

Holyoke Housing Authority



MOVING TO WORK ANNUAL REPORT

HHA FISCAL YEAR 2022
(JANUARY 1, 2022 TO DECEMBER 31, 2022)

Submitted to HUD
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I. Introduction

The Moving to Work Annual Report provides information on programs and initiatives undertaken by the Holyoke Housing Authority (HHA) under the Moving to Work Demonstration Program (MTW) during Fiscal Year 2022, i.e., the period from January 1, 2022 to December 31, 2022. The U.S. Department of Housing and Urban Development (HUD) in the HUD Form 50900 defines the format and required content of this Report.

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.

HHA is required to submit an MTW Annual Report to HUD for approval no more than 90 days following the end of the fiscal year. This document, which is organized according to HUD's requirements, describes HHA's activities under the MTW Demonstration for Fiscal Year 2022, i.e., the period from January 1, through December 31, 2022.

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 continues 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 homeownership opportunities. HHA secured funding through the Community Scale Housing Initiative, a joint program of MassHousing and DHCD, for Phase I which consists of 12 units of affordable housing. The construction for this phase is anticipated to be complete in the fall of 2023. As part of the South Holyoke neighborhood revitalization effort, HHA continued planning for Phase II, which will consist of affordable homeownership units. In FY 2022, design and permitting for the homeownership units was completed. HHA anticipates that construction will commence in early 2023.

In addition to the South Holyoke project, HHA has also acquired two vacant lots next to the Falcetti Towers building. In FY 2022, HHA secured funding from the state of Massachusetts through the Community Preservation Act (CPA) to support the construction of two (2) affordable homeownership single-family homes. HHA will partner with the Habitat for Humanity to build these homes which will be sold to income-eligible, first-time homeowners.

HHA will continue to pursue development opportunities that are community driven and address unique local needs, specifically to redevelop vacant lots of land. HHA may propose additional MTW activities in future fiscal years to support new housing development and increase housing choice.

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 continued to explore opportunities to expand populations served and to further improve the quality of training, education and job placement services provided to families in the HCV and public housing programs. HHA has continued planning to expand this effort and include more vulnerable populations, such as individuals with opioid dependence. HHA conducted research to identify potential programs to address housing and service needs for individuals with opioid dependence who frequent the emergency room, resulting in increased health care costs and harmful patterns to themselves and others. HHA will continue to pursue a collaboration with the Holyoke Medical Center to develop a program to serve this population and 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 continued 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 continued to pursue funding opportunities as well as opportunities to leverage private equity where applicable.

Short Term Goals and Outcomes

The broader themes listed above provide HHA high-level direction for the development of HHA's programs and policies. Below are shorter-term goals and objectives and FY 2022 outcomes. Progress towards these goals is more fully described in the Approved Activities section of this report.

In FY 2022, HHA received approval to implement new leasing incentives to encourage new landlords to participate in the HCV program and broaden the housing stock available to HCV participants. Through the leasing incentive program, landlords receive a \$500 incentive for renting to an HCV participant for the first time. New and existing landlords receive a \$500 incentive for a renting a unit which has not previously been leased to an HCV participant. Since implementation of this MTW initiative, HHA has distributed \$6,000 in incentives to participating landlords.

In line with long-term goals of increasing housing choice for vulnerable populations, HHA has developed and implemented the following partnership initiatives to provide housing stability and supportive services to targeted populations:

- **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 (DCF), continued to provide stable housing and services for youth aging out of foster care. In FY 2022, HHA assisted 11 participants through the partnership program. HHA continued to provide up-front housing assistance to new participants, which included first and last months' rent and security deposit, in order to overcome barriers to leasing. DCF continued to 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 partnered 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. A Homeless Educational Coordinator on staff at HPS identifies families experiencing these circumstances and refers them to HHA for housing assistance. While receiving housing assistance, HPS monitors the student's enrollment and parent commitment to their child's education. In FY 2022, HHA assisted 14 families through the HPS Assistance Program. HHA will continue to evaluate the success of this partnership program and may explore future expansion of the program based on need and staff capacity.
- **Holyoke Horizons Transitional Housing Support:** In FY 2022, HHA provided subsidy to support nine (9) participants in their transition from the criminal justice system and successful re-entry into society. HHA partners with the Hampden County Sheriff's Department (HCSD), subsidizing housing in a sponsor-based transitional housing program to promote the successful re-entry of returning citizens and reduce recidivism. Participants receive case management and supportive services from the HCSD while receiving an HHA rental subsidy.
- **Student Housing Initiative:** In partnership with Holyoke Community College (HCC), HHA provided housing assistance to support the housing stability of college students who are experiencing homelessness through the Student Housing Initiative (SHI) program. The program provides time limited housing subsidies and other college related expenses to income eligible, homeless college students. In FY 2022, HHA provided subsidy to seven (7) students, including one (1) new student identified by HCC and referred to HHA for assistance.

