

Holyoke Housing Authority



MOVING TO WORK ANNUAL PLAN

HHA FISCAL YEAR 2021
(JANUARY 1, 2021 TO DECEMBER 31, 2021)

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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 2021, HHA will continue to 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 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 2020, i.e., the period from January 1, 2021 through December 31, 2021.

Long-Term MTW Goals and Objectives

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

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 efforts throughout the community. HHA was designated by the Holyoke Redevelopment Authority as the developer for an affordable homeownership project in South Holyoke, the City's lowest income neighborhood. The current plans for new construction for infill development are a response to community advocacy to restore housing options. The housing project around Carlos Vega Park has been contemplated for decades and was incorporated into Holyoke's 2012 Urban Renewal Plan with the objectives of redeveloping vacant property, adding more density, improving housing options, improving housing stock and increasing home ownership opportunities. HHA has engaged an architect and held two community engagement sessions, with three additional community meetings planned before the end of 2019. HHA also created and facilitates a monthly stakeholder group that consists of over a dozen community partners to discuss and collaborate on the housing project in South Holyoke.

In addition to the South Holyoke project, HHA has also acquired two vacant lots next to the Falcetti Towers building. The conceptual plans are to build at least two single-family homes, in the style of the adjacent Churchill Homes, and constructing additional parking that would support the regional trainings that occur at our central office.

HHA will continue to pursue development opportunities that are community driven and address unique local needs, specifically 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 new housing development.

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 continues to conduct research and identify potential programs 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.

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 one new MTW initiative in FY 2021:

Holyoke Affordable Homeownership Initiative: HHA proposes to implement a new MTW activity, the Holyoke Affordable Homeownership Initiative (HAHI), to provide affordable homeownership opportunities for households earning up to 80% of Area Median Income. Initially, HAHI will be implemented in the South Holyoke neighborhood, where HHA is working with the City and community partners to develop vacant and distressed parcels into new affordable rental and homeownership units. The HAHI program is intended to provide a flexible set of homeownership financing tools to help ensure the long-term affordability of the units and success of the homebuyers. As such, the HAHI program is proposed as a “toolkit” of resources that will be customized and tailored as needed to meet the needs of individual homebuyer households.

Including the proposed Homeownership Initiative activity, in FY 2021 HHA anticipates providing housing assistance to 2,173 households. Additionally, in FY 2021 HHA will continue to administer the following activities:

Youth Aging Out of Foster Care: The Youth Aging out of Foster Care (YAFC) activity, through a partnership between HHA with the Holyoke Department of Children and Family Services (DCF), provides stable housing and service programs for youth aging out of foster care. HHA entered into an MOU with DCF in July 2019 and 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. HHA anticipates 15 vouchers will be leased by the end of FY 2020 and another 15 vouchers will be leased in FY 2021. 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. DCF 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 Program: HHA partners with the Holyoke Public Schools (HPS) to implement a housing and service program for families with children in the HPS system whose lack of stable housing is affecting their children’s success in school. HHA has begun receiving referrals and issuing vouchers to families referred by a Homeless Educational Coordinator on staff at HPS. 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. Full lease-up of the first 15 vouchers is anticipated by the end of FY 2020 and an additional 15 vouchers are anticipated to be issued and leased in FY 2021.

Modified Project-Based (PB) Voucher Program: HHA continues to operate its Modified PB Voucher Program in connection with HHA’s Preservation after Conservation MTW activity. The features of the PB program allow HHA with greater flexibility in project basing properties with an outcome of increasing housing opportunities in HHA’s jurisdiction. In FY 2021 HHA anticipates adding an additional PBV development that includes twelve (12) new project based units.

Holyoke Horizons Transitional Housing Support: In FY 2021, HHA anticipates assisting thirteen (13) households under the Holyoke Horizons Transitional Housing Support activity. This activity supports successful re-entry into society of persons involved with the criminal justice system. Additionally, in FY 2021, in response to the economic hardship experienced as a result of the COVID-19 pandemic, HHA will increase the rental subsidy from \$200/month per participant to \$400/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.

Student Housing Initiative: Holyoke Housing Authority plans to utilize MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. HHA will work in partnership with Holyoke Community College (HCC) to launch the Student Housing Initiative (SHI) program, which will provide time limited housing subsidies and other college related expenses, to income eligible, homeless college students. HHA will provide up to three years of subsidy for 15 eligible students for an initial three year period. HHA will accept referrals from HCC for the 2020-2021 school year and anticipates that 15 vouchers will be issued and leased by the end of FY 2021.

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

- Biennial Recertifications;
- Rent Simplification, and,
- MTW Utility Allowances.

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.

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 2021.

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			
Planned Total							0			

*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
N/A	0	N/A
Planned Total	0	N/A

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
South Holyoke Homes Phase I	12	No	Affordable rental project; 1-4 bedrooms
Planned Total	12		

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

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
				under preservation after conservation
Lyman Terrace	76	Leased	No	PBV Conversion of remaining public housing units.
Planned Total	130			

v. Planned Other Changes to MTW Housing Stock

HHA is not planning any other changes to the MTW Housing Stock in FY 2021.

