

Holyoke Housing Authority



MOVING TO WORK ANNUAL PLAN

HHA FISCAL YEAR 2024
(JANUARY 1, 2024 TO DECEMBER 31, 2024)

First Submission to HUD: October 13, 2023

Second Submission: January 2, 2024

Third Submission: January 23, 2024

Table of Contents

I.	Introduction.....	1
II.	General Housing Authority Operating Information.....	5
A.	Housing Stock Information.....	5
	<i>Table 1: Planned New Public Housing Units</i>	5
	<i>Table 2: Planned Public Housing Units to Be Removed</i>	5
	<i>Table 3: Planned New Project Based Vouchers</i>	5
	<i>Table 4: Planned Existing Project Based Vouchers</i>	6
	<i>Table 5: Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year</i>	6
	<i>Table 6: Planned Capital Expenditures</i>	6
B.	Leasing Information.....	9
	<i>Table 7: Planned Number of Households Served</i>	9
	<i>Table 8: Local, Non-Traditional Housing Programs</i>	9
C.	Waiting List Information.....	10
	<i>Table 9: Waiting List Information</i>	10
III.	Proposed MTW Activities.....	11
	<i>Activity 2024-1: Special Referral Vouchers</i>	11
IV.	Approved MTW Activities.....	13
A.	Implemented Activities.....	13
	<i>Activity 2013-1: Biennial Recertifications</i>	13
	<i>Activity 2015-1: Rent Simplification</i>	15
	<i>Activity 2015-4: Preservation after Conservation</i>	17
	<i>Activity 2016-1: Modified Project-Based Voucher Program</i>	19
	<i>Activity 2018-1: MTW Utility Allowances</i>	22
	<i>Activity 2018-2: Holyoke Horizons Transitional Housing Support</i>	24
	<i>Activity 2019-1: Youth Aging out of Foster Care (YAFC)</i>	26
	<i>Activity 2019-2: Holyoke Public School (HPS) Assistance Program</i>	28
	<i>Activity 2020-1: Student Housing Initiative</i>	30
	<i>Activity 2021-1: Holyoke Affordable Homeownership Initiative</i>	33
	<i>Activity 2022-1: HCV Leasing Incentives</i>	37
	<i>Activity 2023-1: Local Family Self-Sufficiency Program</i>	39
	<i>Activity 2023-2: Streamlined Transfer Policy</i>	43
B.	Not Yet Implemented Activities.....	45
C.	Activities on Hold.....	46
D.	Closed Out Activities.....	47
V.	Planned Application of MTW Funds.....	48

A.	Planned Application of MTW Funds.....	48
	<i>Table 10: Estimated Sources of MTW Funds.....</i>	<i>48</i>
	<i>Table 11: Estimated Uses of MTW Funds</i>	<i>48</i>
C.	Local Asset Management Plan	51
D.	Rental Assistance Demonstration (RAD) Participation.....	52
	<i>Table 12: RAD Conversions Closed or Projected to Close Prior to FY 2024.....</i>	<i>52</i>
VI.	Administrative	53
A.	Board Resolution and Certifications of Compliance	53
B.	Documentation of Public Process	53
C.	Planned and Ongoing Evaluations.....	53
D.	Lobbying Disclosures	53
	Appendix A: Board Resolution and Certificate of Compliance.....	54
	Appendix B: Documentation of Public Process.....	58
	Appendix D: Certification of Payments (HUD-50071)	62

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, 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 Plan (50900) requirements, describes HHA's planned activities under the MTW Demonstration for Fiscal Year 2024, i.e., the period from January 1, 2024 through December 31, 2024.

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 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. Phase I of the project was completed in FY 2023 and all units are now occupied. Additionally, Phase II of the project will consist of ten homeownership units, which HHA anticipates completing by the end of FY 2024.

In addition to the South Holyoke project, HHA has also acquired two vacant lots next to the Falcetti Towers building. Towards this effort, HHA applied for and received funding from the local Community Preservation Act (CPA), invested some of our own dollars and partnered with Habitat for Humanity for the construction of two single-family homes, which were completed and occupied in FY 2023. Habitat for Humanity has begun construction on a third single-family home on the same lot, which HHA anticipates will be completed at the beginning of FY 2024.

