Notice provides public housing agencies (PHAs)1 and their partners with information and resources on applicable program and relocation assistance requirements when planning for or implementing resident moves as a result of a **Rental Assistance Demonstration (RAD)** conversion2 under the first component of the demonstration.3 This Notice provides guidance on RAD relocation requirements and requirements of the Uniform Relocation Assistance and Real Property Acquisition

Policies Act of 1970, as amended, (URA), as they relate to the public housing conversion process under the first component.

- 1. This Notice always uses the term "PHA" to refer to the owner of the project prior to and after the RAD conversion, even though, in some cases, the owner of the converted RAD project may be another public entity, a non-profit organization, or other owner (e.g., low-income housing tax credit owner). In addition, this Notice uses "PHA" to refer to the "displacing agency," a URA term that means the agency or person that carries out a program or project, which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, may require substituting in a reference to a party that is more appropriate for a specific project.
- 2. The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.
- 3. The "first component" of RAD allows public housing and Moderate Rehabilitation properties to convert assistance; the "second component" refers to conversion of Rent Supplement, Rental Assistance Payment, and Moderate Rehabilitation properties upon contract expiration or termination.
- 4. Relocation concerns and URA requirements apply to both components of RAD. This notice provides guidance only as to the first component.

Relocation assistance provided pursuant to public housing and RAD requirements is broader than URA relocation assistance requirements. Not all specific situations requiring relocation under RAD may trigger URA assistance requirements. In addition, whereas all qualifying residents of a converting public housing project are eligible for relocation assistance under RAD, some residents or household members may not meet the statutory and regulatory requirements for eligibility under URA.

This Notice supersedes PIH Notice 2012-32 (HA), REV-1, with respect to relocation matters. This Notice also specifically addresses when relocation may begin (see Section 9 below). As necessary, the Department will issue additional guidance on relocation issues and requirements as they relate to RAD.

5 The term "resident" as used in this Notice refers to eligible resident families of public housing residing in a property applying for participation in RAD or a property that undergoes a conversion of assistance through RAD.

#### 2. Background

RAD allows public housing properties to convert assistance to long-term project-based Section 8 contracts. In many cases, a RAD project may require relocation of residents when properties undergo repairs, are demolished and rebuilt, or when the assistance is transferred to another site. PIH Notice 2012-32 REV-1 (see also FR Notice 5630-N-05, 78 FR 39759-39763 (July 2, 2013)) details RAD program requirements.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) is a federal law that establishes minimum standards for federally-funded programs and projects that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition of real property.6 The URA will apply to acquisitions of real property and relocation of persons from real property that occurs as a direct result of acquisition, rehabilitation, or demolition for a project that involves conversion of assistance to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA) programs under RAD.

Additionally, all relocation conducted as part of a RAD conversion and all relocation assistance provided under URA must be consistent with applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Because each RAD proposal varies in its scope, this Notice may not address each PHA's specific circumstances. RAD PHAs and participants should carefully review the regulations, notices, and guidance material referenced in this Notice. Any questions related to the applicability of these requirements should be referred to the RAD Transaction Managers (TM) or may be emailed to rad@hud.gov.

# 3. Applicable Legal Authorities

November 18, 2011), with the implementing PIH Notice 2012-32, REV-1 □ URA statute and implementing regulations: 49 CFR part 24 □ FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act □ Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C	RAD: Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved
□ FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act □ Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing	November 18, 2011), with the implementing PIH Notice 2012-32, REV-1
Housing Act $\Box$ Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing	☐ URA statute and implementing regulations: 49 CFR part 24
$\Box$ Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing	$\Box$ FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair
	Housing Act
	$\square$ Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C

#### 4. Relocation Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a project converting under RAD, PHAs must undertake a planning process in conformance with URA in order to minimize the adverse impact of relocation (49 CFR 24.205(a)). While a written Relocation Plan is not a requirement under RAD or URA, the Department strongly encourages PHAs to prepare a written Relocation Plan, both to establish their relocation process and to communicate this process consistently and effectively to all relevant stakeholders. Appendix 1 contains recommended elements of a Relocation Plan.