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 2021. 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	\$250,000
	Clean lateral sewer lines with video assistance	\$15,000
	Replace counter tops, hardwood floor maintenance and ceiling repairs	\$25,000
Toepfert Apts.	Replace existing flooring, kitchen & bath cabinets and baseboards	\$395,000
	Fire Escapes - minor repairs	\$25,000
Churchill I & II	Safety Upgrades (Cameras and wireless System)	\$150,000
	Replace counter tops and flooring replacements	\$25,000
Ramos	Boiler Replacement	\$26,000
Coughlin Apts.	Repair any cracks on balconies & bands; seal	\$145,000
	Elevator upgrades	\$25,000
Zielinski Apts.	Elevator upgrades	\$25,000
Beaudry-Boucher Apts.	Elevator upgrades	\$25,000
Falcetti Towers	Rooftop Exhaust Fan	\$25,000

Development	Planned Work Description	Projected Expenditures
	Elevator upgrades	\$25,000
Rosary Towers	Elevator upgrades	\$25,000
	ADA Showers Improvements	\$50,000
Central Maintenance	Office Space Modifications	\$175,000
Administrative Offices	Parking Lot Extension & Site Prep	\$20,000
	Office Space Modifications	\$25,000

B. Leasing Information

i. Planned Number of Households Served

Table 7: Planned Number of Households Served

Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased*	Planned Number Of Households to Be Served**
MTW Public Housing Units Leased	9,060	755
MTW HCV Utilized	16,560	1,380
Local, Non-Traditional: Tenant Based^	336	28
Local, Non-Traditional: Property Based^	NA	NA
Local, Non-Traditional: Homeownership^	120	10
Planned Totals	26,076	2,173

* “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	156	13
Tenant-Based	Activity 2020-1 Student Housing Initiative	180	15
Property-Based	N/A	N/A	N/A
Homeownership	Activity 2021-1: MTW Homeownership Program	120	10
Planned Totals		456	38

* The sum of the figures provided should match the total provided for each local, non-traditional category 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

HHA does not anticipate any leasing issued in FY 2021.

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	425,764	Open	N/A
HCV	Statewide with Holyoke Residency	5,430	Open	N/A
Federal MTW Public Housing	Merged (excluding Churchill Homes)	320	Open	N/A
Federal MTW Public Housing Units	Site-Based (Churchill Homes)	1,577	Open	N/A

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

There are no plans changes to the waiting list in FY 2021.

Waiting List Name	Description of Actual Changes to Waiting List

III. Proposed MTW Activities

Activity 2021-1: Holyoke Affordable Homeownership Initiative

Description of MTW Activity

HHA proposes to implement a new MTW activity, the Holyoke Affordable Homeownership Initiative (HAHI), to provide affordable homeownership opportunities for households earning up to 80% of Area Median Income.

This local non-traditional activity falls under the categories of Housing Development Programs and Homeownership Programs as defined in HUD PIH Notice 2011-45 (Notice). The activity will conform to the General Parameters detailed in part 5.A. of the Notice, as well as the parts 5.C and 5.D parameters applicable to Homeownership Programs and Housing Development Programs.

HHA was designated by the Holyoke Redevelopment Authority as the developer for an affordable homeownership project in South Holyoke, the City's lowest income neighborhood. The current plans for new construction for infill development are a response to community advocacy to restore housing options, and HHA may utilize MTW funds for initial development costs and construction for this project.

Initially, HAHI will be implemented in the South Holyoke neighborhood, where HHA is working with the City and community partners to develop vacant and distressed parcels into new affordable rental and homeownership units. The South Holyoke neighborhood has historically been the center of a strong working class neighborhood predominantly consisting of tenement style housing with some single and two family houses. Many of the residents would walk to their place of employment in the nearby and thriving mill district. As the mills closed and jobs declined, the area became challenged with disinvestment, poverty and blight. Although a core of quality housing remains, some residents have departed because of the lack of homeownership opportunities.

In 2012, the City worked with HHA and the community to develop a comprehensive Urban Renewal Plan for the Center City, including the South Holyoke neighborhood. The Plan, which has continued to evolve over time, identifies major objectives such as redeveloping vacant property, adding more density, improving housing options, improving housing stock, and increasing home ownership opportunities.

As part of the overall South Holyoke neighborhood revitalization strategy, HHA is moving forward with a five-phase rental and homeownership development consisting of approximately 85 total units. The first rental phase of twelve (12) units will involve state and local funding, and it is anticipated that the third phase will incorporate private equity from Low Income Housing Tax Credits. For Phase 1, HHA will use HUD-held reserves for our equity and to bridge a HOME grant from the City of Holyoke. HHA will provide a long-term Project Based Voucher Housing Assistance Payments contract to support the first phase.

The second phase will include approximately twenty (20) affordable, new construction homeownership units for families to be built on currently vacant lots. Financing is anticipated to involve a combination of state, local and MTW Block Grant funding. Prior to closing, all prospective homeowners will be required to participate in homebuyer counseling sessions, working with qualified HHA partners to understand the responsibilities of homeownership, repair credit, save for a down payment and secure financing. HHA will work with lenders with whom it has partnerships to facilitate the goals of the program.

The HAHl program is intended to provide a flexible set of homeownership financing tools to help ensure the long-term affordability of the units and success of the homebuyers. As such, the HAHl program is proposed as a “toolkit” of resources that will be customized and tailored as needed to meet the needs of individual homebuyer households.

Major features of the proposed HAHl program include:

Eligibility:

- Open to low-income households, including HHA public housing residents and HCV participants who are in good standing with their lease and program requirements.
- Participants must:
 - Be a first time homebuyer.
 - Complete HHA-approved homeownership counseling and financial literacy courses.
 - Agree to participate in post-purchase follow-up review on an annual basis for three years from the point of closing.
- The home must be used as the household’s principal residence. Homeownership assistance may only be provided while the household resides in the unit.

Target Sales Price

- Based on preliminary market analysis, HHA anticipates that prices for the homeownership units will be in the range of \$125,000 to \$195,000. Prices will be dependent on income and bedroom size and are subject to change. HHA will firm up pricing when the construction phase begins.