Modified Project-Based (PB) Voucher Program: HHA continued 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 2022, HHA continued to utilize its approved MTW flexibility to add units to the existing PBV HAP contract for Holyoke Towers. In all, HHA provided subsidy for 156 PBV units in FY 2022.

Holyoke Affordable Homeownership Initiative: In FY 2021, HHA completed planning and design of eight (8) affordable homeownership units through the Holyoke Affordable Homeownership Initiative (HAHI). The goal of this initiative is to provide affordable homeownership opportunities for households earning up to 80% of Area Median Income. HHA anticipates that construction of these affordable, new construction homeownership units in South Holyoke will commence in early FY 2023.

Administrative Streamlining Activities: HHA continued 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 continued to implement a broad array of housing management, maintenance and supportive services efforts. HHA also continues to operate Mod Rehab and Mod Rehab SRO programs that are not part of the MTW Demonstration as well as state-assisted public housing and leasing programs, subject to continued state funding.

HHA continued to look for funding opportunities to enhance services and opportunities for HHA participants. In future fiscal years, HHA may apply for HUD and other competitive funding opportunities, including HUD Lead Hazard Reduction Grant and Housing-related Hazards Capital Fund Program.

II. General Housing Authority Operating Information

A. Housing Stock Information

i. Actual New Project Based Vouchers

Table 1 includes the tenant-based vouchers that HHA project-based for the first time in FY 2022. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) was in place by the end of FY 2022. HHA did not add any new project-based vouchers in FY 2022.

Table 1: Actual New Project Based Vouchers

Property Name	Number of Vouchers Newly Project-Based		Status at End of Plan Year	RAD	Description of Project
	Planned	Actual			
N/A	0	0			
Total	0	0			

Differences between the Planned and Actual Numbers of Newly Project-Based

Not applicable.

ii. Actual Existing Project-Based Vouchers

Table 2 represents the tenant-based vouchers that HHA is currently project-basing in FY 2022. These include only those in which at least an AHAP was in place by the beginning FY 2022. By the end of FY 2022, HHA had three (3) project-based developments under contract representing 156 project-based units.

Table 2: Actual Existing Project Based Vouchers

Property Name	Number of Project-Based Vouchers		Status at End of Plan Year	RAD	Description of Project
	Planned	Actual			
Holyoke Towers	100	68	Leased	No	An elderly high- rise, converted under preservation after conservation
Lyman Terrace	76	76	Leased	No	Conversion of remaining public housing units.
South Holyoke Homes Phase I	12	12	Committed	No	Affordable rental project; 1-4 bedrooms
Total	188	156			

Differences between the Planned and Actual Existing Number of Vouchers Project-Based

In FY 2022, HHA began to add additional units to the HAP contract for Holyoke Towers. However, the addition of units to the HAP contract is dependent on unit turnover.

iii. Actual Other Changes to MTW Housing Stock

In FY 2022, HHA held vacant 15 Public Housing units at Toepfert Apartments for modernization.

iv. General Description of Actual Capital Expenditures

The following chart provides a summary of actual capital expenditures for HHA’s Federal public housing developments during FY 2022.

Table 3: Actual Capital Expenditures During the Plan Year

Development	Planned Work Description	Actual Expenditures
Beaudoin Village	Replace existing roof, repair damaged siding and re-stain; upgrade door hardware	\$101,523
	Site Improvements	\$35,552
	Boiler Improvements	\$20,652
	Clean lateral sewer lines with video assistance	\$0
	Replace counter tops, hardwood floor maintenance and ceiling repairs	\$112,545
Toepfert Apts.	Replace existing flooring, kitchen & bath cabinets and baseboards	\$980,538
	Hot Water Heater Replacement	\$17,363
	Basketball Court Improvements	\$1,521
	Roof Replacement	\$0
Churchill I & II	Boiler Investigation/Replacement	\$22,325
	Exterior Improvements	\$30,068
	Site Improvements	\$960
	Smoke/CO2 Replacement	\$690
	Replace counter tops and flooring replacements	\$27,421
Coughlin Apts.	Repair any cracks on balconies & bands; seal	\$1,287
	Door Access Hardware Upgrade	\$3,640
	Resurface Parking Lot	\$0
Falcetti Towers	Storefront Improvements	\$22,946
	Door Access Hardware Upgrade	\$3,395
	Community Room Bathroom Improvements	\$32,400
	Elevator Improvements	\$71,288
Rosary Towers	Door Access Hardware Upgrade	\$3,795

