Housing Authority of New Haven

MOVING TO WORK ANNUAL PLAN 2019

Submitted: July 12, 2018
Re-submitted: January 31, 2019
Re-submitted: March 07, 2019

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I. Introduction

In 2001, the Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH) was awarded Moving to Work (MTW) status as part of the federal MTW Demonstration Program. ECC/HANH is one of thirty-nine housing authorities nationwide selected for participation in the MTW Demonstration Program. During ECC/HANH's MTW term, in lieu of the standard PHA Annual Plan and Five-Year Plan documents, ECC/HANH is required to develop and submit to HUD MTW Annual Plans that articulate ECC/HANH's key policies, objectives, and strategies for administration of its federal housing programs to most effectively address local needs, in accordance with the terms of ECC/HANH's MTW Agreement.

This MTW Annual Plan states ECC/HANH's MTW goals and objectives, our current status toward achieving these goals and objectives, and our planned activities and objectives for FY 2019 (October 1, 2018 to September 30, 2019).

What is Moving to Work?

Congress established the MTW Demonstration Program in 1996. The MTW Demonstration Program is a pilot project that provides greater flexibility to HUD and to MTW PHAs to design and test innovative local approaches for housing assistance programs that more effectively address the housing needs of low income families in our local communities. The purpose of the MTW Program, as established by Congress, is to identify innovative local approaches for providing and administering housing assistance that accomplish 3 primary goals:

1. To reduce costs and achieve greater cost effectiveness in federal expenditures.
2. To give incentives to families with children where the head of household is working, is seeking to work, or is preparing to work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
3. To increase housing choice for low income families.

Through the MTW Program, MTW agencies may request exemptions or waivers from existing regulations in order to pursue strategies that may result in more effective operations and services to low income families, according to local needs and conditions. The MTW Program also provides greater budget flexibility, as MTW agencies may pool funding from several HUD programs in order to allocate resources according to local determinations of the most effective use of funds in order to address local needs.

The MTW Program also provides greater flexibility in planning and reporting. MTW agencies may be exempted from routine program measures, such as HUD's Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) if these measures do not accurately reflect the agency's performance. ECC/HANH has elected exemption from PHAS and SEMAP reporting.

ECC/HANH Participation in MTW

ECC/HANH's MTW program and flexibility includes, and is limited to, the following HUD programs: ECC/HANH's Public Housing Program (LIPH Operating Fund subsidy), Public Housing Capital Fund Program (CFP formula grants), and Section 8 (Housing Choice Voucher) Program for vouchers on yearly ACC cycles.

According to the MTW Agreement, ECC/HANH's MTW program does *not* include HUD grant funds committed to specific grant purposes, namely: ECC/HANH's HOPE VI grants for Monterey Place, ECC/HANH's HOPE VI grants for Quinnipiac Terrace/Riverview, any future HOPE VI Revitalization grants, Rental Assistance Demonstration Grants and other competitive grant funds awarded for specific purposes. These grant funded programs committed to specific purposes require ECC/HANH to provide periodic reports to HUD. Although these grant funded programs are not included in ECC/HANH's MTW program, ECC/HANH has included information, where relevant, regarding these grant funded programs in this MTW Annual Plan for FY 2019.

ECC/HANH's original MTW Agreement with HUD became effective retroactively to October 1, 2000. The initial seven-year term of ECC/HANH's MTW status expired on September 30, 2008. HUD proposed a new, revised MTW Agreement that would provide MTW status for 10 years. ECC/HANH executed the Amended and Restated Moving to Work Agreement on May 2, 2008. The Amended and Restated MTW Agreement governs ECC/HANH's MTW status through 2018. ECC/HANH made the agreement available for public review and comment for a 30 day period and conducted a public hearing at the end of the review period. The public hearing was conducted on February 25, 2008. The ECC/HANH Board of Commissioners approved the Amended and Restated MTW Agreement through Resolution No. 02-22/08-R on February 26, 2008.

ECC/HANH's redevelopment plans require flexible use of Section 8 and 9 funds to develop affordable housing for families at or below 80% of AMI; therefore, ECC/HANH has executed the Second Amendment to its Restated and Amended Moving to Work Agreement with HUD which clarifies such authority.
On April 15, 2016 HUD communicated its intention to extend MTW agreements for an additional 10 years beyond the current extension date or until 2028.

ECC/HANH's MTW program is the product of an extensive planning process, conducted initially from 1998-2000, to establish long-term plans for improving our agency's operations and for transforming our public housing stock. During 2006-2007, ECC/HANH engaged in a planning process in order to update and reinvigorate our agency's plans. As a result of this planning process, ECC/HANH developed a Three-Year Strategic Plan for FYs 2007-2009. During 2009-2010, ECC/HANH again engaged in a planning process to re-evaluate and provide continuity to the original Three-Year Strategic plan. In 2015 ECC/HANH updated its strategic plan and issued the Strategic Plan for 2015-2018. In 2018, ECC/HANH updated its Strategic Plan.

The MTW planning process provides the agency with a mechanism for updating its long-term strategy on an annual basis by enabling ECC/HANH to take stock of the progress of its on-going activities and by addressing new concerns by establishing new goals and objectives for FY 2019. The 2019 Annual MTW Plan sets forth a short and long-term vision for the agency for the next 10 years. The long-term vision for the agency centers on efforts to ensure ong-term sustainability as a provider of services that serve to move families out of poverty. The long-term vision also calls for the agency to enhance its efforts to promote the economic self-sufficiency of its residents and to increase the housing choices for them and its program participants, as well. The agency recognizes that its long-term viability rests with the economic well being of its residents and the variety of housing choices that it is able to provide them. The long-term plan is focused on the operational sustainability and capacity of the agency to meet the needs of the present day and be positioned to succeed over the long-term.

A. Short Term Strategic Plan

Cost Effectiveness

- Create a new organizational structure
  - Elm City Communities will become the parent organization to several affiliated non-profits
  - Stabilize operations of new property management entity
  - Launch social services entity
  - Create structures across all affiliates for leadership, purchased services and partnerships
  - Create Asset Management division within Elm City Communities' organizational chart
- Aligning expenses with resources
  - Develop business model to sell professional services
  - Structure Property management company staffing such that it is fully funded by property management fees
  - Effectively manage property and capital fund expenditures
  - Maintain high rent collection and occupancy rates
  - Reduce staff costs through attrition and incentives
- Diversify funding for affiliated entities
  - Develop private donors fundraising plan for social services entity
  - Pursue funding opportunities through state and federal grants
  - Secure commercial leasing opportunities
- Effectively use technology
  - Issue and award IT services RFP
  - Implement resource user model for IT training and support
  - Carry out IT Strategic Plan
- Develop and train staff
  - Establish annual training plan
  - Cultivate professional development opportunities
- Improve internal organization communication and collaboration
  - Create an employee workgroup to improve communication and champion agency morale building efforts
  - Administer and analyze annual employee satisfaction survey
  - Establish new mechanisms for staff feedback and communication
- Enhance Operational effectiveness
  - Conduct a review of commonly performed tasks to identify efficiencies
  - Institute a process improvement program
- Evaluate ECC/HANH Program Effectiveness
  - Develop and collect program outcome data
  - Partner with external evaluator to assess program impact

Housing Choice

- Continue implementation of development and modernization plan
    - RAD conversions and investments
    - Westville Manor redevelopment
    - Rockview Phase 2
- Become an advocate to improve affordable housing in CT
    - Advocate for policies to increase housing affordability statewide
    - Address hurdles to regionalization
    - Advocate for increased linkages between housing and education systems
- Tell ECC/HANH story to a broader audience
    - Protect spending flexibility
    - Reduce barriers to regional housing models
- Fully commit to ECC/HANH brand
    - Revise all forms, reports and brochures to use the ECC/HANH brand
    - Train staff to be more disciplined about using the ECC/HANH name
- Strengthen partnerships with community based providers
    - Communicate the likely consequences of MTW funding reductions with partners in the community
    - Work with community partners to identify alternate sources of funding for critical services
- Assume greater role in developing affordable housing for the New Haven community
    - Partner with city leadership to identify opportunities for affordable housing development
        - Church St. South redevelopment
        - Clock Factory redevelopment
        - Hill-to-Downtown
- Grow relocation service delivery and market to other potential customers
    - New London PHA
    - Waterbury PHA
- Pursue development opportunities beyond New Haven area

Family Self-Sufficiency

- Structure the social services entity for maximum flexibilityRefine social services service delivery model to better serve work-able, families with children and elderly/disabled families
- Strengthen partnerships with community based providers
    - Communicate the likely consequences of MTW funding reductions with partners in the community
    - Work with community partners to identify alternate sources of funding for critical services

B. Long-Term Strategic Plan

Cost Effectiveness

- Elm City Communities includes 4 well-funded, mission aligned entities that develop and manage affordable housing and provide services to the recipients of the housing resources
  - High performing traditional housing authority programs through LIPH and HCV platforms
  - Cost effective and efficient Property Management services delivered through Elm City Properties, Inc.
  - Development of housing through Glendower Group, Inc.
  - Social services entity delivers quality and relevant two-generation self sufficiency and youth development programs to residents of the City of New Haven's affordable housing communities that breaks cycles of poverty and builds self-sufficient families
- Elm City Communities includes a stable, well supported technology platform that created efficiencies for staff and customers
- ECC/HANH staff is well trained, effective and efficient and feels engaged in the work that they perform
- Funding flexibility is maintained and utilized to continue to increase housing choice for low income families, create opportunities for self sufficiency and improve the cost effectiveness of service delivery
- ECC/HANH's Asset Management functions ensure best use of affordable housing resources

Self-Sufficiency

- Social services entity delivers quality and relevant two-generation self sufficiency and youth development programs to residents of the City of New Haven's affordable housing communities that breaks cycles of poverty and builds self-sufficient families
- Empowered resident/participants actively engaged in policy and direction setting for the agency
- Maintains sustaining relationships with community providers that benefits the residents of ECC/HANH housing to reach self sufficiency goals

Housing Choice

- ECC/HANH properties are redeveloped and modernized with useful life extended at least 20 years
- Achieves high-performing status across all measures
- ECC/HANH serves as a partners to incoming MTW agencies
- ECC/HANH effectively secures regional opportunities in CT and beyond
- ECC/HANH leads CT efforts in implementation of balanced place-based and choice models of affordable housing development
- ECC/HANH brand is widely known throughout City, Region, State and Nation.
- Implement a City Housing Policy that supports the inclusion of affordable housing component in otherwise market rate housing

Overview of MTW Initiatives

Initiative	Description	MTW	Status
1.1	Development of Mixed Use development of 122 Wilmot Road –FY2009	Increase Housing Choice	Closed[1]
1.2	Local Total Development Cost (TDC) limits initiative – *FY2009*	Cost effectiveness Increase Housing Choice	On going
1.3	Fungibility of MTW funds – FY2012	Cost effectiveness	Closed[2]
1.4	Income Eligibility for HCV PBV units in Mixed Finance Developments - *FY2012*	Cost Effectiveness Housing Choice	On going
1.5	HCV Preference and Set Aside for Victims of Foreclosure – *FY2009*	Increase Housing Choice	Closed[3]
1.6	Deconcentration of Poverty Promote Expanded Housing Opportunities for HCV and PBV Program – *FY2008*	Increase Housing Choice	On going
1.7	Tenant-Based Vouchers for Supportive Housing for the Homeless – *FY2011*	Increase Housing Choice	On going
1.9	Increase the Allowed Percentage of Project Based Voucher "PBV" Units from 75 Percent to 100 Percent in a Mixed Finance Development – *FY2012*	Increase Housing Choice Cost effectiveness	On going
1.10	Income Skewing for PBVs in Mixed Finance Developments - *FY2012*	Cost effectiveness	On going
1.11	Increase the percentage of Housing Choice Voucher budget authority for the Agency that is permitted to project-base from 20% up to 25%	Increase Housing Choice	On going
1.12	Development of Replacement Public Housing Units with MTW Block Grant Funds -	Increase Housing Choice	On going

[1] Project completed
[2] Per HUD directive this initiative does not need to be reported

1.13	Creation of a commercial business venture at 122 Wilmot Road – *FY2008*	Cost Effectiveness	Closed out[3]
1.14	Redevelopment of Edgewood Avenue k/n/a Dwight Gardens – FY2013	Increase Housing Choice	Closed out[4]
1.15	Development of RAD Development for Rockview Phase II Rental-	Increase Housing Choice	On going
1.18	Expanded Jurisdiction: Creating Housing Opportunities Outside of the	Increase Housing Choice	On-going
2.1	Family Self Sufficiency Program - FY2004	Increase Family Self-Sufficiency	On going
2.2	Promotion of Self Sufficiency/ Earned/Income Exclusion - *FY2008*	Increase Family Self-Sufficiency	On going
2.3	Caring About Resident Economic Self Sufficiency - CARES Initiative - *FY2012*	Increase Family Self-Sufficiency	On going
2.4	Teacher in Residence Program – FY 2016	Increase Family Self-Sufficiency	On going
3.1	Rent Simplification - *FY2008*	Cost effectiveness	On going
3.2	UPCS Inspections - *FY2008*	Cost effectiveness	Closed[5]
3.3	Revised HQS Inspection Protocol – FY 2011	Cost effectiveness	Closed[6]
3.4	Mandatory Direct Deposit - *FY2009*	Cost effectiveness	Closed[7]
3.5	HCV Rent Simplification/Cost Stabilization Measures-FY2014	Cost effectiveness	On going

[3] Project completed
[4] Project not being pursued
[5] Initiative no longer requires MTW flexibility
[6] Initiative was revised and relaunched as item 3.5
[7] Initiative does not require MTW flexibility

MTW Initiatives requiring Funding Flexibility only

Description	MTW	Status
Property Disposition • **620 Grand Ave** • **Sheffield Manor** • **7 Shelton St.** • **Valley St/South Genessee Park at McConaughy Terrace** • **RAD Group 1 (Katherine Harvey Terrace, Prescott Bush, Constance Baker Motley and Newhall Gardens)** • **RAD Group 2A (Fulton Park, Stanley Justice Landing and Waverly Townhouses**	Cost effectiveness	• Closed • On going • On going • Closed • Closed • On going
Local Asset Management Program	Cost effectiveness	On going
Use of Frozen/Fixed Utility Consumptions	Cost effectiveness	On going
Research and evaluation	Cost effectiveness	On going
Energy Performance Contract	Cost effectiveness	On going
ECC/HANH Believes! Youth Academic Achievement initiative	Increase Family Self-Sufficiency	On going
Section 3 Employment and Training	Increase Family Self-Sufficiency	Closed[8]
Specialized Training Initiative	Increase Family Self-Sufficiency	On going
Resident Owned Business Development Support Initiative	Increase Family Self-Sufficiency	On going
SEHOP Capital Improvement Program	Increase Family Self-Sufficiency	On going
Resident Services – Family development	Increase Family Self-Sufficiency	On going
Resident Services – Elderly/Disabled development	Increase Family Self-Sufficiency	On going
Supportive services in Elderly/Disabled developments	Increase Family Self-Sufficiency	On going
Community Re-entry Program	Increase Family Self-Sufficiency	On going
Project modernization – various projects	Increase Housing Choice	On going
Valentina Macri disposition and conversion to supportive housing for formerly homeless	Increase Housing Choice	Closed

[8] Initiative has been replaced by Specialized Training Initiative

Redevelopment projects **Brookside I, II and Homeownership** **Rockview I** **122 Wilmot Road** **Rowe** **Eastview Terrace** **Ribicoff I** **Ribicoff II** **Fair Haven** **Rockview Phase II** **Farnam Courts Transformation Plan** **Crawford Manor Transformation Plan- FY** **Westville Manor Transformation Plan**	Increase Housing Choice	On going Closed Closed Closed Closed Closed Closed Closed On going On going On going On hold On going
Capital Fund Financing Program	Increase Housing	Closed
Section Eight Homeownership Program	Increase Housing Choice	On going
Rental Assistance Demonstration Program (RAD)	Increase Housing Choice	On going
Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities.	Cost Effectiveness	On going

(I) GENERAL OPERATING INFORMATION

ANNUAL MTW PLAN

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	Type (below)	0	0
N/A	0	0	0	0	0	0	0	Type (below)	0	0

0

Total Public Housing Units to be Added in the Plan Year

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

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

N/A

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
CT004000015 Fairmont Heights	98	Conversion to RAD
CT004000011 McQueeny Towers	150	Conversion to RAD
CT004000012 Winslow Celentano	65	Conversion to RAD
CT004000013 Robert T. Wolfe	93	Conversion to RAD
CT004000015 Ruoppolo Manor	105	Conversion to RAD
CT004000014 Farnam Courts	92	Conversion to RAD
CT004000001 Westville Manor	62	Conversion to RAD
Scattered Sites Multi-family	19	Conversion to RAD
Waverly Townhouses	52	Conversion to RAD

736	**Total Public Housing Units to be Removed in the Plan Year**

iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
CT004000015 Fairmont Heights	**98**	**Yes**	**97 Units of Converted ACC**
CT004000011 McQueeny Towers	**149**	**Yes**	**149 Units of Converted ACC**
CT004000012 Winslow Celentano	**64**	**Yes**	**64 Units of Converted ACC**
CT004000013 Robert T. Wolfe	**93**	**Yes**	**93 Units of Converted ACC**
CT004000015 Ruoppolo Manor	**103**	**Yes**	**104 Units of Converted ACC**
CT004000014 Farnam Courts	**88**	**Yes**	**92 Units of Converted ACC**
CT004000001 Westville Manor	**62**	**Yes**	**62 Units of Converted ACC**
Waverly Townhouses	**51**	**Yes**	**51 Units of Converted ACC**
Scattered Sites Multi-Family	**19**	**Yes**	**19 Units of Converted ACC**

727	**Total Vouchers to be Newly Project-Based**

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
N/A	0	Status (below)	Yes/No	Description
N/A	0	Status (below)	Yes/No	Description

0	**Planned Total Existing Project-Based Vouchers**

ECC/HANH is working on the AHAP for New Reach, no AHAP was not signed prior to 10/1/18. There were no AHAPs signed in FY2018.

