

MOVING TO WORK ANNUAL REPORT

HHA FISCAL YEAR 2017

JANUARY 1, 2017 - DECEMBER 31, 2017

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HOLYOKE HOUSING AUTHORITY

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I. Introduction

The Moving to Work Annual Report provides information on activities undertaken by the Holyoke Housing Authority (HHA) under the Moving to Work Demonstration Program (MTW) during Fiscal Year 2017, i.e., the period from January 1, 2017 to December 31, 2017. The U.S. Department of Housing and Urban Development (HUD) in the HUD Form 50900 defines the format and required content of this Report.

MTW is a demonstration program created by Congress in 1996 which permits HHA and other participating PHAs to combine Public Housing Operating Fund, Capital Fund and Housing Choice Voucher Program (HCVP) funding into a single, agency-wide block grant and to design and test flexible, locally-tailored approaches to administering its low-income housing programs. The terms and conditions of HHA's participation in the MTW program are defined in the MTW Agreement between HHA and HUD. Subject to HUD approval in the MTW Annual Plan, MTW agencies are allowed to waive some provisions of the US Housing Act of 1937 and HUD regulations to promote one or more of the following MTW statutory objectives:

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

MTW flexibility is a key element of HHA's efforts to better respond to the local needs of the community and invest in affordable housing opportunities in Holyoke and the surrounding neighborhoods.

While MTW affords HHA the opportunity to be more flexible in the implementation of federal housing programs, it does not provide additional funding. Furthermore, 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. Increasing HHA's HAP funding remains a top priority of HHA in order to continue providing essential housing subsidies to current program participants.

MTW Goals and Objectives

Following are HHA's long-term MTW goals and objectives:

- *Increase the number of HHA residents who are working or actively engaged in educational or job training programs.*
- *Increase High School Graduation Rates and Improve Educational Attainment*
- *Support sustainable development and community-wide neighborhood revitalization efforts.*
- *Streamline and reduce the cost of HHA operations.*

- *Leverage non-HUD resources to respond to the housing and related service needs of Holyoke's low-income households.*

These larger, broader themes provide high-level direction for the development of HHA's programs and policies. Below are shorter-term goals and objectives that are in support of HHA's long-term MTW vision. Progress towards these goals is more fully described in Section IV of the Report:

Provide training and jobs to resident through the Career Advancement Program (CAP) in collaboration with community partner agencies. In 2017, HHA was not able to recruit a significant number of participants to the CAP program, despite focused and targeted efforts. HHA has found that the recruitment and administration of the program required a significant amount of staff time and effort. Furthermore, the efforts are not yielding the anticipated results. In 2017, HHA only successfully recruited three CAP participants, and one of those participants moved to another self-sufficiency program, leaving two CAP participants in the program at the completion of 2017. Therefore, HHA will be closing this MTW activity out. While HHA will be closing out the MTW CAP activity, training and job opportunities for HHA clients remains a top priority. HHA will continue to operate its FSS program and will pursue any new upward mobility initiatives that have advantageous benefits for its clients.

Encourage employment and simplify program administration with Biennial Recertification and Streamlined Asset Certification Program for Public Housing and Housing Choice Voucher program households. To encourage adults to obtain employment and to simplify program administration, HHA modified its income recertification policy, moving from an annual process to a biennial process. Under the MTW policy, HHA residents are recertified every two years. Households are also limited to the number of voluntary interim recertifications they may have between biennial recertifications. Additionally, HHA has implementing a number of streamlining initiatives related to asset policies including self-certification of assets when the family's combined market asset value is less than or equal to \$50,000, a revised calculation of asset income and the exclusion of asset income where the combined market asset value is less than or equal to \$50,000. All of these streamlining efforts have proven extremely beneficial for both HHA and the households we serve.

Support neighborhood revitalization and Holyoke's Center City Vision Plan through continuing to work with the City on new opportunities. HHA had planned to support this effort through targeted project based vouchers. However, HHA issued an RFP in October 2017, to which no one applied and expired in December 2017. While HHA still strongly supports the revitalizing of the Arts and Innovation District, the feasibility of project-based vouchers is unclear based on the housing stock within the current District's boundaries. HHA will continue to work and collaborate with the City to develop new strategies to advance this initiative.

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 FY 2017, HHA continued to implement a broad array of housing

management, maintenance and supportive services efforts including the Mod Rehab and Mod Rehab SRO programs that are not part of the MTW Demonstration and state-assisted public housing and leasing programs.

In addition to administering other programs for low-income families, in December 2016, HHA completed the financial closing for the first phase of the redevelopment and conversion to project-based assistance under the Rental Assistance Demonstration (“RAD”) program of the Lyman Terrace family public housing development. The first phase involves redevelopment of 88 of a planned 167 total units. The first 38 units in Phase 1A were completed in FY2017 and are fully occupied. Construction began on Phase 1B and is scheduled for completion in April 2018. In addition to Lyman Terrace, HHA also successfully completed a RAD conversion of 76 units at the South Canal development.

HHA also continually looks for funding opportunities to further advance the goals and objectives of the agency. As such, HHA applied for the following funding opportunities during FY 2017:

- **Family Self-Sufficiency (FSS)** - HHA applied for and received funding of \$99,839 for the FSS Coordinator position under both the Public Housing and Housing Choice Voucher Programs.
- **Other-** HHA continued to monitor federal, state, municipal, and private funding opportunities and applied for and received the following awards to support the goals of the MTW Demonstration:
 - HHA was awarded \$3,000 in CDBG funds through the City of Holyoke for the Authority’s First-Time Homebuyer Education Program
 - HHA applied for and received \$1.3M from Mass Works. The funds will be used for construction work at Lyman Terrace.
 - HHA will also be collaborating with the Holyoke Redevelopment Authority and the City of Holyoke on an Urban Agenda Grant intended to increase multi-family housing homeownership opportunities in South Holyoke.

