

Holyoke Housing Authority



MOVING TO WORK ANNUAL PLAN

HHA FISCAL YEAR 2019
(JANUARY 1, 2019 TO DECEMBER 31,
2019)

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I. Introduction

The Holyoke Housing Authority (HHA) entered into a Moving To Work (MTW) Agreement with the U.S. 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 2019, HHA will explore opportunities to make each federal dollar go further, as well as continue to work with HUD to resolve this issue and ensure that adequate funds are available to support current and projected leasing.

HHA has been selected to receive funding under the Fiscal Year 2017 Lead-Based Paint Capital Fund Program (LBFCFP) in the amount of \$93,450. Under the LBPCFP grant, the HHA will evaluate and reduce lead-based hazards across our federal public housing portfolio.

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 2019, i.e., the period from January 1, 2019 through December 31, 2019.

Long-Term MTW Goals and Objectives

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

Increasing Housing Choice for vulnerable populations and increasing the number of HHA residents who are working or actively engaged in educational or job training programs. Through creative partnerships, HHA plans to continue to explore opportunities to expand populations served and further improve the quality of training, education and job placement services provided to HCV and public housing residents. HHA plans to expand this effort to include more vulnerable populations, such as individuals with opioid dependence. HHA is in the preliminary stages of developing a program to address housing and service needs for opioid addicts who frequent the emergency room, resulting in increased health care costs and harmful patterns to themselves and others. HHA is hopeful that in the future, in collaboration with the Holyoke Medical Center, a program targeting this population will help combat this widespread issue in Massachusetts, as recognized by recently passed legislation.

Supporting sustainable development and community-wide neighborhood revitalization efforts. HHA will continue to look for opportunities to partner and support the City's ongoing revitalization throughout the community. Recently, HHA was selected as the developer for one of the City's development projects, funded by the State's Urban Agenda grant. The state's Urban Agenda is a program to promote economic vitality and cultivate safer, stronger urban neighborhoods across Massachusetts. HHA will work with the city to establish a plan, that is community driven and addresses the unique local needs of Holyoke, to redevelop vacant lots of land. If MTW flexibility is identified through that process as a vehicle to increase housing choice or give incentives to families to become economically self-sufficient, HHA may propose an activity in the future regarding the Urban Agenda project.

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. HHA will continue to explore tools and MTW flexibilities to streamline administration of programs.

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. HHA will continue to pursue funding opportunities as well as opportunities to leverage private equity where applicable.

Short-Term MTW Goals and Objectives

HHA plans to implement two new MTW initiatives in FY 2019:

Youth Aging Out of Foster Care: HHA will partner with a local public child welfare agency (LPCWA) to provide a stable housing and service program for youth aging out of foster care (YAFC). HHA will designate up to 15 Housing Choice Vouchers to eligible YAFC referred by a LPCWA. HHA will also utilize MTW funds to provide up-front housing assistance to new participants, which may include first and last months' rent and security deposit. The LPCWA will provide program participants with support services to assist in housing stabilization for the first year the participant is in the program.

Holyoke Public Schools Assistance: HHA will partner with the Holyoke Public Schools (HPS) to implement a housing and service program for families with children the HPS system whose lack of stable housing is affecting their children’s success in school. HHA will allocate up to 15 Housing Choice Vouchers to eligible participants referred by a Homeless Educational Coordinator on staff at HPS.

In Addition to the proposed activities, in FY 2019 HHA will continue to administer:

Administrative Streamlining Activities: HHA will continue to implement the following activities, which provide administrative efficiencies for the Housing Authority:

- Biennial Recertifications,
- Revised Asset Policies,
- Rent Simplification, and
- MTW Utility Allowances.

Preservation after Conservation: HHA may utilize this flexibility for Lyman Terrace Phase II in FY 2019.

Modified Project-Based Voucher Program: HHA is in the process of exploring project basing vouchers at a development in Holyoke, Holyoke Farms. If HHA moves forward with the contract, the flexibility offered by this activity will be utilized.

Holyoke Horizons Transitional Housing Support: HHA will continue to support the MTW activity that helps support successful re-entry into society of persons involved with the criminal justice system. The program provides 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 and Supportive (CHESS) initiative. Participants receive case management and supportive services from the HCSD while receiving an HHA rental subsidy.