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
No other changes to MTW housing stock anticipated during the plan year

i. General Description of All Planned Capital Expenditures During the Plan Year

The following plan for the FY2019 is presented in anticipation of receipt of both 2018 and 2019 funds. ECC/HANH's goal through its MTW status is to provide housing of choice in the most cost effective method possible. Given the funding limitations, our plan is to address the urgent operational needs within the LIPH portfolio remaining post-RAD conversion. Our ongoing objectives remain:

- Remediate Life-Health, Safety, Security and Code non-compliance property conditions
- Provide Project results which will save on Operational support- or provide energy savings
- Improve Accessibility
- Reduce vacancies
- Provide best use of CFP funds in coordination with ECC/HANH Operations and The Glendower Group, ECC/HANH's development entity.

During FY 2019, ECC/HANH will continue to execute projects which support these goals and improve the remaining portfolio. Properties which are planned for future redevelopment efforts have not been prioritized for CFP projects, however, if there is a Life, Health and Safety challenge, we have considered the needs across the entire portfolio. For example, CFP monies are being allocated to Westville Manor in FY2019 (slated for redevelopment FY2020-23) for the Life, Health and Safety of the current community. Work is planned at Crawford Manor, McConaughy Terrace, Essex Townhouses, Robert Wolfe and the Scattered Sites properties. Funds have also been earmarked for Agency-wide services and obligations.

The following 3 projects will be combined into one to economize on Architectural and Engineering Services:

1. **Crawford Manor ADA Storefront Entry Upgrade**
   - This project will bring the entryway into ADA compliance. The current entry does not provide adequate turnaround area or pull-side clearance. Due to the lack of accessibility, the door is often propped open. The need for a secure entry is critical and will provide residents in the Elderly and Disabled community with the much needed sense of security. Crawford Manor is an Historic preservation site, therefore SHPO has expressed interest in the redesign of the storefront, and that it should comply with the initial design intent of the architect, Paul Rudolph.

2. **Crawford Manor Fire Alarm Panel and Fire Pump**
   - The existing Fire Alarm panel is in its last year of its Estimated Useful Life. This critical equipment needs to be replaced to ensure safety for residents in the 15 story apartment tower. The work will include wiring each smoke detector to the new panel, each with its unique address. The Fire Pump also is in need of replacement.

3. **Wolfe: Skylight Replacement, Associated Abatement and Repairs**
   - ECC/HANH is planning for funding of major renovations at Robert T. Wolfe. In the interim, ECC/HANH has identified a more immediate need to replace the leaking skylight and roofing, including hazardous materials abatement, and make related repairs. The skylight is above the community room and is affecting use of this room.

4. **McConaughy Terrace Sewer Replacement, in Phases**
   - Project will move forward with Phase 2 of the underground investigation of existing sewer lines. Goal is to complete the underground camera investigations and prioritize repairs. ECC/HANH will meet with local utilities to plan a more comprehensive approach to repairs in the neighborhood. This project will begin to address the ongoing and challenging project of upgrading crushed clay pipe in a large family development site built in 1948. We already have evidence of cracked storm and sanitary connections. There are often sewage back-ups or periodic flooding on and off our site in an area where the sanitary and storm sewers are still connected. This is a health hazard which we understand will take a significant investment to correct. We will identify the lineal footages to replace and repair on our property, and start the work with local utilities to plan a neighborhood upgrade in City-wide sewer services.

   - McConaughy is home to approximately 200 families. Not only will the sewer repairs reduce the number of hazardous sewage back-ups on the lawns and in the units, we may also end flooding and ponding in other areas. This is a natural investment in a property we have already committed to with multiple large projects in the past 10 years: Reroofing and Siding 45 buildings, Replacement Windows, Phased Furnace and Domestic Hot Water Heater Replacement, Vacancy Rehabilitation and Asbestos Abatement. This is our largest family development in the west of New Haven. In the absence of a comprehensive renovation, ECC/HANH has pledged to make this development Housing of Choice. The location and access to many amenities, the Merritt Parkway and bus lines make this an excellent community to invest in.

5. **McConaughy Driveways, Parking Lots and Catch Basin Repair**
   - Just as a lawn sets off the exterior improvements to a home, paving the parking lots and driveways is the next step in improving the site. Current paving is full of potholes and is a liability to the

agency which not only jeopardizes vehicles, but has damaged the storm drainage system by clogging the sewer lines with degenerated bituminous materials. The budget, although only half of what is required will go far towards improving the experience being on site. The SOW will focus on the areas most in need of repair, including the resetting of catch basins. This project has long been deferred due to lack of funding availability. These repairs should result in an improvement in our REAC scores at the property.

6. **McConaughy Interior Upgrades, a Continuation of Furnace and Hot Water Heater Replacement**

- Phase 5: Furnace & domestic hot water heater (DHWH) replacement project. 67 apartments completed in prior funding years. Expect to replace the remaining 135 furnaces and DHWH units -, starting in FY 2019, improving energy efficiency and resident comfort. This project will bring the chimneys and utility fire walls up to code through the sealant and chimney liners to be installed. The liner will improve draft, efficiency and reduce the incidence of smoke fume infiltration into the unit. Residents will have a reliable heat source. Operations will have many fewer work orders to process, saving time and Operational funds.

7. **Westville Manor Asbestos Abatement at Bathrooms**

- This project will assist the Housing Manager to address the re-flooring and replacement of rotted subflooring in-house, a cost efficient solution to an unhealthful condition in a development slated for redevelopment within several years. Westville Manor as a family development with many large bedroom sizes with bathrooms which are heavily used. Priority work will be in 2 bathroom apartments so residents will not have to relocate for the renovation. 1 bathroom will always be available to residents. It is anticipated that 2 units will be completed

8. **Lead Abatement Related Repairs**

- PHAs are mandated to provide bi-annual lead testing. The Goal is to identify risks to children under six and develop a plan for remediation, if required, in properties with construction completion dates from prior to1900-1978. The overall scope of work throughout the portfolio is budgeted above $1M.
-
- ECC/HANH applied for and was awarded a **2018 HUD Lead Based Paint Program Grant** of $986,260 with which to perform this work. The Program is targeting the units with the most likely positive readings, the developments with the most number of units/houses built before 1978, the date after which lead was prohibited in residential paint.
-
- The CFP FY 2019 funding will supplement the Grant to pay for repairs necessitated by the lead abatement work but not covered by the Grant. Our Agency has focused much effort on youth building. This is all based on a healthy child, which is the goal of this effort.

- ECC/HANH’s Scattered Sites portfolio includes approximately 75 apartments in single-family, duplex and walkup style homes which ECC/HANH acquired over the past 25 years to further housing choice opportunities by enabling families to reside in more diverse neighborhoods. Several aging homes, some nearly 100 years old, are in need of building and mechanical system upgrades and interior and exterior modernization. Lead testing and abatement is the first step.

9. **Scattered Sites East & West: Replacement of Domestic Hot Water and Heating Ventilation and Air Conditioning Systems**

- Energy and Cost Savings Goals: 1. Replace antiquated inefficient oil-fired furnaces and boilers with gas-fired systems in one - and 2-family homes. This will save on utility costs, Operations repair time and the inconvenience of running out of fuel and associated restart charges. 2. Replace antiquated gas systems with energy-efficient new gas-fired systems. Some systems are at or near end of Estimated Useful Life. 3. Replace any antiquated electric heating and hot water systems with more energy-efficient systems.

10. Scattered Site Multifamily Cornell Scott Ridge: Paving and Parking Lots

- Paving is beyond its useful life. Improvements will affect vehicular traffic, drainage, erosion and overall curb appeal. Project is being paired with the McConaughy paving project to economize on architectural and engineering costs.

11. Essex Townhouses Heating System

- Re-engineering and replacement of heating system equipment components needed to improve energy efficiency and system reliability.

The following are agency wide funding projects:

12. Agency Wide Vacancy Reduction

- These monies are set aside for abatement costs and vacancies which may come to the front during FY19. The budget is reduced from last years'. Planned major work in additional vacancies is being incorporated into RAD conversion scopes of work.

13. Two (2) types of contracts in Architecture Engineering and Environmental indefinite quantity services form the backbone of our Planning & Modernization and Glendower Design team. Many months and dollar savings are ours to keep for not having to procure each design proposal.

- **Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services**
- **IQC Environmental Consulting Services**

14. Administration Salaries & Benefits (CFP only)

- Staff salaries and benefits in support of CFP FY2019 activities.

15. CFFP Bond Debt

- ECC/HANH leveraged the CFP funds when Brookside was being developed. We have been paying the Bond Debt each year since out of the Capital Fund.

Long-term outcomes of the planned FY 2019 work will reflect the MTW Short Term Strategic plan goals to further increases in Housing of Choice and Accessibility, to ensure Organizational Sustainability through development of housing through the Glendower Group, Inc. and ensure Cost Effectiveness through reducing Total Development Costs and replacement of obsolete building systems.

ECC/HANH's Reference to most Recent HUD-approved Five Year Plan: See HUD form 50075.2 approved by HUD on November 2, 2017 as part of HUD's approval of Fiscal Year 2018 MTW Annual Plan.

Refer to the Sources and Uses of Funds section, pages 70-72, to review the budget table associated with the General Description, above.

B. LEASING INFORMATION

i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	11,340	945
MTW Housing Choice Vouchers (HCV) Utilized	74016.	6,168
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	85,356	7,113

The planned number of units for LIPH is based on the number of units ECC/HANH expects to have at the beginning of the fiscal year based on:

- expected completion of development projects
- 95% to 98% occupancy rate
- historical average number of new admissions
- historical average number end of participations

The difference between planned and actual households served is due to the number of units transferred from the LIPH portfolio, as well as the actual number of number of new admissions during the fiscal year. During FY19, ECC/HANH expects to remove 736 units from LIPH and convert 731 of those units to the RAD platform. HCV anticipates having a total voucher count of 6,425, of which 6,168 (96%) are expected to be utilized.

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	0	0

Property-Based	**N/A**	0	0
Homeownership	**N/A**	0	0

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

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing
Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	**There are no anticipated leasing issues**
MTW Housing Choice Voucher	**There are no anticipated leasing issues**
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated
Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

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
LIPH	**Site based. Not population specific.**	**6,633**	**Open/Partially**	**No**
HCV	**Program specific. Not population specific.**	**2,815**	**Closed**	**No**

Please describe any duplication of applicants across waiting lists:

Applicants can apply for more than one program within ECC/HANH. Numbers provided for each waitlist are not duplicated.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
LIPH	**No anticipated changes during the plan year.**
HCV	**No anticipated changes during the plan year.**

Who We Serve

ECC/HANH serves 6,148 families through its low income public housing and housing choice voucher programs. During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current numbers reflect an increase of approximately 1,321 families or 27%, indicating that MTW status has allowed ECC/HANH to increase the number of families being served.

The vast majority of these families fall in the Extremely Low Income category with 84% of LIPH and 74% of HCV families in this income category. 31% percent of LIPH families and 40% of HCV families earn wages. No significant change is noted over last year in the percentage of families reporting no income with 4% of LIPH and 5% of HCV families in this status.
86% of households in LIPH range from 1 person to 3 person families and 79% of households in HCV, range from 1 person to 3 person families. The following table summarizes the population demographics.

ECC/HANH Population Demographics -2019					
	LIPH		**HCV**		**Total**
Total Households	1,738	28%	4,410	72%	6,148
Total Individuals	3,603	26%	10,480	74%	14,083
Average Income	$13,601.00		$16,396.00		
Average TTP	$ 308.00		$ 383.00		
Households with Extremely low income	1,454	84%	3270	74%	4,724
Households with Very Low income	196	11%	787	18%	983
Households with Low income	39	2%	224	5%	263
Households with Above low income	49	3%	129	3%	178
Households with No income	72	4%	205	5%	277
Households with Employment income	543	31%	1,776	40%	2,319
Households with Public Assistance	747	43%	352	8%	1,099
Households with Social Security	983	57%	1,884	43%	2,867
Households with OtheriIncome	341	20%	431	10%	772
Minority Households	1,151	66%	2,546	58%	3,697
Non-minority	587	34%	1,864	42%	2,451

Elderly families	440	25%	1,054	24%	1494
Disabled families	924	53%	1,680	38%	2604
1 member	824	47%	1,650	37%	2474
2 members	394	23%	1,009	23%	1403
3 members	274	16%	836	19%	1110
4 members	128	7%	515	12%	643
5 members	74	4%	250	6%	324
6 members	24	1%	96	2%	120
7 members	18	1%	31	1%	49
8+ members	2	0%	23	1%	25

Low Income Public Housing

ECC/HANH plans to complete FY2019 with a MTW public housing stock of 969 public housing units. This includes 672 site-based family units; 126 Elderly/Disabled units, and 171 Scattered Site units.
This reduction in units is due to the conversion of LIPH units to RAD PBV units through the Rental Assistance Demonstration Program and is accompanied by a commensurate increase in HCV RAD vouchers noted in the following section. This reduction in LIPH units is offset by the conversion of these units to RAD units that with the infusion of capital investment have earned at least 20 more years of useful life. ECC/HANH's RAD conversion includes approval for 1,464 units . At the start of ECC/HANH's MTW status, ECC/HANH's LIPH housing stock included 2,965 total units; however, as noted previously, significantly more families are being assisted through ECC/HANH's affordable housing programs.

Of these LIPH units, post RAD-conversion, 19 units will remain approved vacancies for units off line for officers in residence, Asset Management offices and TRC offices/food banks and the ECC/HANHTeacher in Residence Program.

Development Name	Development Type	Units beginning FY2018	Planned Units to Add	Planned Units to Remove	Planned Units at end of FY2018
Val Macri	Elderly/Disabled	17	0	0	17
Fairmont Heights	Elderly /Disabled	98	0	98	0
Crawford Manor	Elderly /Disabled	109	0	0	109
McQueeney Towers	Elderly /Disabled	150	0	150	0
Winslow Celentano	Elderly /Disabled	65	0	65	0
RT Wolfe	Elderly /Disabled	93	0	93	0
Ruoppolo Manor	Elderly /Disabled	105	0	105	0
Valley Townhouses	Family	40	0	0	40
Farnam Courts	Family	92	0	92	0

Westville Manor	Family	151	0	62	89
McConaughy Terrace	Family	201	0	0	201
Waverly Townhouses	Family	52	0	52	0
Quinnipiac Terrace I	Family	58	0	0	58
Quinnipiac Terrace 2	Family	56	0	0	56
Quinnipiac Terrace 3	Family	17	0	0	17
Essex Townhouses	Family	35	0	0	35
New Rowe	Family	46	0	0	46
Brookside Phase 1	Family	50	0	0	50
Brookside Phase II	Family	50	0	0	50
Rockview Phase 1 Rental	Family	30	0	0	30
Scattered Site - Multi Family	Scattered Sites	115	0	19	96
Scattered Site - West	Scattered Sites	23	0	0	23
Scattered Site - East	Scattered Sites	52	0	0	52
Katherine Harvey	Elderly	0	0	0	0
Newhall Gardens	Elderly	0	0	0	0
Prescott Bush	Elderly	0	0	0	0
CB Motley	Elderly	0	0	0	0
			0		0
Total		**1705**	**0**	**736**	**969**

Housing Choice Voucher Program

At the start of FY 2019 ECC/HANH has budget authority for 4,660 MTW Vouchers (including SRO Vouchers), 848 RAD vouchers and 85 VASH Vouchers for a total vouchers pool of 5,593 vouchers. Over the course of fiscal 2019, ECC/HANH plans to convert 731 Low Income Public Housing Units (LIPH) to RAD platform. The conversion of the aforementioned public housing units to the RAD Platform will increase the agency total RAD Units to 1,579, and increase the agency voucher capacity to 6,324.