Development	Planned Work Description	Actual Expenditures
	Elevator Improvements	\$26,205
	Storefront Improvements	\$9,897
	Resurface Parking Lot	\$2,550
	ADA Showers Improvements	\$1,941
Central Maintenance	Office Space Modifications	\$500
Administrative Offices	Office Space Modifications	\$144,219
Total		\$1,675,221

B. Leasing Information

i. Actual Number of Households Served

Table 4: Number of Households Served

Number of Households Served Through: December 31, 2022	Number of Unit Months Occupied or Leased (Planned)	Number of Unit Months Occupied or Leased (Actual)	Number Of Households Served (Planned)	Number Of Households Served (Actual)
MTW Public Housing Units Leased	9,300	8,790	775	733
MTW HCV Utilized	16,560	18,784	1,380	1,565
Local, Non-Traditional: Tenant Based	300	204	25	17
Local, Non-Traditional: Property Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
Total	26,160	27,778	2,180	2,315

Differences between the Planned and Actual Households Served

The number of households served by the Public Housing program was less than planned as a result of 15 Public Housing units which were held offline for modernization, as noted in the discussion of changes to MTW Housing Stock.

The number of households assisted through local, non-traditional tenant-based programs was less than planned. For both the Holyoke Horizons Transitional Support and Student Housing Initiatives, HHA must rely on partners to provide applicant referrals in order to lease new participants in the program.

Table 5: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Number of Unit Months Occupied/Leased (Planned)	Number of Unit Months Occupied or Leased (Actual)	Number Of Households to Be Served (Planned)	Number Of Households to Be Served (Actual)
Tenant-Based	Activity 2018-2: Holyoke Horizons Transitional Housing Support	120	120	10	10
Tenant-Based	Activity 2020-1 Student Housing Initiative	180	84	15	7
Property-Based	N/A	0	0	0	0
Homeownership	Activity 2021-1: Holyoke Affordable Homeownership Initiative	0	0	0	0
Planned Totals		300	204	25	17

Households Receiving Local, Non-Traditional Services Only

Program Name/ Services Provided	Average Number of Households per Month	Total Number of Households in the Plan Year
Not applicable	0	0

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Housing Program	Description of Actual Leasing Issues and Solutions
Local, Non-Traditional	<p>As noted above, HHA works with external partners to implement programs such as the Student Housing Initiative. HHA must rely on partners, such as the Holyoke Community College, to qualify and refer applicants in order to lease new participants in the respective programs.</p> <p>HHA will continue to engage and collaborate with partners to provide housing assistance to the populations targeted in these local, non-traditional activities.</p>

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. Actual Waiting List Information

Table 6: Waiting List Information

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Status (Open, Partially Open or Closed)	Was the Waiting List Opened During the Plan Year
HCV	Statewide	241,031	Open	Continuously Open
HCV	Statewide with Holyoke Residency	6,173	Open	Continuously Open
Federal MTW Public Housing	Merged (excluding Churchill Homes)	1,272	Open	Continuously Open
Federal MTW Public Housing Units	Site-Based (Churchill Homes)	1,614	Open	Continuously Open

Describe any duplication of applicants across waiting lists:

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

ii. Actual Changes to Waiting List in the Plan Year

HHA did not make any changes to the organization structure or policies of the waiting list during FY 2022.

Waiting List Name	Description of Actual Changes to Waiting List
Not applicable	No changes were made

D. Information on Statutory Objectives and Requirements

Under the MTW Agreement between HHA and HUD, HHA is required to meet certain statutory objectives and other requirements and to report on them in the MTW Annual Report. The tables below provide the required information.

i. 75 percent of Families Assisted are Very Low Income

Table 7: Local Non-Traditional Households and Income Levels

Income Level	Number of Local, Non-Traditional Households Admitted in the Plan Year
80% - 50% Area Median Income	0

Income Level	Number of Local, Non-Traditional Households Admitted in the Plan Year
49% - 30% Area Median Income	0
Below 30% Area Median Income	8
Total Local, Non-Traditional Households Admitted	8

ii. Maintain Comparable Mix

Table 8: Baseline for the Mix of Family Sizes Served

Family Size:	Occupied Number of Public Housing units by Household Size when PHA Entered MTW *	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW **	Non-MTW Adjustments to the Distribution of Household Sizes	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained
1 Person	407	488	0	895	44%
2 Person	186	265	0	451	22%
3 Person	172	183	0	355	17%
4 Person	92	123	0	215	11%
5 Person	37	51	0	88	4%
6+ Person	14	17	0	31	2%
Totals	908	1,127	0	2,035	100%

*Data as of September 2013

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

Explanation for Baseline Adjustments to the Distribution of Household sizes Utilized.