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

In FY 2024, HHA anticipates providing housing assistance to 2,449 households. HHA will continue to leverage its MTW flexibilities to serve these low-income families and administer the following activities:

HCV Leasing Incentives: HHA will continue to provide leasing incentives to landlords participating in the HCV program, in an effort to increase voucher utilization and provide additional housing opportunities for voucher-holders. Landlords will receive incentive payments for participation in the HCV program for the first time as well as for leasing new HCV units. Annually, HHA will allocate \$7,500 to support the leasing incentives. However, HHA may revise these allocations in future fiscal years pending the response to these incentives.

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 and issues up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of five (5) years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates five (5) additional vouchers will be leased in FY 2024, assisting a total of 20 youth during the fiscal year. 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 receives referrals and issues 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 five (5) years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates serving 20 families overall in FY 2024 through this activity.

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 greater flexibility in project basing properties with an outcome of increasing housing opportunities in HHA's jurisdiction. In FY 2024, HHA anticipates that 90 units will be project-based for the first-time, in addition to the 498 existing project-based vouchers.

Holyoke Horizons Transitional Housing Support: In FY 2023, HHA anticipates assisting 10 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. HHA provides a rental subsidy of \$400/month per participant in order to support up 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 will continue to use MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. HHA partners with Holyoke Community College (HCC) to administer the Student Housing Initiative (SHI) program, which provides time-limited subsidy for housing 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 2023-2024 and 2024-2025 school years and anticipates that 15 vouchers will be under lease in FY 2024.

Holyoke Affordable Homeownership Initiative (HAHI): Through the Holyoke Affordable Homeownership Initiative (HAHI), HHA will provide affordable homeownership opportunities for households earning up to 80% of Area Median Income. Initially, HAHAI 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 HAHAI 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. HHA anticipates that construction of 10 affordable homeownership units will be completed and the units occupied by the end of FY 2024 or in early 2025. To prepare families for homeownership, HHA will provide first-time homebuyer workshops.

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.

MTW Transfers: HHA received approval in FY 2023 to establish a streamlined transfer policy which allows for a limited number of transfers between Public Housing and the HCV programs. Through this MTW flexibility, HHA will continue to allow for MTW transfers for families whose needs cannot currently be met with housing from their current program. HHA anticipates that this change will reduce the wait time for families on the Public Housing and HCV transfer waiting lists.

Local Family Self-Sufficiency (FSS) Program: HHA recently received approval to modify and enhance its FSS program to encourage broader participation in the program and further incentivize increased earnings and other core program goals. Under the local FSS program, HHA has implemented a revised escrow model, in which escrow is determined by current earned income rather than the change in the tenant's rent. Additionally, HHA provides incentive payments for meeting certain interim goals related to education attainment and program engagement, which do not directly impact escrow under the traditional escrow model but support the participant in increasing their earnings over the long term.

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.

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 2024.

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+			Section 504 Accessible Units (Mobility)	Section 504 Units (Hearing/Vision)
N/A							0			
Total Public Housing Units to be Added in Plan Year							0			

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

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

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
Total: Public Housing Units to be Removed in the Plan Year	0	

iii. Planned New Project-Based Vouchers

Table 3: Planned New Project Based Vouchers

HHA plans to enter into a contract for 90 project-based units in FY 2024.

Property Name	Number of Vouchers to be Project-Based	RAD? (Yes/No)	Description of Project
Elmwood Towers	90	No	PBV conversion of a former Section 236 property
Planned Total	90		

iv. Planned Existing Project-Based Vouchers

Table 4: Planned Existing Project Based Vouchers

HHA anticipates that there will be 498 PBV units under lease in FY 2024.

Property Name	Number of Project-Based Vouchers	Planned Status at the End of the Plan Year	RAD? (Yes/No)	Description of Project
Holyoke Towers	100	Leased	No	An elderly high-rise, converted under preservation after conservation
Jarvis Heights	186	Leased	No	PBV conversion of a former Section 236 property
Lyman Terrace	88	Leased	Yes	Conversion of existing public housing units through RAD
Lyman Terrace	76	Leased	No	PBV conversion of remaining public housing units.
Pulaski Heights	36	Leased	No	Existing elderly high-rise building
South Holyoke Homes Phase I	12	Leased	No	Affordable rental project; 1-4 bedrooms
Planned Total	498			

v. Planned Other Changes to MTW Housing Stock

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

Site	Planned Change
N/A	

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 2024. Actual expenditures may vary.