The following presents a general sequencing of relocation planning activities within the RAD milestones:

<u>Stage</u>	Activities
1. Prior to submission of RAD application	<ul> <li>□ Determine potential need for relocation</li> <li>□ Meet with residents to discuss plans, communicate right to return, and solicit feedback</li> <li>□ Provide General Information Notice (GIN) to residents</li> <li>□ Survey residents to prepare Relocation Plan and relocation process cost estimate</li> </ul>
2. After receipt of the Commitment to Enter into a HAP Contract (CHAP) Award	<ul> <li>□ Prepare Significant Amendment to PHA</li> <li>Plan</li> <li>□ Assess and refine need for relocation</li> <li>□ Develop a Relocation Plan (See Appendix</li> <li>1 for recommended content)</li> <li>□ Identify relocation housing options</li> </ul>
3. Preparing Financing Plan (due to RAD Transaction Manager no later than 180 days following Chap award).	<ul> <li>□ Budget for relocation expenses</li> <li>□ Submit FHEO Accessibility &amp; Relocation checklist (PHAs may submit Relocation Plan along with checklist.</li> </ul>
4. Receipt of RAD Conversion Commitment (RCC)	<ul> <li>□ The date of issuance of the HUD RCC marks the date of "Initiation of Negotiations" (ION), as defined in the URA (49 CFR 24.2(a)(15))</li> <li>□ Provide residents with appropriate notice informing them if they will be relocated and any associated relocation assistance</li> <li>□ Meet with residents to describe approved conversion plans and discuss required relocation</li> </ul>
5. Closing/RAD conversion	☐ Generally, resident relocation should not begin until after the date of closing/conversion of assistance under RAD ☐ PHAs must adhere to notification requirements (described in Paragraph 8 of this Notice): generally, a minimum of 30 days for residents to be temporarily relocated for up to a year, and 90 days for permanent relocation ☐ PHAs seeking to move residents prior to

closing must receive prior approval from HUD as described in Paragraph 9 of this Notice.

# 5. Resident Right to Return

RAD program rules prohibit the permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed and is in decent, safe, and sanitary conditions. The period during which residents may need to be temporarily relocated is determined by the period of rehabilitation or construction, which will be specific to each project.

Where If proposed plans for a project would preclude a resident from returning to the RAD project, the resident must be given an opportunity to comment and/or object to such plans. If the resident objects to such plans, the PHA must alter the project plans to accommodate the resident in the converted project. If a resident agrees to such plans, the PHA must secure informed, written consent from the resident to receive permanent relocation assistance and payments consistent with URA and acknowledge that acceptance of such assistance terminates the resident's right to return to the project. In obtaining this consent, PHAs must inform residents of their right to return, potential relocation, and temporary and permanent housing options at least 30 days before residents must make a decision. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting permanent relocation assistance and payments.8 A PHA may not terminate a resident's lease if it fails to obtain this consent.

PHAs must keep documentation of such information provided to residents and such consent by residents. While HUD does not require PHAs to submit documentation of obtaining this consent, PHAs and participants must properly brief residents on their housing and relocation options and must keep auditable written records of such consultation and decisions. HUD may request this documentation during a review of the FHEO Relocation and Accessibility Checklist or if relocation concerns arise.

Examples of project plans that may preclude a resident from returning to the converted RAD project
include, but are not limited to:
☐ Changes in bedroom distribution (i.e. when larger units will be replaced with smaller units such
that current residents would become under-housed or when smaller units will be replaced with large
units such that current residents would become over-housed);
☐ Where a PHA is reducing the number of assisted units at a property by a de minimis amount9, but
those units are occupied by assisted residents; or
☐ The reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to
facilitate social service delivery.

In all scenarios where residents voluntarily accept permanent relocation to accommodate project plans, these residents are eligible for permanent relocation assistance and payments under URA. If a resident accepts permanent relocation assistance, the resident surrenders his or her right to return to the completed project.

#### **6. Relocation Assistance**

Under RAD, relocation assistance may vary depending on the length of time relocation is required. a. In instances when the PHA anticipates that a resident will be relocated for more than a year, the PHA must offer the resident the choice of:

☐ Permanent relocation assistance and payments at URA levels; or
$\Box$ Temporary relocation assistance, including temporary housing, while the resident retains his or her
right to return and reimbursement for all reasonable out-of-pocket expenses associated with the
temporary relocation.

