

Holyoke Housing Authority



MOVING TO WORK ANNUAL PLAN

**HHA FISCAL YEAR 2018
(JANUARY 1, 2018 TO DECEMBER 31, 2018)**

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I. Introduction

The Holyoke Housing Authority (HHA) entered into a Moving To Work (MTW) Agreement with the US Department of Housing and Urban Development (HUD) in September 2013. In April 2016, the term of the MTW Agreement was extended until 2028.

Moving To Work is a demonstration program authorized by Congress that permits participating Public Housing Authorities to combine Public Housing Operating Fund, Capital Fund and Housing Choice Voucher Program funding into a single, agency-wide block grant, and to design and test flexible, locally-tailored approaches to administering low-income housing programs. Subject to HUD approval, MTW agencies are allowed to waive some provisions of the US Housing Act of 1937 to promote one or more of the following MTW statutory objectives:

- To reduce cost and achieve greater effectiveness in administering federally funded housing assistance programs;
- To provide incentives to families with children to obtain employment and become economically self-sufficient; and,
- To increase housing choices for eligible low-income families.

HHA's MTW designation provides an opportunity to develop innovative local solutions to the City of Holyoke's unique local needs and challenges while promoting MTW's statutory objectives. HHA believes that MTW designation provides a critically important set of tools that:

- Help to leverage and increase the positive impact of limited federal funding;
- Promote HHA's long-term objectives to revitalize Holyoke's public housing portfolio and surrounding neighborhoods, including the City's Arts and Innovation District;
- Provide HHA residents with training and other supportive services so that they can obtain good-paying jobs and/or become first-time homebuyers;
- Improve and streamline administration of both the Public Housing and Housing Choice Voucher (HCV) programs; and,
- Increase the range and quality of housing choices for low-income households.

As described in prior Annual Plans, HHA's current MTW funding formula has essentially level-funded HHA's Housing Assistance Payment (HAP) funds since 2013, while leasing costs have increased substantially. In FY 2018, HHA will continue to work with HUD to resolve this issue and ensure that adequate funds are available to support current and projected leasing.

HHA is required to submit an MTW Annual Plan for HUD approval in advance of each fiscal year. This document, which is organized according to HUD's requirements, describes HHA's planned activities under the MTW Demonstration for Fiscal Year 2018, i.e. the period from January 1, 2018 through December 31, 2018.

Long-Term MTW Goals and Objectives

The following goals and objectives continue to apply to HHA's MTW activities:

Increasing the number of HHA residents who are working or actively engaged in educational or job training programs - Through creative partnerships with experienced educational and job training partners, HHA plans to expand the range and further improve the quality of training, education and job placement services provided to HCV and public housing residents. As an example of this type of partnership, HHA's Career Advancement Program (CAP), offers an incremental income disregard for all public housing clients who have graduated from an approved professional development program and who have obtained employment.

Supporting sustainable development and community-wide neighborhood revitalization efforts – MTW funding and programmatic flexibility can help support and catalyze new investments for the City's ongoing revitalization efforts in the Arts and Innovation District and elsewhere. HHA's Lyman Terrace public housing development is proximate to the district, and its revitalization utilizing Low Income Housing Tax Credit and other funding, along with conversion to project-based assistance under the Rental Assistance Demonstration (RAD) program, will reinforce and provide synergy with the activities planned for the Arts and Innovation neighborhood. In FY18, HHA plans to issue an RFP for PBV units in the Arts & Innovation District. Also in FY18, HHA has proposed a homeownership repair financing program for former HHA homeownership participants, allowing them to address critical home maintenance needs and preserve homeownership.

Streamlining and reducing the cost of HHA operations – In light of ongoing and severe restrictions on federal funding, HHA continues to focus on efforts to streamline administration and reduce transaction costs. HHA's MTW vision includes identifying more flexible and cost-effective methods to administer federal housing programs. In FY18, HHA intends to streamline its utility allowance schedule, allowing the agency to continue serving current households and resulting in staff time savings.

Leveraging non-HUD resources to respond to the housing and related service needs of Holyoke's low-income households - HHA's vision for MTW includes ongoing efforts to secure additional non-HUD funding sources to address housing and related service needs. Project-basing of vouchers in the Arts and Innovation District provides an example of how HUD funding can be used to leverage private equity and other development resources. In FY18, HHA will partner with the Hampden County Sheriff's Department to provide housing assistance for former offenders participating in a supportive services program.

Short-Term MTW Goals and Objectives

Planned MTW activities for FY18 include:

Streamlined MTW Utility Allowance: HHA proposes to implement a new MTW activity, adopting a revised Utility Allowance (UA) model for MTW tenant-based and project-based households that includes allowances for heat and other electricity only. This streamlined UA model will result in administrative efficiencies, reduction in error rates and cost savings needed to provide rental assistance to current and projected households.

Holyoke Horizons Transitional Housing Support: HHA proposes to implement a new MTW activity that will help support successful re-entry into society of persons involved with the criminal justice system. The proposed program will provide a rental subsidy of \$200/month per participant to support up to thirty (30) formerly incarcerated individuals who are enrolled in the

Hampden County Sheriff’s Department (HCSD) Community Housing Earned Safe & Supportive (CHESS) initiative. Participants will receive case management and supportive services from the HCSD while receiving an HHA rental subsidy.

Homeownership Repair Financing Program: HHA proposes a new MTW activity that will help stabilize low-income homeownership by providing low-interest, five-year loans up to \$5,000 per household. Eligible participants are low-income homeowners residing in Oakhill Homes. Loans may be used on eligible maintenance activities, include heating and electrical system repairs and repair of windows and doors.

Career Advancement Program (CAP): HHA will continue and expand its implementation of the previously-approved CAP program activity. HHA has identified twenty (20) eligible families who will be targeted for participation in FY18. HHA will undertake significant marketing efforts including mailers, phone calls and in-person meetings to demonstrate the potential benefits of the CAP program to families.

Neighborhood Revitalization: As part of its ongoing implementation of the Neighborhood Revitalization MTW activity, HHA plans to set-aside five (5) project based vouchers to be targeted at new or renovated developments in Holyoke’s Arts & Innovation District, and intends to issue an RFP in FY18.

Rent Simplification: HHA will continue to implementation of this MTW activity, which commenced in January 2017.

Preservation after Conservation: Under this approved MTW activity, HHA is anticipating a RAD conversion of the second phase at Lyman Terrace, consisting of 76 units.