Table 6: Planned Capital Expenditures

Development	Planned Work Description	Projected Expenditures
Beaudoin Village	Boiler Venting Improvements	\$25,000
	Clean lateral sewer lines with video assistance	\$10,000

Development	Planned Work Description	Projected Expenditures
	Parking Redesign	\$25,000
	Irrigation Water Meter	\$5,000
	Replace counter tops, hardwood floor maintenance and ceiling repairs	\$25,000
Toepfert Apts.	Replace existing flooring, kitchen & baths including baseboards heating; scrap and paint porches	\$1,500,000
	Exterior Basement Door Replacement	\$13,000
	Roof Replacement	\$200,000
Churchill I & II	Exterior Improvements	\$75,000
	Elevator Upgrades	\$40,000
	Replace counter tops and flooring replacements	\$25,000
Coughlin Apts.	Repair any cracks on balconies & bands; seal	\$145,000
	Energy Efficient Rooftop Exhaust Fans	\$30,000
	Resurface Parking Lot	\$40,000
Falcetti Towers	Miscellaneous Balcony Repairs	\$15,000
	Replace Unit Entry Doors and Hardware	\$75,000
	Elevator Upgrades	\$25,000
	Energy Efficient Rooftop Exhaust Fans	\$22,000
Rosary Towers	Energy Efficient Rooftop Exhaust Fans	\$45,000
	Miscellaneous Balcony Repairs	\$15,000
	Elevator Upgrades	\$25,000

Development	Planned Work Description	Projected Expenditures
	Hallway Flooring & Painting Improvements	\$100,000
	Resurface Parking Lot	\$40,000
	Exterior Metal Door Replacement	\$5,000
	ADA Showers Improvements	\$50,000
Zielinski Apts.	Elevator Upgrades	\$25,000
	Miscellaneous Balcony Repairs	\$15,000
	Resurface Parking Lot	\$25,000
	Energy Efficient Rooftop Exhaust Fans	\$42,000
Beaudry-Boucher Apts.	Energy Efficient Rooftop Exhaust Fans	\$26,000
	Miscellaneous Balcony Repairs	\$15,000
	Elevator Upgrades	\$25,000
	Resurface Parking Lot	\$25,000
Total		\$2,773,000

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	8,868	739
MTW HCV Utilized	20,100	1,675
Local, Non-Traditional: Tenant Based	300	25
Local, Non-Traditional: Property Based	0	0
Local, Non-Traditional: Homeownership	120	10
Planned Totals	29,388	2,449

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	120	10
Tenant-Based	Activity 2020-1 Student Housing Initiative	180	15
Property-Based	N/A	N/A	N/A
Homeownership	Activity 2021-1: Holyoke Affordable Homeownership Initiative Program	120	10
	Planned Totals	420	35

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

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	HHA does not anticipate any PH leasing issues in FY 2024.
MTW HCV	Rents have increased significantly in Holyoke, presenting a substantial barrier to leasing for voucher-holders in the HCV program. To address this barrier, HHA has increased payment standards and hired a Housing Navigator to assist voucher-holders in their housing search, negotiation with landlords, and the leasing process. Additionally, HHA anticipates that HCV Leasing Incentives will continue to encourage new landlords to participate in the program and provide voucher-holders with a broader array of housing options.

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	166,950	Open	N/A
HCV	Statewide with Holyoke Residency	3,880	Open	N/A
Federal MTW Public Housing	Merged (excluding Churchill Homes)	1,417	Open	N/A
Federal MTW Public Housing Units	Site-Based (Churchill Homes)	1,655	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 programs and be listed on both waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

Waiting List Name	Description of Actual Changes to Waiting List
Federal MTW Public Housing Units – Churchill Homes Site-based	HHA may close the site-based waiting list for Churchill Homes in FY 2024, as the number of applicants on the waiting lists greatly exceeds the number of anticipated upcoming vacancies at the property.