Summary	**FY17 Avg Voucher Value**	**Planned Units at End of FY 2019**
MTW Vouchers (including SRO)		4,660
RAD Vouchers		848
New RAD Vouchers for FY19		832
VASH Vouchers		85
Total ECC-HANH Voucher Pool		**6,425**
Total Projected Voucher Allocation		6,168
Estimated Utilizaton (assuming 100% occupany)		**96.00%**
Total Projected Cost of Vouchers @ 100% Utilization	*$1,000*	$74,016,000
Projected Vouchers available for allocation		257
Estimated Value of Vouchers Available for allocation	*$1,000*	$3,084,000

HANH MTW Activities Summary	Description	2019 Voucher Baseline	Planned Units to be Removed	Planned Units to be Added	Plannned Units at end of FY 2019
MTW Tenant Based Voucher	Portable tenant based assistance	3,122	0	0	**3,122**
Expanding Housing Choice	Support mobility and homeowernship oppportunities for residents	426	0	0	**426**
PBV Efforts to End Homelessness	Allocation to homeless providers	58	0	0	**58**
PBV Housing Development	Project Based Voucher Assistance for redevelopment projects	521	0	0	**521**
RAD	Conversion of LIPH Units to RAD Platform	826	0	832	**1,658**
PBV Supportive Housing Efforts	Subsidies for supportive housing efforts	218	0	0	**218**
Mod Rehab-Single Room Occupancy	80 SRO units	80	0	0	**80**
HUD VASH	85 Veterans Supportive Housing	85	0	0	**85**
TOTALS		5,336	0	832	**6,168**

Tenant Based Vouchers (not assigned to special use)		3113	0	0	**3113**
Tenant Based Voucher Subtotal		3113	0	0	**3113**
Expanding Housing Choice					
CARES (SEHOP)	10 Vouchers set aside for CARES participants	5	0	0	**5**
Section Eight Home Ownership Program (SEHOP)	50 Vouchers set aside for LIPH & HCV Homeownership Program	50	0	0	**50**
West Rock Homeownership Phase 1	5 new homeownership units	2	0	0	**2**

Tenant Protection Vouchers for Church St. South	270 vouchers for CSS dislocated residents	242	0	0	**242**
RAD IIA Relocation Voucher	Support relocation of 70 Families in RAD Group 2A	70	0	0	**70**
RAD IIB Tenant Relocation Vouchers	Support relocation of 32 families RAD Group 2B	32	0	0	**32**
State and Local Initiatives vouchers to support housing choice and preservation	New Activity 50 Vouchers	10	0	0	**10**
Expanding Housing Choice Subtotal		391	0	0	**391**
PBV Efforts to End Homelessness					
PBV Fellowship I	100% Supportive Housing	18	0	0	**18**
PBV Fellowship II	100% Supportive Housing	5	0	0	**5**
PBV Also Cornerstone (Continuum of Care)	100% Supportive Housing	4	0	0	**4**
PBV Norton Court (Continuum of Care)	100% Supportive Housing	12	0	0	**12**
PBV Cedar Hill	100% Supportive Housing	4	0	0	**4**
PBV West Village	52 Howe St. – 100% Supportive Housing Single Room Occupancy Units	15	0	0	**15**
PBV Efforts to End Homeless Subtotal		58	0	0	**58**
PBV Housing Redevelopment					
PBV QT Phase 1	81 units – 28% of units PBV	23	0	0	**23**
PBV QT Phase 2	79 units – 29% of units PBV	23	0	0	**23**
PBV QT Phase 3	33 rental units 48% are PBV	16	0	0	**16**
PBV Eastview Phase I	102 units – 48% of units are PBV	49	0	0	**49**

PBV Chatham/Eastview	2 PBV	2	0	0	**2**
PBV Brookside Phase I Rental	100 affordable rental mixed - 50% of units are PBV	51	0	0	**51**
PBV Brookside Phase 2 Rental	51 PBV for affordable housing for families in 1 to 4 bedroom units	51	0	0	**51**
PBV Rockview Phase I Rental	47 units foraffordable housing, 61% of units are PBV	47	0	0	**47**
PBV New Rowe Building	104 affordable mixed use, mixed finance development 31% of units are PBV	32	0	0	**32**
PBV 122 Wilmot Road	13 PBV for affordable housing for elderly in 1 and 2 bedroom accessible units	13	0	0	**13**
PBV Park Ridge	100% Elderly/disabled housing	60	0	0	**60**
PBV Frank Nasti Existing	Scattered Site PBV-Families	8	0	0	**8**
PBV CUHO Existing (possible reduce to 11)	Scattered site PBV units for families	16	0	0	**16**
PBV CUHO New Construction	Affordable 8 unit rental housing development- Families	5	0	0	**5**
PBV Shartenburg	20 PBV units for the City initiative 360 State-Families	20	0	0	**20**
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon) New Construction	8 rehabilitation / 12 new construction affordable housing - 45.5% of units are PBV	20	0	0	**20**
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)	9 MHA PBV units	9	0		**9**
PBV Mutual Housing Existong	15	15	0	0	**15**
PBV Casa Otonal		12	0	0	**12**

PBV Christian Community Action (CCA)		17	0	0	**17**
LiveLearnWorkPlay	PBV for Neighborhood Revitilization	19	0	0	**19**
Expanded ????		?	?	?	**?**
Farnam Emergency Relocation ???					
Residences at Ninth Square	Support the redevelopment of 9th Square Development	55		0	**55**
PBV Housing Redevelopment Subtotal		522	0	0	**522**

RAD Conversion					
RAD 122 Wilmot Road	34 PBV	34	0	0	**34**
RAD Eastview Phase I	102 units – 48% of units are PBV; remaining 53 ACC units converted to RAD PBV	53		0	**53**
RAD Ribicoff (Twin Brook)– 9%	44 units of RAD converted ACC units – 80% PBV; 11 market rate units	44	0	0	**44**
RAD Ribicoff (Twin Brook) -4%	51 units of RAD converted ACC units	51	0	0	**51**
RAD Fair Haven/ Chatham/Eastview	55 units of RAD converted ACC units and 2 PBVs	55	0	0	**55**
RAD Monterey Place- Edith B Johnson	95 units of RAD converted ACC units	95	0	0	**95**

RAD Monterey Place- William Griffin	4 units of RAD converted ACC units	4	0	0	**4**
RAD Monterey Place 1	42 units of RAD converted ACC units	42	0	0	**42**
RAD Monterey Place 2	7 units of RAD converted ACC units	7	0	0	**7**
RAD Monterey Place 3	45 units of RAD converted ACC units	45	0	0	**45**
RAD Monterey Place 4	42 units of RAD converted ACC units	42	0	0	**42**
RAD Monterey Place 5	17 units of RAD converted ACC units	17	0	0	**17**
RAD Monterey Place 2R	28 units of RAD converted ACC units	28	0	0	**28**
RAD McQueeney Towers	150 units of converted ACC units	0	0	150	**150**
RAD Fairmont Heights	98 units of converted ACC units	0	0	98	**98**
RAD Matthew Ruoppolo Manor	105 units of converted ACC units	0	0	105	**105**
RAD Winslow Celentano	65 units of converted ACC units	0	0	65	**65**
RAD Robert T. Wolfe	93 units of converted ACC units	0	0	93	**93**
RAD Prescott Bush	56 units of converted ACC units	56	0	0	**56**
RAD Waverly Townhouses	52 units of converted ACC	0	0	52	**52**
RAD Valley Townhouses	40 units of converted ACC	0	0	0	**0**
RAD CB Motley	45 units of converted ACC	45	0	0	**45**
RAD Newhall Gardens	26 units of converted ACC	26	0	0	**26**
RAD Katherine Harvey Terrace	17 units of converted ACC	17	0	0	**17**
RAD Fulton Park	12 units of converted ACC	0	0	12	**12**

RAD Chamberlain Court (Justice Landing)	7 units of converted ACC	0	0	7	**7**
RAD Westville Manor	62 units of converted ACC	0		62	**62**
Scattered Site Multi-Family	115 units of converted ACC			115	**115**
RAD Chamberlain Court (Justice Landing)	1 units of converted ACC	0	0	1	**1**
RAD Farnam Onsite I	86 units converted ACC	86		0	**86**
RAD Farnam Onsite II		0		92	**92**
RAD Conversion Subtotal		848	0	832	**1680**

TBV Supportive Housing Efforts					
Tenant Based DHMAS Supportive – Housing First	Supportive Housing	10	0	0	**10**
DMHAS Mental Health Transformation Grant – FUSE	Supportive Housing	10	0	0	**10**
Family Options – Homeless	Supportive Housing	15	0	0	**15**
Permanent Enrichment	Supportive Housing	10	0	0	**10**
Foreclosure Protection	Foreclosure Protection	17	0	0	**17**
Family Unification Supportive Housing	DCF Family	20	0	0	**20**
Homelessness/Imminent Danger of Homelessness	(Formerly Foreclosure PBV)	40	0	0	**40**
Supportive Housing/Homelessness Prevention l	Supportive Housing/Homelessness Prevention	51	0	0	**51**
Project Longevity	20 vouchers for city initiative targeting homeless former offenders	20	0	0	**20**
Re-entry Fresh Start	10 vouchers for re-entry applicants through City Fresh Start	10	0	0	**10**
Supportive Housing Efforts Subtotal		203	0	0	**203**

III: Proposed MTW Activities

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

Below is a summary of proposed changes for the FY2019 MTW Plan.Increase Housing Choice	*Summary Description*
• Expanded Jurisdiction: Creating Housing Opportunities Outside of the City of New Haven in Areas of Opportunity • Non-Traditional Housing Support Time Limited Support for Families Transitioning from Homelessness	• This inititiative proposes to expand the jurisdiction of the ECC/HANH and its instrumentalities to develop affordable housing or site project based vouchers in areas that have been identified as "opportunity areas". ECC/HANH proposes to co develop Non-traditional housing supports for 19 units of affordable housing for families transitioning from homelessness. This support is targeted toward families seeking economic self sufficiency following shelter and transitional housing offered through a community provider.
Increase Family Self-Sufficiency	
• Establishment of Incentive Grant Program for ECC/HANH Residents participating in Agency's Family Self-Sufficiency Program, the REACH Grant will provide cash assistance to residents seeking to achieve defined self sufficiency goals. (Participants do not include residents enrolled in HUD FSS Program or ECC/HANH CARES Program). • Non-Traditional Housing Support Time Limited Support for Families Transitioning from Homelessness	• Replace the Incremental Earnings Exclusion initiative • Residents will be able to receive up to $500.00 per year for up to 5 years to support goals they have established. • The REACH grant seeks to reduce barriers and facilitate short term wins for residents as they move toward self sufficiency. ECC/HANH proposes to co develop Non-traditional housing supports for 19 units of affordable housing for families transitioning from homelessness. This support is targeted toward families seeking economic self sufficiency following shelter and transitional housing offered through a community provider.
Cost Effective and Efficient Service Delivery	
n/a	

Expanded Jurisdiction: Creating Housing Opportunities Outside of the City of New Haven in Areas of Opportunity

A. Activity Description

i. Describe the proposed activity.

This initiative proposes to expand the jurisdiction of the ECC/HANH and its instrumentalities to develop affordable housing or site project based vouchers in areas that have been identified as "opportunity areas". Opportunity areas have been mapped in the State of CT by the Open Communities Alliance and identify areas that are "opportunity-rich" with regard to educational outcomes, employment access, poverty, crime rates and more. While the City of New Haven doesn't fare well across several of these measures, it is in close proximity (within 15 miles) of many towns that are considered High and Very High Opportunity. While some of these towns are developing senior housing, unfortunately, these towns have been slow to develop housing for families or disabled residents.

When looking at the availability of affordable housing resources, one will note that these resources fall disproportionately in communities of very low and low opportunity. New Haven has the region's largest percentage of government-assisted public housing. The City's Consolidated Plan notes the need for a more "balanced approach of market-rate and affordable units, spread more evenly across the entire South Central CT region". ECC/HANH and its instrumentality, The Glendower Group, are a major developer and subsidizer of affordable housing in this region. This initiative proposes to allow ECC/HANH and Glendower to expand its reach into neighboring areas of opportunity.

Currently, achieving significant increases in mobility moves to areas of deconcentrated poverty has been difficult. Most ECC/HANH assisted families lease in the City of New Haven – a City of high rates of poverty (30% of families live in poverty). Affordable housing in the city is increasing with over 20 % of housing units subsidized. Most census tracts in the city are classified as concentrated poverty areas. This initiative seeks to allow ECC/HANH and its instrumentalities to develop housing opportunities that allow families from ECC/HANH waitlists to obtain housing opportunities that currently do not exist.

ECC-HANH is in the process of developing this initiative and at this time has not formalized any agreements with other jurisdictions, entities or PHAs. However, in proposing this initiative ECC-HANH is seeks to:

- Identify and locate ECC-Residents in high opportunity, non-impacted areas. (The majority of the census tracts in ECC-HANH current jurisdiction are impacted areas).

- Support the development of preservation of affordable housing in the broader New Haven metropolitan area or in other areas as needed.

ECC-HANH is in the process of developing this initiative and at this time has not formalized any agreements with other jurisdictions, entities or PHAs. However, in proposing this initiative ECC-HANH is seeks to:

- Identify and locate ECC-Residents in high opportunity, non-impacted areas. (The majority of the census tracts in ECC-HANH current jurisdiction are impacted areas).

- Support the development and/or preservation of affordable housing in the broader New Haven metropolitan area or in other areas as needed.

<u>Proposed Services Offerings to Jurisdictions, Local Governments, PHAs and other entities</u>

1. Provide Development Services (on a fee for service basis) with other PHA or jurisdictions to support the development or preservation of affordable housing based on our track record and experience in completing this type of project;

2. Provide capital planning and project coordination/ management to other PHAs on a contractual basis. With almost $250M in development over past decade, ECC has the experience and capacity to support smaller PHA the development and administration of their capital plan, in ways that should reduce administrative expenses, which should increase dollars invested in properties;

3. Continue to provide Relocation Services for PHAs and Jurisdictions. The Glendower Group, an ECC/HANH affiliate, has coordinated relocation efforts for the Hartford, New London, Ansonia and Waterbury Housing Authorities on a fee for service basis in prior years. ECC/HANH is only providing services for relocation efforts; other PHAs/jurisdictions are not using ECC/HANH housing stock.

4. To use ECC/HANH voucher and capital resources (when available) in non-impacted areas, to create housing opportunities for New Haven Residents and affordable housing opportunities to individuals and families in these areas where inventory is often limited;

5. To provide direct or coordinated resident services to PHA, RAD or LIHTC projects that have goals of promoting residents self-sufficiency. Agency has developedan FSS-like program that it would offer to other PHAs that we believe will move residents towards self-sufficiency and reduce dependence on housing subsidies over time; and

6. Explore the possibility of managing the Section 8 program for smaller PHAs in surrounding communities. ECC has invested in data management and reporting systems and has the ability to increase administrative activities without significant increases in overhead, which would result in cost savings for smaller PHAs who may struggle with providing these services based on the number of vouchers the agency manages.

   ECC/HANH is not looking to apply its MTW flexibility to jurisdictions outside of ECC/HANH.

Estimated Timeline:

Program activities will be developed during FY19, with metrics for the initiative to be collected in the FY20 MTW Report.

ii. **Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective.**

   1) Increase housing choice for low income families

iii. **Provide the anticipated schedule for implementing the proposed activity.**

The ability to develop affordable housing and project base housing choice voucher units outside or our jurisdiction in communities defined within the State of CT as areas of opportunity will allow for the exploration of new development projects. On the immediate horizon is a development opportunity in a community that would provide access for families on the ECC/HANH waitlists to access housing opportunities in a neighboring town that meets the standards of designation as an area of opportunity (defined as areas of high or very high opportunity). This project would proceed upon the following timeline.

- March 2019 – Application for funding
- September 2019 – award of funding
- September 2019- September 2021 -Relocation and redevelopment of site
- October 2021 - Leasing families

Simultaneously, ECC/HANH would proceed to issue an RFP for the award of PBV in areas of high or very high opportunity. This would allow developers to apply for PBV to create affordable housing options in planned developments. Award of our PBVs carries the requirement that families be leased from our ECC/HANH waitlists.

- March 2019 – issue RFP for PBV awards
- June 2019- initial awards of vouchers

B. Activity Metrics Information

i. **Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.**

1) HC 1 - Housing Choice 1 - Additional units of housing made available

ii. **Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.**

1) At baseline, ECC/HANH has developed 0 units outside the jurisdiction of the City of New Haven in neighboring towns defined as areas of opportunity

iii. **Give the annual benchmark for each metric.**

1) Number of units of housing produced outside the jurisdiction of the City of New Haven in neighboring towns defined as areas of opportunity

iv. **If applicable, give the overall and/or long term benchmark for each metric.**

1) ECC/HANH is authorized to project base up to 25% of its voucher authority. Currently, ECC/HANH has project based 11% of its MTW voucher authority. ECC/HANH proposes to limit the percent of those vouchers that are project based outside the city to 5% of its MTW budget authority in an effort to balance the need to keep affordable housing resource within the City while also sparking opportunities for families to have expanded options in other areas.

v. **Give the data source from which the metric data will be compiled.**

1) Housing unit data will be collected in agency MIS

C. Cost Implications

i. **State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.** The initiative is expected to begin in initial years with opportunities to project base vouchers from within the MTW voucher authority. No additional costs are expected to be incurred by leasing in areas of opportunity given the already high rental costs in the New Haven market.

ii. **If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.** Not applicable.

D. Need/Justification for MTW Flexibility

i. **Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.**

1) Attachment C. B. 1. b. ii. Single Fund Budget with Full Flexibility. The acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing

2) Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.

3) Attachment C. B. 2. Partnership with For-profit and Non-Profit entities

4) Attachment C. D. 7. a. Establishment of an Agency MTW Section 8 Project Based Program. The agency is authorized to project base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering.

5) Attachment C. D. 7. c. The agency is authorized to duly adopt, according to the requirements of local law, alternate standards for determining the location of existing, newly constructed or substantially rehabilitated housing to receive subsidy.

ii. **Explain why the cited authorization(s) is needed to engage in the proposed activity. *Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorizations that are applicable to a particular activity when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to the activity to include the correct authorization.*** The above cited authorization are required for this initiative as it involves single fund flexibility to acquire, develop or redevelop potential properties through ECC/HANH and/or its instrumentalities and potential for-profit and non-profit partners. Further, this initiative requires development of a local PBV program that allows for citing in other jurisdictions.

E. Rent Reform/Term Limit Information (if applicable)

i. Impact analysis

1) **A description of how the proposed MTW activity will impact household rent/tenant share.** Not applicable.
2) **A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.** Not applicable
3) **A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc. –** Not applicable
4) **A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded. –** Not applicable

ii. Hardship Case Criteria- Not applicable

iii. Description of Annual Reevaluation –Not applicable

iv. Transition Period – Not applicable

Non-Traditional Housing Support Time Limited Support for Families Transitioning from Homelessness

A. Activity Description

a. **Describe the proposed activity.**

ECC/HANH proposes to co develop Non-traditional housing supports for units of affordable housing for families transitioning from homelessness. This support is targeted toward families seeking economic self sufficiency following shelter and transitional housing offered through a community provider. The City of New Haven has identified the need for supportive housing units to assist families, specifically working families as they attempt to make the transition from shelter and transitional housing to permanent non-assisted housing.

The first project developed under this proposed initiative would be a 19 unit development owned by a community provider, CCA.

CCA owns a 19 unit transitional housing development that they seek to transition to 24 to 36 month supportive housing model. ECC/HANH seeks to enter into a partnership with CCA to develop new non-traditional housing models that assist in greater housing choice and self sufficiency for high risk families transitioning out of homelessness. As part of the proposed activity, CCA and ECC/HANH will enter into a new partnership that will own the property where the program activities will take place.

Program Participants would be identified from shelters owned and managed by CCA and from other family shelter providers in the greater New Haven area. Families will receive case management support to achieve work goals that support independent living in 24 to 36 months. Once families graduate from the program, they will receive an additional year of support and mentorship. These services will be provided by CCA's ARISE Center. The ARISE (Accessing

Resources for Independence, Skill-Building and Employment) Center serves families that are residing within the CCA Hillside Family Shelter (HFS) and Stepping Stone Transitional Housing Program (SSTHP), as well as serving families for up to one year after they have moved from a CCA housing program and into permanent housing. The purposes of the ARISE Center services are to increase employability and promote family health, wellness and stability through the work of the ARISE Employment Services and Child and Family Services.

ECC/HANH proposes to provide non-traditional housing support modeled on the housing choice voucher program with subsidy paid at the 110% payment standard. Program income generated from the use of housing choice vouchers will be used to support necessary improvements to the building and to offset a portion of the administrative expenses associated with the program delivery model.