The PHA must give the resident no less than 30 days to decide between permanent and temporary relocation assistance. If the resident elects to permanently relocate with assistance at URA levels, the PHA must inform the resident that his or her acceptance of permanent relocation assistance terminates the resident's right to return to the completed RAD project.

b. In instances when a resident elects temporary relocation assistance and reoccupies a unit in the completed project within one year, the resident need not be offered permanent relocation assistance pursuant to URA. Great care must be exercised to ensure that residents are treated fairly and equitably. If a resident is required to relocate temporarily in connection with the project, his or her temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation.

These expenses include, but are not limited to, moving expenses and increased housing costs during the temporary relocation.

c. In the event that a resident elects to receive temporary relocation assistance and the temporary relocation exceeds one year, the resident becomes eligible for all permanent relocation assistance and payments under URA. (This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.) In such event, the PHA shall give the resident the opportunity to choose to remain temporarily relocated for an agreed-to period (based on new information about when they can return to the completed RAD unit), or choose to permanently relocate with URA assistance.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA. If the resident elects to permanently relocate with URA assistance, the PHA must inform the person that the person's acceptance of URA relocation assistance to permanently relocate will terminate the person's right to return to the completed RAD project.

Conversely, unless and until the resident elects to be permanently relocated, the resident may remain temporarily relocated with a right to return to the completed project.

#### 7. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is generally effective on the date of initiation of negotiations (ION) (49 CFR 24.2(a)(15)). For RAD projects, the ION date is the date of the issuance of the RAD Conversion Commitment (RCC).

#### 8. Resident Notification

When a project converting under RAD will include relocation of residents, notice must be provided to those resident households. For each notice listed below, one notice shall be given to each resident household. The purpose of these notifications is to ensure that residents are informed of their potential rights and the relocation assistance available to them. During initial meetings with residents about RAD and in subsequent communications with residents related to relocation, the PHA should inform residents that if they choose to move after receiving a written GIN, but prior to receiving a RAD Notice of Relocation, they may jeopardize their eligibility for relocation assistance. However, PHAs should note that a resident move undertaken as a direct result of the project may still require relocation assistance and the resident may be eligible to receive permanent relocation assistance under the URA even though the PHA has not yet issued notices.

#### a. General Information Notice (49 CFR 24.203(a) & Handbook 1378, Paragraph 2-3(B))

As soon as feasible in the planning process, the PHA must provide each resident with a written GIN (see sample in Appendix 2) to provide a general description of the project, the activities planned, and the relocation assistance that may become available. URA regulations state that the GIN should be provided as soon as feasible.
Under RAD, PHAs must provide GINs during the initial RAD resident meetings, before submitting a RAD application. GINs must do at least the following:
☐ Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
☐ Inform the resident that he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to nelp the resident successfully relocate;
☐ Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without at least 90 days advance written notice, and inform any person to be displaced from a dwelling that he or she cannot be required to move be be be be comparable replacement dwelling has been made available;
☐ Inform the resident that any person who is an alien not lawfully present in the United States is neligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 CFR 24.208(h) for additional information); and

$\Box$ Describe the resident's right to appeal the PHA's determination as to a person's eligibility for URA assistance.
b. RAD Notice of Relocation
If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide notice of such relocation (RAD Notice of Relocation). The PHA shall issue this notice upon the PHA's receipt of the RCC from HUD, which is the ION date.
If residents will not be relocated, notice of relocation is not required, but the PHA should notify them that they are not being relocated.
The RAD Notice of Relocation must conform to the following requirements:  ☐ The notice must state the anticipated duration of the resident's relocation.
□ PHAs must provide this notice a minimum of 30 days prior to relocation to residents who will be temporarily relocated.12 Longer notice may be appropriate for persons who will be relocated for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.  □ Residents whose temporary relocation is anticipated to exceed one year must be informed that they will have no less than 30 days to elect temporary or permanent relocation as described in Section 6 of this Notice. When timing is critical for project completion, the 30-day decision period can run concurrently with the 30-day notice period for temporary relocation and with the 90-day period for permanent relocation if the PHA makes available comparable replacement dwellings consistent with 24.204(a).  □ Residents who will be permanently relocated must receive written notice a minimum of 90 days
prior to relocation. This 90-day time period may only begin once the PHA has made available at least one comparable replacement dwelling consistent with 49 CFR 24.204(a).13
☐ The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
$\Box$ The notice must explain the reasonable terms and conditions under which the resident may continue to lease and occupy a unit in the completed project.
☐ The notice must state that the PHA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move. These expenses include, but are not limited to moving expenses and increased housing costs (rent_utilities_etc.)