N/A

Table 9: Mix of Family Sizes Served (in Plan Year)

Mix of Family Sizes Served (in Plan Year)				
Family Size	Baseline Mix Percentage	Number of Households Served in Plan Year	Percentage of Households Served in Plan Year	Percentage Change from Baseline Year to Current Plan Year
1 Person	44%	909	53%	9%
2 Person	22%	356	21%	-1%
3 Person	17%	224	13%	-4%
4 Person	11%	139	8%	-3%
5 Person	4%	56	3%	-1%
6+ Person	2%	22	1%	-1%

Mix of Family Sizes Served (in Plan Year)				
Family Size	Baseline Mix Percentage	Number of Households Served in Plan Year	Percentage of Households Served in Plan Year	Percentage Change from Baseline Year to Current Plan Year
Total	100%	1,706	100%	

Describe the justification for any variances of more than 5% between the Plan Year and Baseline Year

The increase in one person families is a result of the MTW activities including Holyoke Horizon Transitional Support, the Student Housing Initiative and the Youth Again Out of Foster Care activities, which generally serve one-person households.

iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year

Table 10: Transition to Self Sufficiency

MTW Activity Name/Number	Number of Households Transitioned to Self-Sufficiency	MTW PHA Definition of Self Sufficiency
Activity #2018-2: Holyoke Horizons Transitional Housing Support	3	Voluntary termination of assistance due to an income increase which results in the participant no longer requiring HHA subsidy for the CHES unit
Activity #2019-1: Youth Aging Out of Foster Care	0	End of participation in the YAFC program due to end of voucher term (not including termination or early departure)
Activity #2020-1: Student Housing Initiative	0	Graduation from college
	3	Total Households Transitioned to Self-Sufficiency

III. Proposed MTW Activities

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

IV. Approved MTW Activities

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 limit the number of voluntary interim recertifications a family may complete between biennial recertifications to two (2). Required interim recertifications (i.e. for changes in family composition or otherwise required by HHA) do not count against the limit. Elderly and disabled households are exempt from this provision and will be able to complete an interim recertification at any time. Zero-income households and households on minimum rent will continue to be subject to annual or more frequent recertification requirements.

In FY 2022, HHA continued to lift the limit on voluntary interim rent reductions, in order to mitigate hardship for families impacted by the economic and health emergencies caused by the COVID-19 pandemic.

Impact

HHA completed a total of 742 regular recertifications and 542 interim recertifications in FY 2022, less than half of the regular and interim recertifications completed prior to the implementation of this activity.

Hardship

There were no hardship requests in FY 2022.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

The benchmark for CE #1 was updated to reflect an increase in the staff hourly rate.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA met all benchmarks in FY 2022.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Recertifications performed in FY 2013: 1,887 Time per recertification: 105 minutes Time spent on recertifications in FY 2013: 3,302 hours Interims performed in FY 2013: 1,321 Time per interim: 45 minutes Time spent on interims in FY 2013: 991 hours Total time spent on interims and recertifications: 4,293 hours Average hourly wage for staff: \$23.87 Total cost in FY 2013: \$102,474	Estimated number of recertifications performed: 1,000 Time per recertification: 85 minutes Anticipated time spent on recertifications: 1,417 hours Estimated number of interims performed: 942 Time per interim: 45 minutes Anticipated time spent on interims: 707 hours Total time spent on interims and recertifications: 2,124 hours Average hourly wage for staff: \$33.45 Total cost after implementation of activity: \$71,048	Actual number of recertifications performed: 742 Time per recertification: 85 minutes Actual time spent on recertifications: 1,051 hours Actual number of interims performed: 542 Time per interim: 45 minutes Actual time spent on interims: 407 hours Total time spent on interims and recertifications: 1,458 hours Average hourly wage for staff: \$33.45 Total cost after implementation of activity: \$48,770	Yes
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

<p>Total time to complete the task in staff hours (decrease).</p>	<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>	<p>Actual number of recertifications performed: 742</p> <p>Time per recertification: 85 minutes</p> <p>Actual time spent on recertifications: 1,051 hours</p> <p>Actual number of interims performed: 542</p> <p>Time per interim: 45 minutes</p> <p>Actual time spent on interims: 407 hours</p> <p>Total time spent on interims and recertifications: 1,458 hours</p>	<p>Yes</p>
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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. (Public Housing and HCV)
- **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. (Public Housing and HCV)
- **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. (Public Housing and HCV)

The activity continues to allow for a more streamlined rent determination process and results in cost and time savings for HHA staff as well as financial benefits for participants.