All Program Participants will agree to a maximum period of housing subsidy support of 36 months. At the end of the program period, unless otherwise authorized, it is the expectation that families will move into non-subsidized permanent housing, identify subsidized housing options inside or outside of the City of New Haven, or pursue other housing options for their families. Program participants can be placed on the ECC/HANH PBV waitlist, and are eligible to occupy one of the agency project based units while they are enrolled in the program or after their matriculation from the program. Participation in the program does not guarantee any housing assistance beyond the 36 month program period.

This activity will be a 10-year PILOT program and at the conclusion of the pilot period, the Authority will determine if it will make this Initiative a permanent activity. The 10-year pilot program is based on the following assumptions. (a) 1-year acquisition, renovations and initial lease up period for program participants. (b) Completion of three thirty-six month program cycles for participants, which will be approximately 50 individuals and families. Our goal during this period is for 70% of our families to transition out of the program with higher incomes and into non-subsidized housing options. Participants who either do not meet the program requirements and are voluntarily or involuntarily released from the program, or who fail to identify housing options for themselves when the program will be completed, will have to seek outside support to address their unmet housing needs. All program participants will continue to have access to ARISE Center staff once they leave the program to support their efforts to become or remain self-sufficient.

In the event that program model does not meet its intended results, ECC/HANH, working in concert with CCA, can either choose to make significant changes to the program model, or transition the development into more traditional subsidized housing development for families in New Haven, that would be subject to the normal requirements of ECC/HANH.

Selection Process, Eligibility and Criteria Families will be selected for participation of CCA's Moving to Work Program based on submission of completed application, income guidelines and willingness to fully participated in the Program.

Families that are homeless or at risk of homelessness, where the heads of household make a commitment to participate fully in the Program must submit a pre-application. All completed pre-applications will be time and date stamped and added to a waitlist maintained by CCA Workforce Housing Program. As openings becomes available families will be scheduled for a pre-screening interview. The Pre- Screening staff (the director of housing services and family coaches) will conduct a needs assessment focusing on the following areas: income, employment, childcare, housing and health, description of the Program goals and opportunities for the family to move to greater independence. The family will complete a full application to the Program. Along with the "full application" families will be required to submit the following documentation: proof of homelessness (letter from shelter provider), proof of income from all income sources, photo identification, birth certificate, social security card, health insurance card for all household members and immunization record (all the children).

To be eligible, household income cannot exceed the income limit of the New Haven-Meriden Area Median Income of Very Low (50%) Income Limit (see income guideline below), and the family desire to move closer to independence by articulating their willingness to fully participate in the workforce housing program for a successful exit to permanent housing.

Income Criteria: Total Household income cannot exceed the income limit for each household size:								
New Haven-Meriden Area Median Income - Very Low (50%) Income Limit								
Household size	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**
Income Limit:	**32,100**	**36,700**	**41,300**	**45,850**	**49,550**	**53,200**	**56,900**	**60,550**

b. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective.

i. Increase Housing Choice for low income families:

During the proposed 10 year period of the PILOT Program, new housing opportunities will be made available to 50-54 families.

ii. To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.

ECC/HANH in partnership with CCA will incorporate current programmatic and results-based methods of serving families to support those heads of household who have a demonstrated desire to make positive changes. The ultimate goal is to instill hope, a desire to change and the commitment to work diligently to improve the quality of life for the heads of household– and all family members – that helps to break the cycle of poverty and homelessness. It is to be a stepping-stone out of poverty into new and greater economic stability.

The model recognizes that the heads of household face significant barriers to obtaining a living wage job. In addition, it recognizes that children have had significant, and in many cases, extended exposure to trauma that come from homelessness and poverty, and affords parents the opportunity to establish new ways to insure their healthy development. The ECC/HANH and CCA Team will use the SDII (Service Delivery Improvement Initiative), as a way to enhance internal practices. Its components are Motivational Interviewing, Person-Centered Practice and Trauma-informed care, all designed to support families in one continuous service pathway from their entrance into CCA until up to a year after they gain permanent housing.

The PILOT Program has been designed to help families move through phases of increased commitment, responsibility and develop the attitudes, behaviors, and skills needed to generate income, provide food, and secure permanent housing.

c. **Provide the anticipated schedule for implementing the proposed activity.**

i. March 2019 Obtain HUD Approval for New MTW Activity
ii. May 2019 Develop Scope of Work for Improvements and Formalize Partnership Agreement with CCA
iii. November 2019 - Secure financing to complete renovations to Project Site
iv. December 2019 – Start Renovations at Property
v. August 2020 – Complete Renovations
vi. September 2020 – Begin enrolled families into Program
vii. September 2023 – 1st families subject to 36 Month Term Limit

B. Activity Metrics Information

a. Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.

i. Self Sufficiency 1 – Increase household income
ii. Self Sufficiency 3 – Increase positive outcomes in employment status
iii. Self Sufficiency 8 – Households transitioned to self sufficiency
iv. Housing Choice 1 - Additional units of housing made available

b. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.

i. As families are enrolled baseline household income will be determined. At baseline family income will be below levels required for unassisted housing
ii. At baseline, all families will be engaged in workforce training or educational program, part time employment or full time employment.
iii. At baseline, no families will meet economic self sufficiency measures as indicated by ability to lease unassisted in the market.
iv. At baseline, 0 units of term limited nontraditional housing are available.

c. Give the annual benchmark for each metric.

i. 33% of families will experience an increase in Family income
ii. The number of families enrolled in PT and FT employment will increase
iii. About 33% of families are anticipated to reach self sufficiency goals in year 1
iv. By year one, 18 new units of term limited nontraditional housing units will be available.

d. If applicable, give the overall and/or long term benchmark for each metric.

i. By end of Program Year 2 - 19 units or term limited non-traditional housing will be made available
ii. By the end of Program Year 3 - 100% of the residents participating Cohort 1 in the program will be employed full time
iii. By the end of program year 4 - 70% of the families participating in Cohort 1 will transition out of the program into non-subsidized housing.
iv. By the end of Program Year 10 - new housing opportunities will have been provided to a minimum of fifty (50) families. Of which, we project that 35 families will have made transition from subsidized housing to market rate housing, with the in-program and post-program supports provided.

e. Give the data source from which the metric data will be compiled.

i. Family income data will be collected in agency MIS

ii. Employment data will be collected in agency MIS and case management tracking software
iii. Self sufficiency data will be collected in agency MIS and tracked in case management tracking software
iv. Housing unit data will be collected in agency MIS

C. Cost Implications

a. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Authority will incur expenses to complete a feasibility study on the property to determine the level (if any) of improvements that need to occur. Additionally, the Authority will incur legal and financing costs associated with formalizing the partnership between the Authority and CCA and closing on any financing necessary to pay for repairs or improvements at the building. In addition to these activities, the Authority anticipates the provision of 19 MTW Project based vouchers into the development to support activities.

b. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

The Authority anticipates that project set, incorporation and financing costs for this Initiative will be approximately $100,000, a portion of which will be reimbursed to the Authority through financing activities. Any non-reimbursed expenses will be paid back to the Authority over a period not to exceed ten (10) years from program income generated from the Authority ownership in the development.

D. Need/Justification for MTW Flexibility

a. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

i. Attachment C. B. 1. b. ii. Single Fund Budget with Full Flexibility. The acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing
ii. Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities
iii. Attachment C. B. 1. b. iv. Single Fund Budget with Full Flexibility. The provision of management services
iv. Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.
v. Attachment C. B. 2. Partnership with For-profit and Non-Profit entities
vi. Attachment C. B. 4. Transition/Conditional Housing Program. The agency may develop and adopt new short-term transitional housing programs consistent with an eligible use of section 8 and 9 funds with supportive services in one or more buildings in collaboration with local community-based organizations and government agencies.
vii. Attachment C. D. 1.a. The agency is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration.
viii. Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued.

ix. Attachment C. D. 2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance
x. Attachment C. D. 1.d. The agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration.
xi. Attachment C. D. 4. Waiting List Policies
xii. Attachment C. D. 7. a. Establishment of an Agency MTW Section 8 Project Based Program. The agency is authorized to project base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering.
xiii. Attachment C. D. 7. c. The agency is authorized to duly adopt, according to the requirements of local law, alternate standards for determining the location of existing, newly constructed or substantially rehabilitated housing to receive subsidy.

b. Explain why the cited authorization(s) is needed to engage in the proposed activity. *Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorizations that are applicable to a particular activity when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to the activity to include the correct authorization.*

The above cited authorizations are required for this initiative as it involves use of single fund flexibility to acquire and rehabilitate the existing property, to provide case management supports to families through our previously approved MTW Family Self Sufficiency Program and to provide property management related services. This development will be carried out by ECC/HANH, the Glendower Group and 360 Management Group, Co, two instrumentalities of ECC/HANH and a non-profit provider, Christian Community Action.

Further this model is a non-traditional housing model involving short term assistance under a modified HAP agreement with modified payment standards for housing that is consistent with uses of Section 8 and 9 funds.

Participants will be selected off a waitlist managed by the non-profit partner and will consist of families transitioning from shelter care. ECC/HANH proposes to project base units in this development of which ECC/HANH or its instrumentality will be a co-owner. The property has already obtained all necessary local approvals for this use.

E. Rent Reform/Term Limit Information (if applicable)

a. Impact analysis

i. A description of how the proposed MTW activity will impact household rent/tenant share.

Selected program participants will be required to pay up to 30% of their income toward their rental expenses during the program period. Rent calculation will be done in manner consistent with ECC-HANH's rent simplification process. However, it should be noted that since it is the intent of the program to transition families out of the program within 36 months on admission, a portion of the participants rent payment will be put into a savings/escrow account during the program period. This amount, if the participant graduates from the program, may be used for support costs to transition to new housing once the program period is completed.

Participation in this program will not cause families to incur any additional rent burden and will positively impact their ability to build savings.

ii. A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.

Total tenant share will be tracked for each family throughout their participation in the program, during the program period the participants rent burden will average up to 30% of their income. Participant's income and employment status is tracked during the program period and for at least 1 year after graduation. As families approach program graduation, income will be compared to area fair market rents, there may be instances where a Participant has met all of the program requirements, but the local cost of housing or the scarcity of affordable market rate units are barriers to the individual transition out of the program. In these instances, participants can petition the program to receive a Good Standing Hardship Exemption. Participants would be eligible to receive up to 2-hardship extensions. Each extension period should be no longer than 90 days; however, families can have up to 30 days from the end of the extension period to move out.

At the conclusion of each Cohort, staff will complete a review and evaluation of program requirements, market barriers, case management approach and success factors and make changes to the program as needed.

iii. A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.

Participants rent burden will be determined as part of the application process and reviewed annually as part of case management model. Program model will not place unnecessary rend burden on families as they attempt to become more economically self sufficient.

iv. A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/ terminated/ reduced/ continued/expanded.

Total tenant share will be tracked for each family throughout their participation. Families rent burden will average up to 30% of income~~.~~ This will be tracked through the agency's MIS system. As families approach program graduation, income will be compared to area fair market rents. Families rent burden in the unassisted market will be tracked for families throughout their transitional year. Families who upon program graduation experience a rent burden exceeding 40% of their monthly income may request a hardship exemption. The numbers of hardship requests, exemptions granted, extensions, terminations and graduations will be tracked. If the number of graduations fails to exceed the number of terminations in any year, the program will be re-evaluated.

b. Hardship Case Criteria

Throughout the family's residence, the Family Coaches will monitor the degree to which the heads of household adhere to and comply with their plan.

During this period, Family Coaches stay in contact with families to see that the lessons learned while in residence are still being applied. (The Family Coaches are also available for support on an informal basis as needed after the one-year post-residence period.)

Their efforts, in this regard, are to meet with or call the heads of household to support the moving in and settling in process, to assist with accessing services and programs for them and their children and to offer continued after-care and employment support so that they will not return to homelessness. The willingness of the heads of household will determine the degree to which the Family Coaches are involved in the following areas:

- Willingness to meet after leaving the program
- Active engagement
- High level of motivation
- Continued compliance of Family Action Plan

CCA can initiate a process to terminate their participation in the program, and invite them to utilize ECC/HANH's existing grievance procedure to try to resolve the problem. If it cannot be resolved through the grievance procedure, and CCA wants the participant to leave, they will need to go through a formal court eviction process (called "summary process"). The Summary Process has been approved by HUD and used by CCA as part of their previous work in federally funding transitional housing programs.

Program Extensions

This is a 36-month Program. The Family Coach will begin the exiting process with the head(s) of household at the 30-month benchmark to reach the 36-month program time limit with a successful move to permanent housing. However, families can request an extension, which will be granted if they have shown documentation to their Family Coach that they have secured an apartment and are awaiting a move in date or have extenuating circumstances (such as the family secured an apartment, but the apartment fell-through due to no fault of the family).

All requests must be submitted in writing and include a plan for the extension will facilitate the move to permanent housing for CCA's Director of Housing Services to review. The Director of Housing Services will meet with the head(s) of Household, along with their Family Coach, to review the plan and the family's progress.

The head(s) of household will have the opportunity to articulate their need for an extension and the timeframe needed to exit the program successfully, in these instances, participants can petition the program to receive a Good Standing Hardship Exemption. Upon receipt of a Good Standing Hardship Exemption, participants would be eligible to receive up to 2-hardship extensions. Each extension period should be not be longer than 90 days; however, families can have up to 30 days from the end of the extension period to move out.

Exit from the Program

This is both a very exciting and very scary time for families, in which they have found affordable, permanent housing and leave and, hopefully, with gainful implement or guaranteed and lasting income. It is also the time of greatest risk of returning to the head of household's unhealthy patterns of behavior. It is one thing to maintain new habits while in a structured environment that regularly models appropriate behavior. It is another thing to maintain those habits upon return to an unstructured setting. To help ensure successful and seamless transitions, Family Coaches lend formal support and guidance to families for up to one year after date of departure from the program.

End of Participation Determination

Voluntary

Families may choose to move out of the Program at any time. The head(s) of Household must give their Family Coach written or verbal notice of their specified move out date, giving the Program a 30-day notice of move out.

<u>Involuntary</u>

If it is determined, after several and continuous efforts and meetings, that the heads of household do not intend to participate fully, the process of termination and invitation to utilize the existing grievance procedure and resolve the problem will be extended.

It will begin with the sending of a discharge letter, indicating that that the family must exit the Program due to lack of participation. This action comes with care and compassion for the family and due process. Therefore, every effort is made through conversation and proper documentation of the actions that led to the termination.

The head of household will be entitled to a mediation process with the Family Coach, Director of Housing Services and Director of Programs to insure that every effort is made for the family to remain in the program and a clear and due process and a plan for corrective action, with description of the goals and timelines for improvement.

Should all efforts to re-engage the head of household fail, the head(s) of household will be informed, in writing, about the termination. The head of household can submit a request to meet with CCA's Fair Hearing Committee who will meet with the head of household. If the Fair Hearing Committee revokes the decision, the family will remain in the Program with the expectations of any infractions of non-compliance would be remedied by outlining stipulated rules that the family must follow within the next 30-60 days; the family will have a probationary period. If program termination proceeds, CCA will follow eviction procedures and the ECC/HANH will afford the resident all rights under the program termination guidelines of the agency's HCV Administrative Plan.

c. Description of Annual Reevaluation

All residents will be subject to Annual Re-evaluations of their income and rent share throughout the course of their participation. Rent will be calculated per the agency's Rent Simplification Plan previously approved by HUD. All aspects with the exception of Biannual and Tri-annual review will stand.

d. Transition Period

This is a new initiative, as such there is not a transition period from a previous initative. ECC-HANH anticipates that program activities will begin during FY2019 and lease ups will begin once the proposed renovations to the project site and the selection of the initial program participants are completed.

At the conclusion of the MTW demonstration period if approval is not received to continue the initiative, these units will revert to traditional project based units without a term-limit. Families currently in good standing will be allowed to remain in the units with assistance. Units will be filled from ECC/HANH's Housing Choice Voucher waitlist as vacancies occur.

i. **A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.**
ii. A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/ terminated/ reduced/ continued/expanded.

Total tenant share will be tracked for each family throughout their participation. Families rent burden will average 30% of income or below. No family's rent burden shall exceed 40%. This will be tracked through the agency's MIS system. As families approach program graduation, income will be compared to area fair market rents. Families rent burden in the unassisted market will be tracked for families throughout their transitional year. Any families who upon program graduation will experience a rent burden exceeding 40% of their monthly income will be allowed to request a hardship exemption. Numbers of hardship requests, exemptions granted, extensions, terminations and graduations will be tracked. If the number of graduations fails to exceed the number of terminations in any year, the program will be re-evaluated

Establishment of Incentive Grant Program for ECC/HANH Residents participating in Agency's Family Self-Sufficiency Program

Establishment of Incentive Grant Program for ECC/HANH Residents participating in Agency's Family Self-Sufficiency Program, the REACH Grant will provide cash assistance to residents seeking to achieve defined self sufficiency goals. (Participants do not include residents enrolled in HUD FSS Program or ECC/HANH CARES Program).

Activity Description

v. **Describe the proposed activity.**

ECC/HANH proposes to phase out and replace the Earned Income Exclusion program with the REACH Grant Program. ECC/HANH residents that have elected to participate in the agency Non-HUD FSS Program, will be able to apply for and receive up to $500 per year for up to 5-years to support their achievement of goals that they have established for themselves as part of the Individuals Self Sufficiency Plan. REACH Grant funds will be managed by FSS Case Managers.

The REACH Grant Program seeks to reduce barriers and facilitate short term wins for residents as they move toward self-sufficiency. REACH grant funds will not roll over from year-to-year. The intent of not having funds carry forward for one year to the next is place an emphasis of goal achievement during each year of participation. This is a departure for previous programs that the Agency has established, like with the CARES Program and from the traditional HUD FSS Program, where participants can become eligible build or grow dollars in escrow accounts, which can be used to purchase automobiles, down payment for home purchase or educational expenses.

Instead the REACH Grant aims to support our residents in different ways. It is designed to be an accelerator that seeks to make the first or next step in a resident's pursuit of their goals possible, without a great deal of bureaucracy, but with full transparency.