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,	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
	bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or 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 to 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
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	Possible candidate for modernization,	None	HHA monitors its	Possible conversion of unit/parcels for residential	None

Name and Location	Development Activities	Demo/Dispo Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
21 Bowers Street	ESPC, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice Neighborhoods and/or LIHTC Application		waiting list and may apply for additional designated housing dependent upon need	unit reconfiguration and commercial, economic development, management offices, community and supportive services offices, and/or open space	
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, management offices, community and supportive services offices, and/or open space	None

II. General Housing Authority Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

HHA does not plan on adding new public housing units in FY 2019.

Table 1: Planned New Public Housing Units

Asset Management Project (AMP) Name and Number	Bedroom Size						Total Units	Population Type *	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A							0	N/A	N/A	N/A
Planned Total							0	N/A	N/A	N/A

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

If the "Population Type" is "Other" please describe

N/A

ii. Planned Public Housing Units to be Removed

Table 2: Planned Public Housing Units to Be Removed

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Lyman Terrace	76	Completion of Lyman Terrace Phase II.
Planned Total	76	

iii. Planned New Project-Based Vouchers

Table 3: Planned New Project Based Vouchers

Property Name	Number of Vouchers to be Project-Based	RAD (Yes/No)	Description of Project
Holyoke Farms	30	No	PBV conversion in well-established mixed-income development in Holyoke, MA.
Lyman Terrace*	76	No	Completion of Lyman Terrace Phase II. HHA is not certain as to how many units under this Phase will be completed in this plan year. If not all completed in FY 2019, the remainder will be completed in FY 2020.
Planned Total*	106		

*HHA has a demo/dispo application in for Lyman Terrace Phase II. HHA has not determined whether the replacement units will be incorporated in the MTWs, however, since the units are noted above to be removed from HHA's housing stock, HHA wanted to show the current plan to replace the removed units.

iv. Planned Existing Project-Based Vouchers

Table 4: Planned Existing Project Based Vouchers

Property Name	Number of Project-Based Vouchers	Planned Status at the End of the Plan Year (Committed/Leased-Issued)	RAD (Yes/No)	Description of Project
Holyoke Towers	54	Leased	No	An elderly high-rise, converted under preservation after conservation
Planned Total	54			

v. Planned Other Changes to MTW Housing Stock

HHA is not planning any other changes to the MTW Housing Stock in FY 2019.

Table 5: Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Site	Planned Change
NA	

vi. General Description of all Planned Capital Expenditures

The following chart provides a summary of planned capital expenditures for HHA’s Federal public housing developments during FY 2019. Actual expenditures may vary.

Table 6: Planned Capital Expenditures

Development	Planned Work Description	Projected Expenditures
Beaudoin Village	Replace existing roof, repair damaged siding and re-stain; upgrade door hardware	\$355,332
	Clean lateral sewer lines with video assistance	\$15,000
Toepfert Apartments	Replace existing flooring and kitchen and bath cabinets	\$190,000
Coughlin Apartments	Repair any cracks on balconies and bands; seal	\$145,000
	Fire Alarm panel replacement	\$20,000
	Key fob replacement	\$10,000
Zielinski Apartments	Key fob replacement	\$10,000
	Fire Alarm panel replacement	\$20,000
Beaudry-Boucher Apartments	Key fob replacement	\$10,000
Falcetti Towers	Key fob replacement	\$10,000
	Storefront replacements and vestibule upgrades	\$25,000
Rosary Towers	ADA Showers improvements	\$50,000
Central Maintenance	Ventilation and basement improvements	\$275,000
Administrative Offices	Office space modifications	\$25,000

B. Leasing Information

i. Planned Number of Households Served

Table 7: Planned Number of Households Served

Number of Households Service Through:	Planned Number of Unit Months Occupied/Leased*	Planned Number Of Households to Be Served**
MTW Public Housing Units Leased	7,848	654
MTW HCV Utilized	16,560	1,380
Local, Non-Traditional: Tenant Based^	360	30
Local, Non-Traditional: Property Based^	NA	NA
Local, Non-Traditional: Homeownership^	NA	NA
Planned Totals	24,768	2,064

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plan to have leased/occupied in each category throughout the full Plan Year.