III. Proposed MTW Activities

Activity 2024-1: Special Referral Vouchers

Description of MTW Activity

Upon HUD approval, HHA will enter into a partnership with Holyoke's Care Center in order to provide housing assistance to families who are working to obtain their high school equivalency certificate or diploma or are enrolled in coursework at Bard College. The Care Center provides critical services and support for the entire family, including transportation and daycare, allowing the head of household to achieve their educational goals. To further support their stability and success in reaching their goals, HHA will allocate up to 15 Housing Choice Vouchers to eligible families referred by the Care Center. Eligibility will be defined as families where the head of household is actively engaged in Care Center programming. 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 a contract of participation (COP), which HHA anticipates will be completed within 60 months. However, HHA may provide extensions to the term of the COP, based on extenuating circumstances. Extensions will be granted on a case-by-case basis. The COP will require families to remain enrolled in their respective Care Center program for the duration of their housing assistance. When a Care Center participant successfully completes their COP, i.e. upon obtaining their high school equivalency certificate or diploma, HHA will issue a regular MTW voucher to the family. If a family is no longer able to comply with the terms of the COP and participate in the Care Center program but is otherwise eligible for the HCV program, HHA will issue a regular MTW voucher to the family.

The Care Center will be responsible for monitoring and reporting participant's compliance with and completion of the COP. When available, HHA will re-issue vouchers to applicants referred by the Care Center upon turnover.

The Care Center will be responsible for identifying qualifying families where the head of household is actively engaged in Care Center programming and referring them to HHA. HHA will conduct screening to verify that the family meets all eligibility requirements for the HCV program, including income. HHA will calculate the family's housing assistance consistent with the policies for the HCV program outlined in the Administrative Plan. The Care Center will be responsible for reporting on participants' compliance with the Care Center's program requirements.

In FY 2024, HHA plans to allocate up to 15 vouchers for eligible families referred by the Care Center. HHA may increase this allocation in future fiscal years. Based on the success of this partnership, HHA may also look to expand this activity to include additional referral partnerships that align with local needs.

Statutory Objective

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

Anticipated Timeline

HHA is prepared to implement this activity upon HUD approval.

Cost Implications

There are no cost implications associated with this activity.

Metrics

Outcomes will be reported in the MTW Annual Report.

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that in this box.	0	15		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity.	0	15		

Data Source

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

Authorization Standard

This activity will require a waiver of certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as permitted under Attachment C, Section D, Paragraph 4 of the MTW Agreement. This waiver is necessary to authorize HHA to determine waiting list procedures, tenant selection procedures, criteria and preferences that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

Additionally, this activity will require a waiver of certain provisions of Section 8 (o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 CFR 982 Subpart L as permitted under Attachment C, Section D, Paragraph 2(d) of the MTW Agreement.

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 uses 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 is 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. 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.

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. The HCV program may reinstate this limit in FY 2024.

Planned Non-Significant Changes

There are no planned non-significant changes to this activity.

Planned Changes to Metrics/Data Collection

HHA has removed CE #1: Agency Cost Savings. Though the time to complete recertifications has been reduced through streamlining, staff time is reallocated to perform other core functions.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<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>		

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 components outlined below. With the exception of the Payment Standard provision, all components apply to both the HCV and Public Housing programs.

- **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.
- **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.
- **Adult Full-Time Student Deduction:** Elimination of the adult full-time student deduction
- **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 more streamlined process and results in 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 or data collection.

Planned Significant Changes

There are no significant changes proposed to the activity.

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>		
<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>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>		

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).

In FY 2024, HHA plans to leverage the flexibilities provided through this activity in order to convert 90 units at Elmwood Towers to project-based.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

The benchmarks have been updated to reflect the anticipated conversion of 90 units at Elmwood Towers in FY 2024.

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	376 units		
<i>* Includes new PBV units at Elmwood Towers and existing PBV units at Holyoke Towers and Jarvis Heights.</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)

Plan Year Approved, Implemented, Amended

- 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. 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. 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.
- 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. HHA 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.

In FY 2024, HHA plans add an additional 90 project-based units at Elmwood Towers for seniors who are 55 years and older. This conversion will increase HHA's project-based portfolio to 588 units overall.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

HHA updated the benchmark for HC #1: Additional Units of Housing Made Available to reflect the number of additional units which HHA expects to project-base in FY 2024.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

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	90 units		
<i>* HHA is incorporating this standard metric as a local metric.</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 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.

HHA periodically, at its discretion, reviews HCV utility allowance schedules to determine if adjustments are required. Annual updates would not be required. HHA will use the rates provided by the local provider, Holyoke Gas & Electric (HG&E) to determine if the average five-year rate change is greater than 10%. When 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 HG&E’s current rates. HHA does not anticipate updating the schedule of utility allowances in FY 2024.

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 or data collection.

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 #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	10%	8%		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	\$332	\$345		

Activity 2018-2: Holyoke Horizons Transitional Housing Support

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 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 \$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.