Program Components

Prospective homebuyers will work with existing HHA Resident Services staff and may be referred to a local partner agency identified by HHA to review their financial status, credit standing and household goals. HHA will review choice of purchase options with families to enable families to make informed decisions on the assistance provided. Financing options available to program participants will include:

- **Monthly voucher assistance:** Households may receive monthly homeownership assistance for up to 15 years. Generally, this assistance will cover the difference between up to 30% of adjusted household income and the projected monthly homeownership costs, subject to a cap equal to HHA’s HCV voucher payment standard. Household income will be reviewed on a biennial basis to ensure continued eligibility and redetermine monthly subsidy amounts. Similar to the HCV program, monthly homeownership assistance will be ended 180 days after a household subsidy equals \$50 or less.
- **Financing Options:** The four financing options below were based on HHA estimates of gap financing needed along with prior experience with first-time homebuyers as well as experience with administration of down-payment assistance programs.
 - **Down payment assistance:** In lieu of receiving monthly voucher assistance, HAHl participants will be eligible for one-time down payment assistance up to a maximum of \$10,000 per household. HHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default that is not cured, HHA will recoup the down payment assistance amount, which will decrease 5% annually over the 20 year term.
 - **Soft second mortgage option:** Up to a maximum of \$20,000 per household may be provided as a soft second mortgage, provided that the household is not receiving any other

HAHI homeownership assistance. As with the down payment assistance option, HHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default that is not cured, HHA will recoup the soft second mortgage amount, which will decrease 5% annually over the 20 year term.

- **Lease to purchase option:** HHA may implement a lease to purchase option in situations where the household is not appropriate and/or eligible for immediate homeownership. In these cases, HHA will provide a monthly rental subsidy to the household for a fixed period of up to 15 years. The amount of rental subsidy, and the methodology used to calculate the subsidy, will be comparable to that used in the HCV program. During the lease to purchase period, ownership of the unit will be held by an HHA subsidiary/affiliate. A portion of the rent will be escrowed during the lease to purchase period and then applied to the down payment at the time of purchase. Household income will be reviewed on a biennial basis to ensure continued eligibility and redetermine monthly subsidy amounts.
- **Unit Equity:** All purchasers will be required to sign a deed rider which restricts resale for a given number of years, includes a maximum resale price and terms on net proceeds.

For the down payment assistance and soft second options, HHA will authorize only up to the minimum amount needed to close the affordability gap based on individual household circumstances. HHA will calculate the maximum mortgage payment allowed at 35% of adjusted monthly income, and total housing expenses at 38% of adjusted monthly income. HHA program staff will work to maximize household eligibility for any other non-HHA down-payment and/or closing cost assistance programs.

HHA plans to budget approximately \$500,000 in MTW Block Grant funds yearly to support the program. The initial program will be limited in size to twenty (20) participants with 10 participants anticipated to be enrolled in FY 2021. However, HHA may elect to expand the program beyond the South Holyoke project based on funding availability. If demand exceeds available budget, HHA will establish a wait list based on date and time of application.

Statutory Objective

The HHA initiative will advance the MTW statutory objective of increasing housing choice for low-income families.

Anticipated Impact

HHA projects that this initiative will result in an increase in the number of low-income, first time homebuyers.

Hardship

Not applicable.

Implementation

Program start-up activities will begin in FY 2021.

Metrics

The metrics below will be compiled using HHA's housing software as well as data and reports from program partners.

<i>HC #2 Housing Units 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	10		
<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	10		
<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	10		
<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	10		

Cost Implications

HHA plans to budget approximately \$500,000 in MTW Block Grant funds yearly to support the program. The initial program will be limited in size to twenty (20) participants. However, HHA may elect to expand the program beyond the South Holyoke project based on funding availability.

Need/Justification for MTW Flexibility

MTW Agreement Attachment D, Broader Uses of Funds. Where HHA utilizes MTW funds to provide funding for housing development targeted for low-income households the applicable provisions of PIH 2011-45 on Housing Development Programs will apply. Additionally, where HHA utilizes MTW funds to provide homeownership assistance, the applicable provisions of PIH Notice 2011-45 on Homeownership Programs will apply.

Rent Reform/Term Limit Information

Not applicable

IV. Approved MTW Activities

A. Implemented Activities

Activity 2013-1: Biennial Recertifications

Plan Year Approved, Implemented, Amended

- Approved: FY 2013
- Implemented FY: 2014
- Amended: FY 2015

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 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.

Planned Non-Significant Changes

During declared states of economic/health emergencies as declared by the Governor or his/her designee, HHA will temporarily lift the limit on voluntary interim rent reductions for non-exempt families. HHA will make determinations as to when to re-impose the limit.

Planned Changes to Metrics/Data Collection

The benchmarks for CE #1 and CE #2 have been updated to reflect the volume of recertifications anticipated for FY 2021.

Planned Significant Changes

There are no significant changes proposed to the activity.

<i>CE #1: Agency Cost Savings</i>				
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 2013: 3,302 hours</p> <p>Interims performed in FY 2013: 1,321</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 2013: 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: 1,000</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications: 1,417 hours</p> <p>Estimated number of interims performed: 942</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interims: 707 hours</p> <p>Total time spent on interims and recertifications: 2,124 hours</p> <p>Average hourly wage for staff: \$24.35</p> <p>Total cost after implementation of activity: \$51,719</p>		
<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>Recertifications performed in FY 2013: 1,887</p> <p>Time per recertification: 105 minutes</p> <p>Time spent on recertifications in FY 2013: 3,302 hours</p> <p>Interims performed in FY 2013: 1,321</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 2013: 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: 1,000</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications: 1,417 hours</p> <p>Estimated number of interims performed: 942</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interim: 707 hours</p> <p>Total time spent on interims and recertifications: 2,124 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>		
*HUD is requiring the use of this metric; however, HHA does not believe it is applicable in this context of this MTW activity.				

Activity 2015-1: Rent Simplification
(Combined with 2013-2: Revised Asset Policies)

Plan Year Approved, Implemented, Amended

Rent Simplification

- Approved: FY 2015
- Implemented: FY 2017

Revised Asset Policies

- Approved: FY 2013
- Implemented: FY 2014

Description/Update of MTW Activity

HHA's rent simplification activity includes the following components.