** “Planned Number of Households to Be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.

^In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

Table 8: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served**
Tenant-Based	Activity 2018-2: Holyoke Horizons Transitional Housing Support	360	30
Property-Based	N/A		
Homeownership	N/A		
	Planned Totals	360	30

* The sum of the figures provided should match the total provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leased

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	NA
MTW HCV	NA
Local, Non-Traditional	NA

C. Waiting List Information

HHA administers its waiting lists in accordance with the HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable.

i. Waiting List Information Anticipated

Table 9: Waiting List Information

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
HCV	Statewide	194,590	Open	NA
HCV	Statewide with Holyoke Residency	5,030	Open	NA
Federal MTW Public Housing	Merged (excluding Churchill Homes)	640	Closed	TBD
Federal MTW Public Housing Units	Site-Based (Churchill Homes)	815	Open	NA

Describe any duplication of applicants across waiting lists:

Because Public Housing and HCV maintain separate waiting lists, applicants may apply to both.

ii. Planned Changes to Waiting List in the Plan Year

Waiting List Name	Description of Actual Changes to Waiting List

III. Proposed MTW Activities

Activity 2019-1: Youth Aging out of Foster Care (YAFC)

Description of MTW Activity

HHA will partner with a local public child welfare agency (LPCWA) to provide a stable housing and service program for youth aging out of foster care (YAFC). Hundreds of youth “age out” of the foster care system each year in Massachusetts, meaning they reach the age threshold required to receive services, including housing. Some are adopted by their foster care family, others are reunited with their biological parents, but many have no support network.

In support of many other initiatives and programs to assist youth aging out of foster care, HHA will partner and enter into an MOU with the Holyoke Department of Children and Families (Holyoke DCF Office) on the YAFC Activity. HHA will designate up to 15 tenant-based Housing Choice Vouchers, annually, to eligible YAFC referred by a LPCWA for a period of 36-months. The LPCWA will refer eligible participants, defined as individuals who have been in foster care within the last six months or will be leaving foster care within 90 days, are 18 years of age or older and are homeless or at risk of homelessness, as defined by the LPCWA. HHA will then screen referrals, calculate income, rent and subsidy in accordance with HHA’s Admin Plan and MTW policies.

As participants are not likely to have accrued finances available for initial housing costs, HHA will also utilize MTW funds, through its Single Fund Flexibility, to offer up-front housing assistance to new participants of the Youth Aging out of Foster Care program. Up-front housing assistance may include first and last months’ rent and security deposit. Each component of the up-front housing assistance will not exceed the applicable payment standard. Participants will only be eligible for up-front housing assistance once, upon initial lease up with an HHA issued voucher. Up-front housing assistance payments will only be made directly to owners on behalf of participants. Through an HHA lease addendum, security deposits made on behalf of program participants will be returned to HHA upon termination of a participant’s lease, except for in cases where owners need funds from a participant’s security deposit to address damage to their unit

Local youth aging out of foster care, who wish to receive ongoing support contact and work with their local DCF Office. As the Holyoke DCF Office will be responsible for directly referring participants, participants will have signed up for continued services at minimum upon initial lease up. Continued eligibility will not be subject to the receipt of supportive services. The Holyoke DCF Office will provide program participants with support services to assist in housing stabilization for the first year the participant is in the program. In addition to stabilization services, the Holyoke DCF Office will also provide appropriate referrals to employment and education providers to program participants.

After 36-months in the program, if in compliance with HHA continued occupancy policies as identified in the Administrative Plan, YAFC voucher holders will be allowed an extension of an additional 24-months resulting in a total housing assistance period of 60-months or five years. Based on funding availability and staff capacity, HHA may issue up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of 5 years. HHA may explore future expansion of the program based on need and staff capacity.

Statutory Objective

This initiative will support the MTW Statutory objective to increase housing choice for low-income families.

Anticipated Time Line

HHA has engaged staff at the local Department of Children and Families' (DCF) office in Holyoke and is prepared to implement this activity upon HUD approval.

Cost Implications

The activity will result in added costs associated with providing program participants with up-front housing assistance in the form of first, last and/or security deposits upon lease up. The FY 2019 FMR for a one-bedroom unit in Holyoke is \$831. Assuming enrollment of 15 participants in the program and up-front housing assistance in the form of first and last months' rent and security deposits provided to all participants, HHA estimates the program initial program cost to be approximately \$2,493 per participant, for total initial cost of \$37,395. Additional costs may be incurred upon voucher turnover.

Metrics

Outcomes will be reported in the MTW Annual Report.