II. General Housing Authority Operating Information

A. 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
South Canal**	127	0	4 story building with 8 zero-bedroom, 45 one-bedroom, 38 two-bedroom, 25 three-bedroom, 7 four-bedroom, and 4 five-bedroom units for families.
Lyman Terrace***	0	38	A RAD conversion of a family public housing development. The first 38 units in Phase 1A was completed in FY2017 and are fully occupied.
**There was an error in this section in the FY 2017 Plan. While HHA did complete a RAD conversion, with 76 PBVs, at the South Canal development, the PBVs are not under MTW.			
*** Mistakenly, the RAD conversion at Lyman Terrace was excluded from this section in the FY 2017 Plan, and should have been included. The PBV numbers above reflect accurate MTW PBV counts for FY2017.			

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 *
229	218

Actual Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	Actual Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
92	92

Anticipated Total Number of New Vouchers to be Project-Based *	Actual Total Number of New Vouchers that were Project-Based
127**	38
**There was an error in this section of the FY2017 Plan. In the Plan, PBVs and Enhanced Vouchers at the South Canal development were mistakenly entered in this section. PBV information has been revised and numbers	

included above are up to date.

*From the Plan.

Other Changes to the Housing Stock that Occurred during the Fiscal Year

HHA has applied for and has received a CHAP for the conversion of 167 housing units at Lyman Terrace. HHA is in the process of completed a RAD conversion of 88 of the 167 total units. There are three parts to Phase 1. Phase 1A was completed in FY 2017 and Phase 1B is well on its way.

General Description of Actual Capital Expenditures During the Plan Year

The table below provides a summary of the planned improvements, planned expenditures and actual expenditures for HHA's Federal Public Housing developments during FY 2017.

Public Housing Development	Planned Improvements	Planned Expenditures for FY 2017	Actual Expenditures for FY 2017
Beaudoin Village	Parking Lot & Play Scape	\$152,190	\$193,909
	Roof Replacement	\$100,000	\$40,863
	Main & Lateral Sewer Cleaning	\$13,000	\$6,517
	Hardwire CO Detectors	\$5,000	-
	Landscaping/Tree Removal	\$9,999	\$1,200
	Safety & Security Grant including security cameras, lighting and landscaping	-	\$16,892
Rosary Towers	Radio Box & Hardwire CO Detectors	\$10,000	\$7,607
	Common Area Floors and Community Room Upgrades	-	\$18,019
	Kitchen & Accessible Bath Upgrades	\$277,305	\$578,937
	Boiler replacement		\$33,328
Toepfert Apts.	Floor Replacement	\$30,000	\$24,971
	Lintel Replacement	-	\$2,498
	Hardwire CO Detectors	\$3,000	\$6,720
Falcetti Towers	Radio Box & CO Detectors	\$10,000	\$6,575
Coughlin Apts.	Hardwire CO Detectors	\$3,000	\$3,000
Beaudry-Boucher Apts.	Hardwire CO Detectors	\$3,000	-
Zielinski Apts.	Hardwire CO Detectors	\$3,000	\$3,000
334 Elm St - Churchill Community Room	Hardwire CO Detectors	\$2,000	-

Overview of Other Housing Owned and/or Managed by HHA at Fiscal Year End

Housing Program*	Total Units	Overview of the Program
State Funded	72	State funded Public Housing
State Funded	147	MRVP Project Based
State Funded	26	MRVP Mobile
Non-MTW HUD Funded	100	Section 8 MOD
Non-MTW HUD Funded	14	SRO Chapin Mansion
State Funded	17	AHVP
Total Other Housing Owned and/or Managed	376	

**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:

N/A

B. Leasing Information

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

Housing Program:	Numbers of Households Served*	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs **	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs **	0	0
Port-In Vouchers (not absorbed)	N/A	37
Total Projected & Actual Households Served	0	37

* 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:	Unit Months Occupied/Leased****	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs ***	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs ***	0	0
Port-In Vouchers (not absorbed)	N/A	444
Total Projected & Annual Units Months Occupied/Leased	0	444

*** 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.

There are no differences between planned and actual households served.

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	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

Fiscal Year:	2011	2012	2013	2014	2015	2016	2017
Total Number of Local, Non-Traditional MTW Households Assisted	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percentage of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Reporting Compliance with Statutory MTW Requirements - Maintain Comparable Mix

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	407	488	0	895	44%
2 Person	186	265	0	451	22%
3 Person	172	183	0	355	17%
4 Person	92	123	0	215	11%
5 Person	37	51	0	88	4%
6+ Person	14	17	0	31	2%
Totals	908	1,127	0	2,035	100%

*Data as of September 2013

**Data as of March 2014 – closest data available to date HHA entered MTW. Data does not include Enhanced Vouchers.

***“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.

Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized

N/A

Mix of Families Served

	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained	44%	22%	17%	11%	4%	2%	100%
Number of Households Served by Family Size this Fiscal Year	960	465	368	238	73	33	2,137
Percentages of Households Served by Household Size this Fiscal Year	45%	22%	17%	11%	3%	2%	100%
Percentage Change	1%	0%	0%	0%	-1%	0%	0%

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

NA.

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	Leasing projections were impacted by Lyman Terrace redevelopment schedule.

Number of Households Transitioned to Self-Sufficiency by Fiscal Year End

Activity Name/#	Number of Households Transitioned	Agency Definition of Self Sufficiency
Family Self-Sufficiency (FSS) Program – Public Housing*	7 public housing participants graduated from the FSS Program and reached self-sufficiency, including 3 homebuyers **	See below
Family Self-Sufficiency (FSS) Program – Section 8*	2 Housing Choice Voucher participants graduated from the FSS Program and reached self-sufficiency, both were homebuyers ***	See below
Other – Section 8*	4 Housing Choice Voucher participants reached self-sufficiency **	See below

* The number provided here should match the outcome reported where metric SS #8 is used.

** FSS participants are not eligible for participation in the Career Advancement Program and are not included in metric SS #8; therefore this number will not match the outcome reported for metric SS #8 under CAP.

*** Per HUD guidance, the number provided here should match the outcome reported where metric SS #8 is used. However, the only activity that includes metric SS #8 is the Career Advancement Program (CAP), which is open only to public housing clients and is not part of FSS. Thus, this number will not match the outcome reported for metric SS #8 under CAP.