- **Application of Payment Standards:** 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)
- **Exclusion of all Full-Time Student Income:** Exclusion of all Full-time student income for household members other than the Head, Spouse or Co-Head. (Public Housing and HCV)
- **Adult Full-Time Student Deduction:** Elimination of the adult full time student deduction. (Public Housing and HCV)
- **Self-Certification of Assets.** Clients are permitted to self-certify asset value and income when the family's combined market asset value is less than or equal to \$50,000. For families whose market value of their assets is greater than \$50,000, asset verification is subject to standard HUD verification requirements. HHA determines asset value using market, rather than cash value.
- **Calculation of Asset Income.** When determining asset income, HHA uses the market value of the combined assets and imputes asset income using HHA's established passbook savings rate.
- **Exclusion of Asset Income.** HHA received approval in FY 17 to revise the asset exclusion policy to reflect exclusion of asset income when total asset value is less than or equal to \$50,000. Prior to that, HHA excluded the first \$500 of asset income.

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

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>CE #1: Agency Cost Savings: Students</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>Number of households with full-time student in FY 2014: 66</p> <p>Approximate time to verify full-time student income and status: 15 minutes</p> <p>Hourly Staff Rate: \$23.87</p> <p>Total cost of activity: \$394</p>	<p>Number of households with full-time students: 66</p> <p>Approximate time to verify full-time student income and status: 5 minutes</p> <p>Hourly Staff Rate: \$24.35</p> <p>Total cost of activity: \$134</p>		
<i>CE #1: Agency Cost Savings: Assets</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>HCV households with assets: 229</p> <p>PH households with assets: 411</p> <p>Time per asset verification: 20 minutes</p> <p>Total time spent verifying assets: 213 hours</p> <p>Average hourly staff wage: \$23.87</p> <p>Total cost to verify assets prior to implementation of activity: \$5,084</p>	<p>HCV households with assets over \$50,000: 1</p> <p>PH households with assets over \$50,000: 1</p> <p>Time per asset verification: 20 minutes</p> <p>Total time spent verifying assets: 40 minutes</p> <p>Average hourly wage for staff: \$24.35</p> <p>Total cost after implementation of activity: \$16.23</p>		

CE #2: Staff Time Savings: Full-Time Student				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Number of households with full-time student in FY 2014: 66</p> <p>Approximate time to verify full-time student income and status: 15 minutes</p> <p>Total time spent on activity: 16.5 hours</p>	<p>Number of households with full-time student: 66</p> <p>Approximate time to verify full-time student income and status: 5 minutes</p> <p>Total time spent on activity: 5.5 hours</p>		
CE #2: Staff Time Saving: Assets				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>HCV households with assets: 229</p> <p>PH households with assets: 411</p> <p>Time per asset verification: 20 minutes</p> <p>Total time spent verifying assets: 213 hours</p>	<p>HCV households with assets over \$50,000: 1</p> <p>PH households with assets over \$50,000: 1</p> <p>Time per asset verification: 20 minutes</p> <p>Total time spent after implementation of activity: 40 minutes</p>		
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	0%	<5%		

percentage (decrease).				
<i>CE #5: Increase in Agency Rental Revenue*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	Average tenant rent share in HCV: \$350 Average tenant rent share in public housing: \$300	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 2015-4: Preservation after Conservation

Plan Year Approved, Implemented, Amended

- Approved: FY 2015
- Implemented: FY 2015
- Modified: FY 2018

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).

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity. HHA does not project any expiring use preservation conversions in FY 2021.

Planned Changes to Metrics/Data Collection

The benchmark for this activity has been updated to reflect removal of the Jarvis Heights project, which is not part of the HHA's MTW portfolio. The 130 units represents the Holyoke Towers preservation project and the Lyman Terrace RAD conversion.

Planned Significant Changes

There are no significant changes 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	130 units		

Activity 2016-1: Modified Project-Based Voucher Program
(combined with Activity 2015-3 PBV Rent Reasonableness, which was closed out in the FY 2019 Report)

Approval and Implementation

- Approved: FY 2016
- Implemented: FY 2016
- Amended: FY 2018

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, 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 FY 2018 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.

- 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 will inspect PBV units at least once every 24 months. HHA will not conduct turn-over inspections before providing assistance to a new family in a unit under contract.
- Increase income eligibility for PBV units up to 80% of AMI, except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd party funding sources, i.e. units that also have low income housing tax credits.
- HHA will waive the independent entity requirements for HHA owned units.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

HHA has updated the benchmarks for HC #1 and HC #4 to reflect the existing and planned PBV units for FY 2021. The units included in the benchmark reflect both PBV units in the Preservation after Conservation activity as well as the PBV units awarded under the Modified Project Based Voucher Program activity.

Planned Significant Changes

There are no significant changes proposed for this 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		
*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.				
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		
*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.				

***HHA does not anticipate owner management of waiting lists in FY 2021.*

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).	0 units	142 units		

** HHA is incorporating this standard metric as a local metric.*

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).	0 units	142 units		

HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity as this activity is not designed as a displacement prevention initiative.

Activity 2018-1: MTW Utility Allowances

Plan Year Approved, Implemented, Amended

- Approved: FY 2018
- Implemented: FY 2019

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.

Implementation began in FY 2018 and full implementation was completed in FY 2019. All households, regardless of the change in tenant rent, received 180 days advance notice of any increase as a result of the change to the MTW UA schedule. For households receiving reasonable accommodations for heat and/or electricity at implementation, HHA applied 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.