<i>HC #1: Additional Units of Housing Made Available</i>				
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	15		
<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). If units reach a specific type of household, give that type in this box.	0	15		
<i>HC #3: Decrease in Wait List Time</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	NA	Less than 3 months		

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 in this box.	0	15		
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.	0	15		
HC #6: Increase in Homeownership Opportunities*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase)	0	0		
*This is a HUD required metric, however HHA does not believe this metric reflects an outcome of this activity.				
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.	0	15		
CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	0	TBD		
SS #5 Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency.	0	15		
SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households	0	TBD		

transitioned to self-sufficiency (increase).*				
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**Self-sufficiency will be defined as HHs who have ended participation in the program due to end of voucher term, not termination or early departure.*

Data Source

HHA will use data collected from its software system, and the partner agencies to track the outcomes of the participants as a result of this activity.

Authorization Standard

MTW Agreement Attachment C, (D) (4): The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan;

HHA is seeking Attachment C flexibility in order to provide rental vouchers to eligible youth who meet the referral standards for these vouchers.

Activity 2019-3: Holyoke Public School (HPS) Assistance Program

Description of MTW Activity

Since being placed in receivership, the city of Holyoke, school administrators and stakeholders have spent significant time and effort in improving instruction and services offered in the Holyoke Public Schools (HPS). Additionally, HPS has established a number of resources for families with children in the school system, which provides supportive services and case management. One such resource is the Family Access and Engagement Coordinator's (FAEC). FAEC's staff each school with a point person who assists families in identifying and accessing resources. The school department is also staffed with a Homeless Education and Services Coordinator, who provides various types of support for students experiencing homelessness.

Research has shown that instability in housing has a negative impact on a child's educational attainment. To address the needs of families who are experience unstable housing, HHA will allocate up to 15 Housing Choice Vouchers, to eligible families referred by HPS. Eligibility will be defined as families with at least one school-aged child enrolled in HPS, whose lack of stable and affordable housing is affecting their children's attendance and success at school. Referred families will be screened and issued vouchers consistent with HHA's Administrative Plan and MTW policies.

Families who receive a voucher will be required to enter into and sign a contract of participation (COP). The COP will ask that families to commit to supporting their children's education in ways such as getting them to school on time each day and engaging in parent teacher conferences when requested. HPS will be responsible for ensuring participant compliance with school enrollment and COP requirements, as well as providing additional support services to participating families as needed. HPS will be required to track families progress and provide HHA information pertaining to families on a monthly basis. If families are consistently engaged and in compliance with both the COP and continued occupancy policies in the voucher program at the conclusion of the 36-months, and still have at least one school-aged child enrolled in HPS, they may be granted an extension of up to 24-months which will result in a total housing assistance period of 60-months or 5 years. Families will receive notice 12 months in advance of their final rental assistance payment and HPS and HHA staff will work closely with families to establish a transition plan to better prepare them once they transition from the voucher assistance. The HHA, at its sole discretion, may allow a family to maintain the voucher indefinitely so long as they remain in compliance with HCV regulations. This will be assessed on a case by case basis.

Based on funding availability and staff capacity, HHA may issue up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of 5 years.

Statutory Objective

This initiative will support the MTW Statutory objective to increase housing choice for low-income families.

Anticipated Time Line

HHA is prepared to implement this activity upon HUD approval.

Cost Implications

There are no cost implications associated with this activity.

Metrics

Outcomes will be reported in the MTW Annual Report.

<i>HC #1: Additional Units of Housing Made Available</i>				
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	15		
<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). If units reach a specific type of household, give that type in this box.	0	15		
<i>HC #3: Decrease in Wait List Time</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	N/A	Less than 3 months		
<i>HC #4: Displacement Prevention</i>				
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 in this box.	0	15		
<i>HC #5: Increase in Resident Mobility</i>				
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.	0	15		
<i>HC #6: Increase in Homeownership Opportunities*</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase)	0	0		
<i>*This is a HUD required metric, however HHA does not believe this metric reflects an outcome of this activity.</i>				
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice.	0	15		

Data Source

HHA will use data collected from its software system, and the partner agencies to track the outcomes of the participants as a result of this activity.

Authorization Standard

MTW Agreement Attachment C, (D) (4): The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan.

HHA is seeking Attachment C flexibility in order to provide rental vouchers to eligible families who meet the referral standards for these vouchers.

IV. Approved MTW Activities

A. Implemented Activities

Activity 2013-1: Biennial Recertifications

Description/Update of MTW Activity

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 have more time to ensure income reviews are accurate and thorough.

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). 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.