We anticipate that REACH Grant Funds will be used by residents in the following ways:

- Books for School or Educational Courses
- Application or Enrollment Fees
- Uniforms
- Testing Requirements
- Tools and Equipment for Work
- Technology
- Small Emergencies
- Short Term Transportation Needs

In establishing the REACH Grant program, ECC/HANH is attempting to determine if there is a direct correlation between receiving incentives and goal achievement for participants in the FSS Program. Grant awards must be made in the context of the Self-Sufficiency Goals that have been established by the participant, and will be tracked using ECC/HANH new Case Management System. The case management System will be linked directly with Service Providers. FSS Case Managers will able to see impact of the REACH Grant on performance of success of our participants in real time, with the goal of not only being able to show the impact of how these funds are impacting the lives of our participants, but also to illustrate how small incentives have an impact of reducing subsidies.

vi. **Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective.**

1) *To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.*

REACH Grant provides support to head of households and is designed to provide resources to overcome barriers or obstacles that often prevent individuals for moving forward or achievement of a defined goal. We very much see the REACH Grant Program as the "But For Stopper". The program model is designed to give individuals the resource they need to move forward, without making them dependent on the resource for their future success.

2) *Achieve Agency Cost Savings*

The REACH Program will replace the Agencies IEE Program. Under the terms of the IEE Program that agency assume the costs for the rent discounts that were applied for all program participants, regardless of whether or not they met the objectives of the initiative. We believe that the REACH Grant Program will not only result in agency cost savings in terms of the cost of program cost per resident, we also believe that impact of the REACH Grant will be more measurable than IEE Program that it is replacing.

vii. Provide the anticipated schedule for implementing the proposed activity.

1) February 2019 Obtain HUD Approval for New MTW Activity
2) January 2019 –February 2019 : Formalize REACH Grant Rules, Eligibility Requirements and Grant Disbursement and Tracking Protocols
3) February 2019- March 2019: Inform and Educate Residents about the REACH Grant Program
4) April 1, 2019: Launch REACH Grant Program for Non-HUD FSS Participants

F. Activity Metrics Information

i. Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.

1) Self Sufficiency #1 – Increase household income
2) Self Sufficiency# 5 –Households Assisted by Services that Increase Self Sufficiency
3) Self Sufficiency# 7- Increase in Agency Rental Revenue

ii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.

1) Average income for families enrolled in Non-HUD FSS Program is $14,000
2) We currently serve 30 Non-HUD FSS Families. By 2023 the Agency Goal is to serve at least 225 Non-HUD FSS Participants.
3) In 2017 the cost of the monthly MTW TBV was $990, goal is to decrease cost of TBV from $990 by 20% for Non-HUD FSS Participants over the 5 year program period or 2023.

iii. Give the annual benchmark for each metric.

1) 5% Increase in Household Income for Non-HUD FSS Participants in the REACH Grant Program
2) 50% Increase in the number of participants in the Non-HUD FSS Program
3) 5% Decrease in PHA MTW TBV Subsidies to Non-HUD FSS Participants in the REACH Grant Program

iv. If applicable, give the overall and/or long term benchmark for each metric.

1) By 2024 20% Average income increase for Year 1 participants (2019); 10% for all participants
2) By 2024 there will be 225 participants in the Non-HUD FSS Program; and program will have issued 600 REACH grants between 2019 and 2024.
3) PHA Voucher Costs for Non-HUD FSS Participants will be $700

v. Give the data source from which the metric data will be compiled.

1) Family income data will be collected in agency MIS (Emphasys ELITE)
2) Households Assisted by Services will be collected in Agency MIS (Client Track)
3) PHA Rent /Subsidy Costs data will be collected in agency MIS (Emphasys ELITE) and tracked in case management tracking software (Client Track)

G. Cost Implications

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The cost of the REACH Grant funds will be paid out of MTW Flexible Funds. REACH Funds will be budgeted annually. Any unused funds will be rolled over in the following year budget.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

We anticipate during the initial program period, 2019 – 2024 REACH Grant Awards to participants will not exceed $500,000.

H. Need/Justification for MTW Flexibility

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

1) Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities
2) Attachment C. B. 1. b. iv. Single Fund Budget with Full Flexibility. The provision of management services
3) Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.
4) Attachment C. B. 2. Partnership with For-profit and Non-Profit entities
5) Attachment C. D. 2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity. *Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorizations that are applicable to a particular activity when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to the activity to include the correct authorization.*

I. Rent Reform/Term Limit Information (if applicable)

i. Impact analysis

1) A description of how the proposed MTW activity will impact household rent/tenant share. **Not Applicable**

2) A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts. **Not Applicable**

3) A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc. **Not Applicable**

4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/ terminated/ reduced/ continued/expanded. **Not Applicable**

ii. Hardship Case Criteria:

Participants will work directly with FSS Case Managers for the receipt of REACH Grant Funds. In the event of a dispute or disagreement concerning the release of REACH Grant Funds to an eligible participant, the final decision concerning the grant award will be made by the ECC/HANH CED Director or his/or her designee.

iii. Description of Annual Reevaluation

Results for this activity will be reviewed annually as part of the ECC/HANH MTW Report Submission to HUD. Changes to the program model will be made at that time. Changes to the program will be the result of performance or resource levels.

iv. Transition Period

Agency will be transitioning from the IEE Program to the REACH Grant Program Model beginning in FY 2019.

IV: Approved MTW Activities

A. IMPLEMENTED ACTIVITIES

Increase Housing Choice

Initiative 1.2 – Local Total Development Cost (TDC) Limits

This iniative was approved in FY2008 and implemented in FY2009. This activity establishes TDC and HCC limits for ECC/HANH separate from HUD's standard limits to better reflect local market conditions for development and redevelopment activities.

ECC/HANH prepared a TDC and HCC schedule, which reflects construction, and development costs in New Haven. ECC/HANH first submitted its revised Alternate TDC and HCC schedule as part of the Appendix to the MTW Fiscal Year 2009 Report. ECC/HANH used the approved 2009 TDC and HCC limits for the Rockview Phase I Redevelopment. During Fiscal Year 2012, ECC/HANH submitted revised TDC and HCC limits. Pursuant to the approval of the alternate TDC, the ECC/HANH updated its TDC and HCC, which was included in our 2017 MTW Plan, and is attached hereto in Appendix 1.

The market demands have driven costs higher, but the Authority has been and will continue to be a good steward of public resources. The TDC cost limitations derived from (1) construction cost data obtained from RS Repair and Modeling Cost, and (2) an analysis of unit size and construction cost data obtained from a survey of local mixed income developments, and an analysis of other local factors and market conditions affecting the cost of the development of mixed income communities in the local market area.

The Housing Authority has the following developments in its pipeline: Rockview Phase II; Farnam Phase II 4%, Farnam Phase II 9%; Westville Manor Phase I, and Westville Manor Phase II. As it relates to our approved TDC, the aforementioned developments shall not exceed the approved TDC. These developments are in the predevelopment stages, with the exception of Rockview that is in the closing stage. Rockview's TDC aligns more closely with the HUD approved TDCs. This is in large part of not having a significant amount of infrastructure. The Authority continues to work diligently to find creative construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of the approved TDC.

ECC/HANH does anticipate changing the metrics to further detail the impact of this initiative. It is proposed to update the baseline for HC#2 to include the total number for units at sites developed. It is also proposed to remove the CE #4 Increase in Resources Leveraged and include as a metric, the number of days a unit remains available to lease. In addition, the impact statement will be revised and internal metrics #2 will be reevaluated to be compared with rest of portfolio, internal metric #6 will be compared to determined most comparable sites, internal metrics #7 and #8 will be discontinued. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

Initiative 1.4 and 1.10 – Defining Income Eligibility for the Project Based Voucher Programs

This initiative was approved in FY2012 and implemented in FY2013. This activity defines the incomes to be eligible for Project Based Voucher Programs as follows:

- No less than 40 percent of the project based vouchers awarded in any year to be awarded to families with incomes at or below 30 percent of the area median income, adjusted for family size.
- ECC/HANH will award up to 15 percent of the PBV's allocated to for any mixed finance project to families with incomes between 50 and 80 percent of Area Median Income for Brookside Phase 1 Rental.
- 45 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 Rental mixed finance development.

ECC/HANH does anticipate changes to the initiative or metrics. It is proposed to discontinue CE #4, Increasing leveraged funds is not a goal of this initiative. Rather, this initiative aims to decrease maintenance costs and increase durability of units and the quality of life of residents. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

Initiative 1.4 and 1.10							
Income Eligibility for Project Based Voucher Program							
PBV in Mixed Finance Developments							
Development	Units at or below 30% of AMI	Percent	Units at 30-50% of AMI	Percent	Units at 50-60% of AMI	Percent	Total Units
Brookside I	0	0%	42	84%	8	15%	50
Brookside II	0	0%	30	59%	21	41%	51
Rockview	20	43%	20	43%	7	15%	47
Wilmont Crossing	0	0%	11	85%	2	15%	13
Ribicoff 9%	11	25%	28	64%	5	11%	44
Ribicoff 4%	25	49%	19	37%	7	14%	51
Fair Haven- EVT	4	16%	13	52%	8	32%	25
Fair Haven-Chatham	11	34%	15	47%	6	19%	32
Total	71	23%	178	57%	64	20%	313

Initiative 1.6 – Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Program)

This initiative was approved in FY2008 and implemented in FY2009. Under ECC/HANH's MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods. This includes reasonable policies for setting rents and subsidy levels for tenant-based assistance.

During FY2008, ECC/HANH began to implement MTW Rent Standards that allow ECC/HANH to approve exception rents in the following cases: Wheelchair accessible units; Large bedroom-size units, (4 bedrooms or larger); Expanded housing opportunities in neighborhoods with low concentrations of poverty; Housing opportunities in new development projects that include significant public investment to promote revitalization of neighborhoods; and Mixed-income housing opportunities that promote expanded housing opportunities and deconcentration of poverty.

In addition, ECC/HANH approved budget-based rent increases for landlords who make major capital improvements in their property, including accessibility modifications. Requests for MTW Rent Standards will be reviewed on a case-by-case basis. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% without prior HUD approval. ECC/HANH will reexamine its MTW Rent Standards monthly to ensure that ECC/HANH does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, HAP RAD Payments, tenant rent payments to landlords, and any utility allowance amounts.

Finally, ECC/HANH provides mobility counseling services for voucher participants to assist their search for housing in non-impacted areas.

ECC/HANH does not anticipate any changes to the initiative, and does not require different authorizations from what was initially proposed. HC#5 will be reviewed to determine continued use during FY 2019.This initiative meets the statutory objective of increasing housing choice.

Initiative 1.7 – Tenant-Based Vouchers for Supportive Housing for the Homeless

This initiative was approved in FY2010 and implemented in FY2011. Under ECC/HANH's MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods.

ECC/HANH has designated use of housing choice voucher resources for the purpose of ending homelessness. ECC/HANH works in conjunction with City and Regional entities, Continuum of Care, shelters, transitional and permanent housing providers to prioritize and identify chronically homeless, homeless families and other homeless populations. ECC/HANH entered in a Memoranda of Understanding with organizations that provide housing for homeless with supportive services.

Current allocation of vouchers for this purpose is outlined in the table below.

There continues to be a need for vouchers for the homeless population and we are forming additional partnerships with homeless advocates. ECC/HANH does not anticipate any changes to the metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing housing choice.

Use of Tenant Based Vouchers to End Homelessness				
Efforts to End Homelessness	**Original**	**Reallocated**	**Added**	**Total**
Tenant Based DHMAS Supportive-Housing First	10	0	0	10
DMHAS Mental Health Transformation Grant-FUSE	10	0	0	10
Family Options- Homeless	15	0	0	15
Permanent Enrichment	10	0	0	10
Foreclosure Protection	17	0	0	17
DCF Family	20	0	0	20
(Formerly Foreclosure PBV)	40	0	0	40
Supportive Housing/Homelessness Prevention	51	0	0	51
20 vouchers for city initiative targeting homeless former offenders	20	0	0	20
10 vouchers for re-entry applicants through City Fresh Start	10	0	0	10
				203

Initiative 1.9 – Increase the Allowed Percentage of Project Based Voucher (“PBV”) Units from 75 Percent to 100 Percent in a Mixed Financed Development

This initiative was approved in FY2012 and implemented in FY2013. ECC/HANH has completed a Project Needs Assessment (“PNA”) of its entire portfolio. The PNA shows that over the next 20 years ECC/HANH’s needs would exceed available funds by a ratio of more than 3:1. In order to address this funding gap and to help assure the long-term viability of its portfolio, the Agency used the PNA to determine an asset management strategy for each of its developments. Part of this strategy included converting existing public housing to Project Based Assistance under Section 8(o) (13). ECC/HANH would dispose of properties under Section 18 of the Housing Act of 1937 or Rental Assistance Demonstration (RAD) prior to conversion to Project Based Vouchers.

ECC/HANH conducted analysis of the feasibility of converting Annual Contribution Contract (“ACC”) units to Project Based Units using criteria similar to that set forth under Section 22. ECC/HANH will increase its flexibility to allocate the number of units in a project from 75 percent as previously approved by HUD to 100 percent for the purpose of converting ACC units to PBV units under this initiative. The purpose is to provide cash flow to enable ECC/HANH to borrow private funds for the purpose of rehabilitating aging developments in ECC/HANH’s portfolio. ECC/HANH also seeks to waive the requirement of one-year tenancy which will allow participants greater flexibility in housing options.

The mobility issue is addressed by allowing the tenants the option to vacate the development during rehabilitation with an option to return upon the completion of such rehabilitation and/or the convenience of using a Tenant Based Voucher to relocate permanently. ECC/HANH will provide all of the assistance and counseling as required under Section 18 or the Uniform Relocation Act, if applicable.

ECC/HANH will limit the amount of project based units in non-mixed finance projects to no more than 50% of the units in the project; provided, however, that the agency may project base up to 75 percent of the units in such project if the project will provide replacement units for public housing units lost as a result of demolition or disposition, if the project is undertaken in an area where significant investments are being made, if the project will help to reduce de-concentration of very low income families, or if the project is located in areas that provide increased access to transportation or employment opportunities.

HUD development of the Rental Assistance Demonstration Program has made this initiative unnecessary for projects approved for RAD conversion. However, ECC/HANH continues to have 985 units that are not currently approved for RAD conversion for which this authorization remains vital.

ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

Initiative 1.11 – Increase the percentage of Housing Choice Voucher (NON_RAD) budget authority for the Agency that is permitted to project-base from 20% up to 25%

This initiative was approved in FY2013 and implemented in FY2014. This authorization will allow for the continued redevelopment efforts of the underperforming developments as well as increase housing choices for our residents. It allows the Authority to use its vouchers to pool monies together in order to leverage funds for redevelopment efforts.
This initiative was contemplated prior to the advent of the RAD program. The percentage of MTW project based did not include the full conversion of ACC sites to PBVs. The advent of RAD increases the proportion of the portfolio that will be project-based. ECC/HANH’s current percentage of non-RAD project based MTW vouchers is 11% (522 vouchers).

With the RAD portfolio award, ECC/HANH expects that percentage to increase to 32% of the portfolio during FY2019. This is the result of the addition of 1431 RAD vouchers in addition to the above cited 522 vouchers. ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing housing choice.

Initiative 1.12 – Development of Replacement Public Housing Units with MTW Block Grant Funds

This initiative was approved in FY2013 and implemented in FY2014. ECC/HANH has been very active in redeveloping and repositioning its aging public housing stock by leveraging private investment through the mixed-finance process and replacing demolished units with a variety of affordable housing types, including public housing, project-based vouchers and tax credit units. ECC/HANH has also been at the forefront of using its MTW authority creatively to complement and enhance these efforts.

In FY2013, ECC/HANH proposed to begin a new initiative to develop public housing replacement units with MTW block grant funds while making use of MTW authority to waive or substitute certain program rules. ECC/HANH intended to pursue this initiative at certain specific sites in FY 2013, including Farnam Courts and Abraham Ribicoff Cottages and Extensions, but intended to use this same model at other sites to be identified in the future.

Essentially, ECC/HANH will use MTW block grant funds (which are drawn collectively from public housing Operating Funds and Capital Funds and Section 8 Housing Choice Voucher funds) to develop public housing units through a mixed-finance process. The units will be operated as public housing for purposes of admissions, continued occupancy, resident rights, and certain other rules. However, for purposes of providing ongoing operating assistance, ECC/HANH will use its MTW authority to design and fund a local program to develop replacement public housing units under a local housing assistance payments contract with the owner entity, with operating assistance being utilized in a manner similar to the project-based voucher program. Among other things, this approach will allow ECC/HANH to pay debt service on private loans taken out to support redevelopment projects. To the extent necessary, under its MTW authority ECC/HANH will revise required forms to provide for this mix of applicable rules and seek any necessary HUD approvals.

ECC/HANH's need to implement this initiative has been limited due to the RAD portfolio award. This approach may be applied to developments not selected or appropriate for RAD conversion.

ECC/HANH does anticipate changes to the initiative or metrics by adding the number of days a unit remains available to lease. In addition, the impact statement will be revised. This initiative meets the statutory objective of increasing housing choice.

Initiative 1.15 – RAD Finance Development for Rockview Phase II Rental

This initiative was approved and implemented in FY2014.

ECC/HANH has aggressively redeveloped the West Rock community in multi-phases. To date, Brookside Phase I, Brookside Phase II, Rockview Phase I, Ribicoff Cottages 4%, Ribicoff Cottages 9% and Wilmont Crossing have all been completed transforming obsolete public housing and commercial sites into vibrant mixed income communities that brought 444 units of affordable and market rate rental housing, homeownership, associated community space and commercial space into the West Rock community. ECC/HANH worked successfully with the City of New Haven and the Town of Hamden to open a long-closed road thereby creating an access way into the community from the Town of Hamden. Westville Manor, a 150 unit LIPH development remains the only community not yet redeveloped.

The Authority has undertaken an aggressive modernization program which includes the submission of an application for RAD funding for several sites including for Westville Manor. The Rockview Phase II development will be an off-site component of the Westville Manor redevelopment. This initiative is part of the Westville RAD submission for the creation of replacement public housing units. The Authority intends to demolish Westville Manor and create these units on-site and off-site at Rockview Phase II Rental. Rockview Phase II Rental will rely on the MTW authorizations for alternative TDCs and commingling of funds. This initiative was approved in FY2014, was subsequently put on hold in FY2015, and was reactivated in FY2017.