Planned Non-Significant Changes

HHA will periodically, at its discretion, review HCV utility allowance schedules to determine if adjustments are required. Annual updates would not be required. HHA will use the U. S. Energy Information Administration's rate summaries for heat and electricity to determine the percent change from year to year. HHA will review the rate summaries and if the average five rate change is greater than 10%, HHA will update its UA schedules accordingly.

Planned Changes to Metrics/Data Collection

The benchmark CE #1: Agency Cost Savings has been updated to reflect the number of households paying both heat and electricity.

Planned Significant Changes

There are no significant changes proposed for this 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	\$60,000		
<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 FY 2017: 1,102 Total staff time prior to implementation: 184 hours	Time required to calculate UA: 5 minutes Number of households with UA: 1,102 Total staff time prior to implementation: 92 hours		
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	10%	8%		
CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	\$332	\$345		

Activity 2018-2: Holyoke Horizons Transitional Housing Support

Plan Year Approved, Implemented, Amended

- Approved: FY 2018
- Implemented: 2018

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.

Currently, 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.

Planned Non-Significant Changes

In FY 2021, in response to current economic conditions resulting from the COVID 19 pandemic, HHA will increase the per participant subsidy from \$200 to \$400 per month. Going forward, HHA may further adjust the subsidy level for this activity in response to declared states of economic and/or health emergencies as authorized by the Governor or his/her designee and/or other economic factors which dictate the need for a subsidy change. HHA is able to cover the potential increased annual cost of \$72K in order to process this change.

Planned Changes to Metrics/Data Collection

The benchmark for CE #4 has been updated for consistency with availability of past leveraged resources. The benchmark for SS #5, HC #5 and HC #7 have been updated to reflect the number of participants that HHA anticipates serving in FY 2021.

Planned Significant Changes

There are no significant changes proposed for this 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	\$7,000		
SS #5: Households Assisted By Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households receiving services aimed to increase self-sufficiency.	0 households	13 households		
SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households transitioned to self-sufficiency (increase).*	0 households	5 households		
*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.				
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	13 households		
HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	13 households		
Local Metric: Number of Households Served Per Voucher				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households served per voucher.	0 households	1 household		
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Activity 2019-1: Youth Aging out of Foster Care (YAFC)

Plan Year Approved, Implemented, Amended

- Approved: FY 2019
- Implemented: FY 2019

Description/Update of MTW Activity

HHA partners with the 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 has entered 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. DCF 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 DCF. 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. 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. HHA anticipates 15 vouchers will be leased by the end of FY 2020 and another 15 vouchers will be leased in FY 2021.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

The benchmarks for HC #1, HC #2, HC #4, HC #5, HC #7, and SS #5 have been updated to reflect the increase in participation in FY 2021.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<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	30		
<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	30		
<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		
<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	0	30		

specific type of household, give that in this box.				
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	30		
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		
<i>*This is a HUD required metric, however HHA does not believe this metric reflects an outcome of this activity.</i>				
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	30		
CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	0	\$123,840		
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	30		
SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).*	0	0		
<i>*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.</i>				

Activity 2019-2: Holyoke Public School (HPS) Assistance Program

(Activity number changed from 2019-3 to 2019-2 to reflect corrected numbering sequence)

Plan Year Approved, Implemented, Amended

- Approved: FY 2019
- Implemented: FY 2019

Description/Update of MTW Activity

Since being placed in receivership, the city of Holyoke, school administrators and stakeholders have spent significant time and efforts 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 and Community Engagement Department (FCED). FCED staffs each school with a point person who assists families in identifying and accessing resources. FCED is also staffed with a Homeless Educational 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, annually, 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 require 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. HHA will terminate vouchers, and may deny extension requests, for HPS families, who do not comply with the COP. 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.

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. Full lease-up of the first 15 vouchers is anticipated by the end of FY 2020 and an additional 15 vouchers are anticipated to be issued and leased in FY 2021.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

The benchmarks for HC #1, HC #2, HC #4, HC #5 and HC #7 have been updated to reflect the existing and additional vouchers to be leased and issued in FY 2021.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<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	30		
<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	30		
<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	30		
<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	0	30		

neighborhood of opportunity as a result of the activity.				
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		
<i>*This is a HUD required metric, however HHA does not believe this metric reflects an outcome of this activity.</i>				
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	30		

Activity 2020-1: Student Housing Initiative

Plan Year Approved, Implemented, Amended

- Approval: FY 2020
- Implemented: FY 2020

Description/Update of MTW Activity

Holyoke Housing Authority utilizes MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. Working in partnership with Holyoke Community College (HCC) HHA will provide time limited housing subsidies, to income eligible, homeless college students.

HHA will provide up to three years of subsidy for 15 eligible students for an initial three year period. Where a student becomes part of the SHI program after they are already enrolled at HCC, HHA will adjust the participation period in the program to reflect the remaining portion of the three year cap plus an additional six month post-graduation period. HHA has an MOU with HCC, including roles and responsibilities for determining initial and continued eligibility and reporting requirements. Upon review of program outcomes and financial considerations, HHA and HCC will determine program viability and make any necessary changes to the program.

HCC will be responsible for identifying eligible participants, defined as fully matriculated, full-time, low income students, who meet HUD's definition of Unaccompanied Homeless Youth or who have recently aged out of foster care and meet HUD's criteria of an independent student. HHA will verify and calculate income to determine income eligibility. HCC will be responsible for ensuring that participants meet HUD's criteria of an independent student. HCC will also be responsible for providing HHA with quarterly academic progress reports to ensure participants continue to be in compliance with continued occupancy and SHI program requirements.

The SHI subsidy will operate as follows:

- HHA will provide SHI participants with a subsidy up to the current voucher payment standard for the family size or the contract rent whichever is lower and SHI participants will pay the remaining portion of rent;
- In the event the gross rent exceeds the applicable payment standard, an SHI participant will pay an additional family share; however, HHA will cap the family share at 40% of the family's adjusted monthly income;
- HHA will conduct reasonable rent determinations prior to unit approval;
- HHA will provide utility allowances to students where the cost of utilities is not included in the rent;
- The SHI voucher will have a term limit of three years, which may be adjusted downward for students who begin participation in SHI subsequent to beginning their education at HCC; and,
- Where applicable, security deposit assistance may be provided up to one month's subsidy.