Impact

In FY 2022, there were 76 households with full-time students who did not require verification of income and only three (3) households with assets over \$50,000 who required third-party verification. Both the full-time student and asset policies resulted in time savings for HHA and rent savings for participants.

Hardship

There were no hardship requests related to the payment standard policy. The remaining rent simplification features do not have any adverse impact on participants.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet the benchmarks for staff time savings, as there were more households with full-time students and assets of \$50,000 than were anticipated. However, HHA continues to realize time savings per verification.

Metrics

<i>CE #2: Staff Time Savings: Full-Time Student</i>				
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>	<p>HCV households with full-time student: 54</p> <p>PH households with full-time student: 22</p> <p>Approximate time to verify full-time student income and status: 5 minutes</p> <p>Total time spent on activity: 6.3 hours</p>	No
<i>CE #2: Staff Time Saving: Assets</i>				
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>HCV households with assets over \$50,000: 1</p> <p>PH households with assets over \$50,000: 1</p>	<p>HCV households with assets over \$50,000: 3</p> <p>PH households with assets over \$50,000: 0</p>	No

	<p>Time per asset verification and calculation: 20 minutes</p> <p>Total time spent verifying assets: 213 hours</p>	<p>Time per asset verification and calculation: 20 minutes</p> <p>Total time spent after implementation of activity: 40 minutes</p>	<p>Time per asset verification and calculation: 20 minutes</p> <p>Total time spent after implementation of activity: 1 hour</p>	
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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).

Through the end of FY 2022, the two developments that used the flexibility under this activity are Holyoke Towers (now 68 units), which was a Section 236 exchange, and the Lyman Terrace Non-RAD conversion of 76 PH units to PBV.

Impact

There were no expiring use contracts referred by HUD to HHA in FY 2022.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

The determination of award of expiring use contracts is a HUD determination; and as such, HHA does not control the ebb and flow of units in this activity. HHA remains optimistic that HUD will continue to consider HHA for future administration of RAD Part II and expiring use contracts.

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	144 units	Yes
<i>* Total number of project-based units which were developed to date using the MTW flexibility provided through this activity. HHA also applies flexibilities provided under Activity #2016-1: Modified Project-Based Voucher Program to these project -based units.</i>				

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.

Impact

In FY 2022, HHA continued to utilize the flexibility provided under this activity to add units to an existing PBV HAP contract during the contract term. In FY 2022, an additional eight (8) units were added to the PBV HAP contract for Holyoke Towers. In total, HHA provided continuing subsidy for 156 PBV units in FY 2022.

Hardship Policy

HHA will issue a tenant-based voucher to a PBV participant if they are deemed eligible for a reasonable accommodation, VAWA or emergency transfer. HHA did not receive any hardship request related to this MTW policy. Other features of this activity do not have an adverse impact on participants.

Actual Non-Significant Changes

HHA received approval to implement the following non-significant changes to the Modified Project-Based Voucher Program:

- HHA will define a PBV project as a single building, multiple contiguous or non-contiguous buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single family building is a building with no more than four dwelling units. PHA may elect to combine units that cumulatively meet the definition of a UBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contracts, into a single HAP Contract. For such scattered site projects, HHA will implement an alternative method to determine rent reasonableness whereby HHA bases the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one- bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.
- HHA will waive the 20% cap on PB units in HHA's portfolio and replace that with a 40% cap and will waive the requirement to provide advance notice to its HUD field office of its intent to project- base vouchers.
- As approved in HHA's 2016 MTW Plan, HHA allows 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. Pursuant to this provision of HHA's Modified PBV Program, when HHA adds additional units to an existing PBV HAP contract, during the term of the HAP contract, eligible families

residing in the added units on the date the units are added to the PBV HAP contract will be considered “in-place families.” To protect eligible families from displacement, HHA will add “in-place families” to the waiting list and assign an absolute selection preference once they have been determined eligible.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet the benchmark for additional units of housing, as fewer units were added to the HAP contract for Holyoke Towers than anticipated for FY 2022. HHA will continue to add additional units to the HAP contract for Holyoke Towers in FY 2023 upon unit turnover.

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).	0 units	188 units	156 units	No
<i>* Total number of new and existing project-based vouchers.</i>				

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 continues to select the UA for the smaller of the unit size or voucher size.