Approval and Implementation

HHA received approval for this activity in FY13 and implemented this activity in FY14. HHA will continue to utilize this flexibility in FY19.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. 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. Management functions of Churchill Homes will be transitioning back to HHA in FY19. HHA will revise metrics in the following fiscal year plan to account for Churchill Homes.

Planned Significant Changes

There are no significant changes are proposed to the activity.

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Recertifications performed in FY13: 1,887 Time per recertification: 105 minutes Time spent on recertifications in FY13: 3,302 hours Interims performed in FY13: 1,321 Time per interim: 45 minutes Time spent on interims in FY13: 991 hours Total time spent on interims and recertifications: 4,293 hours Average hourly wage for staff: \$23.87 Total cost in FY13: \$102,474	Estimated number of recertifications performed in FY19: 1,052 Time per recertification: 85 minutes Anticipated time spent on recertifications in FY19: 1,490 hours Estimated number of interims performed in FY19: 926 Time per interim: 45 minutes Anticipated time spent on interims in FY19: 695 hours Total time spent on interims and recertifications: 2,185 hours Average hourly wage for staff: \$24.35 Total cost after implementation of activity: \$53,205		

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 FY19: 1,052</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications in FY19: 1,490 hours</p> <p>Estimated number of interims performed in FY19: 926</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interims in FY19: 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</i>				

of this MTW activity.

Activity 2013-2: Revised Asset Policies

Description/Update of MTW Activity

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 FY17 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.

Approval and Implementation

HHA received approval for this activity in FY13 and HHA implemented this activity in FY14. HHA will continue to utilize this flexibility in FY19.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. 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. Management functions of Churchill Homes will be transitioning back to HHA in FY19. HHA will revise metrics in the following fiscal year plan to account for Churchill Homes.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

<i>CE #1: Agency Cost Savings</i>				
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 assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Total time spent verifying assets: 40 minutes Average hourly wage for staff: \$24.35 Total cost after implementation of activity: \$16.23		
<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).	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 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		

<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).	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%		
<i>CE #5: Increase in Agency Rental Revenue*</i>				
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 2015-1: Rent Simplification

Description/Update of MTW Activity

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)

The activity allows for a much more streamlined process and results in cost and time savings for HHA staff.

Approval and Implementation

HHA received approval for this activity in FY15 and implemented this activity in FY17. HHA will continue to utilize this flexibility in FY19.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

Note, the FY 2018 Plan did not have baselines or benchmarks established for this activity. The baselines and benchmarks below are consistent with what was included in the FY 2017 report.

Additionally, 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. Management functions of Churchill Homes will be transitioning back to HHA in FY19. HHA will revise metrics in the following fiscal year plan to account for Churchill Homes.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

<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	Number of households with full-time student: 66		

	FY14: 66 Approximate time to verify full-time student income and status: 15 minutes Hourly Staff Rate: \$23.87 Total cost of activity: \$394	Approximate time to verify full-time student income and status: 5 minutes Hourly Staff Rate: \$24.11 Total cost of activity: \$133		
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		
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%		
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		
*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.				

Activity 2015-2: Rent Reasonableness

Description/Update 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 one year before the contract anniversary. However, HUD recently increased the threshold that triggers PHAs to re-determine reasonable rent from a 5% decrease in FMR to a 10% decrease in FMR. Therefore, the activity is now obsolete and as such, HHA intends to close the activity out in the FY 2019 Report.

Approval and Implementation

HHA received approval and implemented this activity in FY15. HHA will only need to use this flexibility in FY19 if FMRs decrease more than 10%.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. HHA will report on outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

<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 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			
<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 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

Description/Update 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 5% or greater decrease in the published FMR in effect 60 days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary. However, HUD recently increased the threshold that triggers PHAs to re-determine reasonable rent from a 5% decrease in FMR to a 10% decrease in FMR. Therefore, this part of the activity is now obsolete.

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.

Approval and Implementation

HHA received approval and implemented this activity in FY15. HHA may use this flexibility in FY19.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. HHA will report on outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of PBV developments receiving	\$0.00		

	<p>assistance leased in FY15: 2</p> <p>Time to complete Reasonable Rent: 30 minutes</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>			
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 minutes</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

Description/Update 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 voucher, 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 versus 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.

The activity also provides the following flexibilities:

- 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.
- 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).