Households Duplicated Across Activities/Definitions	0
ANNUAL TOTAL NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	13

HHA recognizes the challenges its clients face in obtaining self-sufficiency. The high cost of housing and obstacles to earning a living wage make the objective of self-sufficiency difficult to attain. HHA has adopted the definition of self-sufficiency listed below for the activities that have the statutory objective of self-sufficiency and/or for which HHA is required to report on Standard Metric SS #8 (Households Transitioned to Self-Sufficiency). The overarching definition for the families in these activities is a voluntary termination of housing assistance, as

well as other forms of government assistance. The criteria generally used to identify these individuals are:

- Voluntary termination of housing assistance;
- Total household income of 80% of AMI or greater at time of termination; and
- Total household income from other forms of government assistance (TANF, cash aid, etc.) of \$0 at time of termination.

C. 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	Merged (excluding Churchill Homes)	944	Closed	No
Federal MTW Public Housing (Churchill Homes)	Site-Based	400	Open	Yes
Housing Choice Voucher	Other: Statewide	184,989	Open	Yes
Housing Choice Voucher	Other: Statewide with Holyoke Residency	4,890	Open	Yes

* *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.*

If partially open waiting list, please describe:

Not applicable

If Local, Non-Traditional Program, please describe:

Not applicable

If Other Wait List Type, please describe:

Other 1: Housing Choice Voucher – The Holyoke Housing Authority participates in the MassNAHRO Centralized HCV waiting list. This list indicates the Statewide HCV waiting list of participating Public Housing Authorities.

Other 2: Housing Choice Voucher – The Holyoke Housing Authority participates in the MassNAHRO Centralized HCV waiting list. This list indicates the HCV applicants who have residency preference.

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.

HHA did not make any changes to the organizational structure of the wait list or policy changes regarding the wait list during the fiscal year.

III. Proposed MTW Activities

All proposed activities that are granted approval by HUD are reported on in Section IV as 'Approved Activities.'

IV. Approved MTW Activities

This section provides HUD-required information detailing previously approved MTW activities.

A. Implemented Activities

2013-1: Biennial Recertifications

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.

The biennial recertification initiative was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May 2013 and was implemented by HHA in FY 2014. In FY 2015, 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). Required interim recertifications (i.e. for changes in family composition or otherwise required by HHA) do not count against the limit. Elderly and disabled households are exempt from this provision and will be able to complete an interim recertification at any time. Zero-income households and households on minimum rent will continue to be subject to annual or more frequent recertification requirements. In addition, clients participating in the Career Advancement Program were submitted to additional interim reporting requirements described in the applicable section of the MTW Plan and/or implementing policies/procedures. This initiative is designed to maintain the administrative efficiencies gained by completing regular recertifications every other year.

While HHA was not able to determine metrics for CE #1 or CE#2 this year due to a problem with its computer system reporting function, we believe HHA realized administrative savings associated with this activity. Changing recertifications to a biennial schedule and limiting the number of interims both reduce the number of transactions HHA staff must complete annually per household and result in time and cost savings for the agency. HHA will be working with its vendor to resolve the issue and will report on these metrics moving forward.

Changes to Metrics

The "Average Tenant Rent Share in HCV" baseline under CE#5: Increase in Agency Rental Revenue has been updated due to a calculation error. The metrics for this MTW activity 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 metrics do not currently include the residents at Churchill Homes.

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>Recertifications performed in FY 2013: 1,887</p> <p>Time per recertification: 105 minutes</p> <p>Time spent on recertifications in FY 13: 3,302 hours</p> <p>Interims performed in FY 13: 1,321</p> <p>Time per interim: 45 min.</p> <p>Time spent on interims in FY 13: 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 FY 2013: \$102,474</p>	<p>Estimated number of recertifications performed :1,290</p> <p>Time per recertification: 85 minutes</p> <p>Time spent on recertifications: 1,827 hours</p> <p>Estimated number of interims performed: 1,293</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interims: 970 hours</p> <p>Total time spent on interims and recertifications: 2,797 hours</p> <p>Average hourly wage for staff: \$24.11</p> <p>Total cost after implementation of activity: \$67,436</p>	<p>Recertifications performed in FY 17: 516</p> <p>Time per recertification: 85 minutes</p> <p>Time spent on recertifications in FY 17: 731 hours</p> <p>Interims performed in FY 17: 423</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 17: 317 hours</p> <p>Total time spent on interims and recertifications: 1,048 hours</p> <p>Average hourly wage for staff: \$26.62</p> <p>Total cost after implementation of activity: \$27,898</p>	Yes
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 FY 2013: 1,887</p> <p>Time per recertification: 105 minutes</p>	<p>Estimated number of recertifications performed: 1,290</p> <p>Time per recertification: 85 minutes</p>	<p>Recertifications performed in FY 17: 516</p> <p>Time per recertification: 85 minutes</p>	Yes

	<p>Time spent on recertifications in FY 13: 3,302 hours</p> <p>Interims performed in FY 13: 1,321</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 13: 991 hours</p> <p>Total time spent on interims and recertifications prior to implementation of activity: 4,293 hours</p>	<p>Time spent on recertifications: 1,827 hours</p> <p>Estimated number of interims performed: 1,293</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interims: 970 hours</p> <p>Anticipated time spent on interims and recertifications after implementation of activity: 2,797 hours</p>	<p>Time spent on recertifications in FY 17: 731 hours</p> <p>Interims performed in FY 17: 423</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 17: 317 hours</p> <p>Total time spent on interims and recertifications: 1,048 hours</p>	
<i>CE #5: Increase in Agency Rental Revenue**</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	<p>Average tenant rent share in HCV: \$347</p> <p>Average tenant rent share in public housing: \$315</p>	<p>Estimated Average tenant rent share in HCV: \$350</p> <p>Estimated Average tenant rent share in public housing: \$321</p>	<p>Average tenant rent share in HCV: \$365</p> <p>Average tenant rent share in public housing: \$334</p>	<p>Yes, HHA achieved the benchmark; however, HHA does not believe it is applicable in the context of this activity.</p>
**HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.				