Modified Project-Based Voucher Program: Beginning in FY18, HHA will permit owners to prepare and submit written requests to operate owner-managed PBV site-based waiting lists.

Non-MTW Goals and Objectives

Non-MTW activities are defined by HUD as those activities that do not require MTW authority or flexibility to implement. In addition to its planned long and short-term MTW activities, HHA will continue to implement a broad array of housing management, maintenance and supportive services efforts. HHA will continue to operate Mod Rehab and Mod Rehab SRO programs that are not part of the MTW Demonstration. HHA will also continue to operate state-assisted public housing and leasing programs, subject to continued state funding.

HHA may apply for HUD and other competitive funding opportunities and/or take other necessary actions consistent with the table below:

Name and Location	Development Activities	Demo/Dispo Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Beaudoin Village 40 Leary Drive	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or	None	None	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic	None

Name and Location	Development Activities	Demo/Dispo Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	LIHTC Application			development, management offices, community and supportive services offices, and/or open space	
Beaudry-Boucher Apartments 68 Cabot Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA monitors its waiting list and may apply for additional designated housing dependent upon need	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	None
Coughlin Apartments 300 Walnut Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA monitors its waiting list and may apply for additional designated housing dependent upon need	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	None
Falcetti Towers Apartments 475 Maple Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA intends renew the elderly only designated housing plan.	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	None

Name and Location	Development Activities	Demo/Dispo Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Ramos Units Scattered Site	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	None	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	Possible homeownership component in connection with potential modernization and revitalization
Rosary Towers 21 Bowers Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA monitors its waiting list and may apply for additional designated housing dependent upon need	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space.	None
Toepfert Apartments 22 North Summer Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA monitors its waiting list and may apply for additional designated housing dependent upon need	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	None
Zielinski Apartments 70 Walnut Street	Possible candidate for modernization, ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application	None	HHA monitors its waiting list and may apply for additional designated housing dependent upon need	Possible conversion of unit/parcels for residential unit reconfiguration and commercial, economic development,	None

Name and Location	Development Activities	Demo/Dispo Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				management offices, community and supportive services offices, and/or open space	

II. General Housing Authority Operating Information

The tables and information in this section are required by HUD Form 50900.

II.1 Housing Stock Information

A. Planned New Public Housing Units to be Added During the Fiscal Year

HHA does not plan to develop any new public housing units during the fiscal year.

AMP Name and Number	Bedroom Size							Total Units	Population Type*	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added

0

*Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other

Other Population Type**:

N/A

**Description of other population type served. I.e. Veteran, Supportive housing

B. Planned Public Housing Units to be Removed During the Fiscal Year

HHA does not plan to remove any additional units from inventory during the fiscal year.

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Lyman Terrace	76	The remaining units at Lyman Terrace will be converted to either RAD or PBV
Total Number of Units to be Removed	76	

C. New Housing Choice Vouchers to be Project-Based During the Fiscal Year

HHA plans to project-base 169 new vouchers in FY18 as summarized below.

Property Name	Anticipated Number of New Vouchers to be Project-Based	Description of Project
Arts and Innovation District	5	Component of the Neighborhood Revitalization activity to PBV units in Holyoke's Arts & Innovation district.
Leeds Village	20	PBV conversion in Northampton, MA.
Lyman Terrace	76	RAD or PBV conversion. Remaining units of public housing family development.

Anticipated Total New Vouchers to be Project-Based

101

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year
 Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year

274
274

D. Other Changes to the Housing Stock Anticipated During the Fiscal Year

HHA received a CHAP for the conversion of 164 public housing units to project-based assistance at Lyman Terrace. In FY 2017, 88 units were converted under Phase I of the redevelopment and the remaining 76 units are projected to be placed under HAP contract in FY18 via disposition of application.

E. General Description of All Planned Capital Fund Expenditures During the Plan Year

The following chart provides a summary of planned capital expenditures for HHA's Federal public housing developments during FY18. Actual expenditures may vary.

Public Housing Development	Planned Improvements	Projected Expenditures for FY 2018
Beaudoin Village	Roof Replacement	\$325,000
	Main & Lateral Sewer Cleaning	\$13,000
Rosary Towers	Key Fob Replacement	\$15,000
Toepfert Apts.	Floor Replacement	\$150,000
	Paint Porch & Railings	\$25,000
	Fire Escape Repairs	\$15,000
Ramos Units Scattered Site	Boiler Replacement	\$20,000
Total		\$563,000

II.2 Leasing Information

A. Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	733	8,796
Federal MTW Voucher (HCV) Units to be Utilized	1,371	16,452
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs**	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs**	30	360
Total Households Projected to be Served	2,134	25,608

*Calculated by dividing the planned 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 unit/households to be served, the PHA should estimate the number of households to be served.

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

B. Reporting Compliance with Statutory MTW Requirements

HHA is not out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement.

C. Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers, and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
N/A	N/A
N/A	N/A
N/A	N/A

II.3 Wait List

A. Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s)*	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Housing Choice Voucher	Statewide	173,737	Open	N/A
Housing Choice Voucher	Statewide with Holyoke Residency	4,610	Open	N/A
Federal Public Housing	Merged (excluding Churchill Homes)	949	Closed	To be determined
Federal MTW Public Housing Units	Site-Based	375	Open	N/A

**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:

N/A

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

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.

Per federal regulations, HHA will give preference to RAD households that request an HCV tenant-based voucher after their first year of assisted tenancy following conversion. HHA will be prioritizing Lyman Terrace Phase I residents on the waiting list.

III. Proposed MTW Activities

Activity 2018-1: MTW Utility Allowances

1. Activity Description

HHA will adopt a streamlined Utility Allowance (UA) model that will eliminate all utility allowances except for heat and other electricity for both MTW tenant-based and project-based program households. The streamlined UA model establishes one UA table for heat and another UA table for other electricity. The streamlined UA is independent of fuel type or building type. HHA will continue to select the UA for the smaller of the unit size or voucher size.

Proposed Utility Allowances						
Flat heat	\$39	\$51	\$67	\$83	\$99	\$114
Flat electric	\$27	\$29	\$31	\$37	\$40	\$43

In developing the UA schedule for other electricity, HHA reviewed the various billing elements for electricity by the local electricity provider. HHA factored in the charge per kWh, the renewable energy charge and the purchase power adjustment to determine the other electric utility allowance. HHA revised the UA for heat by applying the weighted averages, for the two highest fuel types and the two most common building types, to the current UA tables.