The subsidy will be limited to housing assistance, in the form of rent in privately owned housing, and will be paid directly to the housing provider. While identified housing will be subject to HUD's HQS requirements, participants will be permitted to reside in shared housing. HHA will conduct the HQS inspections or partner with another regional housing provider to conduct the HQS inspections.

Participants must continue to remain enrolled full-time and maintain passing grades in order to be eligible for subsidy renewal each year. Students receiving assistance are expected to maintain continuous enrollment with the goal of earning degrees and/or certificates of value. Every student will be required to utilize academic support services and counseling services available at the college. If the student does not remain compliant with program terms, the subsidy may be terminated.

The clients served under this activity will not be participants in the Housing Choice Voucher Program or residents of federal public housing. HHA will accept referrals from HCC for the 2020-2021 school year and anticipates that 15 vouchers will be issued and leased by the end of FY 2021.

Hardship

In the event that a student needs to take an extended leave from his or her academic program, the subsidy will be discontinued; however, the student may reapply to the SHI as long as the program continues to operate. For leaves which do not exceed two months in duration, and which have been reviewed and approved by HHA and HCC, the subsidy will continue.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

The benchmark for CE #1 was updated to reflect the leveraged resources for FY 2021.

Planned Significant Changes

There are no significant changes 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).	\$0.00	\$32,352		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed*	0	0		
	0%	0%		
Employed Part-Time or Full-Time *	0	0		
	0%	0%		
Enrolled in an Educational Program or Job Training	0 households	15 households		
	0%	100%		
* This initiative is not anticipated to increase the number of households employed, as the goal of the Activity is to keep students enrolled in college.				

<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	15 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	0 households		
<i>*Self-sufficiency is defined as graduation from college.</i>				

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 revitalizing the Arts and Innovation District, the feasibility of project-based vouchers is unclear based on the housing stock within the current District's boundaries.

Implementation Plan Update

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 extensively marketed the program to potential stakeholders; however, there was no real interest and the activity was never implemented. As the City of Holyoke has no immediate plans to expand the footprint for the Arts and Innovation District, and this activity was never implemented, HHA plans to close this activity out in the FY 2020 report.

Planned Non-Significant Changes

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

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	FY 2013	NA	FY 2014	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	FY 2013	FY 2015	FY 2018	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.
2015-2 Rent Reasonableness	FY 2015	FY 2015	FY 2018	Under HOTMA, the trigger for reasonable rent redeterminations increased from a 5% decrease to a 10% decrease in FMR from one year to the next. HHA determined that a 10% decrease in FMR was such that a reasonable rent redetermination would be warranted to ensure that subsidies paid are in line with market rents.
2015-3 PBV Rent Reasonableness	FY 2015	FY 2015	FY 2019	This activity was closed out as it was modified and combined with the previously HUD approved Modified Project Based Voucher Program activity. Please note that the portion of this activity related to re-determining reasonable rent when the FMR decreases by 5% or more will no longer be applied. HUD increased this threshold, under the regulations, to 10%. All other aspects of this activity remain in effect in Activity 2016-1.

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 2021.

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	2,344,450
70600	HUD PHA Operating Grants	16,872,340
70610	Capital Grants	1,664,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	2,472,380
71100+72000	Interest Income	15,000
71600	Gain or Loss on Sale of Capital Assets	
71200+71300+71310+71400+71500	Other Income	435,370
70000	Total Revenue	23,803,540

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	3,704,400
91300+91310+92000	Management Fee Expense	1,477,100
91810	Allocated Overhead	
92500 (92100+92200+92300+92400)	Total Tenant Services	145,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	1,195,800
93500+93700	Labor	1,461,500
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	910,240
95000 (95100+95200+95300+95500)	Total Protective Services	25,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	280,770
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	210,750

FDS Line Item	FDS Line Item Name	Dollar Amount
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	187,295
97100+97200	Total Extraordinary Maintenance	300,000
97300+97350	Housing Assistance Payments + HAP Portability-In	11,750,300
97400	Depreciation Expense	-0-
97500+97600+97700+97800	All Other Expenses	
90000	Total Expenses	21,648,155

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

The difference between revenue and expenses of \$2,155,385 is going to be used for the following:
The capital funds of \$1,664,000 will be used for improvements of our federal developments and the balance of \$491,385 will be used for development of 2 houses as part of our homeownership program.

iii. Description of Planned Use of MTW Single Fund Flexibility

Activities that utilize single fund flexibility are summarized below:

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. To date, HHA has acquired two vacant lots next to the Falcetti Towers building. The conceptual plans are to build at least two single-family homes and construct additional parking that would support the regional trainings that occur at our central office. Single fund flexibility may be used for this construction activity.

Utilizing single fund flexibility, HHA will continue to support the operation of satellite units at our family developments for use by the Boys and Girls Club of Greater Holyoke as well as explore different opportunities for further resident service and engagement.

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

The conversion of public housing units to project-based assistance under the RAD program is of critical importance to housing preservation and expansion. Under RAD, HHA is able to access private equity and other funds to invest in existing HHA developments. Table 12 includes RAD conversions which have closed or are projected to close by the end of FY 2021. HHA does not anticipate any RAD conversions for FY 2021.