In FY 2021, in response to economic conditions resulting from the COVID 19 pandemic, HHA increased the subsidy per participant from \$200 to \$400 per month. 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.

In FY 2024, HHA anticipates serving 10 participants through this partnership initiative.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

The benchmarks for SS #5 and SS #8 have been updated to reflect anticipated leasing in FY 2024.

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		

<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	10 households		
<i>SS #8: Households Transitioned to Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households transitioned to self-sufficiency (increase).*	0 households	3 households		
<i>*Self-sufficiency will be defined as voluntary termination of assistance due to an income increase great enough so that HHA subsidy is not required for the CHESS unit.</i>				

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 Administrative 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 five (5) additional vouchers will be issued and leased over the fiscal year, serving a total of 20 participants in FY 2024.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics or data collection.

Planned Significant Changes

There are no significant changes proposed for this activity.

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	20		
<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	20		
<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		
<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	20		
<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		
*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.				

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 their first 36-months post enrollment, 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 five (5) years. HHA may explore future expansion of the program based on need and staff capacity. In FY 2024, HHA anticipates issuing five (5) additional vouchers, serving 20 families overall.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics or data collection.

Planned Significant Changes

There are no significant changes proposed for this activity.

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	20		
<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	20		

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 entered into an MOU with HCC, which sets forth 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 will verify and calculate 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 provides 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 conducts reasonable rent determinations prior to unit approval;
- HHA provides utility allowances to students where the cost of utilities is not included in the rent;
- The SHI voucher has 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. HHA anticipates that all 15 vouchers will be issued and leased in FY 2024.

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

There are no planned changes to metrics or data collection.

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?
Enrolled in an Educational Program or Job Training	0 households	15 households		
	0%	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		
<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>				

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 ten (10) affordable, new construction homeownership units for families to be built on currently vacant lots. Financing involved 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 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 updated budget scenarios taking into consideration growing interest rates, HHA anticipates that prices for the homeownership units will be around \$250,000. Prices will be dependent on income and bedroom size and are subject to change.

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.

Overall, HHA will budget up to \$3 million in MTW Block Grant funds to support the development of rental and homeownership units under this initiative. HHA may elect to expand the program beyond the South Holyoke project based on funding availability. If demand exceeds the available budget, HHA will establish a wait list based on date and time of application.

Due to increasing construction costs, HHA has adjusted the initial plans for the development of homeownership units, and now anticipates constructing 10 units overall. Construction and occupancy of these units will be phased; HHA anticipates that all units will be ready for occupancy by the end of FY 2024 or early in FY 2025.

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

The benchmarks for HC #2, HC #5, HC #6, and HC #7 have been updated to reflect the number of homeownership units which HHA anticipates will be available for occupancy in FY 2024.

Planned Significant Changes

There are no significant changes proposed to the activity.

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	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	0	10		

neighborhood of opportunity as a result of the activity (increase).				
<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		

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 annually for this activity. However, HHA may revise these allocations in future fiscal years pending the response to these incentives. In FY2024, HHA will allocate \$7,500 to this activity.

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.

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 or data collection.

Planned Significant Changes

There are no significant changes proposed to the 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 this activity (increase).	0	10		
--	---	----	--	--

Activity 2023-1: Local Family Self-Sufficiency Program

Plan Year Approved, Implemented, Amended

- **Approval: FY 2023**
- **Implemented: FY 2024**

Description/Update of MTW Activity

HHA has implemented a local Family Self-Sufficiency (FSS) Program to encourage broader participation and increased savings for participants. The MTW FSS program policies will apply to Housing Choice Voucher (HCV) and Public Housing (PH) FSS program participants who enroll after approval of this activity. Those FSS participants who enrolled prior to the approval of this activity will not be subject to local FSS program policies; however, HHA will provide these participants the opportunity to opt-in to the local FSS program and sign a modified Contract of Participation (COP).

HHA’s local FSS program include the following components:

- **Revised Escrow Model:** HHA will implement a revised escrow model upon HUD approval. In order to encourage families of all income levels to participate in the FSS program and save towards their long-term goals, HHA will establish an escrow model in which the monthly escrow amount is determined by the family’s annual earned income, rather than the change in their Total Tenant Payment (TTP). As shown in the table below, the family will accrue escrow according to income tiers. HHA will begin to make escrow payments to families at the start of the term of their participation if they report earned income of at least \$10,000 at their first re-examination of income after the execution date of the COP. Families who do not report earning at least \$10,000 at their first re-examination of income after the execution date of the COP will not receive escrow payments until their earned income increases to \$10,000 or more. In accordance with the regulations at 24 CFR 984.303(d), the term of the family’s participation may be up to five (5) years after the family’s first re-examination of income after the COP is executed. During the term of participation, HHA will make escrow payments each month according to the table below.