Approval and Implementation

HHA received approval and implemented this activity in FY15. HHA will continue to use the flexibility of this activity in FY 2019.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

The benchmark for this activity was reduced to reflect only phase I of Lyman Terrace, which included 88 vouchers. HHA originally assumed this flexibility would be applied to phase II. However, HHA is currently determining whether this flexibility will be applied to phase II. HHA will report on outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

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	88 units		

Activity 2016-1: Modified Project-Based Voucher Program

Description/Update of MTW Activity

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 to be eligible for a VAWA transfer; or, has requested and been determined to be 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 and will continue to adhere to the requirements set forth in the Notice unless or until HHA receives HUD approval to waive said requirements.
- In FY18 HHA amended the activity to 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.

HHA may apply this flexibility in FY 2019 at a Holyoke Farms. HHA is in the process of exploring project basing vouchers at Holyoke Farms, a mixed-income development of 225 units of two-bedroom townhouses. If HHA moves forward with the contract, the flexibility offered by this activity will be utilized.

Approval and Implementation

HHA received approval and implemented this activity in FY16. HHA will continue to utilize this flexibility in FY19.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. HHA will report on outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

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 FY19.</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 FY19.</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>				
<i>HC #1: Additional Units of Housing Made Available*</i>				
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>				

Activity 2018-1: MTW Utility Allowances

Description/Update of MTW Activity

HHA adopted a streamlined Utility Allowance (UA) model that eliminates 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.

HHA began implementation planning in FY 2018 and will fully implement the streamlined UA in FY 2019. All households, regardless of the change in tenant rent, received 180 days advance notice of any increase they may experience. For households currently receiving reasonable accommodations for heat and/or electricity, HHA will apply the higher of the table UA and the previously approved reasonable accommodation UA. HHA will continue to determine reasonable accommodations for utilities on a case-by-case basis.

Approval and Implementation

HHA received approval of this activity in FY 2018, and the activity will be fully implemented in FY 2019.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. HHA will report on outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$80,471	\$51,885		
<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).	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		
<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).	10%	8%		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	\$332	\$345		

Activity 2018-2: Holyoke Horizons Transitional Housing Support

Description/Update of MTW Activity

In support of the Sheriff's Department's efforts to reduce recidivism and enhance community safety, HHA has set aside MTW funds to support the Community Housing Earned Safe and 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, through the Mental Health Association (MHA), leases 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. This activity supports otherwise eligible low-income participants who do not earn sufficient income to pay the \$400/month rent minimum.

HHA provides up to 30 rental subsidies of \$200/month per participant to the HCSD, who will then disburse funds to the landlords through MHA. 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.

Approval and Implementation

HHA received approval of this activity in FY 2018 and the activity will be implemented in FY 2019.

Planned Non-Significant Changes

There are no non-significant changes are proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA does not anticipate making any changes to the metrics in FY2019. However, additional benchmarks will be established in the FY 2018 report and HHA will include them and outcomes in the MTW Annual Report.

Planned Significant Changes

There are no significant changes are proposed to the activity.

Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Amount of funds leveraged in dollars (increase).	\$0	TBD		
<i>SS #5: Households Assisted By Services that Increase Self-Sufficiency</i>				
Unit of	Baseline	Benchmark	Outcome	Benchmark

Measurement				Achieved
Number of households receiving services aimed to increase self-sufficiency.	0 households	30 households		
<i>SS #8: Households Transitioned to Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households transitioned to self-sufficiency (increase).*	0 households	TBD		
<i>*Self-sufficiency will be defined as voluntary termination of assistance due to an income increase great enough so that HHA subsidy is not required for the CHES unit.</i>				
<i>HC #5: Increase in Resident Mobility</i>				
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		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	30 households		
<i>Local Metric: Number of Households Served Per Voucher</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households served per voucher.	0 households	1 household		

B. Not Yet Implemented Activities

Activity 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 and 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 planned on committing 30 project-based units to the area to ensure the preservation of affordable housing in the area.

The activity would have allowed:

- HHA to waive the requirement limiting the number of PBV units in a project to 25% of the total number of units in that project,
- PBV sites to develop their own tenant selection plans, and
- HHA to waive or revise the requirement that HHA offer tenant-based rental assistance to clients after one-year of occupancy in the assisted unit.

HHA initially set aside 30 project-based vouchers for this activity; however, HHA issued an RFP in October 2017, to which no one applied and which 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.

Approval and Implementation

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. HHA implemented this activity in FY16.