HHA has completed an impact analysis on the proposed streamlined UA model (see Appendix D). The analysis shows an average tenant rent increase of \$29. Four hundred and seventy nine (479) households will experience an increase in rent and of those 479 households, four hundred and twenty two (422) households (88%) will experience an increase in rent of less than \$50/month.

Households with tenant rent increases of \$50 or less, as a result of the UA activity, will be given 120 days advance notice of the increase. Households with tenant rent increases of more than \$50 will be given 180 days advance notice of the increase. For households currently receiving reasonable accommodations for heat and/or electricity, HHA will apply the higher of the table UA and previously approval reasonable accommodation UA. HHA will continue to determine reasonable accommodations for utilities on a case by case basis. Additionally, HHA will monitor the cost of all utilities and may further modify the UA tables and/or the UA activity for consistency with market and economic conditions.

2. Hardship Policy

As noted above, HHA will provide an additional advance notice to those households experiencing rent increases of more than \$50 in an effort to minimize hardship. HHA will continue to determine reasonable accommodations for utilities on a case by case basis.

3. MTW Statutory Objective

This initiative will support the MTW statutory objective of reducing costs and achieving greater cost effectiveness in federal expenditures.

4. Anticipated Timeline

HHA is prepared to implement this activity upon HUD approval.

5. Anticipated Impact

The goal of these revisions is significant cost and staff time savings, in addition to decreased error rates. As HHA noted in prior MTW Plans and Reports, the current MTW funding formula has resulted in only a small increase to HHA's HAP funds since 2013, while leasing costs have continued to dramatically increase. The proposed schedule will allow HHA to maintain current assistance levels.

6. Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$80,471	\$51,885		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Time required to calculate UA: 10 minutes Number of households with UA in FY17: 1,102 Total staff time prior to implementation: 184 hours	Time required to calculate UA: 5 minutes Number of households with UA in FY17: 1,102 Total staff time prior to implementation: 92 hours		
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).	10%	8%		
CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Revenue	\$0	\$89,448		

(Increase).				
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7. Data Collection Processes

HHA will utilize internal reporting systems to collect and analyze data on the number of households impacted, the change in error rates and changes to Utility Allowance Payments.

8. Authorization Cited

Standard MTW Agreement, Attachment C, Paragraph D, Section 2(a)- The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

Activity 2018-2: Holyoke Horizons Transitional Housing Support

1. Description of MTW Initiative

In FY 2016, three hundred fifty two (352) individuals were released from the custody of the Hampden County Sheriff's Department (HCSD). Of the offenders released from the HCSD, 40 offenders (45%) were released without a stable housing plan. In support of the Sheriff's Department's efforts to reduce recidivism and enhance community safety, HHA will set aside MTW funds to support the Community Housing Earned Safe & Supportive (CHESS) initiative of the HCSD.

CHESS is a sponsor-based transitional housing program that is designed to promote the successful community re-entry of persons formerly in the custody of the Hampden County House of Correction. HCSD works through a local nonprofit organization, Mental Health Association (MHA) to lease three-bedroom apartments in the community that will house non-related former offenders participating in the CHESS program. Program participants are required to pay 40% of their income or a minimum of \$400/month towards rent to MHA and also participate in a supportive services program. The Holyoke Horizons Transitional Housing Support initiative is designed to support otherwise eligible low-income participants who do not earn sufficient income to pay the \$400/month rent minimum.

HHA will provide up to thirty (30) rental subsidies of \$200/month per participant to the HCSD, who will then disburse funds to the landlords through MHA. Subsidies will not be time-limited, and will support single person household participants unable to meet the monthly rent minimum of \$400. Dependent on unit availability, up to three participants unable to meet the monthly rent minimum of \$400 may be housed in one unit, which would result in a \$600 subsidy for that particular unit. Should an assisted participant leave the program within the fiscal year, the subsidy will remain with the program and may be used to support another eligible low income participant.

The HCSD will continue to provide comprehensive support services and case management to participants. HHA will enter into a Memorandum of Understanding (MOU) with the HCSD which will require the Department to certify that assisted households meet eligibility requirements and that HHA will conduct HQS inspections.

Upon implementation of this initiative, HHA will evaluate program challenges and successes and may seek to work with other community agencies such as the local emergency women's shelter to provide similar housing subsidies.

2. MTW Statutory Objective

This initiative will support the MTW statutory objective of increase housing choices for eligible low-income families.

3. Anticipated Timeline

HHA is prepared to implement this activity upon HUD approval.

4. Anticipated Impact

HHA anticipates that this activity will be an effective means of successfully transitioning former offenders to permanent housing, thereby increasing housing choice. Participants will also obtain supportive services and work towards self-sufficiency.

5. Metrics

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).	0 Units	TBD		
HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	30 households		
Local Metric: Number of Households Served Per Voucher				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households served per voucher.	0 households	1 household		
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6. Data Collection Processes

Partner agencies will be required to provide copies of client program agreements and quarterly updates on client progress towards program completion.

7. Authorization Cited

Standard MTW Agreement, Attachment D, Broader Use of MTW Funds. HHA is seeking Attachment D flexibility in order to provide local, non-traditional, transitional housing assistance to eligible low-income households that are not otherwise permitted under the Housing Choice Voucher and public housing programs established in Sections 8 and 9 of the US Housing Act of 1937.

IV. Approved MTW Activities

A. Implemented Activities

Activity 2013-1: Biennial Recertifications

1. Activity Description

HHA has used its MTW Authority to recertify clients in both the Housing Choice Voucher Program and the Public Housing Program on a biennial schedule. The documentation requirements for the recertification process are time consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, HHA was able to reallocate staff resources to other program areas and staff has more time to ensure income reviews are accurate and thorough.

Zero-income households and households on minimum rent will continue to be subject to annual or more frequent recertification requirements. Additionally, MTW households will remain subject to all interim reexamination policies outlined in HHA's Administrative Plan and/or ACOP. HHA will continue to allow clients to request interim rent decreases when income changes, and clients will not be required to report changes between regular recertifications unless for a reason required in HHA's Administrative Plan and/or ACOP, i.e. change in household composition. Clients participating in the Career Advancement Program may be subject to additional interim reporting requirements described in the applicable section of the MTW Plan and/or implementing policies/procedures.