# c. Notice of Intent to Acquire (49 CFR 24.203(d))

For RAD projects involving acquisition, residents may be provided with a notice of intent to acquire ("Notice of Intent to Acquire") prior to the ION date with HUD's prior approval. Once the Notice of Intent to Acquire is provided, a resident's eligibility for relocation assistance and payments is established. Therefore, the RAD Notice of Relocation must be provided in conjunction with or after

the Notice of Intent to Acquire. A RAD Notice of Relocation would not otherwise be sent prior to the ION date.

Since residents who accept permanent relocation must receive 90 days advanced written notice prior to being required to move, providing residents the Notice of Intent to Acquire and RAD Notice of Relocation prior to the ION date may be necessary to provide sufficient notice of relocation to a resident in instances where there may not be 90 days between the issuance of the RCC (ION date) and the anticipated closing date. This allows the PHA to issue the notice earlier so that relocation may begin upon closing. This allows program participants to conduct orderly relocation upon closing, minimize adverse impacts on displaced persons, and to expedite project advancement and completion.

# d. URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 CFR 24.203(b) & Handbook 1378, Paragraph 2-3(C))

After a resident has been temporarily relocated for one year, the PHA must provide a notice of relocation eligibility in accordance with URA requirements ("Notice of Relocation Eligibility"). This notice is not required if the resident has already accepted permanent relocation assistance. The Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 CFR Part 24, to HUD Handbook 1378 and to the following requirements:

The PHA must provide updated information as to when it is anticipated that the resident will be able to return to the completed project.

The resident may choose to remain temporarily relocated based upon such updated information or may choose to accept permanent URA relocation assistance in lieu of exercising the right to return.

If the resident chooses to accept permanent URA relocation assistance and such assistance requires that the resident move, the URA requires such resident to receive 90 days advance written notice of the earliest date they will be required to move (i.e., 90-Day Notice, 49 CFR 24.203(c)). The PHA should be mindful that the 90-day time period may only begin once the PHA has made available at least one "comparable replacement dwellings" as set forth in 49 CFR 24.204(a).

#### 9. Initiation of Relocation

Unless otherwise approved by HUD, relocation may not begin until the date of closing of the RAD transaction and recordation of the RAD Use Agreement. PHAs must provide residents being temporarily relocated at least 30 days advance written notice of the required move. PHAs must give residents being permanently relocated at least 90 days advance written notice of the required move. This means PHAs are advised to plan carefully to account for this 30-day or 90-day notice period to ensure the closing is not delayed.

However, HUD is aware that, in rare cases, some project plans necessitate relocation prior to closing. With prior HUD approval, for projects involving acquisition, PHAs may relocate residents prior to the closing date subject to public housing requirements (see 24 CFR part 5 and 24 CFR 966). PHAs must contact their assigned RAD transaction manager (TM) to discuss plans as early as possible in the process to ensure compliance with all RAD and URA requirements.

If relocation prior to closing is desired, PHAs should submit to the TM the following information, as early as possible in the process:  A written request for relocation prior to closing. The request must include justification of why the early relocation is necessary for the viability of the RAD transaction. Justification may include the presence of outside financing, such as Low Income Housing Tax Credit (LIHTC) awards, if the PHA can show that early relocation is necessary to meet critical LIHTC deadlines.  FHEO Accessibility and Relocation Checklist.
Evidence of intent to comply with public housing requirements, as applicable. Generally, public housing regulations require public housing residents to receive 30 days' notice prior to relocation and that such notice either be published in the PHA's admissions and continued occupancy policies (ACOP) or published elsewhere at least 30 days prior to receipt of such notice (24 CFR parts 5 and 966).
When seeking to relocate residents prior to closing, submission of this request as early as possible is preferred, prior to the 180-day Financing Plan milestone if possible (with Financing Plan submission following the request).
HUD reserves the right to request additional follow-up information, including a Relocation Plan and related budget, prior to approving such requests. PHAs must receive written HUD approval before beginning relocation of residents prior to closing.  Early planning and submission of the Financing Plan and FHEO checklist to HUD will ensure the PHA has built in the 30- or 90-day notice period prior to initiating relocation.
10. Fair Housing and Civil Rights Requirements
PHAs must comply with all applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. Further, communication must be provided in a manner that is effective for persons with disabilities (24 CFR 8.6) and for person who are Limited English Proficient (see 72 FR 2732). This section discusses some of the PHA's obligations under these laws and regulations.
However, the applicability of civil rights laws is not limited to the activities discussed in this section. PHAs conducting relocation activities should familiarize themselves with applicable civil rights statutes, regulations, and guidance, including but not limited to, those listed at the end of this section.