HHA continues to determine reasonable accommodations for utilities on a case-by-case basis. For households who were receiving reasonable accommodations for heat and/or electricity at the time this MTW policy was implemented, HHA applied the higher of the table UA and the previously approved reasonable accommodation UA.

Impact

The total cost of utility allowances in FY 2022 was \$63,239, a decrease 22% compared to the baseline in FY 2018.

Hardship

HHA has established a hardship policy in which participants can request an exemption from the MTW utility allowance policies if they can demonstrate financial hardship would result from the application of these policies. In FY 2022, HHA did not receive any hardship requests.

Actual Non-Significant Changes

HHA periodically, at its discretion, reviews HCV utility allowance schedules to determine if adjustments are required. Annual updates are not required. HHA will review rate summaries and if the average five-year rate change is greater than 10%, HHA will update its UA schedules accordingly.

In FY 2022, HHA conducted a rate change review and determined that the five-year rate change was greater than 10%. Accordingly, HHA updated the utility allowance schedule in concert with Holyoke Gas & Electric's (HG&E) current rates.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet benchmarks related to agency cost savings, as the number of HCV participants receiving a utility allowance increased by 120 (consistent with the overall increase in utilization in the HCV program). Additionally, HHA did not meet the benchmark for average tenant rent share, which may be due in part to the implementation of an updated utility allowance schedule in FY 2022.

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	\$63,239	No
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	10%	8%	<1%	Yes
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome*	Benchmark Achieved?
Average Tenant Rent Share (increase).	\$332	\$345	\$314	No
* Average tenant rent share for households with a utility allowance.				

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 \$400/month per participant to the HCSD, who will then disburse funds to the landlords through MHA. Dependent on unit availability, up to three (3) participants unable to meet the monthly rent minimum of \$400 may be housed in one unit, which would result in a \$1,200 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.

Impact

In FY 2022, the subsidy provided under this activity supported nine (9) CHESS participants. The story of a recent graduate highlights the success of HHA's partnership with the CHESS program. Through the housing and services provided through this partnership, the recent graduate and mother was able to reunite with her son after making strides in her recovery and achieving self-sufficiency. During her participation in the CHESS program, she was able to save money for her future, obtain her driver's license, and purchase a vehicle. She has successfully transitioned to permanent housing and serves as a mentor for participants in the CHESS program, facilitating a support group for women currently enrolled in the first phase of the program.

Hardship

HHA has established a hardship policy in which program participants can request an exemption from the minimum rent requirement if they can demonstrate that financial hardship resulted from the application of this policy. In FY 2022, HHA did not receive any hardship requests from program participants.

Actual Non-Significant Changes

There were no non-significant changes in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet the benchmarks set forth for FY 2022, as the number of households participating was lower than expected. To lease new participants, HHA must rely on program partners to identify and refer eligible applicants, and does not control the number of applications received.

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	\$5,196 Hourly wage of Aftercare Support Supervisor \$38.49 Average of 15 hours spent per client on referral, housing search & leasing 9 households served	No
<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.	0 households	13 households	9 households	No
<i>SS #8: Households Transitioned to Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households transitioned to self-sufficiency (increase).*	0 households	5 households	3 households	No
*Self-sufficiency is defined as voluntary termination of assistance. In FY 2022, three (3) households transitioned to long-term affordable housing through HHA's PBV program.				

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 families, 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 designates up to 15 tenant based Housing Choice Vouchers, annually, to eligible YAFC referred by a LPCWA for a period of 36-months. DCF refers 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 then screens referrals, calculate income, rent and subsidy in accordance with HHA’s Administrative Plan and MTW policies.

As participants are not likely to have accrued finances available for initial housing costs, HHA also utilizes MTW funds 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 is responsible for directly referring participants, participants sign 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 provides 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 also provides 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.

Impact

In FY 2022, HHA received four (4) referrals from DCF. However, only one (1) referred applicant successfully leased up, using security deposit assistance from HHA. No participants reached the end of 36-month term limit for program participation in FY 2022.

Hardship

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet the majority of benchmarks related to housing units made available and households served. HHA must rely on DCF to refer eligible applicants for leasing in the YAFC program, and does not control the volume of referrals received.

Metrics

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that in this box.	0	15	11	No
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity.	0	15	11	No
<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	0	\$123,840	\$1,111 DCF Social Worker III average hourly wage \$37.02	No

			Average 30 hours spent per client on referral, housing search & lease-up for 1 client	
<i>SS #5 Households Removed from Temporary Assistance for Needy Families (TANF)</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency.	0	15	11	No
<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	0	Yes
<i>*Self-sufficiency will be defined as households 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 allocates up to 15 Housing Choice Vouchers, annually, to eligible families referred by HPS. Eligibility is 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 are screened and issued vouchers consistent with HHA's Administrative Plan and MTW policies.