In FY15, HHA received approval from HUD to modify the biennial recertification initiative and include a limitation on the number of voluntary interim recertifications a family may complete between biennial recertifications to two (2). Elderly and disabled households are exempt from this provision and will be able to complete an interim recertification at any time.

2. Status

HHA implemented this activity in FY14. HHA will continue to utilize this flexibility in FY18.

3. Proposed Changes to Activity

HHA does not anticipate making any changes to this activity in FY18.

4. Changes to Baselines, Benchmarks & Metrics

The benchmarks below have been updated to reflect FY18 activity. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>Recertifications performed in FY13: 1,887</p> <p>Time per recertification: 105 minutes</p> <p>Time spent on recertifications in FY13: 3,302 hours</p> <p>Interims performed in FY13: 1,321</p> <p>Time per interim: 45 min.</p> <p>Time spent on interims in FY13: 991 hours</p> <p>Total time spent on interims and recertifications: 4,293 hours</p> <p>Average hourly wage for staff: \$23.87</p> <p>Total cost in FY13: \$102,474</p>	<p>Estimated number of recertifications performed in FY18: 1,052</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications in FY18: 1,490 hours</p> <p>Estimated number of interims performed in FY18: 926</p> <p>Time per interim: 45 min.</p> <p>Anticipated time spent on interims in FY18: 695 hours</p> <p>Total time spent on interims and recertifications: 2,185 hours</p> <p>Average hourly wage for staff: \$24.35</p> <p>Total cost after implementation of activity: \$53,205</p>		

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Recertifications performed in FY13: 1,887</p> <p>Time per recertification: 105 minutes</p> <p>Time spent on recertifications in FY13: 3,302 hours</p> <p>Interims performed in FY13: 1,321</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY13: 991 hours</p> <p>Total time spent on interims and recertifications prior to implementation of activity: 4,293 hours</p>	<p>Estimated number of recertifications performed in FY18: 1,052</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications in FY18: 1,490 hours</p> <p>Estimated number of interims performed in FY18: 926</p> <p>Time per interim: 45 min.</p> <p>Anticipated time spent on interims in FY18: 695 hours</p> <p>Total time spent on interims and recertifications: 2,185 hours</p>		
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	<p>Average tenant rent share in HCV: \$346.71</p> <p>Average tenant rent share in Public Housing: \$315.01</p>	<p>Average tenant rent share in HCV: \$349.09</p> <p>Average tenant rent share in Public Housing: \$321.70</p>		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.</i>				

Activity 2013-2: Revised Asset Policies

1. Activity Description

Holyoke Housing Authority has used its MTW Authority to revise the requirements for the verification, calculation, and inclusion of asset income. Verifying and calculating assets is a time consuming process, and clients rarely have enough assets to impact the final rent determination.

In order to streamline the recertification process, HHA made three revisions to the existing asset policy:

- **Self-Certification of Assets-** Clients are permitted to self-certify asset value and income when the family's combined market asset value is less than or equal to \$50,000. For families whose market value of their assets is greater than \$50,000, asset verification is subject to standard HUD verification requirements. HHA determines asset value using market, rather than cash value.
- **Calculation of Asset Income-** When determining asset income, HHA uses the market value of the combined assets and imputes asset income using HHA's established passbook savings rate.
- **Exclusion of Asset Income-** HHA received approval in FY 17 to revise the asset exclusion policy to reflect exclusion of asset income when total asset value is less than or equal to \$50,000. Prior to that HHA excluded the first \$500 of asset income.

2. Status

HHA implemented this activity in FY14. HHA will continue to utilize this flexibility in FY18.

3. Proposed Changes to this Activity

HHA does not anticipate making any changes to this activity in FY18.

4. Changes to Baselines, Benchmarks & Metrics

The benchmarks below have been updated to reflect FY18 activity. HHA will report on outcomes in the MTW Annual Report.

All baselines include public housing and HCV clients; however, the Churchill Homes public housing development is managed by a third-party and HHA does not have easy access to the managing company's data systems. As such, the baselines and benchmarks do not currently include the 100 residents at that development. HHA is currently working to integrate the two to systems and will update the baselines and benchmarks accordingly.

5. Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	HCV households with assets: 229 PH households with assets: 411 Time per asset verification: 20 Total time spent verifying assets: 213 hours Average hourly staff wage: \$23.87 Total cost to verify assets prior to implementation of activity: \$5,084	HCV households with assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Average hourly wage for staff: \$24.35 Total cost after implementation of activity: \$16.23		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	HCV households with assets: 229 PH households with assets: 411 Time per asset verification: 20 Total time spent verifying assets: 213 hours	HCV households with assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Total time spent after implementation of activity: 40 minutes		
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).	HHA quality control samples demonstrate that 0% of files have asset related errors.	HHA anticipates the number of files with asset related errors will be less than 5%.		
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Average tenant rent share in HCV: \$350 Average tenant rent share in public housing: \$300	Average tenant rent share in HCV: \$349.09 Average tenant rent share in public housing: \$321.70		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.</i>				

Activity 2013-3: Career Advancement Program

1. Activity Description

HHA has used its MTW Authority to partner with local non-profit and educational institutions to develop the Career Advancement Program (CAP). The goal of this activity is to encourage HHA clients to improve their long-term employment prospects, to increase the number of HHA clients with earned income, and to increase the savings of program participants.

HHA offers an incremental income disregard for all clients who have graduated from an approved professional development program and who have obtained employment. This disregard will be open to any HHA Public Housing or HCV client who participates in the CAP initiative and completes all of the requirements. All clients must meet eligibility requirements of the partner program they choose, which in some cases may limit participation to clients who are currently unemployed. HHA will divide clients into a control and treatment group for purposes of its rent reform study. The control group will not be eligible for this income disregard.

Once HHA has verified that the client participating in CAP successfully completed an approved job training program, the individual's income disregard will be structured as follows:

- 100% of the individual's earned income less the client's prequalifying earned income will be disregarded for the first twelve months following graduation from the program.
- 75% of the individual's earned income less the client's prequalifying earned income will be disregarded for the second twelve months following graduation from the program.
- 50% of the individual's earned income less the client's prequalifying earned income will be disregarded for the third twelve months following graduation from the program.
- 25% of the individual's earned income less the client's prequalifying earned income will be disregarded for the fourth twelve months following graduation from the program.
- After the final twelve months at the 25% disregard level, the individual's rent and income calculation will be in accordance with standard HHA rent and income calculation policies. There will be no earned income disregard.