C. Activities on Hold – None

D. Closed Out Activities

Activity	Year Approved	Year Implemented	Year Closed Out	Reason for Closing Out
Activity 2013-5: Biennial HQS Inspections	FY2013	NA	FY2014	HHA 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.
Activity 2013-3: Career Advancement Program	FY2013	FY2015	FY2018	This activity was closed out because there was a general lack of interest in the CAP program amongst HHA participants. Furthermore, HHA invested substantial time and commitment to this program, yet efforts did not yield the type of response anticipated.

V. Sources and Uses of Funds

A. Estimated Sources and Uses of MTW Funding for the Fiscal Year

Tables 10 and 11 below provide estimated sources and uses of MTW funds for FY 2019.

i. Estimated Sources of MTW Funds

Table 10: Estimated Sources of MTW Funds

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$2,450,600
70600	HUD PHA Operating Grants	\$13,980,600
70610	Capital Grants	\$1,825,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,700,000
71100+72000	Interest Income	\$12,600
71600	Gain or Loss on Sale of Capital Assets	\$
71200+71300+71310+71400+71500	Other Income	\$345,000
70000	Total Revenue	\$20,313,800

ii. Estimated Uses of MTW Funding for the Fiscal Year

Table 11: Estimated Uses of MTW Funds

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$1,535,900
91300+91310+92000	Management Fee Expense	\$1,550,900
91810	Allocated Overhead	\$
92500 (92100+92200+92300+92400)	Total Tenant Services	\$195,600
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	1,328,540
93500+93700	Labor	\$
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$1,870,700
95000 (95100+95200+95300+95500)	Total Protective Services	\$25,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$252,760
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$440,000

FDS Line Item	FDS Line Item Name	Dollar Amount
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$168,900
97100+97200	Total Extraordinary Maintenance	\$195,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$10,580,500
97400	Depreciation Expense	\$2,150,000
97500+97600+97700+97800	All Other Expenses	\$20,000
90000	Total Expenses	\$20,313,800

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

NA

iii. Description of Planned Use of MTW Single Fund Flexibility

Activities that utilize single fund flexibility are summarized below:

- Working with the local Continuums of Care, HHA intends to provide up-front housing assistance to eligible families experiencing homelessness. HHA will allocate up to 15 Housing Choice Vouchers in the initial year to eligible homeless families who will be referred to HHA from local service providers who are part of the Western Massachusetts’s COC. Each subsequent year the HHA will determine, based on availability, additional voucher allocations.
- HHA will continue to explore new affordable housing development opportunities. HHA may utilize single fund flexibility for the acquisition of vacant land for development purposes. Specifically, the City of Holyoke owns multiple vacant lots that may be suitable for affordable housing development. HHA will pursue those prospects and if development is determined feasible, HHA may acquire vacant land using single fund flexibility.
- The HHA intends to use single fund flexibility in conjunction with the Commonwealth of Massachusetts Department of Housing and Community Development (DHCD) High Leverage Asset Preservation Program (HILAPP) for a major rehabilitation project. The project consists of kitchen and bath as well as Americans with Disability (ADA) renovations.

B. 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

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

HHHA is not planning on converting any units under RAD in FY 2019.

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the Appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.**

No

- iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?**

NA

VI. Administrative

A. Board Resolution and Certifications of Compliance

A Resolution approving the FY 2019 MTW Annual Plan and the MTW Plan Certification of Compliance is included in Appendix A.

B. Documentation of Public Process

This MTW Plan was made available for public comment on September 10, 2018 through October 10, 2018. The public hearing was held on September 26, 2018 at 475 Maple Street in Holyoke and two individuals attended in addition to HHA staff. Documentation of the public process and the public hearing attendance sheet are included in Appendix B.

C. Planned and Ongoing Evaluations

There are no planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities for FY 2019.

D. Lobbying Disclosures

N/A

VII. Appendix A- Board Resolution and Certificate of Compliance



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

**SPECIAL 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 11, 2018 AT 12:00PM
AT 475 MAPLE STREET, HOLYOKE, MA**

MOVING TO WORK (MTW) 2019 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

17-136

On a motion by Commissioner Falcetti and seconded by Chair Cooper-Gordon, the Board voted to accept and approve the 2019 Moving to Work Annual Plan for submission to HUD. The Board voted in favor of this motion:

Present and voting:

Theresa Cooper-Gordon
Marilyn Sanabria
Michael Falcetti

Absent:

Aaron W. Wilson
Timothy W. Purington



Matthew A. Mainville, Secretary

MTHEW A. MAINVILLE
Executive Director

THERESA COOPER-GORDON
Chair

MARILYN SANABRIA
Vice Chair

MICHAEL FALCETTI
Treasurer

AARON W. WILSON
Commissioner

TIMOTHY W. PURINGTON
Commissioner

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 1/1/19, 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 MA 005
PHA Name 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 Chair, Board of Commissioners
Name of Authorized Official Title
 10/11/2018
Signature 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 B – Public Hearing Attendance

... and assigns...
 ...ly 15, 2011 and re-
 ...with the Hampden
 ...Registry of Deeds,
 ...18842, Page 449, as
 ...by Assignment of
 ...dated March 28,
 ...d recorded with
 ...County Regist
 ...Book 21628, Pag
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 ...losing the same
 ...id at Public Auc
 ...1:00 PM, on Sep
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 ...Northeasterly
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 ...beginning.
 ...f Sale: These
 ...are being sold

... August 17, 2018
 Present holder of said
 mortgage
 Monument Mortgage LLC d
 by Mr. Cooper
 Its Attorneys
 Gaetia and Benson, LLC
 Peter V. Gaetia, Esquire
 P.O. Box 519
 Chelmsford, MA 01824
 (August 27, Sept. 3, 10)

Holyoke

The Holyoke Housing Authority (HHA) is a participant in HUD's Moving to Work Demonstration Program (MTW). The draft FY 2019 Moving to Work Annual Plan will be available for review from September 10th - October 10th, 2018 at the Authority's Administrative Office, 475 Maple Street, Holyoke, MA 01040; the Authority's Website at: www.holyokehousing.org; the Authority's Property Management Offices; and at the Holyoke Public Library, located at 250 Chestnut Street. Copies of the draft FY 2019 Moving to Work Annual Plan may also be obtained by contacting the Authority at 413-539-2202. The Authority's hours of operation are Monday through Friday from 8:30am to 4:30pm. Written comments on the draft FY 2019 Moving to Work Annual Plan must be addressed to FY 2019 Moving to Work Annual Plan Comments at the Authority's Administrative Office address above and must be received by close of business (4:30pm) on Wednesday October 10th, 2018. A Public Hearing to receive comments on the Plan will be held on Wednesday, September 26, 2018 at 5:00pm at Falcetti Towers Community Room, 475 Maple Street, Holyoke, MA. Persons with disabilities requiring assistance or alternative formats, or wishing to submit comments in alternative formats, can contact the HHA MTW Coordinator at 413-539-2220; TDD 1-800-545-1833, extension 510. The Holyoke Housing Authority is an Equal Opportunity/Affirmative Action Agency. Theresa Cooper-Gordon, Chair. (September 10)

Eugene M. Saul dated December 21, 1999 recorded in Book 5855, Page 293. For mortgagors(s)' title see deed recorded with Hampshire County Registry of Deeds in Book 5855, Page 293. These premises will be sold and conveyed subject to and with the benefit of all rights, rights of way, restrictions, easements, covenants, liens or claims in the nature of liens, improvements, public assessments, any and all unpaid taxes, tax titles, tax liens, water and sewer liens and any other municipal assessments or liens or existing encumbrances of record which are in force and are applicable, having priority over said mortgage, whether or not reference to such restrictions, easements, improvements, liens or encumbrances is made in the deed.

TERMS OF SALE:
 A deposit of Five Thousand (\$5,000.00) Dollars by certified or bank check will be required to be paid by the purchaser at the time and place of sale. The balance is to be paid by certified or bank check at Harmon Law Offices, P.C., 150 California Street, Newton, Massachusetts 02458, or by mail to P. O. Box 610389, Newton Highlands, Massachusetts 02461-0389, within thirty (30) days from the date of sale. Deed will be provided to purchaser for recording upon receipt in full of the purchase price. The description of the premises contained in said mortgage shall control in the event of an error in this publication. Other terms, if any, to be announced at the sale.

CITIMORTGAGE, INC., SUCCESSOR BY MERGER TO ABN AMRO MORTGAGE GROUP, INC.
 Present holder of said mortgage
 By its Attorneys,
HARMON LAW OFFICES,
 P.C.,
 150 California Street
 Newton, MA 02458
 (617) 558-0500
 201803-0190 - YEL
 (September 10, 17, 24)

FY19 HHA MTW Annual Plan
Public Hearing
September 26, 2018
475 Maple Street, Holyoke, MA

Justine Sabbs HHA
Barbara Favallo 308
Donald A. Lavallee 308