2013-2: Revised Asset Policies

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 affect 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 all assets, 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 asset and imputes asset income using HHA's established passbook savings rate.
- **Exclusion of Asset Income** - Originally HHA excluded all asset income below \$500 under this activity, however In HHA's FY 2017 Annual Plan submitted to HUD in December 2016, HHA proposed excluding asset income where the combined market asset value is less than or equal to \$50,000. This proposed policy is consistent with HHA's existing policy on Self-Certification of Assets.

This activity was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May 2013. HHA developed policies and procedures regarding the revised asset policies. HHA educated clients and trained staff on the new asset requirements in the first quarter of FY 2014. The policies were implemented in May of 2014 and during FY 2015 were applied to each client's first interim or regular recertification. As mentioned above, the activity was slightly revised in FY 2017. HHA continued to implement this activity, resulting in increased agency cost savings and staff time savings.

Changes to Metrics:

The "Average Tenant Rent Share in HCV" baseline under CE#5: Increase in Agency Rental Revenue has been updated due to a calculation error. The metrics for this MTW activity 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 metrics do not currently include the residents at Churchill Homes.

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 minutes 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 asset over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Average hourly wage for staff: \$24.11 Total cost after implementation of activity: \$16.07	HCV households with assets over \$50,000: 2 PH households with assets over \$50,000: 0 Time per asset verification: 20 minutes Average hourly wage for staff: \$26.62 Total cost after implementation of activity: \$17.75	The benchmark was not met due to a slight increase in the hourly wage of staff. However, compared to the baseline, HHA realized significant savings associated with this activity.
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 minutes Total time spent verifying assets: 213 hours	HCV households with asset 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	HCV households with assets over \$50,000: 2 PH households with assets over \$50,000: 0 Time per asset verification: 20 minutes Total time spent after implementation of activity: 40 minutes	Yes, there were a total of 2 households with assets over \$50,000 across HCV and Public Housing.
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a	HHA quality control samples	HHA anticipates the number of files	<5% error rate	Yes, the number of files with

task as a percentage (decrease).	demonstrate that 0% of files have asset related errors.	with asset related errors will be less than 5%.		asset related errors was 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: \$347 Average tenant rent share in public housing: \$315	Average tenant rent share in HCV: \$350 Average tenant rent share in public housing: \$310	Average tenant rent share in HCV: \$365 Average tenant rent share in public housing: \$334	Yes, HHA achieved the benchmark; however, HHA does not believe it is applicable in the context of this activity.
<i>*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.</i>				

2013-4: Neighborhood Revitalization

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.

HHA’s MTW authority allowed for more flexible use of PBVs for this initiative. 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.

This activity was first proposed in HHA’s MTW Year 1 Annual Plan submitted to HUD in May 2013. Final HUD approval was received in September 2013. In FY 2017 HHA developed and issued an RFP for PBV units in the Arts & Innovation district in order to select a developer(s).

HHA initially set aside thirty project-based vouchers for this activity; however, HHA issued an RFP in October 2017, to which no one applied and expired in December 2017. While HHA still strongly supports the revitalizing of the Arts and Innovation District, the feasibility of project-based vouchers is unclear based on the housing stock within the current District’s boundaries. HHA will continue to work and collaborate with the City to develop new strategies to advance this initiative.

Changes to Metrics

NA

CE #1: Agency Cost Savings**				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0.00	\$0.00	\$0.00	Since HHA did not award any PBV under this activity, there was no savings realized for this activity.
<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	0	Since HHA did not award any PBV under this activity, there was no time savings realized

				for this activity.
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***HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.*

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.	0	Since HHA did not award any PBV under this activity, zero households were prevented from displacement. However, HHA does not believe this is an applicable metric for this activity as the activity was designed to create units.

***HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.*

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	5 Units	0	Since HHA did not award any PBV under this activity, zero households were able to move to a better unit and/or neighborhood of opportunity as a result of the activity.

2015-1: Rent Simplification

Description/Update

HHA’s rent simplification activity includes the following components.

- Use the Payment Standard in effect at the effective date of the regular recertification regardless of any change in the Payment Standard. (HCV Program only)
- Exclude all Full-time student income for household members other than the Head, Spouse or Co-Head. (Public Housing and HCV)
- Eliminate the adult full time student deduction. (Public Housing and HCV)

This activity was first proposed in HHA’s MTW FY 2015 and implemented in 2016. HHA continued the implementation of this activity in FY2017. The activity allows for a much more streamlined process and results in cost and time savings for HHA staff. With an uptake in the number of households with full-time students, HHA realized more time and cost savings than anticipated associated with the verification and calculate of income for full time students.

Changes to Baselines, Benchmarks & Metrics

Note, there was an error in the FY 2017 Plan and had the activity as not yet implemented (metrics were not established). HHA utilized the baseline data included in the metrics from the 2015 Annual Plan. Below, HHA developed and included the benchmark and outcome metrics required.

Metrics

HHA established benchmarks and reported the outcomes of the metrics below:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of households with full-time student in FY14: 66	Number of households with full-time student: 66	Number of households with full-time student: 104	The benchmark was not met due to a slight increase in the hourly wage of staff and an increase in the number of households with full time students. However, compared to the baseline, HHA
	Approximate time to verify full-time student income and status: 15 minutes	Approximate time to verify full-time student income and status: 5 minutes	Approximate time to verify full-time student income and status: 5 minutes	
	Hourly Staff Rate:	Hourly Staff Rate:	Hourly Staff Rate:	

	\$23.87 Total cost of activity: \$394	\$24.11 Total cost of activity: \$133	\$26.62 Total cost of activity: \$231	realized savings associated with this activity.
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Number of households with full-time student in FY14: 66 Approximate time to verify full-time student income and status: 15 minutes Total time spent on activity: 16.5 hours	Number of households with full-time student: 66 Approximate time to verify full-time student income and status: 5 minutes Total time spent on activity: 5.5 hours	Number of households with full-time student: 104 Approximate time to verify full-time student income and status: 5 minutes Total time spent on activity: 8.7 hours	The benchmark was not met due to an increase in the number of households with full time students. However, compared to the baseline, HHA realized savings associated with this activity.
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 demonstrated that 0% of files had full time student related errors	HHA anticipates the number of files with full time student related errors will be less than 5%	<5%	Yes, there were less than 5% full time student related errors.
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	Average tenant rent share in HCV: \$350.46 Average tenant rent share in public housing: \$299.76	Estimated Average tenant rent share in HCV: \$350 Estimated Average tenant rent share in public housing: \$321	Average tenant rent share in HCV: \$365 Average tenant rent share in public housing: \$334	Yes, HHA achieved the benchmark; however, HHA does not believe it is applicable in the context of this activity.
*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.				