In FY17 Plan, HHA's CAP was open only to HHA Public Housing residents. Additionally, HHA established the following revised definition for self-sufficiency to ensure consistency in future reporting:

Control Group

- Voluntary termination of housing assistance
- Graduation from FSS

Treatment Group

- Voluntary termination of housing assistance
- Transition from CAP to FSS
- Successful completion of a CAP educational program resulting in employment

In FY 17, HHA further modified this activity to allow FSS and CAP participants to transfer between programs in a beneficial manner. This change included allowing FSS participants to freeze their participation in the FSS program while they take advantage of CAP educational programs and the income disregard. After completing the educational requirement through CAP, the participant would be permitted to return to the FSS program. This modification also allows the FSS participant to freeze their escrow account while they were active CAP participants. The goal of this modification was to allow participants the greatest flexibility possible while achieving their educational goals.

2. Status

HHA implemented this activity FY15. The program currently has eight participants. HHA has identified twenty (20) eligible families who will be targeted for participation in FY18. HHA is undertaking marketing efforts including mailers, phone calls and in-person meetings to demonstrate the potential benefits of the CAP program to families.

3. Proposed Changes to this Activity

HHA will revise the way it tracks the progress of CAP as described in the section on Changes to Baselines, Benchmarks and Metrics. This will allow HHA and HUD to more readily identify program successes and areas for improvement in the coming years. HHA will continue to work with its evaluator through FY18 as HHA strives to achieve its enrollment goal.

4. Changes to Baselines, Benchmarks & Metrics

As a result of low enrollment and programmatic changes such as opening CAP only to residents of public housing, measuring impact consistently using the current metric methods has remained challenging. In an effort to streamline the data tracking process and enable HHA to best measure CAP's impact on participants moving forward, HHA has revised its baselines and benchmarks for FY18 as follows:

- Control Group includes all public housing participants except for CAP participants
- Treatment Group includes CAP participants only

HHA will report on outcomes in the MTW Annual Report.

Please note that all baselines include only public housing residents, as of January 2016. The Churchill Homes public housing development is managed by a third-party and HHA does not have easy access to the managing company's data systems. As such, the baselines do not currently include the 100 residents at that development. HHA is currently working to integrate the two to systems and will update the baselines accordingly.

5. Metrics

SS #1: Increase in Household Income
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Control Group

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$15,635	\$15,635		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$16,958	\$16,958		
SS #2: Increase in Household Savings				
Control Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$900	\$900		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$359	\$359		
SS #3: Increase in Positive Outcomes in Employment Status				
Control Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed – Full-Time or Part-Time*	209 participants 75%**	209 participants 75%**		

Enrolled in an Educational or Job Training Program*	29 participants 4%	29 participants 4%		
Unemployed	69 participants 25%	69 participants 25%		
Other	N/A	N/A		

Treatment Group

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed – Full-Time or Part-Time*	11 participants 61%	11 participants 61%		
Enrolled in an Educational or Job Training Program*	4 participants 22% - Education and Job Training	4 participants 22% - Education and Job Training		
Unemployed	7 participants 39%	7 participants 39%		
Other	N/A	N/A		

**Not tracked separately.*

***209 of 278 work-able households.*

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

Control Group

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	73	73		

Treatment Group

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance	2	2		

(decrease).				
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Control Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (Increase)	76	76		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (Increase)	18	18		
SS #6: Reducing Per Unit Subsidy Cost for Participating Households*				
Control Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	N/A	N/A		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	N/A	N/A		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity as it involves PH households only.</i>				
SS #7: Increase in Agency Rental Revenue				
Control Group				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase). (TTP)	\$310	\$310		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase). (TTP)	\$356	\$356*		
<i>*CAP offers an incremental disregard for clients, thus rental revenue will generally decrease until participants transition out.</i>				
SS #8: Households Transitioned to Self-Sufficiency				
Control Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Households transitioned to self-sufficiency (increase).	0	0		
Treatment Group				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Households transitioned to self-sufficiency (increase).	0	0		

Activity 2013-4: Neighborhood Revitalization

1. Activity Description

Holyoke Housing Authority used its MTW Authority to set-aside project based vouchers to be targeted at new or renovated developments in Holyoke's Arts & Innovation District. In August 2009, the City of Holyoke began the implementation of the Holyoke Center City Vision Plan, the transit-oriented redevelopment plan for Center City and its surrounding neighborhoods. The revitalization of Holyoke's Arts & Innovation district is an essential component to this plan, and HHA's commitment of thirty project-based units to the area will help ensure that affordable housing is a central component of the area's revitalization.

HHA may waive the requirement limiting the number of PBV units in a project to 25% of the total number of units in that project. Additionally, HHA may allow PBV sites to develop their own tenant selection plans, provided the plans receive HHA approval and are consistent with the goals of the city's transformation plan.

Lastly, HHA will waive or revise the requirement that HHA offer tenant-based rental assistance to clients after one-year of occupancy in the assisted unit. HHA believes this is necessary to ensure the PBVs are serving the intended purpose of revitalizing the Arts & Innovation District and are not being used as a means of obtaining tenant-based vouchers. This limitation will not apply to households seeking to move due to domestic violence under VAWA and/or as a reasonable accommodation for a person with a disability.

The goal of this activity is to promote development in the Art's & Innovation District which will allow low-income households to move to a new or rehabilitated unit in a neighborhood of opportunity. HHA will initially set aside thirty project-based vouchers for this activity; however, this number may be revised in future years depending on the success of this activity. HHA will award project-based contracts as the city's transformation plan progresses and as new units come on line in the area.

2. Status

HHA implemented this activity in FY16 and plans to issue an RFP in FY18. HHA will set aside five (5) vouchers for this activity.

3. Proposed Changes to this Activity

HHA does not anticipate making any changes to this activity in FY18.

4. Changes in Baselines, Benchmarks and Metrics

The metrics below have been updated to reflect FY18 activity. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

CE #1: Agency Cost Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0.00	\$0.00		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.</i>				
CE #2: Staff Time Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.</i>				
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.	0 units	0 Units – This activity is designed to create units, not prevent displacement.		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.</i>				
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	0 units	5 Units		

opportunity as a result of the activity (increase).				
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Activity 2015-1: Rent Simplification

1. Description of MTW Activity

In August of 2015, HHA received approval from HUD to proceed with a Rent Simplification initiative relating to payment standards.

This activity allows for the use of the payment standard in effect at the effective date of the regular recertification regardless of any change in the payment standard.