The Authority submitted a 9% tax credit application in November 2016 which was awarded in FY2017. Closing is planned for FY2018.

ECC/HANH does anticipate changes to the initiative or metrics by removing HC#2 Units of Housing Preserved, HC#3 Decrease in Wait List Time, and removing internal metric #10, Turnover cost, will also be discontinued.This initiative meets the statutory objective of increasing housing choice.

Increase Family Self-Sufficiency

Initiative 2.1 – Family Self-Sufficiency (FSS) Program

This initiative was approved and implemented in FY2007. ECC/HANH's FSS program provides intensive counseling and case management services to help participant families achieve their self-sufficiency goals, according to each family's needs. Redefining the program model developing identified paths to success for work-able families, youth and our elderly/disabled families, such as motivational programming, financial literacy, including creating opportunities to assist residents in opening checking accounts, when previously not able, and increasing specialized training options has allowed ECC/HANH to provide much needed support to a larger number of LIPH and Section 8 residents.

The FSS Programs is designed upon best practice that includes assessment, consistent, one-on-one follow up with all program participants which includes multiple forms of outreach with an overall goal of increasing the FSS graduation rate. New participants will be seen more often by the assigned case workers. Case loads can average anywhere between 100, more stable group of participants and FSS Coordinators will have a manageable caseload averaging 200 residents per caseworker based on capacity and needs of the population.

In effort to increase the percentage of participants who gain new employment or go from part time to full time, FSS Coordinators will meet with each participant at least once per quarter at either their office, participants home, community room or participants work/training setting to make the personal contact convenient for the participants. ECC/HANH has taken a holistic approach that allows the FSS Coordinator to support the whole family where necessary as it impacts the participants ability to be successful in the program. This approach includes Community providers in the Program Coordinating Committee (PCC) who offer necessary services for our families. Our approach recognizes the personal responsibilities, and family commitments of the participant.

Service referrals focus on remedial education, literacy classes, GED preparation, vocational and financial management, job skills/ employability, etc. Further ECC/HANH has invested in Computer/Learning Labs which offer services that assist families in their move toward self-sufficiency.

ECC/HANH also created a "Specialized Training" program which offers training in fields where there are employment opportunities (e.g., healthcare, auto repair). This training should provide the skills necessary for residents to obtain employment or increase their earnings.

ECC/HANH will continue to partner with a wide variety of community agencies to offer a multitude of supportive programming at the multiple Computer/Learning Labs to support participants. Programs will address employment, training and financial empowerment, and services will be offered in both a small group and one-on-one approach. The financial empowerment programs offered include financial education, budgeting, financial coaching for the participants geared towards a one-on-one approach. It is expected that participants meet with a financial coach four times within the first year and twice annually thereafter to help set financial goals, build savings, reduce debt and improve credit.

Additionally, ECC/HANH will introduce a self esteem and visioning component into the Individual Training and Services Plan towards building long lasting gains and successes for participants in the program. FSS Coordinators will work with participants to establish challenging goals that ensure supports through the process and also focus on soft skills such as dressing for a job interview, handling difficult situations in the workplace, etc. Partner agencies will support this process of weekly training and one-on-one coaching in these skills.

The MTW FSS program serves over 1150 families. This includes 150 families enrolled in the HUD FSS grant funded slots; up to 177 families enrolled in the CARES Program; 570 Elderly/Disabled individuals; and 260 identified work-able families enrolled in MTW funded slots.

Program	Number of Slots	Benefits from Escrow	Owner	Supports
HUD FSS Grant Funded Slots	150	Yes	FSS Coordinators	RSC, CED Supervisor, CED Manager, MSW
CARES Program	Up to 177	Yes	CARES Coordinators	RSC, CED Supervisor, CED Manager, MSW
Work-Able families	260	Yes	Program Managers FSS Coordinators	RSC, CED Supervisor, CED Manager, MSW
Elderly/Disabled	570	No	RSC	FSS Coordinators, CED Supervisor, CED Manager, Recreational Therapist, MSW
TOTAL	1157			

ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

Initiative 2.2 – Incremental Earned Income Exclusion

This initiative was approved and implemented in FY2008. ECC/HANH believes promoting self-sufficiency is most effectively accomplished through helping residents to access services and supports, while also assisting residents to have greater choice in allocating their limited resources. Incremental Earnings Exclusion is phased increases of the determination of earned income over the five year term of a family's participation in the FSS program. For example ECC/HANH will exclude from the determination of annual income 100% of any incremental earnings from wages or salaries earned by any family member during the first year.

- Where the <u>earned income increases</u> (*from the effective date of contract*) of participants is excluded in increments according to the year of participation: 1st year of participation = 100%, 2nd year of participation = 75%, 3rd year of participation = 50%, 4th year of participation = 25%, 5th year of participation = 0%. During the 5th year, FSS staff will include all earned income in rent calculations.
- Note that during this period, if there is a contract, participants will not earn escrow benefits during the 1st year and may or may not during the following based on the rent increase and income exclusions.

This initiative will be closed out; those residents who are currently utilizing the benefit will be phased out of the program starting in FY2019. As of October 1, 2018, no new participants will be added to the IEE program. ECC/HANH is replacing this Initiative with a new initiative REACH

ECC/HANH does not anticipate any changes to the metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

Initiative 2.3 – CARES (Caring About Resident Economic Self Sufficiency)

This initiative was approved in FY2012 and implemented in FY2013. As an MTW Agency, ECC/HANH implemented a new pilot program to promote HUD's mission to promote self-sufficiency throughout the agency. ECC/HANH developed a pilot self-sufficiency plan for the Brookside Phase II Rental development and Rock View (not RAD sites) that encompassed HUD's continued mission to increase self-sufficiency among residents and promote accountability.

Key program components:

- The C.A.R.E.S. Program (Caring About Resident Economic Self-Sufficiency) introduced the concept of term limits into the public housing and Section 8 programs administered by ECC/HANH. All residents, except those exempt under the program requirements will be subject to a 72-month time limit on receiving rental assistance.
- The second component of the program is that certain individuals will be required to participate in an extensive 24- month case management supportive program designed to overcome barriers to becoming self-sufficient. The returning residents are exempt but can voluntarily participate in the program. The agency will use its MTW flexibility to fund the required social service component of this program.
- At year three, in an effort to support transition to unassisted housing, CARES residents are paid their subsidy directly and learn to manage their finances and the payment of their full rental payment.
- At year three, CARES participants subsidy is frozen at that level.
- A deposit is made into the escrow account for all participating families. The deposit is equal to the amount of one year's subsidy and is available to deal with hardships, self sufficiency needs or can be taken upon graduation from the program.

Prior to signing a lease at the newly redeveloped Brookside Phase II Rental site and Rock View, all residents will have a pre-orientation that will explain the CARES Program. At the end of the 72-month limit receiving rental assistance, the rent will be adjusted to Flat rent (public housing) or Market rent (PBV), less prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt, as described in the plan.

We recognize that there are individuals who due to no fault of their own will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an Individual Service Plan (ISP) and case manager, and show progress towards the goals of the plan will continue to be able to receive assistance as long as they continue to make progress towards their goals. Out of the 101 units developed in the Brookside Phase II Rental project and 77 at Rock View, all have been assessed and are required to enroll in the CARES program except those residents who are excluded.

There are two levels of engagement into the program, a Full CARES participant and Transition participant. A Full CARES resident is an individual who possesses educational and job development skills that have a substantial demand in the labor market. The Full CARES participant typically is working full time and earning a livable wage. Transition CARES residents lack one or both criteria mentioned above. A typical Transition participant is working part time and/or in need of training to obtain higher wages and full time job.

Residents and participants are incentivized to enroll in the CARES program because of the intensive supportive services offered, the escrow payment and the increased control over the use of their funds (including subsidy dollars). Also, the intensive supportive services for a 24-month period over the 72 months, residents will receive a lump sum of the equivalent to the subsidy payments in the final year of the program deposited into an escrow account (REEF) released upon graduation from CARES. The funds in the REEF at year three may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted), purchase a computer, or enroll in higher education, subject to the approval of ECC/HANH. The monthly subsidy payment will be pre-determined at an initial assessment conducted prior to lease up in a manner consistent with the Authority's Rent Simplification Program.

While the most intensive supportive services are provided during the first two years of the program, all participants continue to be able to avail themselves of the support as needed. It is anticipated that as barriers and service needs are addressed, the need for such intensive support will wane. This policy and procedural change has resulted in modifications to the MTW Plan, ACOP and Administrative Plan.

The CARES program description can be found in Appendix 3.

In 2018, the CARES program underwent improvements to focus on reinforcing the inaugural principles of the program. CARES' focus continues to provide case management, resources and tools to support participants in reaching self-sufficiency. As part of this effort, ECC/HANH offered participants the opportunity to elongate their program participation to receive the full benefit of the CARES program. The following options were provided to participants:

- Participants remain at their original contract date in the CARES program with no changes in income or reset. Household will pay full rent to owner and will be subject to the 72-month time limit reflecting original contract date.
- Participants will remain at their original contract date in the CARES program, however, household will go back to year 3 income. Household will pay full rent to owner and will be subject to the 72-month time limit reflecting original contract date.
- Participants will reset to year 3 as an extension to receive all resources & tools for families to reach self-sufficiency & reset to year 3 annual recertification. Income will be based on year 3 to determine the monthly subsidy. Household will pay full rent to owner and will be subject to the 72-month time limit reflecting New Year 3 reset date.

During this time, program participation increased by 17%. Families participated in briefings where they were reminded of the program rules and requirements, and all families were again given the opportunity to opt into or out of the program. All current participants opted to stay in the program, and a number of families who previously were not participating opted in. CARES is reaching its 1st 72 month mark, and residents who chose option 1 are aware of the program requirements and are preparing to graduate from the program. In 2015 the program was reviewed and updated to clarify that receipt of a PBV is not an option for families living at the CARES sites (Brookside II & Rockview I), regardless of participation in the CARES program or if they opted out; unless the family has an exemption. At time of graduation, for some residents, this means transitioning to Fair Market rent or Flat rent, and for others, this means moving into a fair market unit in the community or purchasing a home. Every participant in the CARES program is receiving on-going support and assistance through Family Self Sufficiency, homeownership, Resident-Owned Business, Connecticut Association Human Services-Financial Literacy, CONNCAT Training School, and other programs with ECC/HANH or in the community.

ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. Benchmarks for metrics SS#2, SS#4, & SS#5 will be reevaluated during the 2019 FY.

This initiative meets the statutory objective of increasing family self-sufficiency.

Initiative 2.4. Teacher in Residence

This initiative was approved in FY2015 and implemented in FY2015. As part of ECC/HANH Believes, an ECC/HANH youth initiative, Elm City Communities seeks to make academic supports readily available to the approximately 2,000 school age youth residing in our developments. Modeled on the Officer in Residence program already implemented through HUD approval, ECC/HANH offers housing to teachers in exchange for the delivery of homework help and tutorial services for our youth. Teachers housed through ECC/HANH Believes are called “Teachers in Residence” and the initiative provides ECC/HANH youth with the necessary academic assistance so many of our youth need, as well as help bridge a historical divide between educators and our families. Creating communities where teachers and parents reside and commune regularly shifts traditional relationships between teachers and parents. In turn, the program creates space for experiential learning, living, and communication. We are building relational pathways from the home into the classroom.

Teachers in the pilot program, as part of an agreement between ECC/HANH and each teacher, are required to provide educational assistance to ECC/HANH’s youth residing at McConaughy Terrace (the development selected for the pilot where the Teachers in Residence will be housed). Educational assistance to Elm City Communities’ school-aged youth is defined as follows:

- Conduct a site-base homework help program at the developments in which the Teacher in Residence resides, in conjunction with ECC/HANH staff, throughout the school year;
- Provide homework help and/or tutoring for students in their respective ECC/HANH developments;
- Facilitate site-based meetings for parent residents, in conjunction w/ECC/HANH staff, so that parents may better understand how to navigate the New Haven public schools; and
- Participate in the Tenant Resident Council.

ECC/HANH hosts meet and greets for each teacher at the identified ECC/HANH sites in order to spark relationships between and among the Teachers in Residence and residents, facilitate communication between the teachers and ECC/HANH staff and to evaluate and alter the program, as needed. Specific terms of the program are included in the Teacher in Residence agreement.

The Special Use unit designation benefits teachers in providing subsidized housing as well as benefits residents as the teacher in residence will support academic achievement of ECC/HANH’s youth through the aforementioned educational assistance. Increasing students' academic achievement has the potential to end the cycle of poverty for our families. In doing so we are building a new, vibrant middle class in New Haven; as this initiative increases the economic self- sufficiency of our families. Anticipated outcomes include improved academic success as students receive additional academic assistance, improved attendance in school as students better understand their respective academic material, and improved performance on district and/or standardized testing.

Program dollars are limited in terms of the ability to pay for such on-site services. By offering the incentive of housing, we are able to access these services without an additional outlay of cash. Efforts to ensure the academic success of young people reduce the likelihood that they become the next generation of subsidized housing recipients.

ECC/HANH has received HUD approval for one (1) MTW neighborhood services special use dwelling unit previously at Waverly townhouses, and now moved to McConaughy Terrace.

Teacher in Residence meets with ECC/HANHSupervisor on a weekly basis as the program continues to develop at Waverly, and continues at McConaughy. The expectation is that the Teacher in Residence also meets with the property manager, Community & Economic Development Manager and Resident Services Coordinator for the site on a quarterly basis to review progress, challenges, influence recruitment, coordinate activities and events. TIR will also be working closely with the Board of Education to facilitate access to other pertinent information and to compare progress in program to school outcomes as well as attendance.

ECC/HANH has planned and implemented a non-significant change of moving the pilot site from Waverly Townhomes to McConaughy Terrace and does not anticipate any changes to the metrics, and does not require different authorizations from what was initially proposed. Benchmark for metrics SS#5 may be reavaluated during FY 2019. This initiative meets the statutory objective of increasing family self-sufficiency.

In FY18, the special-unit at Waverly was transitioned to a residential unit due to RAD conversion planned for the development in FY19. The afterschool program at Waverly concluded at the end of the 2018 school year to accommodate the teacher's move to McConaughy. In efforts to continue to provide the service to families from Waverly, ECC/HANH provides transportation for those who are interested in having their children continue to attend.
Programming at McConaughy started once again at the end of FY18, once the teacher-in-residence was relocated. Children from neighboring Valley Townhouses have also been invited to attend the afterschool program; allowing the program to reach a larger number of ECC/HANH youth across developments.

As a result of changes, and the move from one site to the other, reporting for 2019 FY will be treated as base reporting year. Staff are working with students and their parents, and providing incentives to the new community in efforts to get more participiation and bring new attention to the program.

INITIATIVE 3.1 – RENT SIMPLIFICATION

Approved in FY 2007 and implemented in FY08

Cost

Description and Status

The full description of ECC/HANH's rent simplification program can be found in Appendices 6 and 7.

ECC/HANH utilizes the Enterprise Income Verification (EIV) system for all third-party verifications. In FY09, ECC/HANH implemented the multi-year recertification cycles that recertifies "work-able" families every two years and elderly/disabled families[9] every three years. MTW families that don't meet the elderly/disabled definition will be considered work-able families.

ECC/HANH's rent simplification activities include the following major elements:

i. **Multi-year recertification cycles.**

- Triennial cycle (every three years) for elderly/disabled households (defined as head, co-head, or spouse is elderly and/or disabled)
- Biennial cycle (every two years) for work-able households (those that do not meet the elderly/disabled definition)
    - **Rationale**: Very little change in income takes place with elderly/disabled families on fixed income and there is little financial incentive for ECC/HANH to verify their income annually. Work-able families will

[9] *Elderly/disabled families are newly defined as: all adult members (excluding live-in attendants) of the household are elderly (age 62) and/or disabled.*

benefit from two-year cycles as they will not pay incremental rent increases on any income increases for the two years between recertifications.

- **Expected impact**: Administrative savings, increased participant satisfaction and reduced need for interim recertifications

ii. **Simplified Rent Tiers that incorporate deductions.** Rent tiers were built to simplify the rent calculation. Rents are based on $1,000.00 income bands starting at $2,500.00. Rent is based on the mid-point of each income band. In addition, ECC/HANH eliminated standard deductions for elderly, disabled and non-elderly households.

- **Rationale**: Using a band-based tiered rent schedule allows families to move away from verifying every dollar earned and deducted

- **Expected impact**: Less intrusive recertification process and increased understanding of the rent calculation methodology

iii. **Exceptional expense tiers.** Households with exceptional expenses may request a rent reduction. This includes large families (with more than two children). It also includes families with excessive medical, disability assistance, or childcare expenses. Participants are not required to provide documentation of every expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier. The amount of monthly rent reduction is established at the mid-range of the tier. Households with exceptional expenses will receive a direct reduction of the monthly rent. However, all participants must contribute a minimum of $50 towards their monthly rent.

Tiered Amount of Expenses	Monthly Rent Reduction
$ 2,000 - $ 3,999	$ 75 (equivalent to $3,000 deduction)
$ 4,000 - $ 5,999	$ 125 (equivalent to $5,000 deduction)
$ 6,000 +	Hardship Review

- **Rationale:** Excessive resources are dedicated to verifying deductions for childcare, medical and disability allowances. Third-party verifications of these amounts are difficult to accomplish, and the agency often relies upon second- and first-party verifications of these deductions. Obtaining verification data also places an undue burden on the resident.

- **Expected impact:** Administrative savings, simplified process for residents/participants and fewer recertification appointments are expected. Also, rent tiers have been built to minimize impact on residents during the initial years and to phase in rent increases over time. Residents will not experience an overwhelming rent burden but will be incentivized to increase their earnings over time as their rent gradually increases. The impact on income has been tracked.

iv. **Minimum Rent of $50.** ECC/HANH established a minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for $0 rent. These individuals meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent is then modified accordingly based on the information collected. To move these residents towards self-sufficiency, they are referred to the Family Self-Sufficiency program if the adult household member is non-elderly/non-disabled.

- **Rationale:** All families should pay something for their housing.

- **Expected impact:** HCV subsidy should decrease, and PH rent rolls should increase. ECC/HANH will monitor the number of families on minimum rent and hardship requests to gauge the impact on families.

v. **Transition to Avoid Hardships.** There will be a transition period of one year from the current income-based rent determination process to the new income-tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy.