Tiered Income and Escrow

Earned Income Min.	Earned Income Max.	Monthly Escrow Amount
\$0	\$9,999	\$0
\$10,000	\$12,999	\$50
\$13,000	\$15,999	\$100
\$16,000	\$18,999	\$150
\$19,000	\$21,999	\$200
\$22,000	\$24,999	\$250
\$25,000	\$27,999	\$300
\$28,000	\$30,999	\$350
\$31,000	\$33,999	\$400
\$34,000	\$36,999	\$450
\$37,000	\$39,999	\$500
\$40,000	\$42,999	\$550

Tiered Income and Escrow

Earned Income Min.	Earned Income Max.	Monthly Escrow Amount
\$43,000	\$45,999	\$600
\$46,000	\$48,999	\$650
\$49,000	\$51,999	\$700
\$52,000	\$54,999	\$750
\$55,000	\$57,999	\$800
\$58,000	\$60,999	\$850
\$61,000	\$63,999	\$900
\$64,000	\$66,999	\$950
\$67,000	\$69,999	\$1,000
\$70,000	\$72,999	\$1,050
\$73,000	\$75,999	\$1,100
\$76,000	\$78,999	\$1,150
\$79,000	and up	\$1,200

If the family’s earned income decreases below \$10,000 during their participation, they will no longer accrue escrow. However, if the family’s earned income later increases and exceeds \$10,000, they will again accrue escrow. Please note that HHA will evaluate the impact of the revised escrow model on FSS participants and may make adjustments based on the outcome of such evaluation in future fiscal years.

Participating families can access and withdraw escrow when the COP has been completed and the family has met all applicable requirements set forth in 24 CFR 984.305.

- **Interim Incentives:** HHA will establish incentives for participants who meet interim goals in order to encourage continued participation in the FSS program and commitment to Individual Training and Services Plan (ITSP) goals. Incentives payments may be made at the time the goal is achieved or upon final escrow disbursement.
 - \$50 for completing a financial education and/or homeownership readiness program approved by HHA
 - \$100 for completion of a GED or receipt of a high school diploma;
 - \$100 for obtaining the skilled trade or job-specific certification, approved by HHA
 - \$150 for an Associates Degrees (one-time limit per person); and,
 - \$250 for completion of a bachelor’s or master’s degree (one-time limit per person).

HHA will provide families currently participating in the FSS program the opportunity to benefit from these changes. During the family’s regular or interim recertification, HHA will allow the family to choose to sign a modified Contract of Participation (COP), which includes the revised escrow model and interim incentives, or to continue with their existing COP. The revised escrow model and interim incentives will not be retroactive for existing FSS families who opt to sign a modified COP. Further, the revised escrow and interim incentive policies will generally apply to all families who enroll in the FSS program after these changes are approved.

In FY 2024, HHA anticipates that 20 families will be enrolled in the local FSS program.

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 or data collection.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	HCV - \$18,113 PH - \$18,781	HCV - \$21,736 PH - \$22,537		
<i>SS #2: Increase in Household Savings</i>				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy (increase).	\$0	\$2,305		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	HCV – 27% PH – 29%	HCV – 25% PH – 27%		
Employed	HCV – 73% PH – 71%	HCV – 75% PH – 73%		
Enrolled in Education	3	5		
Enrolled in Job Training	0	5		
<i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	2	0		
<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	20		
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>* Metric will apply to families who enroll in FSS after the approval of this activity. HHA does not anticipate families who participate in the local FSS program will graduate in FY 2024.</i>				

Activity 2023-2: Streamlined Transfer Policy

Description/Update of MTW Activity

HHA has a streamlined transfer policy for both Public Housing and Housing Choice Voucher (HCV) programs, including the project-based voucher (PBV) program. The streamlined transfer policy allows HHA to approve a limited number of transfers from Public Housing to the HCV program, and vice versa. These transfers will be referred to as MTW transfers.