HHA originally proposed the elimination of the adult full-time student deduction along with the exclusion of all full-time student income for household members other than the head, spouse or co-head. HHA analysis demonstrated that the agency cost of programming additional software changes outweighed the overall client and agency benefit.

2. Status and Timeline

HHA began implementation of this activity in FY17 and will continue to utilize this flexibility in FY18.

3. Proposed Changes to this Activity

HHA does not anticipate any changes to this activity in FY 18.

4. Changes to Baselines, Benchmarks & Metrics

This activity was implemented as of January 1, 2017; however, the FY 17 Plan listed the activity as not yet implemented (metrics were not established). As such, HHA will establish baselines and benchmarks and report on outcomes in the FY 17 report.

5. Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	TBD	TBD		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	TBD	TBD		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	TBD	TBD		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	TBD	TBD		

Activity 2015-2: Rent Reasonableness

1. Description of MTW Activity

HHA eliminated the requirement to re-determine reasonable rent if there is a 5% decrease in the published Fair Market Rent (FMR) in effect 60 days before the contract anniversary date as compared to the FMR in effect 1 year before the contract anniversary. HHA continues to complete a reasonable rent determination when a unit is placed under HAP contract for the first time, when an owner requests a contract rent adjustment, and at any other time HHA deems it necessary. As rent increases will continue to be allowed during the lease-prescribed time periods, HHA assumes that owners will request a rent increase within market fluctuations as warranted. Therefore, HHA believes that reasonable rent determinations will continue to be made with regular frequency.

2. Status

HHA implemented this activity in FY15. HHA does not anticipate an FMR decrease of greater than 5% in FY18, and thus will not require use of this flexibility in FY18.

3. Proposed Changes to this Activity

HHA does not anticipate making any changes to this activity in FY18.

4. Changes to Baselines, Benchmarks & Metrics

There are no changes to the benchmarks for FY18. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of HCV units leased in FY15: 1,203 Time to complete Reasonable Rent: 15 minutes Staff Hourly Wage: \$23.87 Cost to re-determine reasonable rent in FY15 if 5% decrease in	\$0.00		

	published FMR: \$7,179			
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Number of HCV units leased in FY15: 1,203</p> <p>Time to complete Reasonable Rent: 15 minutes</p> <p>Time spent to re-determine reasonable rent in FY15 if 5% decrease in published FMR: 301 hours</p>	\$0.00		

Activity 2015-3: PBV Rent Reasonableness

1. Description of MTW Activity

Under this initiative HHA modified the requirement for conducting rent reasonableness for re-determined rents under the Project Based Voucher (PBV) program. Note that no change was implemented to the existing policy for determining initial rents, i.e. initial PBV rents will continue to be determined in conformance with the provisions of 24 CFR 983.301 through 983.305 as applicable.

Under the new policy, re-determined rents to owners of PBV units, *except for certain tax credit units as defined in 983.501(c)*, shall not exceed the lowest of the reasonable rent or the rent requested by owner. This policy change eliminated consideration of the then current Fair Market Rent (FMR) limits when re-determining PBV rents. HHA also eliminated the requirement at 983.303(b) to re-determine the reasonable rents for PBV units whenever there is a five percent or greater decrease in the published FMR in effect sixty days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary.

Affordable housing developers use the PBV commitment to secure project funding and project lenders assume rent trending when underwriting projects; therefore, this policy change helps to ensure the long-term viability and affordability of PBV developments while also promoting housing choice.

2. Status

HHA implemented this activity in FY15. HHA does not anticipate an FMR decrease of greater than 5% in FY18, and thus will not require use of this flexibility in FY18.

3. Proposed Changes to this Activity

HHA does not anticipate making any changes to this activity in FY18.

4. Changes to Baselines, Benchmarks & Metrics

There are no changes to the benchmarks. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>Number of PBV developments receiving assistance leased in FY15: 2</p> <p>Time to complete Reasonable Rent: 30 min.</p> <p>Staff Hourly Wage: \$23.87</p> <p>Cost to re-determine reasonable rent in FY15 if 5% decrease in published FMR: \$23.87</p>	\$0.00		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Number of PBV developments receiving assistance leased in FY15: 2</p> <p>Time to complete Reasonable Rent: 30 min.</p> <p>Time spent to re-determine reasonable rent in FY15 if 5% decrease in published FMR: 1 hour</p>	\$0.00		

Activity 2015-4: Preservation after Conservation

1. Description of MTW Activity

HHA has preserved the long term affordability of expiring use properties by project-basing Enhanced and Tenant Protection vouchers for up to a 15 year extendable term. Households that reside in a preservation eligible project as of the conversion date are given the choice between an Enhanced or Tenant Protection voucher or a Project-Based Voucher. Prior to the conversion date, HHA meets with tenants to explain the advantages/disadvantages and the impact of an Enhanced Voucher vs. a Project-Based Voucher so the tenants can make informed decisions. When a household opts for an Enhanced or Tenant Protection Voucher, HHA may apply their MTW operating flexibilities (i.e. Revised Asset Policies) to the Voucher provided the operating flexibilities do not infringe on the enhanced nature of the Voucher. The only Enhanced Voucher provision which will apply to tenants selecting the Project-Based option is the initial income eligibility requirement.

For tenants that are over-housed as of the conversion date and elect to receive a Project-Based Voucher, HHA may waive the subsidy policy provided there is at least one household member per bedroom. Tenants may also request a reasonable accommodation if applicable.

HHA may waive 24 CFR 983.56 in its entirety including the 25% per building/project which will allow for every eligible household in a preservation eligible project to elect to receive a Project-Based Voucher. Additionally, should a household that elects to receive an Enhanced or Tenant Protection Voucher move from the property, HHA may add the unit to the Project-Based HAP contract at any time during the term of the HAP contract.

2. Status

HHA implemented this activity in FY15. HHA completed a RAD conversion at South Canal of 118 units in FY17. In addition, HHA entered into a Phase I HAP contract for the RAD conversion at Lyman Terrace of 88 units in FY 17. The remaining 76 of these units will be project-based or under a RAD conversion. 76 units at Lyman Terrace will also undergo a RAD conversion in FY18.

3. Proposed Changes to this Activity

In FY 2018, HHA will modify the components of its project-based voucher program in order to streamline administration of the Preservation after Conservation activity and maximize the number of units benefitting from these efficiencies.