Families who receive a voucher are required to enter into and sign a contract of participation (COP). The COP requires 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 is 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.

Impact

In FY 2022, HHA assisted 14 families through the HPS Assistance Program. No new families leased up in the program during the fiscal year.

For each family, HHA receives monthly progress reports from the Holyoke Public Schools, which track each family's progress to ensure compliance with the COP and continued occupancy policies. With the housing stability provided through this activity, HHA anticipates that school-aged children participating in the program will continue to improve their attendance.

Hardship

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet the benchmarks related to households served. HHA must rely on HPS to refer eligible families to HHA for leasing in the HPS Assistance program, and does not control the volume of referrals received.

Metrics

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity.	0	30	14	No
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice.	0	30	14	No

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 provides 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 is 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 verifies and calculates income to determine income eligibility. HCC is responsible for ensuring that participants meet HUD's criteria of an independent student. HCC is also 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 operates 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 is limited to housing assistance, in the form of rent in privately owned housing, and is paid directly to the housing provider. While identified housing is subject to HUD's HQS requirements, participants are permitted to reside in shared housing. HHA conducts the HQS inspections or partners 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 is 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 are not participants in the Housing Choice Voucher Program or residents of federal public housing.

Impact

In FY 2022, HCC referred two (2) students for SHI vouchers and one (1) student successfully leased a unit. HHA provided housing assistance for seven (7) students in all during FY 2022.

Hardship

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this activity in FY 2022.

Challenges in Achieving Benchmarks & Possible Strategies

HHA did not meet benchmarks for resources leveraged and households assisted, as HHA must rely on HCC to identify and refer qualified students to the program and does not control the volume of referrals.

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	\$2,265 Hourly wage of Special Programs Coordinator at HCC \$28.31 80 hours per student 1 student enrolled	No

<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Enrolled in an Educational Program or Job Training	0 households	15 households	7 households	Yes
	0%	100%	100%	
<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	7 households	No
<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	0 households	Yes
<i>*Self-sufficiency is defined as graduation from college.</i>				

Activity 2021-1: Holyoke Affordable Homeownership Initiative

Plan Year Approved, Implemented, Amended

- Approval: FY 2021
- Implementation Planned: FY 2023

Description/Update of MTW Activity

HHA's Holyoke Affordable Homeownership Initiative (HAHI) provides affordable homeownership opportunities for households earning up to 80% of Area Median Income. 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.

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 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 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 fourth and fifth phases will involve the development of additional homeownership units, including one- and two-family infill units throughout the South Holyoke neighborhood and townhouses in the area surrounding Carlos Vega Park.

The HAHI program provides 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 like 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 HAHI 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, HHA 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 HHA 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.

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. If demand exceeds available budget, HHA will establish a wait list based on date and time of application.

Impact

In FY 2022, HHA completed planning and design for eight (8) homeownership units. Construction of these homeownership units is slated to begin in FY 2023.

Hardship

Not applicable.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this the activity in FY 2022.

Challenges in Achieving Benchmarks and Possible Strategies

Construction of homeownership units developed under this activity has not yet been completed. As a result, HHA did not provide homeownership assistance to families through this activity in FY 2022.

Metrics

<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	0	0	Yes
<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	0	0	Yes
<i>HC #6 Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase).	0	0	0	Yes
<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	0	0	Yes

Activity 2022-1: HCV Leasing Incentives

Plan Year Approved, Implemented, Amended

- Approval: FY 2022
- Implemented: FY 2022

Description/Update of MTW Activity

Using its MTW flexibility, HHA has established an HCV Leasing Incentive program to increase voucher utilization and provide additional housing opportunities for voucher-holders.

HHA provides leasing incentives to owners to increase their participation in the HCV program. Owners receive incentive payments for participation in the HCV program for the first time as well as for leasing new HCV units. HHA will allocate \$7,500 in the first year of this activity. However, HHA may revise these allocations in future fiscal years pending the response to these incentives.

HHA provides the following incentives to owners participating in the HCV program:

- A \$500 one-time incentive for a new HCV program unit. HHA will define a new HCV program unit as a unit which has not been previously leased under the HCV program or was last leased three or more years ago.
- A \$500 incentive to an owner who had not previously leased a unit in HHA's HCV program. "New Owner" refers to an owner who has never previously leased a unit under the HCV program or who had last leased a unit under the HCV program three or more years ago.