HHA authorizes an MTW transfer for families whose needs cannot currently be met with housing from their current program. For example, if a PH family grows while participating in the program and now requires a seven-bedroom unit, HHA may authorize the family for an MTW transfer to the HCV program, as the largest unit available in the PH portfolio is six-bedrooms. Eligibility for an MTW transfer will be based upon immediate need, disability needs and availability of vouchers or PH units and will be evaluated on a case-by-case basis. If a resident transfers from PH to the HCV program, that household will be subject to HCV eligibility guidelines, and vice versa.

HHA will initially provide for up to 15 HCV and 15 Public Housing families to transfer from the HCV program to Public Housing program, and vice versa. No more than 30 moves will be authorized in a given fiscal year. HHA will review the volume of MTW transfers annually and may revise the limit based on need in future fiscal years.

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 or data collection.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<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).	PH: 3 years HCV: 7-8 years	PH: 2 years HCV: 6 years		
<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	30		
---	---	----	--	--

B. Not Yet Implemented Activities

There are no approved activities which are not yet implemented.

C. Activities on Hold

There are no approved activities which are on hold.

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	N/A	FY 2020	HHA closed out this activity as extensive program marketing and solicitation did not elicit interest from potential stakeholders in the Arts and Innovation District. The City of Holyoke has no immediate plans to expand the footprint for the Arts and Innovation District.

V. Planned Application of MTW Funds

A. Planned Application of MTW Funds

Tables 10 and 11 below provide estimated sources and uses of MTW funds for FY 2024.

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	3,110,000
70600	HUD PHA Operating Grants	24,530,000
70610	Capital Grants	2,380,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	2,700,000
71100+72000	Interest Income	18,600
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	220,000
70000	Total Revenue	32,958,600

ii. Estimated Application of MTW Funds

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	4,650,580
91300+91310+92000	Management Fee Expense	1,995,500
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	50,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	1,650,000
93500+93700	Labor	1,920,500
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	1,280,000
95000 (95100+95200+95300+95500)	Total Protective Services	25,000

FDS Line Item	FDS Line Item Name	Dollar Amount
96100 (96110+96120+96130+96140)	Total Insurance Premiums	390,000
96000 (96200+96210+96300+96400+96500+96600 +96800)	Total Other General Expenses	220,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	215,000
97100+97200	Total Extraordinary Maintenance	225,000
97300+97350	Housing Assistance Payments + HAP Portability-In	14,105,000
97400	Depreciation Expense	2,610,000
97500+97600+97700+97800	All Other Expenses	100,000
90000	Total Expenses	29,436,580

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

HHA will use the difference between revenue and expenses of \$3,522,020 toward development and capital improvements.

iii. Description of Planned Application of MTW Funding Flexibility

HHA will continue to explore opportunities for new and existing affordable housing development. Specifically, HHA may utilize single fund flexibility for pre-development and rehabilitation activity of existing properties in addition to vacant land to build homeownership and rental units.

HHA will continue to support the operation of satellite units at Public Housing 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.

HHA may also use single fund flexibility to supplement a robust capital improvement plan for existing properties.

B. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning FY – Unspent Balances	Planned Application of Unspent Funds during FY
HCV HAP	\$ 8,400,800	\$6,000,000
HCV Admin Fee	\$ 3,115,000	\$1,500,000
PH Operating Subsidy	\$ 4,580,000	\$1,000,000

Total	\$ 16,095,800	\$8,500,000
--------------	----------------------	--------------------

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

In FY 2024, HHA plans to utilize \$8,500,000 in unspent HCV HAP funds toward pre-development, capital improvement projects, and construction activities.

	Planned Use	Estimated Amount	Funding Source	Projected Timeline
1.	Predevelopment and Construction Activities	\$4,500,000	HCV HAP and Admin Fee Reserves	01/01-12/31/2024
2.	Capital Improvement Projects	\$1,000,000	PHA Operating Subsidy	01/01-12/31/2024
3.	Churchill Repositioning	\$3,000,000	HCV HAP and Admin Fee Reserves	01/01/2024-12/31/2025

C. Local Asset Management Plan

Is the MTW PHA allocating costs within statute?

Yes

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

No

Has the MTW PHA provided a LAMP in the appendix?

No

D. 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 prior to FY 2024. HHA does not anticipate any RAD conversions for FY 2024.