Table 12: RAD Conversions Closed or Projected to Close by the End of FY 2021

Property Name	No. of Units Converted to PBV	RAD Conversion Type	Dated Closed or Projected to Close
Lyman Terrace Phase I	88	Conversion of Existing Public Housing	12/31/2016

- i. **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

- ii. **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?**

N/A

VI. Administrative

A. Board Resolution and Certifications of Compliance

The MTW Plan Certification of Compliance, the Resolution approving the FY 2021 MTW Annual Plan, and Certification of Consistency with the Consolidated Plan are included in Appendix A.

B. Documentation of Public Process

This MTW Plan was made available for public comment from September 1, 2020 through September 30, 2020. The public hearing was held, using a video conferencing format, on September 16, 2020 at 1:00 PM. Documentation of the public process and the public hearing participation 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 2021.

D. Lobbying Disclosures

HHA does not have any lobbying activities to disclose. HHA has included the Lobbying Activities (SF-LLL) form in Appendix C and Certification of Payments (HUD-50071) form in Appendix D.

Appendix A- Board Resolution and Certificate of Compliance

OMB Control Number: 2577-0216
Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE
<p align="center">U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBIC AND INDIAN HOUSING</p> <p align="center">Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</p> <p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2021), 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:</p> <ol style="list-style-type: none">(1) The MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.(2) The MTW 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 MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).(4) The MTW PHA will carry out the 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 MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and Implementing regulations at 49 CFR Part 24.

HUD FORM 50900: Certifications of Compliance

24

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW 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.
- (22) 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Holyoke Housing Authority
MTW PHA NAME

MA005
MTW PHA NUMBER/HA CODE

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

Theresa Cooper-Gordon
NAME OF AUTHORIZED OFFICIAL

Chairman of the Board
TITLE

SIGNATURE

DATE

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

Board Resolution Extract



HOLYOKE HOUSING AUTHORITY

475 Maple Street, Suite One
Holyoke, MA 01040-3798
Phone 413-539-2220, Fax 413-539-2227, T.D.D. 1-800-545-1833 Ext. 510
An Equal Opportunity / Affirmative Action Agency

**REGULAR BOARD MEETING
THE FOLLOWING IS AN EXTRACT OF
THE MINUTES OF A MEETING
OF THE MEMBERS OF THE BOARD OF COMMISSIONERS
OF THE HOLYOKE HOUSING AUTHORITY
HELD ON THURSDAY OCTOBER 1, 2020 AT 6:00PM
AT 475 MAPLE STREET, HOLYOKE, MA**

Moving to Work (MTW) Annual Plan FY 2021 – Submission

Each year, HHA is required to submit a Moving to Work Annual Plan to HUD for the following fiscal year. In the attached FY 2021 plan, we have proposed one additional activity which would allow for flexibilities around supporting affordable homeownership.

Motion

20-59

On a motion by Chair Cooper-Gordon and seconded by Commissioner Wilson, the Board voted to approve the FY 2021 MTW Annual Plan for submission to HUD no later than October 15, 2020. The Board voted in favor of this motion.

Present and Voting:

Theresa Cooper-Gordon	Yes
Marilyn Sanabria	Yes
Michael Falcetti	Yes
Aaron W. Wilson	Yes
Myriam Quinones	Yes

Absent:

Matthew A. Mainville, Secretary

MATTHEW A. MAINVILLE
Executive Director

THERESA COOPER-GORDON
Chair

MARILYN SANABRIA
Vice Chair

MICHAEL FALCETTI
Treasurer

AARON W. WILSON
Commissioner

MYRIAM QUIÑONES
Commissioner

Certification of Consistency with the Consolidated Plan

OMB Approval No. 2506-0214 (Exp. 2/28/2022)

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
Please clearly print the following information:)

ApplicantName: Holyoke Housing Authority

ProjectName: HHA - Moving to Work Annual Plan FY 2021

Location of the Project: Holyoke, MA. The development and implementation of affordable
housing and economic development initiatives in Holyoke in accordance
with the City's Consolidated Plan and Assessment of Fair Housing.

Name of the Federal
Program to which the
applicant is applying: HUD - Moving to Work Demonstration