- Consistent with PIH Notice 2012-32, HHA may apply MTW flexibilities to units converted to PBV under the Rental Assistance Demonstration to the extent that said flexibilities are not in conflict with RAD provisions specified in HUD's Notice(s).
- HHA may institute other changes, on a case by case basis, as long as such changes are consistent with the MTW authorizations granted herein.

4. Changes in Baselines, Benchmarks and Metrics

The benchmark below has been updated for the FY18 Plan. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

<i>HC #2: Units of Housing Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 units	101 units		

Activity 2016-1: Modified Project-Based Voucher Program

1. Description of MTW Initiative

Preserving affordable housing and expanding the supply of units continues to be a major objective of HHA. In connection with HHA's Preservation after Conservation MTW Activity and other PBV activities undertaken by HHA, has implemented the following activities:

- HHA may elect to unit-base 100 percent (100%) of the dwelling units in any PBV project or development provided that the development meets the applicable MTW Site and Neighborhood Standards.
- HHA will not provide a mobile tenant-based voucher to PBV participants except when the participant has requested and been granted a reasonable accommodation transfer; or, has requested and been determined eligible for a VAWA transfer; or, has requested and been determined eligible for an emergency transfer. HHA will not permit a family member to be added to a PBV household if the new member would result in the family being under-housed except in the case of birth, court-ordered custody, marriage or live-in aides.
- HHA will allow for units to be added to a PBV HAP Contract at any time during the term of the HAP Contract if HHA determines that such addition will support the goals of promoting neighborhood revitalization, avoiding tenant displacement and/or ensuring long-term affordability. The anniversary and expiration dates of the HAP Contract term for the PBV units originally placed under contract and the new units added to the contract will remain consistent. HHA envisions that this flexibility will be applied infrequently and only as necessary to support the above-listed goals. HHA will follow any applicable non-MTW provisions related to subsidy layering, Field Office approval or other applicable HUD requirements.
- HHA may select its own units to receive project-based assistance without a competitive process. Such units will be subject to subsidy layering requirements. HHA may project-base assistance at properties other than public housing properties owned directly or indirectly by HHA, including those owned by HHA affiliates or instrumentalities. HHA acknowledges the guidance provided by HUD in PIH Notice 2015-15(HA) and will continue to adhere to the requirements set forth in the Notice unless or until HHA receives HUD approval to waive said requirements.

2. Status

HAA implemented this activity in FY16. HHA will continue to utilize this flexibility in FY18

3. Proposed Changes to this Activity

In FY18 HHA will permit owners to prepare and submit written requests to operate owner-managed PBV site-base waiting lists (SBWLs). As part of the SBWL request, owners must submit their proposed Tenant Selection Plan. HHA will review all requests and provide a written

response regarding the outcome of their request to operate a PBV SBWL. HHA will monitor owner compliance with regulatory and agency requirements.

4. Changes to Baselines, Benchmarks & Metrics

The benchmarks below have been updated to reflect FY18 activity. HHA will report on outcomes in the MTW Annual Report.

5. Metrics

CE #1: Agency Cost Savings*				
Unit of Measurement	Baseline	Benchmark**	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0.00	\$0.00		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity as this activity is not anticipated to result in cost savings.</i>				
<i>**HHA does not anticipate owner management of waiting lists in FY18.</i>				
CE #2: Staff Time Savings*				
Unit of Measurement	Baseline	Benchmark**	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity as this activity is not anticipated to result in staff time savings.</i>				
<i>**HHA does not anticipate owner management of waiting lists in FY18.</i>				
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.	0 units	5 units		
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity as this activity is not designed as a displacement prevention initiative.</i>				

HC #1: Additional Units of Housing Made Available*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0 units	5 units		
<i>* HHA is incorporating this standard metric as a local metric.</i>				

B. Not Yet Implemented Activities – None

C. Activities on Hold – None

D. Closed Out Activities

Activity 2013-5: Biennial HQS Inspections

1. Activity Description

Holyoke Housing Authority intended to use its MTW Authority to develop and implement a risk-based HQS inspection schedule in the Housing Choice Voucher Program. Units would continue to be physically inspected annually, unless HHA designated the unit as “low-risk” per the criteria listed below. Units designated as “low-risk” will be moved to a biennial schedule for physical inspections. In the place of the physical inspection, on the off year landlords of “low-risk” units would be required to self-certify that the units meet HQS standards.

2. Reason for Closing Out

This activity was approved by HUD in HHA’s FY13 Annual Plan, but was not implemented under HHA’s MTW authority. HHA has closed out this activity as an MTW initiative due to the 2014 Appropriations Act which allows HHA to transition to a biennial inspection schedule without MTW authority.

V. Sources and Uses of Funds

A. Estimated Sources of MTW Funding for the Fiscal Year

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$2,245,330
70600	HUD PHA Operating Grants	\$13,860,600
70610	Capital Grants	\$1,800,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,630,000
71100+72000	Interest Income	\$10,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$125,000
70000	Total Revenue	\$19,670,930

B. Estimated Uses of MTW Funding for the Fiscal Year

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$3,324,330
91300+91310+92000	Management Fee Expense	\$1,200,000
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$200,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,350,800
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$1,820,000
95000 (95100+95200+95300+95500)	Total Protective Services	\$25,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$225,600
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$186,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$168,900

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
97100+97200	Total Extraordinary Maintenance	\$100,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$9,250,300
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expenses	\$1,820,000
90000	Total Expenses	\$19,670,930

C. Describe Activities that will use only MTW Single Fund Flexibility

Savings achieved from Biennial Recertifications, the streamlined MTW Utility Allowance and Rent Simplification will be reallocated to support services for Moving to Work initiatives.

D. Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes

Is the PHA implementing a local asset management plan (LAMP)?

No

Has the PHA provided a LAMP in the appendix?

No

VI. Administrative

A. Resolutions

On October 5, 2017 the Board of Commissioners of Holyoke Housing Authority passed a resolution approving this MTW Plan. This resolution and the required MTW Certification are included in the Appendix A to this plan.

B. Public Review Process

This MTW Plan was made available for public comment on September 1, 2017 through September 30, 2017. The public hearing was held on September 20, 2017 at Falcetti Towers Community Room, 475 Maple Street, Holyoke, Massachusetts. The attendance sheet from the public hearing has been included as Appendix B.