☐ Effective Communication for Persons with Disabilities: Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6), and as applicable, the Americans with Disabilities Act; and for persons who are limited English proficient (see

72 Fed Reg 2732). This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.
Accessible Meeting Facilities for Persons with Disabilities: When holding public meetings, PHAs must give priority to methods that provide physical access to individuals with disabilities, i.e., holding the meetings, workshops, and briefings or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden, in which case the PHA must take any action that would not result in such an alteration or such burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible, in-home briefing. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs.
The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with nondisabled person to the fullest extent possible (28 CFR part 35, appendix B).
☐ Meaningful Access for Persons with Limited English Proficiency (LEP): PHAs must provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English. Any person with LEP who will be temporarily relocated or permanently displaced must have meaningful access to any public meetings regarding the project. In addition, any information provided to residents including, but not limited to, any notices required under the URA, should be provided in the appropriate language to persons with LEP. Generally, PHAs will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.
□ <b>URA requires</b> that PHAs provide persons who are unable to read or understand the notices, such as persons with disabilities or persons with LEP, with appropriate translation and counseling to ensure that they understand their rights and responsibilities and the assistance available to them (49 CFR 24.5). URA also requires that each notice indicate the name and telephone number of a person to contact with questions or for other needed help (49 CFR 24.5). This notice should include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable (24 CFR 8.6(a)(2)).
□ Comparable Housing for Persons with Disabilities: PHAs should identify the accessibility needs of residents to be relocated by consulting existing information (e.g., tenant characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations, and records of the presence of accessible unit features). For guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.
☐ <b>Advisory Services</b> : PHAs should determine the advisory services that will be necessary to ensure a successful relocation program consistent with 49 CFR 24.205(c). Such advisory services may include housing counseling that should be facilitated to ensure that residents affected by the project

understand their rights and responsibilities and the assistance available to them (49 CFR 24.205(c)). Advisory counseling must also inform residents of their fair housing rights and be carried out in a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 CFR 24.205(c)(1)). In addition, PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

Fair Housing References:
☐ Section 504 of the Rehabilitation Act of 1973
□ Regulations: 24 CFR part 8
☐ Fair Housing Act Regulations: 24 CFR part 100
☐ Title VI of the Civil Rights Act of 1964
□ Regulations: 24 CFR part 1
☐ Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) (72 FR 2732)
$\ \square$ Exhibit 3-1 Compliance with Section 504 of the Rehabilitation Act in HUD Handbook 1378 (Tenant Assistance Relocation and Real Property Acquisition)

#### **11. Other Requirements**

## a. Public Housing Program Compliance

PHAs should note that public housing resident provisions related to occupancy and termination, including grievances and related hearings, will remain in effect until the execution of the new PBV or PBRA Housing Assistance Payment (HAP) contract.

#### **b.** Evictions for Cause

If the PHA determines that a resident was evicted in accordance with applicable state and local law for serious or repeated violation of material terms of the lease, and the eviction was not undertaken for the purpose of evading the obligation to make available URA payments and other assistance, the resident is not entitled to relocation payments and assistance under the URA (49 CFR 24.206).

## **SIGNIFICANT AMENDMENT DEFINITION**

As part of the Rental Assistance Demonstration (RAD), (insert PHA name here) is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

a. The decision to convert to either Project Based Rental Assistance or Project Based

## Voucher Assistance;

- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.