2015-2: Rent Reasonableness

Description

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.

Generally, a 5% or greater decrease in the published FMR compared to the FMR in effect 1 year before is not typical in the Holyoke area. Although infrequent, when this does occur, it places a significant administrative burden on HHA staff who must conduct reasonable rent determinations. Staff may also need to renegotiate rents and if negotiations are unsuccessful, tenants will be required to move, which will further increase the administrative burden on staff and place an onerous burden on tenants.

The savings generated from this initiative are realized only when the FMRs decrease by 5% or more. Between FY 2016 and FY 2017 the FMR for the Holyoke area increased. As such, HHA would not have had to re-determine reasonable rent in FY 2017.

This activity was first proposed in HHA's FY 2015 Annual Plan and was implemented by HHA in FY 2015 upon approval by HUD. HHA continued to implement this activity in FY 2017. However, as the FMR increased in FY 2017, the authority was not utilized.

Changes to Metrics

Since the FMR increased from FY 2016 to FY 2017, there was no cost or time savings associated with this activity.

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of HCV units leased in FY 2015: 1,203 Time to complete RR: 15 minutes Staff Hourly Wage: \$23.87 Cost to re-	\$0	\$0	Since the FMR increased, there was no savings realized for this activity.

	determine RR in FY15 if 5% decrease in published FMR: \$7,179			
<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).	<p>Number of HCV units leased in FY 2015: 1,203</p> <p>Time to complete Reasonable Rent: 15 minutes</p> <p>Time spent to re-determine reasonable rent in FY 15 if 5% decrease in published FMR: 301 hours</p>	\$0	\$0	Since the FMR increased, there was no savings realized for this activity.

2015-3: PBV Rent Reasonableness

Description

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.

This activity was first proposed in HHA's FY 2015 and was implemented by HHA in FY 2015 upon approval by HUD. HHA continued to implement this activity in FY 2017. However, as the FMR increased in FY 2017, the authority was not utilized.

Changes to Metrics

Since the FMR increased from FY 2016 to FY 2017, there was no cost or time savings associated with this activity.

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of PBV developments receiving assistance leased in FY 2015: 2 Time to complete Reasonable Rent: 30 min. Staff Hourly Wage: \$23.87	\$0	\$0	Since the FMR increased, there was no savings realized for this activity.

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	Cost to re-determine reasonable rent in FY 15 if 5% decrease in published FMR: \$23.87			
<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).	<p>Number of PBV developments receiving assistance leased in FY 2015: 2</p> <p>Time to complete Reasonable Rent: 30 min.</p> <p>Time spent to re-determine reasonable rent in FY 15 if 5% decrease in published FMR: 1 hour</p>	\$0	\$0	Since the FMR increased, there was no savings realized for this activity.

2015-4: Preservation after Conservation (formerly Project-Basing Enhanced Vouchers)

Description

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 MTW operating flexibilities (i.e. Biennial Recertification and Inspections; 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 that 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.

This activity was implemented in FY 2015. HHA anticipated that the regulatory flexibility under this activity may have been used for Neighborhood Revitalization projects. However, since there were no applications to the RFP issued under Neighborhood Revitalization, HHA did not end up utilizing the flexibility under this activity in FY 2017. HHA will continue to look for opportunities where this activity would assist in the preservation of expiring use properties.

Changes to Metrics

Since HHA did not use this activity in FY 2017 there are no metrics to report.

<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	0 units	0 units	0 units	Since HHA did not use this activity in FY 2017 there are no metrics to report.

HC #2: Units of Housing Preserved

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(increase).				

Activity 2016-1: Modified Project-Based Voucher Program

Description

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.

This activity was implemented in FY16. HHA anticipated that the regulatory flexibility under this activity may have been used for Neighborhood Revitalization projects. However, since there were no applications to the RFP issued under Neighborhood Revitalization, HHA did not end up utilizing the flexibility under this activity in FY 2017. HHA will continue to utilize the flexibility as opportunities become available.

Changes to Metrics

HUD requires HHA to utilize standard metrics CE#1, CE#2 and HC#4; however, as noted below, HHA does not believe these metrics are applicable to the proposed activity. HHA has included HC#1 as a local metric as the activity is designed to create or preserve housing units. However, since HHA did not use this activity in FY 2017 there are no metrics to report.

CE #1: Agency Cost Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0.00	\$0.00	\$0.00	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>*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>				
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	0	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>*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>				
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	0 units	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>*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	0 units	0 units	Since HHA did not use this activity in FY 2017 there are no metrics to report
<i>*HHA is incorporating this standard metric as a local metric.</i>				

B. Not Yet Implemented Activities

Not Applicable.

C. Activities on Hold

Not applicable.

D. Closed Out Activities

2013-3: Career Advancement Program

Description

HHA used its MTW Authority to collaborate with local non-profit and educational institutions to develop the Career Advancement Program (CAP). CAP participants received case management support and self-sufficiency support from HHA as well as an income disregard. The goal of this activity was 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.