C. Planned Agency-Directed Evaluations of Demonstration

Dr. Michael Krezmien of the University of Massachusetts-Amherst (UMass) has led the effort to evaluate the design and implementation of the rent reform study and to conduct a block grant evaluation. Dr. Krezmien's academic career has focused on social and educational inequities and much of his research has focused on populations that are heavily represented in subsidized housing programs, including current programs serving HHA families.

Dr. Krezmien has conducted evaluations of the Career Advancement Program, and the latest report can be found in HHA's FY16 MTW Report. Baselines and revised benchmarks for control and treatment groups are included in this FY18 Annual Plan above. HHA will report on FY18 CAP activities are part of the FY18 MTW Annual Report. HHA anticipates that the rent reform study will be fully closed out in FY18 as CAP meets its enrollment target and focuses on public housing residents only.

Detailed Block Grant Evaluation- As stated in the FY15 Annual Report, Public Housing Operating Fund, Capital Fund, and HCVP HAP funds have all been used for the original program purposes and there have been no internal transfers for other authorized MTW activities.

D. Annual Statement/Performance and Evaluation Report (HUD 50075.1)

See Appendix C.

VII. Appendix A- Board Resolution



HOLYOKE HOUSING AUTHORITY
AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION AGENCY

ADMINISTRATION BUILDING, 475 MAPLE STREET, HOLYOKE, MASSACHUSETTS 01040
TELEPHONE (413) 539-2220, FAX (413) 539-2227, T.D.D. 1-800-545-1833 EXT. 510

REGULAR BOARD MEETING
THE FOLLOWING IS AN EXTRACT OF
THE MINUTES OF A MEETING
OF THE MEMBERS OF THE BOARD OF COMMISSIONERS
OF THE HOLYOKE HOUSING AUTHORITY
HELD ON THURSDAY, OCTOBER 12, 2017 AT 6:00PM
AT 475 MAPLE STREET, HOLYOKE, MA

MOVING TO WORK ANNUAL PLAN

As per HUD regulations, Moving to Work Agencies are required to submit an annual plan. This plan includes the Authority's initiatives, activities, sources and uses of funds, and timelines. Each member of the Board was presented a copy of the proposed Annual Plan.

MOTION

17-061

On a motion by Vice Chair Falcetti and seconded by Commissioner Purington, the Board voted to accept the Moving to Work Annual Plan for submission to HUD. The Board voted in favor of this motion:

Present and voting:

Commissioner Falcetti	Yes
Commissioner Sanabria	Yes
Commissioner Purington	Yes
Commissioner Wilson	Yes

Absent:

Theresa Cooper-Gordon

Matthew A. Mainville, Secretary

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

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
Certifications of Compliance

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

**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan***

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Holyoke Housing Authority
PHA Name

MA005
PHA Number/HA Code

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

Theresa Cooper Gordon
Name of Authorized Official

Chair of the Board of Commissioners
Title



Signature

12/15/2017
Date

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

VIII. Appendix C - Annual Statement/Performance and Evaluation Report (HUD 50075.1)

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. 2577-0157 Expires 3/31/2020	
Part I: Summary PHA Name: Holyoke Housing Authority		Grant Type and Number Capital Fund Program Grant No: MA06P005501-18 Replacement Housing Factor Grant No: Date of CFFP:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Estimated Cost Revised?	Total Actual Cost ¹ Expended
Line	Original	Obligated	Expended
1	Total non-CFF Funds		
2	1406 Operations (may not exceed 20% of line 21) ²		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration	1,207,215	
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴		

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

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

Part I: Summary		FFY of Grant: 2018	
PHA Name: Holyoke Housing Authority	Grant Type and Number Capital Fund Program Grant No: MAU6P00501-18 Replacement Housing Factor Grant No: Date of CFPF:	FFY of Grant Approval:	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Type of Grant		Reserve for Disasters/Emergencies	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,207,215	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date August 30, 2017		Date	

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

IX. Appendix D – MTW Utility Allowances Impact Analysis

	Bedroom Size								
	ALL	Elderly/ Disabled	Family	0	1	2	3	4	5
# of Households	1102	745	357	3	330	396	336	32	5
# of HH with smaller voucher size	264	196	68	0	0	142	102	18	2
# of Households with Heat	339	192	147	2	61	108	140	23	5
# of Households with Other Electric	877	539	338	3	166	348	327	28	5
Total HAP									
Current Monthly	\$598,650	\$378,398	\$220,252	\$1,287	\$148,396	\$202,670	\$219,894	\$21,688	\$4,715
Proposed Monthly	\$583,742	\$370,890	\$212,852	\$1,279	\$146,566	\$198,432	\$212,414	\$20,370	\$4,681
Change in Monthly Total HAP	(\$14,908)	(\$7,508)	(\$7,400)	(\$8)	(\$1,830)	(\$4,238)	(\$7,480)	(\$1,318)	(\$34)
Change in Annual Total HAP	(\$178,896)	(\$90,096)	(\$88,800)	(\$96)	(\$21,960)	(\$50,856)	(\$89,760)	(\$15,816)	(\$408)
UAP									
Current # of HH with UAP	24	3	21	0	2	7	12	2	1
Current Average	\$53	\$16	\$58	-N/A-	\$37	\$32	\$47	\$148	\$123
Proposed # of HH with UAP	12	0	12	0	1	3	5	2	1
Proposed Average	\$42	-N/A-	\$42	-N/A-	\$55	\$36	\$43	\$15	\$89
Tenant Rent									
Current Average	\$332	\$318	\$360	\$168	\$260	\$353	\$377	\$317	\$489
Proposed Average	\$345	\$328	\$378	\$171	\$265	\$364	\$398	\$350	\$489
Tenant Rent									
# of HH with an Increase in Tenant Rent	479	285	194	1	119	146	196	17	0
Average Increase in Tenant Rent	\$29	\$26	\$34	\$8	\$15	\$28	\$36	\$62	-N/A-
Increase from \$1 to \$5	30	11	19	0	6	5	18	1	0
Increase from \$6 to \$10	26	23	3	1	20	3	1	1	0
Increase from \$11 to \$25	166	127	39	0	83	51	32	0	0
Increase from \$26 to \$50	211	105	106	0	10	78	119	4	0
Increase from \$51 to \$75	29	11	18	0	0	4	17	8	0
Increase from \$76 to \$100	6	3	3	0	0	2	3	1	0
Increase from \$101 to \$150	7	4	3	0	0	3	3	1	0
Increase from \$151 to \$200	4	1	3	0	0	0	3	1	0