Table 12: RAD Conversions Closed or Projected to Close Prior to FY 2024

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

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

No

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

N/A

VI. Administrative

A. Board Resolution and Certifications of Compliance

The MTW Plan Certification of Compliance, the Resolution approving the FY 2024 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 5, 2023 through October 5, 2023. The public hearing was held, using a video conferencing format, on September 27, 2023 at 3:00 PM. Other than the Host, there were no other participants who attended via video conference or participated via telephone. 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 2024.

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



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 12, 2023, AT 6:00 PM
475 MAPLE STREET, HOLYOKE, MA 01040**

Submission of FY 2024 MTW Annual Plan

Each year, HHA is required to submit a Moving to Work Annual Plan to HUD for the following fiscal year. In the FY 2024 Annual Plan, we have proposed one new activity for Special Referral Vouchers. This activity will allow us to enter into a partnership with The Care Center to provide housing assistance to young mothers and low-income women who are working to obtain their HISET or enrolled in Bard College.

Motion

23-64

On a motion by Commissioner Wilson and Seconded by Commissioner Falcetti, the Board voted to approve the FY 2024 MTW Annual Plan for submission to HUD no later than October 15, 2023. The Board voted in favor of this motion.

Present and Voting:

Theresa Cooper-Gordon	Yes
Michael Falcetti	Yes
Marilyn Sanabria	Yes
Aaron Wilson	Yes
Gladys Lebron-Martinez	Yes

Absent:

Matthew A. Mainville, Secretary

MATTHEW A. MAINVILLE
Executive Director

THERESA COOPER-GORDON
Chair

MICHAEL FALCETTI
Vice Chair

MARILYN SANABRIA
Treasurer

AARON W. WILSON
Commissioner

GLADYS LEBRON-MARTINEZ
Commissioner

CERTIFICATIONS OF COMPLIANCE

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING**

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

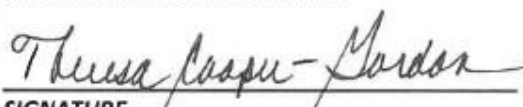
Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2024), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents 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 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (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.
- (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 75.

form HUD 50900: Certifications of Compliance (3/2021)

30

- (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.
- (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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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	MA005
MTW PHA NAME	MTW PHA NUMBER/HA CODE
<p><i>I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).</i></p>	
Theresa Cooper-Gordon	Chair, Board of Commissioners
NAME OF AUTHORIZED OFFICIAL	TITLE
	10-12-2023
SIGNATURE	DATE

Certification of Consistency with the Consolidated Plan

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.
(Type or clearly print the following information:)

Applicant Name: Justine Sabbs

Project Name: HHA - FY 2024 Moving to Work Annual Plan

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

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

Name of Certifying Jurisdiction: Holyoke, MA

Certifying Official of the Jurisdiction Name: Joshua A. Garcia

Title: Mayor

Signature: 

Date: 10/5/2023

Appendix B: Documentation of Public Process

Legal Notice

The Holyoke Housing Authority (HHA) is a participant in HUD's Moving to Work Demonstration Program (MTW). The draft FY 2024 Moving to Work Annual Plan will be available for review from September 5th to October 5th, 2023 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 2024 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-Friday 8:00am to 4:00pm. Written comments on the draft FY 2024 Moving to Work Annual Plan must be addressed to FY 2024 Moving to Work Annual Plan Comments at the Authority's Administrative Office address above and must be received by close of business (4:00pm) on October 5th. A Public Hearing to receive comments on the Plan will be held on Wednesday September 27th @ 3:00PM via Zoom. The meeting can be accessed at this link <https://us02web.zoom.us/j/87823853419> or via telephone at +1-929-436-2866. Meeting ID: 878 2385 3419. 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 5)

Public Hearing Participation

The public hearing was held, using Zoom video conferencing software, on September 27, 2023, at 3:00 PM. Other than the Host, there were no other participants who attended via video conference or participated via telephone.

Comments on MTW Plan

Holyoke Housing Authority received no comments on the FY 2024 MTW Annual 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: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	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 Registrant <i>(if individual, last name, first name, MI):</i>	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. 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 fee above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. The information 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>10/13/2023</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Appendix D: Certification of Payments (HUD-50071)

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Holyoke Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(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.

(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.

(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.

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.

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)

Name of Authorized Official

Matthew Mainville

Title

Executive Director

Signature



Date (mm/dd/yyyy)

10/13/2023

Previous edition is obsolete

form HUD 50071 (01/14)