This activity was approved in 2013, implementation began in 2015 and the program was up and running in 2015. In 2017, HHA continued extensive recruitment of CAP participants. The recruitment process, even further refined from 2016, included mass mailing, convening of HHA hosted information meetings, and direct contact with potential participants. However, recruitment procedures were unsuccessful. The end result was that there were only 3 CAP eligible households that participated in the CAP program in 2017. One of those participants moved to another self-sufficiency program, leaving 2 CAP participants in the program at the completion of 2017.

As identified in the CAP Evaluation Report attached, CAP participants have had positive opinions of the program and some have been able to accumulate savings. However, there is a lack of general interest in the CAP program amongst HHA participants. Furthermore, HHA has invested substantial time and commitment to this program, as demonstrated by heavy levels of recruitment efforts, and by their one-on-one support of the CAP participants. Even so, these efforts have not yielded the type of response anticipated. In 2017, CAP participants were not able to accumulate significant savings due to an emergency that arose. HHA has decided to close the CAP program as a result of the limited participation rate, coupled with the amount of staff time required.

Moving forward, upward mobility opportunities for HHA clients remains a top priority. HHA will continue to operate its FSS program and will pursue any new upward mobility initiatives that have advantageous benefits that interest clients.

Changes to Metrics:

HHA revised baselines and benchmarks for both treatment and control groups in the FY 2015 Annual Report. Benchmarks set reflect anticipated results at the end of the disregard period. HHA does not currently have any HCV CAP participants as the program only served public housing clients.

Below is a summary table that provides outcomes for the Activity for the years it was up and running.

Please also note, the Churchill Homes public housing development is managed by a third-party and the data is not maintained in HHA's data systems. As such, the universe for this MTW activity does not currently include the residents at Churchill Homes.

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes*
Control Group				
Average earned income of households affected by this policy in dollars (increase).	PH - Average earned income: \$7,875	PH - Average earned income: \$7,875	PH - Average earned income \$8,174	PH - Average earned income \$9,925
Treatment Group				
Average earned income of households affected by this policy in dollars (increase).	PH - Average earned income: \$7,907	PH - Average earned income: \$7,907	PH - Average earned income \$9,322	PH - Average earned income \$8,106
*The difference between the Treatment Group and the Control Group were tested using an Independent Samples t-test. When I compared the Treatment group to the control group, the test was not significant for Income from in 2017 ($F = 1.926, p = .166$).				
SS #2: Increase in Household Savings				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes**
Control Group				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	PH - Average savings/escrow balance: \$137	PH - Average savings/escrow balance: \$137	PH - Average savings/escrow balance: \$44	PH - Average savings/escrow balance: \$78
Treatment Group				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	PH - Average savings balance: \$604	PH - Average savings balance: \$604	PH - Average savings balance: \$552	PH - Average savings balance: \$83
** The difference between the Treatment Group and the Control Group were tested using an Independent Samples t-test. When I compared the Treatment group to the control group, the test was not significant for Assets in 2017 ($F = 0.010, p = .922$).				
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
Report the following information	(1) and (2)*** PH - Have earned income: 74	(1) and (2)*** PH - Have earned income: 74	(1) and (2)*** PH - Have earned income: 86	(1) and (2)*** PH - Have earned income: 70

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	Have earned income: 51% of PH (3) and (4)**** (5) PH - Are unemployed: 72 Are unemployed: 49% of PH (6) Other: Not applicable	Have earned income: 51% of PH (3) and (4)**** (5) PH – Are unemployed: 72 Are unemployed: 49% of PH (6) Other: Not applicable	Have earned income: 59% of PH (3) and (4)**** (5) PH – Are unemployed: 61 Are unemployed: 41% of PH (6) Other: Not applicable	Have earned income: 62.5% of PH (3) and (4)**** (5) PH – Are unemployed: 42 Are unemployed: 37.5% of PH (6) Other: Not applicable
Treatment Group				
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	(1) and (2)*** PH - Have earned income: 78 Have earned income: 52% of PH (3) PH - Are enrolled in an educational program: 3 Are enrolled in an educational program: 2% of PH (4) PH - Are enrolled in job training program: 2 Are enrolled in job training program: 1% of PH (5) Public Housing - Are unemployed: 73 Are unemployed: 48% of PH	(1) and (2)*** PH - Have earned income: 78 Have earned income: 52% of PH (3) PH - Are enrolled in an educational program: 3 Are enrolled in an educational program: 2% of PH (4) PH - Are enrolled in job training program: 2 Are enrolled in job training program: 1% of PH (5) Public Housing - Are unemployed: 73 Are unemployed: 48% of PH	(1) and (2)*** PH - Have earned income: 96 Have earned income: 60% of PH (3) PH - Are enrolled in an educational program: 3 Are enrolled in an educational program: 2% of PH (4) PH - Are enrolled in job training program: 4 Are enrolled in job training program: 3% of PH (5) PH – Are unemployed: 64 Are unemployed: 40% of PH	(1) and (2)*** PH - Have earned income: 73 Have earned income: 56% of PH (3) PH - Are enrolled in an educational program: 1 Are enrolled in an educational program: 1% of PH (4) PH - Are enrolled in job training program: 0 Are enrolled in job training program: 0% of PH (5) PH – Are unemployed: 58 Are unemployed: 44% of PH

			(6) Other: Not applicable	(6) Other: Not applicable
***HHA does not track full-time employment vs. part-time employment.				
****HHA does not track this information for the control group.				
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
Number of households receiving TANF assistance (decrease).	PH – Number of households receiving TANF: 32	PH – Number of households receiving TANF: 32	PH – Number of households receiving TANF: 17	PH – Number of households receiving TANF: 14
Treatment Group				
Number of households receiving TANF assistance (decrease).	PH – Number of households receiving TANF: 37	PH – Number of households receiving TANF: 37	PH – Number of households receiving TANF: 24	PH – Number of households receiving TANF: 20
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
Number of households receiving services aimed to increase self-sufficiency (Increase).	PH - Number of households receiving services to increase self-sufficiency***	PH - Number of households receiving services to increase self-sufficiency***	PH – Number of households receiving services to increase self-sufficiency***	PH – Number of households receiving services to increase self-sufficiency***
Treatment Group				
Number of households receiving services aimed to increase self-sufficiency (Increase).	PH - Number of households receiving services to increase self-sufficiency: 0	PH - Number of households receiving services to increase self-sufficiency: 0	PH – Number of households receiving services to increase self-sufficiency: 8	PH – Number of households receiving services to increase self-sufficiency: 3*****
***HHA does not track this information for the control group.				
****One of those households moved to another self-sufficiency program through the FSS program				
SS #6: Reducing Per Unit Subsidy Cost for Participating Households*****				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	There were no HCV participants in the program.	There were no HCV participants in the program.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