- Year 2: No family shall be subject to an increase in TTP greater than $25/month

- Year 3: No family shall be subject to an increase in TTP greater than $50/month
- Year 4: No family shall be subject to an increase in TTP greater than $75/month
- Subsequent years: No family shall be subject to an increase in TTP greater than $100/month

Increases are based on a family's monthly TTP in the year immediately preceding the implementation of the Rent Simplification Policy.

- **Rationale:** Limit undue hardship to families due to minimum rents and streamlining of deductions.
- **Expected impact:** No sudden increase in hardship applications due to rent simplification activities.

Impact

Multi-year recertification schedules. In FY18 there were 2,181 HCV recertifications scheduled. ECC/HANH realized a slight decrease in the number of annual recertifications processed in FY17 (1401) in comparison with FY16 (1431). This is a 61% decrease in annual certs from the approximate 3,628 recertifications processed in FY07, prior to implementation of the Rent Simplification policy in 2008. In addition, there were 1241 requests for a HCV interim in FY18, a decrease from the baseline of 1280 in 2007.

Now that biennial and triennial recertifications have gone through a full cycle, the downward trend will not be as significant and will only fluctuate based on the number of families who enter or leave the program on an annual basis. There has also been a 47% reduction in printing costs since 2007 due to a reduction in the number of annual recertifications for families.

The biennial/triennial recertification process has reduced the required staff time to process the recertifications, reduced the burden for residents and participants from having to recertify annually, provided documentation for every dollar expense for deductions, and allowed families to save money for any increase in wages in between recertification cycles.

Minimum rent. In FY16, 94 applications were received and 55 (59%) of those applications were approved. In FY17, 73 hardship requests were received and 67 (92%) were approved. ECC/HANH continues to monitor trends in hardship applications. Since 2012, there has been a 70% decrease in requests received. It is anticipated that applications will trend downward with approvals will steadily increase as fewer inappropriate applications are received, appropriate applications are processed and approved, and ultimately more residents are able to obtain employment and thus do not need minimum rent or exemptions.

Simplification of deductions. Even though the rent calculation was simplified with tiered rents and simplified deductions, most time savings have resulted from a decrease in the number of recertifications processed and a reduction in time required to process a recertification. This year, annual staff hours increased by an estimated 24% as a result of changes associated with staffing and additional recertfication projects taken on by the HCV team. In 2017 we saw a significant decrease in staff hours of about 104% in comparison to baseline year, 2007.

In FY 2018, 102 applications were received and 35 (34%) were approved. In FY 2017, 73 applications were received and 67 (49%) were approved. There has been a 58% decrease in the number of applications received, and a 32% decrease in number applications approved in comparison to the 2012 baseline.

Due to staff reductions in LIPH during FY 2018, our time estimates are 1.5 hours per recertification without interviews (family). With interviews of family members (size) it can add an additional hour. In HCV staff used 3.5 hours on average to complete certifications; this included time associated with filing, answering calls & emails.

Initiative 3.5 – HCV Rent Simplification/Cost Stabilization Measures

This initiative was approved and implemented FY2008 and updated in FY2014. The Authority enacted Rent Simplification measures consistent with the FY2008 MTW Plan. This initiative expanded those streamlining measures. This initiative replaced previous Initiative 3.3 (closed-out).

This proposed activity has three components:

Part 1. HQS Inspections on Biennial/Triennial Schedule
Unit inspections and rent increases will be placed on a schedule consistent with recertifications (in other words, recertifications and HQS inspections will coincide). However, Housing Choice Voucher participants and landlords can request a Special inspection, if necessary, at any point that deficiencies are suspected.

Part 2. Self-Certification for Fails Not Related to Health/Safety

A self certification process will be used for inspection follow-up related to HQS inspection fails linked to items that are not health and safety related. For annual (biennial and triennial) HQS inspections, landlords and participants will be able to self certify and submit documentation of correction of deficiencies. All participants retain the right to request a Special Inspection at any time.

Part 3. Landlord Rent Increases on Biennial/Triennial Schedule

Landlord rent increases will only be processed at the time the family is recertified. These recertifications take place biennially for work-able families and triennially for elderly/disabled families. HQS inspections will be placed on the same schedule as HCV recertifications. Since the proposed HCV caseload optimization will change recertification dates, HQS inspection dates will change correspondingly. See Initiative 3.1 for definitions of elderly/disabled and work-able families.

ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of cost effectiveness.

B. Not Yet Implemented Activities

ECC/HANH has no activities listed under Not Yet Implemented

C. Activities On Hold

This section includes approved activities that have been implemented and ECC/HANH has stopped implementing but has plans to reactivate in the future.

Initiative 1.16 – Crawford Manor Transformation Plan

This initiative was approved in FY2013, implemented in FY2016, and placed on hold in FY2017.

The Authority applied for the Choice Neighborhoods Initiative Planning Grant, but it was not awarded. This initiative is being placed on hold while an alternative plan and timeline is being devised. This grant would have allowed for a comprehensive approach to neighborhood transformation, including the provision of up to $500,000 in funding to develop a transformation plan to revitalize Crawford Manor and the surrounding neighborhood. The Authority also planned to use this grant to assist with detailing a comprehensive neighborhood transformation plan. As one of the older, blighted developments in our portfolio, Crawford Manor is an ideal center focus towards initiating a transformation plan.

The transformation plan would have included not only a redevelopment of the housing units at Crawford Manor, but transformation of the surrounding community into a community that supports the long term economic sustainability of our residents, as well as the long term economic sustainability of the City of New Haven along the Route 34 corridor. Through collaboration with other community partners, including the Economic Development Corporation, City of New Haven, the Board of Education and many more, the Authority anticipates to redesign the infrastructure to create more traffic flow through the community, redesign the housing units to be more spacious, remove barriers that individuals and families are facing by providing supportive services, and other critical components as they arise throughout the planning process. The supportive services may include but are not limited to improved access to jobs, high quality early learning programs, public assets, public transportation, and high quality public schools and education programs.

D. Closed-Out Activities

This section includes all approved activities that have been closed out, including activities that ECC/HANH does not plan to implement and obsolete activities.

LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families

1. Specify the Plan Year in which the activity was first approved, implemented, and placed on hold.
This initiative was first approved in FY2008. Due to ECC/HANH's focus on redevelopment activities, this initiative was placed on hold in FY2012 and continued to be deferred in FY2014.

Implementation of the marketing initiatives for Higher Income Eligible families began during FY09 with the development of marketing materials. Outreach will continue during FY11.

2. Report any actions that were taken towards reactivating the activity.
No actions were taken towards reactivating this activity in FY 2016, ECC/HANH will no longer pursue this activity.

Initiative 1.1 – Development of Mixed Use Development at 122 Wilmot Road

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This activity was Proposed and approved in 2009 MTW Annual Plan, it was implemented in FY 2014. The development was completed and occupied in September 2013.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to close out this activity.

3. Provide the year the activity was closed out.
This activity was closed out in FY2014.

Initiative 1.3 – Fungibility

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
Approved in FY2012 and implemented in FY2013.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to eliminate in MTW reporting as it is not necessary to list as an initiative.

3. Provide the year the activity was closed out.
This activity was closed out in FY2013.

Initiative 1.5 – HCV Preference and Set-Aside for Victims of Foreclosures

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This initiative was approved in FY2009 and implemented in FY2010.

2. Explain why the activities was closed out.

This initiative prevents displacement of families due to foreclosure. The demand for foreclosure vouchers decreased during F Y2017 and FY2018. In addition, many participants either ported out to another jurisdiction or left the HCV program, thereby reducing the need for the number of set aside vouchers even further. At the end of FY 2018 there were 18 families leased and in the 1st quarter of 2018, there were 17 families leased.

ECC/HANH was able to assist families with the foreclosure vouchers at a time when homes were being foreclosed.
Now that the market has stabilized and there are fewer foreclosures, there isn't as great of a need for the set aside of the foreclosure vouchers, and so the Foreclosure Waiting List is now closed. ECC/HANH will allocate the remaining vouchers and close out the initiative in FY 2019.

3. Provide the year the activity was closed out.
This activity was closed out in FY 2019.

Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
Approved in FY2013.

2. Explain why the activities was closed out.
HUD instructed ECC/HANH to close-out this activity. It was combined with Section V: Initiatives Requiring MTW Funding Flexibility Only, Major Redevelopment Efforts at West Rock and the description of the activity is now placed in that section of the report.

3. Provide the year the activity was closed out.
This activity was closed out in FY2014.

Initiative 1.14 – Redevelopment of 99 Edgewood Avenue (Dwight Gardens)

ECC/HANH will use MTW Block Grant Banks to develop housing through a mixed finance process
1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This activity was approved in FY2013 and was never implemented.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to eliminate in MTW reporting. The Authority and its instrumentality, the Glendower Group, Inc., determined that this redevelopment undertaking was no longer feasible and therefore did not pursue the redevelopment efforts with the co-developer. During FY2014 ECC/HANHdetermined that the Redevelopment of 99 Edgewood Avenue k/n/a Dwight Gardens would not benefit ECC/HANH because the feasibility of the project needed to be expended in order to complete the redevelopment.

3. Provide the year the activity was closed out.
This activity was closed out in FY2014.

Initiative 3.2. UPCS Inspections

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
UPCS Inspections were approved and implemented in FY2008.

2. Explain why the activities was closed out.
MTW authorization was no longer required. Since ECC/HANH implemented the initiative in FY2008, HUD subsequently permitted all PHAs to inspect on a similar schedule. It is no longer being reported on as an MTW initiative.

3. Provide the year the activity was closed out.
This activity was closed out in FY2013.

Initiative 3.3 – Revised HQS Inspection Protocol

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).

Revised HQS Inspections: Approved and implemented in FY2011.

<u>2. Explain why the activities was closed out.</u>
This activity will be replaced with Initiative 3.5.

<u>3. Provide the year the activity was closed out.</u>
This activity will be closed out in FY2015.

Initiative 3.4. Mandatory Direct Deposit for Housing Choice Voucher Landlords

<u>1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).</u>
Mandatory direct deposit for Housing Choice Voucher landlords was approved and implemented in FY2010.

<u>2. Explain why the activities was closed out.</u>
This activity was closed since it does not require MTW flexibility as it is covered by general operational flexibility provided to all PHAs. Although the activity continued in FY2014 and will in the future, it will no longer be reported on as an MTW initiative.

<u>3. Provide the year the activity was closed out.</u>
This activity was closed out in FY2014.

(II) SOURCES AND USES OF MTW FUNDS

<u>ANNUAL MTW PLAN</u>

A.

ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds
The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	**Total Tenant Revenue**	$ 2,218,154
70600	**HUD PHA Operating Grants**	90,297,564
70610	**Capital Grants**	4,035,320
70700 (70710+70720+70730+70740+70750)	**Total Fee Revenue**	0
71100+72000	**Interest Income**	0
71600	**Gain or Loss on Sale of Capital Assets**	0
71200+71300+71310+71400+71500	**Other Income**	60,716
70000	**Total Revenue**	**$96,611,754**

ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000(91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$ 4,500,434
91300+91310+92000	Management Fee Expense	8,707,020
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	399,082
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	3,398,060
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	3,845,962
95000 (95100+95200+95300+95500)	Total Protective Services	82,692
96100 (96110+96120+96130+96140)	Total Insurance Premiums	76,444
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	4,551,557
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	4,776,805
97300+97350	HAP + HAP Portability-In	61,283,603
97400	Depreciation Expense	$8,000,000
3397500+97600+97700+97800	All Other Expense	$0
90000	Total Expenses	$99,621,659

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

Estimated Total Expenses include Line Item 97400 Depreciation Expense for $8,000,000, which is a non-cash item. After adjusting the depreciation expense, Estimated Total Revenue exceed Estimated Total Expenses for $4,990,095, which has been planned for development projects under the Non-MTW activities.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
Single fund flexibility is made possible by the MTW program. It enables ECC/HANH to make improvements at some of its developments, enables vacancy prep which increases occupancy, enables major redevelopment efforts, and enables provision of services to our residents through the self-sufficiency initiatives including SEHOP Capital Improvement program, Resident Owned Business program, and the Prison Community/Reentry Program as well as the Resident Services for Elderly/Disabled.

B. LOCAL ASSET MANGEMENT PLAN

i. **Is the MTW PHA allocating costs within statute?**

No

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

Yes

iii. **Has the MTW PHA provide a LAMP in the appendix?**

Yes

iv. **If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.**

ECC/HANH is proposing a simplified LAMP. Instead of charging project or program separate management fee, bookkeeping fee and asset management fee per unit per month, ECC/HANH proposes a simple fee system of charging each project or program up to 10% to cover the costs of the Central Office Cost Center (COCC). An updated LAMP is provided in Appendix 2.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. **Description of RAD Participation**
The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
ECC/HANH has received approval to convert a significant proportion of its portfolio under the RAD conversion process. ECC/HANH completed the conversion of Ribicoff Cottages to Twin Brook under a RAD redevelopment resulting in 95 RAD units. ECC/HANH converted all formerly LIPH units at the Monterey Place development resulting in 280 RAD units. ECC/HANH converted 34 LIPH and 53 LIPH units to 87 RAD units at Wilmont Crossing and Eastview Terrace respectively. ECC/HANH is converting 244 LIPH units at Farnam Courts in a multi phase redevelopment. The first phase resulted in 57 new RAD units at Fair Haven and 86 new RAD units on site at Mill River Crossing. 144 units of elderly only LIPH units were converted to RAD units at Prescott Bush, Katherine Harvey Terrace, Newhall Gardens and Constance Baker Motley. Also under our portfolio award, it is anticipated that 623 LIPH units will be converted at multiple sites throughout the portfolio during FY19. Finally, a RAD award was received to convert 150 LIPH units at Westville Manor to RAD units.

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?**

There are no proposed changes to the RAD Significant Amendment.

Planned ECC/HANH and Non-ECC/HANH Sources and Uses for Non-Operating/HAP Activities by Development

Community and Economic Development 2019

	FY2019 Project Total	MTW	Ross	RAD Budget
Tenant Service Salaries	$ 1,925,186.00	$ 1,893,686.00	$ 31,500.00	$ -
SEHOP Capital Improvement	$ 50,000.00	$ 50,000.00		
Cares	$ 200,000.00	$ 200,000.00		
Mcqueeney Supportive Services	$ 50,000.00	$ 50,000.00		
Crawford Manor Supportive Services	$ 15,000.00	$ 15,000.00		
Ruoppolo and Fairmont	$ 40,000.00	$ 40,000.00		
Robert T. Wolfe	$ 30,000.00	$ 30,000.00		
William R. Rowe	$ 15,000.00	$ 15,000.00		
Winslow Celentano	$ 15,000.00	$ 15,000.00		
Westville Manor	$ 125,000.00	$ 125,000.00		
McConaughy Terrace	$ 50,000.00	$ 50,000.00		
Valley and Waverly Townhouses	$ 15,000.00	$ 15,000.00		
Katherine Harvey Terrace	$ 4,000.00	$ 4,000.00		
Newhall Gardens	$ 6,000.00	$ -		$ 6,000.00
Prescott Bush	$ 10,000.00			$ 10,000.00
Constance Baker Motley	$ 10,000.00			$ 10,000.00
Farnum Courts	$ 10,000.00			$ 10,000.00
Essex Townhouses	$ 5,000.00	$ 5,000.00		
Scattered Sites	$ 35,000.00	$ 35,000.00		
Quinnipiac Terrace	$ 25,000.00	$ 25,000.00		
Miscellaneous	$ 500,000.00	$ 500,000.00		$ -
Total CED	$ 3,135,186.00	$ 3,067,686.00	$ 31,500.00	$ 36,000.00

Modernization Planned Expenditures MTW 2019

Description	Approved Capital Expenditures FY 2019	Revised Capital Budgets FY 2019	Actual Capital Expenditures During FY 2019 as of 12-31-18	CFP Total	MTW Total	Other Total	Total Estimated Project Cost	Comments
Crawford ADA Storefront & Entry access system Upgrades	$40,000	**$60,000**	$0	$0	$0	$0	$60,000	Project supports MTW goal to further ADA access to our properties by upgrading common areas in existing buildings. Soliciting A&E proposals. Budget increased due to SHPO concerns.
Crawford Fire Panel & Fire Pump	$25,000	**$450,000**	$0	$0	$0	$0	$450,000	Fire alarm panel is at its Estimated Useful Life (EUL), and original budget did not include the now required addressing features for Smoke alarms. Upon review of the site the Fire Pump was observed to be also in need of replacement. Budget increase includes $250K for the Fire Panel and $200K for the Fire Pump.
Crawford Manor Compactor	$110,000	**$0**	$13,875	$0	$0	$13,875	$13,875	Replacement trash compactor installed through Operations; completed.
McConaughy Sewer Replacement, in Phases	$1,439,000	**$100,000**	$0	$0	$0	$0	$5,000,000	Project planned as a phased multi-year project. Project will include camera investigation of the 2 remaining uninspected areas of the site and a Prioritized Work Plan and Specifications. Repairs and replacements will be coordinated with City Engineering and the Greater New Haven Water Pollution Control Authority. Soliciting A&E proposals.
McConaughy Driveways & parking lots; Catch Basin repair	$250,805	**$250,000**	$0	$0	$0	$0	$250,805	In FY18, Operations staff completed paving in 4 McConaughy parking lots. Remaining work being scheduled. Soliciting A&E proposals.