Where a unit had previously been leased by an HCV participant and there is a gap in leasing with the HCV program, HHA will not provide a \$500 incentive when and if the unit gets leased by a new HCV participant.

Incentive payments will be payable upon execution of the HAP contract.

Impact

In FY 2022, HHA distributed \$6,000 in incentives to six (6) landlords, who were considered new owners and leased a new HCV program unit, qualifying them for both incentives.

Hardship

Not applicable.

Actual Non-Significant Changes

There were no non-significant changes to this activity in FY 2022.

Actual Changes to Metrics/Data Collection

No changes have been made to the metrics identified in the FY 2022 Annual Plan.

Actual Significant Changes

There were no significant changes to this the activity in FY 2022.

Challenges in Achieving Benchmarks and Possible Strategies

HHA did not meet the benchmark for number of new housing units. In FY 2023, HHA will continue to conduct outreach and engage potential landlords to expand the number of units available to voucher-holders.

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 this activity (increase).	0	10	6	No

B. Not Yet Implemented Activities

Not applicable.

C. Activities on Hold

Not applicable.

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.
Activity 2013-4: Neighborhood Revitalization	FY 2013	FY 2013	FY 2020	HHA planned to commit 30 project-based units to the Arts and Innovation District to ensure the preservation of affordable housing in the area. However, extensive marketing to potential stakeholders did not generate interest in the

Activity	Year Approved	Year Implemented	Year Closed Out	Reason for Closing Out
				program. As a result, HHA was not able to implement the program and decided to close out this activity.

V. Application of MTW Funds

A. Financial Reporting

i. Available MTW Funds in the Plan Year

As required, HHA submits unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA).

Table 11: Actual Sources of MTW Funds

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$2,570,424
70600	HUD PHA Operating Grants	\$20,732,578
70610	Capital Grants	\$1,993,024
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$2,250,428
71100+72000	Interest Income	\$35,162
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	\$144,900
70000	Total Revenue	\$27,726,516

ii. Expenditures of MTW Funds in the Plan Year

Table 12: Actual 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	\$4,538,466
91300+91310+92000	Management Fee Expense	\$2,250,428
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	\$343,904
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,423,035
93500+93700	Labor	\$1,362,863
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$931,141
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$366,730
96000 (96200+96210+96300+96400+96500+96600+ 96800)	Total Other General Expenses	\$84,790

FDS Line Item	FDS Line Item Name	Dollar Amount
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$63,899
97100+97200	Total Extraordinary Maintenance	\$44,272
97300+97350	Housing Assistance Payments + HAP Portability-In	\$13,455,889
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
90000	Total Expenses	\$24,865,417

iii. Description of Application of MTW Funding Flexibility

Utilizing single fund flexibility, HHA provided \$50,000 in MTW funds to support the operation of satellite units at HHA’s family developments for use by the Boys and Girls Club of Greater Holyoke.

Additionally, HHA provided \$1,304,422 in MTW funds to support the construction of 12 rental units, which are part of Phase I of the South Holyoke neighborhood revitalization plan.

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

VI. Administrative

A. HUD Reviews, Audits and Physical Inspection Issues

In FY 2022, there were no HUD reviews, audits, or physical inspection issues which required HHA to take action to address.

B. PHA-Directed Evaluations

There were no other evaluations completed in FY 2022.

C. Certifications of MTW Statutory Requirements

HHA certifies that, in Fiscal Year 2021, it continued to meet the following statutory objectives of the MTW program:

1. Assuring that at least 75% of the families assisted by LMHA are very low-income; and
2. Maintaining a comparable mix of families (by family size) served as would have been served had the amounts not been used under the demonstration.

HHA is substantially compliant with the statutory requirement to assist substantially the same number of eligible low-income families and has a plan in place to reach full compliance. The certification required by HUD is included as Appendix A.

D. MTW Energy Performance Contract (EPC) Flexibility Data

Not applicable.

Appendix A: Certification of Conformance with MTW Statutory Requirements

The Holyoke Housing Authority hereby certifies that between the period of January 1, 2022 and December 31, 2022, HHA met the following MTW statutory requirements:

1. Assuring that 75% of the families assisted by HHA are very low income; and,
2. Maintaining a comparable mix of households (by family size) served as would have been served had HHA not participated in the MTW demonstration.

HHA is substantially compliant with the statutory requirement to assist substantially the same number of eligible low-income families and has a plan in place to reach full compliance.

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

Matthew Mainville
Name of Authorized Official


Signature of Authorized Official

Executive Director
Title

3/27/2023
Date