Treatment Group				
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	There were no HCV participants in the program.	There were no HCV participants in the program.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
*****HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.				
SS #7: Increase in Agency Rental Revenue*****				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
PHA rental revenue in dollars (increase).	PH – HHA rental revenue: \$290	PH-HHA rental revenue: \$290	PH – HHA rental revenue: \$272	PH – HHA rental revenue: \$269
Treatment Group				
PHA rental revenue in dollars (increase).	PH – HHA rental revenue: \$309	PH – HHA rental revenue: \$309	PH – HHA rental revenue: \$319	PH – HHA rental revenue: \$288
*****HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity. HHA is using TTP for this metric.				
SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	2016 Outcomes	2017 Outcomes
Control Group				
Number of Households transitioned to self-sufficiency (increase).	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.
Treatment Group				
Number of Households transitioned to self-sufficiency (increase).	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for	PH - Number of households transitioned to self-sufficiency: 1 FSS participants are not eligible for

	participation in the Career Advancement Program and therefore are not included in this metric.	participation in the Career Advancement Program and therefore are not included in this metric.	participation in the Career Advancement Program and therefore are not included in this metric.	participation in the Career Advancement Program and therefore are not included in this metric.
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Activity 2013-5: Biennial HQS Inspections

Description/Update

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.

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 MTW Funds

A. Sources and Uses of MTW Funds

HHA submitted unaudited and audited information in the prescribed FDS format through HUD's Financial Assessment System (FASPHA).

Activities Using Only Single Fund Flexibility

HHA did not use single fund flexibility for broader use purposes during FY 2017.

B. Local Asset Management Plan

Has the PHA allocated costs within statute during the plan year?	Yes
Has the PHA implemented a local asset management plan (LAMP)?	No
Has the PHA provided a LAMP in the appendix?	No

C. Commitment of Unspent Funds

There were no planned commitments or obligations of unspent MTW funds at the end of HHA's fiscal year.

Account	Planned Expenditures	Obligated Funds	Committed Funds
N/A	No current planned commitments or obligations	\$0	\$0
	Total Obligated or Committed Funds	\$0	\$0

VI. Administrative

A. HUD Reviews, Audits and Physical Inspection Issues

In FY 2017 HHA's single audit resulted in one finding. HHA has resolved the issue with the local HUD Field Office and the finding has been closed out. HHA did not receive any other HUD review or physical inspection issues that would require HHA to take action to address the issue.

B. PHA-Directed Evaluations

See Appendix B for a report on HHA's Career Advancement Program (CAP).

Detailed MTW Block Grant Evaluation

During FY 2017, HHA continued to work with the evaluator to track and report on the baseline and benchmark cost savings metrics that are discussed and reported on above in the Approved MTW Activities section of the Report. With respect to single fund flexibility, to date, HHA has not utilized MTW Block Grant flexibility, i.e. Public Housing Operating Fund, Capital Fund and HCVP HAP funds have been used for the original program purposes and there have been no internal transfers for other authorized MTW activities. HHA's ability to utilize single fund flexibility is severely constrained due to the funding formula issue previously noted.

C. Certifications of MTW Statutory Requirements

See the attached certification regarding the statutory requirements in Appendix A.

Appendix A: Certification Of Conformance with MTW Statutory Requirements

The Holyoke Housing Authority (“HHA”) hereby certifies that between the periods of January 1, 2017 and December 31, 2017, HHA met the following three MTW statutory requirements of:

- 1) Assuring that at least seventy-five (75) percent of the families assisted by HHA are very low-income;
- 2) 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
- 3) 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.

Holyoke Housing Authority

MA005 _____
PHA Number/HA Code

I hereby certify that all the information stated herein is true and accurate.

Matthew A. Mainville _____
Name of Authorized Official


Signature

Executive Director _____
Title

3/16/18 _____
Date

Appendix B: CAP 2018 Evaluation Report

Holyoke Housing Authority Moving to Work Career Advancement Program (CAP)

2018 Evaluation Report

Michael Krezmien, PhD.

Karen Harrington, M.Ed.

Recruitment and Enrollment

In 2017, the Holyoke Housing Authority (HHA) continued extensive recruitment of CAP participants. The recruitment process was refined from the 2016 recruitment, in an effort to enhance the process in order to recruit a broader number of participants. This included mass mailing, convening of HHA hosted information meetings and direct contact with 18 CAP eligible participants who were identified by the evaluator as persons who would benefit from the CAP program because of the income disregard and the current earnings. These recruitment procedures were unsuccessful. The HHA then followed these up with additional mailings and direct contacts. The end result was that there were only 3 CAP eligible households that participated in the CAP program in 2017. One of those participants moved to another self-sufficiency program, leaving 2 CAP participants in the program at the completion of 2017.

Due to the significant amount of time and effort HHA dedicates to this program and the little interest it results in, it is not beneficial to HHA to continue to administer it.

Impact of CAP on Participants

We examined the impact of CAP on the CAP participants through a data review and an interview process with CAP participants. At the time of the evaluation, there were just two CAP participants and both of the participants were employed at the time of the evaluations. One of the participants had a break in employment during the year because of maternity leave, but returned back to work.

Interviews were conducted using an interview guide. The questions were designed to determine the impact of the CAP program from the perspective of the stakeholders.