Name of
Certifying Jurisdiction: Holyoke, Massachusetts

Certifying Official
of the Jurisdiction
Name: Alex B. Morse

Title: Mayor

Signature: *Alex Morse*

Date: 9-21-20

Appendix B – Documentation of Public Process

Legal Notice

Holyoke	Holyoke	Springfield
<p>comment@holyokey.org. For information on these applications please contact City Council Admin. Assistant Ryan Allen at allenr@holyokey.org or by phone at (413) 322-5525 Ord. Chair: Rebecca Lisi (August 2, Sept. 1)</p>	<p>The Holyoke Housing Authority (HHA) is a participant in HUD's Moving to Work Demonstration Program (MTW). The draft FY 2021 Moving to Work Annual Plan will be available for review from September 1st to September 30th, 2020 at the Authority's Administrative Office, 475 Maple Street, Holyoke, MA 01040, or on the Authority's Website at: www.holyokehousing.org. Copies of the draft FY 2021 Moving to Work Annual Plan may also be obtained by contacting the Authority at 413-539-2229. The Authority's hours of operation are Monday through Friday from 8:30am to 4:30pm. Written comments on the draft FY 2021 Moving to Work Annual Plan must be addressed to FY 2021 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 September 30th. A Public Hearing to receive comments on the Plan will be held on Wednesday September 16th @ 1:00PM via Zoom. The meeting can be accessed at this link https://us02web.zoom.us/j/81191997681?pwd=K2JXCHFYbFZlZDJEV0xNQzNGZ3grdz09 or via telephone at +1-929-436-2866, Meeting ID: 811 9199 7681, Passcode: 440660. Persons with disabilities requiring assistance or alternative formats, or wishing to submit comments in alternative formats, can contact the HHA MTW Coordinator at 413-539-2229; TDD 1-800-545-1833, extension 510. The Holyoke Housing Authority is an Equal Opportunity/Affirmative Action Agency. Theresa Cooper-Gordon, Chair. (September 1)</p>	<p>Planning Board CITY OF SPRINGFIELD Springfield Massachusetts NOTICE OF VIRTUAL PUBLIC HEARING Notice is hereby given that the Planning Board will give a hearing on Wednesday, September 16th and October 7th, 2020 at 5:30 P.M. via teleconference (Zoom), to all parties interested in the petition of: Petitioner: Parkside Discount Liquors, Inc. Package Store Liquor License (Transfer), at the property known as 445-447 Sumner Avenue. Copies of said petition, texts and maps may be requested by email or phone. Emails should be directed to the Office of Planning & Economic Development at pdromey@springfieldcityhall.com or by calling (413) 787-6020. To View Public Hearing: • FOCUS Springfield Community TV Website: http://focusspringfield.com/meeting-archive. Public comment will also be taken in two segments. The first public-comment period will take place prior to the meeting discussion. The second public-comment period will take place after the meeting and will remain open for 24 hours after the meeting. To Provide for Public Comment in writing: Mail: Springfield Planning Board, 70 Tapley Street, Springfield, MA 01104 or Email: planningboardmeeting@springfieldcityhall.com To Provide for Public Comment by Voicemail: (413) 750-3223. Messages received will be played at the Planning Board hearing or at the continued hearing date. All commenters should state their name, address and company or organizational affiliation in addition to the item(s) their comment pertains to. Voice messages received 24 hours before the hearing will be put into the re-</p>
<p>PUBLIC HEARING NOTICE The Holyoke Planning Board will hold a Public Hearing on Tuesday, Sept 8, 2020 at 5:30 p.m. via Zoom.com; ID: 889 1918 4075; CALL IN *67 646 558 8656 to hear, pursuant to the Holyoke Zoning Ordinance: a Site Plan Review petition (Sec 10); and Special Permits for a Parking Reduction (Sec 6.1.7) and Fence Height (Sec 4.6), submitted by Way Finders, Inc. for the Library Commons Phase II Project. Way Finders, Inc. is proposing to construct with associated site improvements at: • 344 Appleton St. (005-02-008) 7 units; • 188-190 Chestnut St. (011-10-007/-008) 10 units; and • 207 Elm St. (005-05-004) 12 units. A complete copy of the application and site plan may be viewed at www.holyoke.org/calendar-list/ APPLICANT: Way Finders, Inc. PLANNING BOARD: Eileen Regan (August 25, September 1)</p>		
<p>PUBLIC HEARING NOTICE The Holyoke Planning Board will hold a Public Hearing on Tuesday, September 8, 2020 at 5:30 p.m. via Zoom.com; ID: 889 1918 4075; CALL IN *67 646 558 8656 to hear, pursuant to the Holyoke Zoning Ordinance: a Site Plan Review petition (Sec 10); Special Permit for an Increase in Sign Size (Sec 6.4.6.4); and a Special Permit for Multiple Structures (Sec 5.4) submitted by the Victoria Frost LLC for the Victoria</p>		

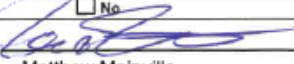
Public Hearing Participation

The public hearing was held, using Zoom video conferencing software, on September 16, 2020 at 1:00 PM. Other than the Host, there were no other participants who attended via video conference nor any participants who participated via telephone.

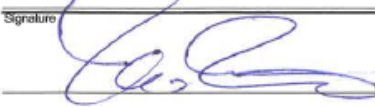
Comments on MTW Plan

HHA did not receive any comments on the FY 2021 MTW Plan.

Appendix C: Disclosure of Lobbying Activities (SF-LLL)

Not Applicable DISCLOSURE OF LOBBYING ACTIVITIES Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)			Approved by OMB 0348-0046
1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known:		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: US Department of Housing & Urban Development		7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:		9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Entity (if individual, last name, first name, MI): Not applicable		b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): (attach Continuation Sheet(s) SF-LLA, if necessary)	
11. Amount of Payment (check all that apply): \$ _____ <input type="checkbox"/> actual <input type="checkbox"/> planned		13. Type of Payment (check all that apply): <input type="checkbox"/> a. retainer <input type="checkbox"/> b. one-time fee <input type="checkbox"/> c. commission <input type="checkbox"/> d. contingent fee <input type="checkbox"/> e. deferred <input type="checkbox"/> f. other; specify: _____	
12. Form of Payment (check all that apply): <input type="checkbox"/> a. cash <input type="checkbox"/> b. in-kind; specify: nature _____ value _____		14. Brief Description of Services Performed or to be Performed and Date(s) of Service, including officer(s), employee(s), or Member(s) contacted, for Payment Indicated in Item 11: (attach Continuation Sheet(s) SF-LLA, if necessary)	
15. Continuation Sheet(s) SF-LLA attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
16. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature:  Print Name: <u>Matthew Mainville</u> Title: <u>Executive Director</u> Telephone No.: <u>413-539-2202</u> Date: <u>8/27/2020</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Appendix D: Certification of Payments (HUD-50071)

Certification of Payments to Influence Federal Transactions	OMB Approval No. 2577-0157 (Exp. 03/31/2020) U.S. Department of Housing and Urban Development Office of Public and Indian Housing
<hr/>	
Applicant Name	
Holyoke Housing Authority	
<hr/>	
Program/Activity Receiving Federal Grant Funding	
Moving to Work Program	
<hr/>	
The undersigned certifies, to the best of his or her knowledge and belief, that:	
<hr/>	
<p>(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.</p> <p>(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</p>	<p>(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.</p> <p>This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</p>
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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)	
<hr/>	
Name of Authorized Official	Title
Matthew Mainville	Executive Director
Signature	Date (mm/dd/yyyy)
	8/27/2020
<hr/>	
Previous edition is obsolete	
form HUD 50071 (01/14) ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3	