Reasons for Enrolling in CAP: The CAP participants reported that the purpose to enroll in CAP was to save money, which was consistent with the 2016 program. One of the participants reported that they were saving toward buying a home for herself and her two children. She was successful at saving substantial funds, but then had to use her funds for a family emergency and depleted the savings. This appears to be a consistent challenge participants' encounter, as also observed last year. Because participants have such tight financial circumstances, any emergency or unexpected occurrence depletes their finances in a very short time. The client also heavily valued the income disregard as a beneficial element of the program. The second client has only begun the participation in CAP, and had not yet saved appreciable assets. However, she was optimistic about this possibility over time.

One quote from a CAP participant displays her reason for enrolling in the CAP program:

“I want to buy a house for me and my kids (she has two boys, a toddler and an 11-year-old). The program helps me to save money to do that.”

Training and Education Programs: Because we only had three total participants, and two at the end of the year, we had a limited sample. All three participants were employed, and consequently

were not involved in any training or educational programs. However, one of the successful clients who moved to self-sufficiency had completed an RN degree while in the CAP program, which supported both savings and her move to self-sufficiency.

Employment and Employment Support: All three of the CAP participants were employed. One of the three participants successfully left the program, and became self-sufficient. The other two participants were employed during the 2017 program. The participants are generally self-directed, but they did report the importance of HHA personnel in support of their work.

Opinions about CAP: We only had two participants at the time of the program. There was evidence that both had strong and positive opinions about the program. One of the clients repeatedly shared the benefits from the program, and the utility of the program in saving money. Although the purpose of the savings was to purchase a house, the client was able to use her savings to manage a family emergency. Without the program, this emergency would have put the client in debt. Although the depletion of funds was definitely a struggle, it did demonstrate the practical impact that the CAP program had on this client. This impediment did not stop the learning process. She stated:

“Yes, even though I had to spend my savings. But I’ve started to save up again because I still want to buy a house.”

Benefits of CAP: The participants all stated that support from the HHA staff was a primary benefit of being in the program. Even the single participant who has struggled with maintaining contact and with maintaining involvement in the prescribed program reported that the staff could always be counted on. The three participants pointed out that the rent savings was a major benefit. The savings in rent was critical to putting aside money and saving towards a future goal. Two of the three identified support from the HHA staff in budgeting and setting aside money as a benefit. This was even the case with one individual who was injured and out of work, but still focused on the savings process as a means of weathering the unemployment period. All four indicated that the program contributed to savings for a home. Even the two who were out of work identified this as a benefit of the program.

Three CAP participants (including the participant who moved to self-sufficiency) provided statements about the benefits of CAP. These ranged from impacts of the program, to the specialized support received from HHA staff as part of the program.

“It helps me to manage my money and stabilize my necessities. They talked with me about different ways to save money and about how to buy a house. I feel like I can count on them (the HHA staff) if I need help.”

“It really truly helped me get the BSN which is required by so many places to get a job. It meant that I could continue school. And Justine helped me write my resume and cover letter for the Elms Nursing program – and it worked. I got in! I am going to take the homeowner classes in September after I graduate.”

“Everything. They’ve been informative about so much and they check in to see how I’m going. It’s really helpful that rent doesn’t go up, since I’m not working.”

Savings: Only one of the two current CAP participants was able to save money, although the funds were depleted because of an emergency at the time of the data analysis. The second participant only recently began the program, and the income disregard had not yet resulted in demonstrable savings. The person who completed the program was able to save sufficient funds to leave HHA and purchase a home.

Quantitative Findings

SS#1:

There was no statistical difference in the mean income across groups. Because the CAP program outcome measures relied heavily on the CAP participants to generate income that created a change in the mean income for the treatment group, it is critical to have a substantial number of CAP participants earning income. In 2016, several of the CAP participants obtained jobs with substantial income, which created a substantial change in the overall group. This year, there were only two participants, limiting the impact on the mean of the total group.

The comparison group had a mean earned income of \$9,925 and the treatment group had a mean earned income of \$8,106. We tested the difference between the Treatment Group and the Control Group using an Independent Samples t-test. When I compared the Treatment group to the control group, there were no significant difference for Earned Income in 2017 ($F = 1.926$, $p = .166$).

SS#2:

The treatment group had a mean savings of \$82.54, while the comparison group had a mean savings of \$78.40. We tested the difference between the Treatment Group and the Control Group using an Independent Samples t-test. When I compared the Treatment group to the control group, there were no significant difference for Average savings balance in 2017 ($F = 0.010$, $p = .922$).

Summary of Findings

The HHA CAP program is beneficial to the CAP participants, but the program has not had a meaningful impact on the treatment groups with regards to income and savings as was demonstrated in 2016. The CAP participants experienced a number of positive outcomes, and had a positive response to the program. The HHA staff were clearly the critical element of the program. All of the interviewed participants were effusive in their praise for the support and effort of the HHA staff.

However, there is a lack of general interest in the CAP program. It is my opinion that the HHA has invested substantial time and commitment to this program, as demonstrated by heavy levels of recruitment efforts, and by their one-on-one support of the CAP participants. Nonetheless, these efforts have not yielded the type of response anticipated. We felt that targeting specific individuals through direct recruitment would increase CAP participants to 30, in line with the

projections. Instead, the recruitment yielded just two more participants. Additionally, one of the prior participants successfully completed the program, obtained a degree, obtained a job, and left HHA. While this is a positive outcome, it created a decrease in the number of participants, and also negatively affected the Treatment group income and asset numbers. Because the program outcomes rely on the CAP participants obtaining employment and saving money, the limited number of CAP participants has resulted in a minimal impact on the overall Treatment Group. The HHA staff supported the participants through referrals, direct advice, writing of letters and

Recommendations

We recommend that HHA end the CAP initiative as part of their strategic MTW efforts. At this time, the time and effort put into the recruitment is actually resulting in a net efficiency of staff time, counter to the goals of MTW. Additionally, despite direct targeted recruitment of eligible participants, there has been an inability to find interested HHA clients. Subsequently, the program is not yielding the expected outcomes. While we recommend that the program be terminated, we do recommend keeping the income disregard for the two participants currently involved, as it is making a difference in their capacity to move toward self-sufficiency.