McConaughy Interior Upgrades including Continuation of Furnace & Hot Water Heater Replacement, in Phases	$212,500	**$2,877,000**	$0	$0	$0	$0	$2,877,000	Furnace & hot water heater replacement project being implemented in phases. 66 apartments completed in prior funding years; 135 units are to be completed improving energy efficiency and resident comfort. Soliciting A&E proposals.
Westville Manor ACM Abate bathrooms	$30,000	**$14,626**	$7,307	$7,307	$0	$0	$30,000	Operations is providing work for subfloor and flooring replacement, as needed. CFP Funding is addressing abatement only. Completed 60 & 27 Wayfarer. Anticipated number of bathrooms needing repairs is 15. Operations will fund the remaining, or defer to RAD.
Westville Manor CO & Smoke Detector Replacement	$33,975	**$0**	$0	$0	$0	$0	$33,975	This Life, Health & Safety Project is being addressed by Operations, in-house.
Westville Manor Dryer Vent Cleaning and Replacement	$33,975	**$0**	$0	$0	$0	$0	$33,975	Life and Safety Project planned to remove a Fire Hazard and provide interior environmental condition improvement. Existing conditions have released Moisture and dust from dryer venting into unit and has lead to mold, rust and moisture build up within the interior of the unit; Operations is addressing by bypassing the duct with an internal filter. The ducts will be addressed with the RAD project.
Lead Testing by Certified Inspector for all scattered site Multi units	$270,064	**$270,064**	$0	$0	$0	$0	$270,064	ECC has been awarded a 2017 HUD Lead Based Paint Grant for $986,260., which was not known at the time of the MTW 2019 Plan. Therefore these funds are now being held for lead property related renovations not covered by the LBP Grant.

Scattered Sites EAST & WEST: Replacement of DHW and HVAC systems	$567,950	**$567,950**	$0	$0	$0	$0	$567,950	Replacing antiquated inefficient oil-fired furnaces & boilers with gas-fired systems in 1-2 family homes saving utility cost, operations time and inconvenience of running out of fuel; Replacing antiquated gas systems with energy efficient new gas fired systems; DHWH and heating systems with low energy efficient systems. Property list being confirmed by Operations. Budget is for 4-5 properties including Hazmat abatement costs.
65 County St. Replace back deck & stairs with rail to the basement David Echols: Replace front decks	$21,000	**$0**	$0	$0	$0	$0	$21,000	Life safety Project to be addressed by Operations.
Scattered Site Multifamily Cornell Scott Pave Driveways, Parking Lots, Striping	$190,000	**$190,000**	$0	$0	$0	$0	$190,000	Paving is beyond its useful life, and is being replaced. Soliciting A&E proposals.
Essex Heating System	$350,000	**$100,000**	$0	$0	$0	$0	$100,000	Re-engineering and replacement of heating system equipment needed to improve energy efficiency and system reliability. Portions of system have already been upgraded, so Scope of work has been reduced. Soliciting A&E proposals.
McQueeney Domestic Hot Water Heater & Storage Tank Replacement	$175,000	**$0**	$0	$0	$0	$0	$175,000	Re-engineer and replace 2 hot water boilers and five storage tanks. To be included in RAD conversion scope of work.
Wolfe Skylight Replacement and Associated Abatement & Repairs	$75,000	**$75,000**	$0	$0	$0	$0	$75,000	Replacement of leaking skylight and roof section and associated water damage and hazardous material abatement. Soliciting A&E proposals.

Agency wide Vacancy Reduction	$100,000	**$31,528**	$31,527.55	$2,238.80	$15,408.75	$13,880.00	$100,000	Hazardous materials abatement completed in 1 unit at McConaughy (116 S Genesee), 1 unit at Westville (70 Lodge), & 3 units at Wolfe (#105, 107, 108). Operations will fund further vacancy work or defer to RAD.
IQC A&E	$100,000	**$250,000**	$4,500.00	$4,500.00	$0	$0	$100,000	A&E consultant firms assist with design & construction management needs agency wide. Budget increase due to the multiple project needs.
IQC Environmental	$100,000	**$250,000**	$21,944.00	$21,944.00	$0	$0	$100,000	Environmental consultant firms assist with potential hazardous materials testing, preparation of scopes and abatement monitoring needs agency wide.Budget increase due to the multiple project needs.
Administration Salaries-Benefits (CFP only)	$253,111	**$295,000**	$73,028.51	$73,028.51	$0	$0	$295,000	Covers portion of 3 staff salaries & benefits to support CFP activities.
Prior year activity: RAD Portfolio Conversions A&E/Environmental	$0	**$7,636**	$7,636.00	$7,636.00	$0	$0	$3,100,000	CFP funds committed to supplement multiple public and private funding resources for RAD conversion of 761 LIPH units to PBV. $1,115,415 of CFP spent in FY 2017; $967,818.76 spent in FY 2018. RAD conversion enabling ECC to improve quality of housing that could not be upgraded with annual CFP allocation alone.
CFFP Bond Debt	$773,800	**$837,963**	$0	$0	$0	$0	$837,963	Post defeasance bond debt higher than planned at $837,962.50 for FY 2019 in accordance with HUD repayment schedule. Payments are made in March and September.
Total	**$5,151,180**	**$6,626,766**	**$159,818**	**$116,654**	**$15,409**	**$27,755**	**$14,681,607**	Total of Revised Capital Budget exceeds HUD CFP FY19 funding as projects are anticipated to span multiple funding years. Projects will be prioritized based on Life Safety, Energy Efficiencyand REAC goals and priorities

Development Costs

Glendower Group

	FY 2019 Project Total	Capital Grants	MTW	DECD	Developer Fees	Other	Tax Credit Equity	DOH	Bank Loan	Est Total Project Cost
Development										
Farnam Courts Phase II- RAD	$ 53,381,755.00		$ 5,000,000.00	$ 5,000,000.00		$ 8,989,514.00	$ 16,939,466.00	$ 6,500,000.00	$ 14,452,775.00	$ 53,381,755.00
Valley Townhouses RAD	$ 23,719,718.00		$3,586,463		$500,000	$6,722,100	$7,319,740		$5,591,415	$ 23,719,718.00
Waverly Townhouses RAD	$ 9,196,504.00		$ 1,005,000.00				$ 3,250,000.00		$ 4,941,504.00	$ 9,196,504.00
Constance Baker Motley RAD	$ 10,636,572.00		$ 2,475,785.00				$ 5,231,893.00		$ 1,928,894.00	$ 10,636,572.00
Chamberlain Courts RAD	$ 957,460.00		$ 107,460.00						$ 850,000.00	$ 957,460.00
Fulton Park RAD	$ 2,361,240.00		$ 950,000.00						$ 1,411,240.00	$ 2,361,240.00
Katherine Harvey Terrace RAD	$ 2,697,053.00		$ 1,027,420.00				$ 871,045.00		$ 798,588.00	$ 2,697,053.00
Newhall Gardens RAD	$ 4,314,638.00		$ 1,509,910.00				$ 1,719,035.00		$ 1,085,693.00	$ 4,314,638.00
Prescott Bush RAD	$ 5,597,848.00		$ 1,100,750.00				$ 3,343,782.00		$ 1,153,316.00	$ 5,597,848.00
Robert T. Wolfe RAD	$ 11,763,337.00		$ 1,182,993.00				$ 6,270,818.00		$ 3,309,526.00	$ 11,763,337.00
Winslow-Celentano RAD	$ 8,776,073.00		$ 3,023,163.00				$ 2,419,300.00		$ 3,233,610.00	$ 8,776,073.00
Matthew Ruoppolo Manor RAD	$ 13,086,651.00		$ 2,466,151.00				$ 6,520,500.00		$ 4,100,000.00	$ 13,086,651.00
Fairmont Heights RAD	$ 11,671,276.00		$ 1,028,000.00				$ 5,776,380.00		$ 4,866,896.00	$ 11,671,276.00
McQueeney Towers RAD	$ 18,472,149.00	$ 1,000,000.00	$ 1,316,688.00				$ 10,098,141.00		$ 6,057,320.00	$ 18,472,149.00
Westville Manor- RAD	$ 100,000.00		$ 100,000.00							$ 100,000.00
Rockview Phase II	$ 34,542,065.00		$ 2,943,483.00				$14,412,582	$5,600,000	$11,586,000	$ 34,542,065.00
Rockview Community Center	$ 100,000.00		$ 100,000.00							$ 100,000.00
GAP Financing	$ 1,500,000.00		$ 1,500,000.00							$ 1,500,000.00
Total Development Projects	$ 212,874,339.00	$ 1,000,000.00	$ 26,836,803.00	$ 5,000,000.00	$ 500,000.00	$ 15,711,614.00	$ 62,440,360.00	$ 12,100,000.00	$ 48,189,362.00	$ 212,874,339.00

PBV

PBVs	2018	2018 MTW Expenditure	2018 Voucher cost	2019	2019 MTW Expenditure	2019 Voucher cost
Currently under HAP			$39,004,301.33			$39,784,387.36
HANH overhead			$10,000,000.00			$10,200,000.00
PreDevelopment Loans						
Fellowship Place I	18	$ 113,479		18	$115,748	
Fellowship Place II	5	$ 49,244		5	$50,229	
Cornerstone	4	$ 41,464		4	$42,293	
NHR-Norton Ct	12	$ 89,187		12	$90,970	
Cedar Hill	4	$ 29,467		4	$30,056	
West Village	15	$ 139,692		15	$142,486	
PBV QT Phase 1	23	$ 368,336		23	$375,703	
PBV QT Phase 2	23	$ 371,603		23	$379,035	
PBV QT Phase 3	16	$ 264,931		16	$270,229	
PBV Eastview Phase I	49	$ 812,597		49	$828,849	
PBV Brookside Phase I Rental	51	$ 596,589		51	$608,521	
PBV Brookside Phase 2 Rental	51	$ 594,979		51	$606,878	

PBV Rockview Phase I Rental	47	$	612,701		47	$624,955	
PBV New Rowe Building	32	$	390,325		32	$398,132	
PBV 122 Wilmot Road	13	$	1,774,140		13	$1,809,623	
PBV Park Ridge	60	$	839,936		60	$856,735	
PBV Frank Nasti Existing	8	$	88,960		8	$90,739	
PBV CUHO Existing	16	$	136,776		16	$139,512	
PBV CUHO New Construction	5	$	80,339		5	$81,945	
PBV Shartenburg	14	$	136,485		14	$139,215	
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon) New Construction	20	$	173,947		20	$177,426	
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)	10	$	84,109		10	$85,792	

Christian Community Action	12	$ 79,845		12	$81,442	
PBV Casa Otonal	17	$ 117,396		17	$119,744	
Residences at Ninth Square	55	$ -		55	0	
Downtown						
Ribicoff						
Ribicoff 4						
Eastview						
Total PBV	580	7,986,527	$49,004,301.33	580	8,146,257	$49,984,387.36

Initiatives Requiring MTW Funding Flexibility Only

Vacancy Reduction

This initiative was implemented in FY2008.

ECC/HANH will continue to show improvement from the baseline FY2008 vacancy rate of 10%. Efforts will continue during FY 2019. ECC/HANH currently uses the funding flexibility to perform more unit turn over to maintain an Occupancy percentage of 96%. The Agency has set a standard of unit turns by bedroom size. Typically a 0 or 1 bedroom unit turn should occur within a 5 week period. A larger 3-5 bedroom unit may take several weeks particularly if hazardous materials (asbestos/lead) have been found in the unit. Funding allows the Agency to bulk, abate hazardous materials, renovate the unit and manage all administrative functions supporting vacancy reduction. The metrics for this initiative will be reevaluated during FY 2019.

Resident Owned Business Development

This initiative was approved and implemented in FY2009.

ECC/HANH continues to strengthen Resident Owned Business (ROB) Development by providing technical assistance; business and financial capacity assessments; business entity formation, development of business plans, business conduct; bookkeeping and financial management; obtaining liability insurance; licensing, understanding the bonding process and other business growth training and supports. ECC/HANH ROB services cover both construction and non-construction Section3 ROBS/Vendors.

Under this program ECC/HANH serves residents that start their own businesses by providing technical assistance services. ECC/HANH support includes the following:

- Provide assistance in the outreach, recruitment, and potential contractor's capacity assessment.
- Provide a computerized database for Section 3, MBE, WBE and other small businesses to access for potential contract opportunities. Provide computer access for Resident Owned Businesses ("ROBs") to obtain information on construction contract advertisements and communicate with other owners regarding potential contracting opportunities.
- Provide one on one consultation with Resident Owned Businesses once a week.
- Provide quarterly training workshops for participants that will assist Resident Owned Businesses in gaining a better understanding of ownership and basic business tools required to successfully operate a newly formed business. This will include, but is not limited to, instructional training in business plans development and business conduct, OSHA 10, bookkeeping and clerical, financial and payroll management, contract negotiating and cost estimating skills.

ECC/HANH continues to provide a revolving loan fund to which ROBs may apply for loans up to $25,000 by submitting a bona fide business plan and letter of intent for a pending contract award option. The prerequisites for the loan program is; 1) only ECC/HANH Resident Owned Business Concerns may apply for the revolving loans; and 2) the business' Principal must commit to enrolling into ECC/HANH's Family Self Sufficieny Program ("FSS"). FSS has been designed to work specifically with participants on basic personal financial capability skills such as workshops on credit, basics of banking, budgeting, saving, and insurance. Loan applications are reviewed by an ECC/HANH loan committee. Loan repayments are scheduled over a 12 month period. A total of $250,000 in MTW flexible funds are dedicated to the Revolving Loan Fund.

The ROBs are based on resident areas of interest and have included services in the construction trades, food truck operation, child care, transportation, and consulting areas.

There are currently 7 Resident Owned Businesses. In 2019, ECC/HANH will be working to add more businesses to the ROB portfolio by completing additional outreach and providing more information to the residents of ECC/HANH.

For FY 2019 ECC/HANH does not anticipate any changes to the initiative, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

SEHOP Capital Improvement Program

ECC/HANH launched the SEHOP (Section Eight Homeownership Program) Capital Improvement Program in FY2010.

This program supports new homeowners with necessary capital improvements costing $500.00 or more that arise after being in the home for a minimum of three years. In reviewing this inititiave, ECC/HANH has determined that the need for this service is low. Families are purchasing homes with newer systems, roofs and windows; making it less likely for families to request assistance. ECC/HANH is closing and phasing out this initiative. Only those with a current contract will have access to the program until the contract expires, or program participation ends.
Meanwhile the metric CE#1 will be replaced with SS#7 since the issue of savings can be better addressed with SS#7.

Prison/Community Reentry

This initiative was approved in FY2009 and implemented in FY2010.

Under this program ECC/HANH serves individuals who have reentered society after completing a prison sentence. ECC/HANH offers mentoring, training and housing for individuals that qualify for this program. ECC/HANH reentry program candidates are referred by the City of New Haven. ECC/HANH interviews candidates immediately following referral, assessing not only their needs, but their strengths and the challenges they will likely face as they work to rejoin the community. Upon acceptance to the program, participants sign a one-year lease, affording them housing while they work toward their reentry goals. The goals are identified in an individualized service plan. Participants who suffer with a mental health illness and/or a substance use/abuse disorder must be compliant with treatment and employed or in a training program. They must also comply with probation or parole requirements. After one year, progress is assessed. Participants who have successfully achieved their individual service plan goals complete the program and are eligible to remain in housing. Individuals who have not met their service plan goals by the one-year mark can remain in the program as they continue to work toward their goals. Individuals participating in the program are expected to be lease compliant i.e. pay rent on time and will not be a nuisance to other residents.

ECC/HANH's reentry program activities include the following elements:
When the Reentry Program was initiated in June 2010, ECC/HANH had established a preference for a maximum of 12 Low Income Public Housing units for individuals returning to the community from prison. The program's maximum capacity is now at 16 housing units. Since the program's inception, the agency has been faced with difficulties housing many of the applicants referred to us by the agency tasked with managing the referrals . Unfortunately, the current housing portfolio does not include many units for 1 person, non-disabled/non-elderly households. Shifting focus on 2+ family households will help ECC/HANH meet the requirements of the reentry program as currently written.
All workable families will be required to engage with our Self Sufficiency unit. This unit will refer the families to the community partners that offer specialized training for our families to increase their employability which in turn fosters movement toward increased income and self-sufficiency. Families will also be paired with career mentors to provide other supports to the families (i.e.: information about transitioning from student to employee; after school care for children with homework help, etc).

For FY 2019 ECC/HANH does not anticipate any changes to the initiative, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

Resident Services for Elderly/Disabled

This initiative was approved and implemented in FY2005. No amendments have been made.
Under this program ECC/HANH serves individuals who are elderly and/or disabled.

ECC/HANH offers a full array of self-sufficiency services that require flexibility in the use of ECC/HANH's dollars to fund staff and contractual costs associated with mental health and substance abuse services provided on site in ECC/HANH's mixed population developments. These services include, but are not limited to: Individual Psychosocial assessments, coordination of services, visiting nurses, home health aides, occupational therapist, provision of education regarding nutrition, exercise, mental health and substance abuse, engagement and outreach, skill building regarding housekeeping, financial literacy, recreational services, and crisis intervention.

On average each RSC will have a caseload of about 340 residents; case workers assess the participant's needs, and create action plans for each individual, and depending on the level of need, meet with the residents as often as weekly to bi-monthly. Participants receive services specific to their needs. The program is geared toward keeping the residents in their units, and in the community by assisting them with coordination of lease compliance and accessing programs, & health services in the community. The team is also providing the services of a MSW to all the senior and disabled buildings. As a result of providing these services to our residents, we have seen a higher rate of residents remaining in the community indefinitely.

For FY 2019 ECC/HANH does anticipate changes to the metrics. SS#3 is not a goal of this initiative. Rather, this initiative aims to decrease health care costs, and increase the ability of residents to continue to live independently. This initiative meets the statutory objective of increasing family self-sufficiency.

ECC/HANH Believes

ECC/HANH believes that all children can achieve excellence. ECC/HANH incorporates youth outcomes among our core goals and invest in the future of our families and in so doing; we build new, vibrant middle class in New Haven. HANH believes is designed to assist students in achieving academic excellence, to support parents as they engage in their children's education, and to help avail postsecondary opportunities to ECC's young people. This program amplifies a variety of youth programming to residents and has strong partnerships with the New Haven Public Schools and other community partners. The ECC/HANH believes program offers robust services that will increase students' academic success, and has worked to instill a culture of high academic expectations for ECC/HANH students, parents, and staff.

Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities

This initiative was approved and implemented in FY2017. ECC/HANH has initiated the planning and formation of new affiliate-instrumentality entities to support the Agency's short term and long term plans to establish a new corporate structure, better align revenues and provide more coordinated and effective services to residents. These new instrumentality entities will be vehicles for ECC/HANH to partner with financial institutions and other investors to continue to redevelop and modernize ECC's portfolio or properties and support the agency's mission of creating and preserving affordable housing opportunities and supportive services for low income and working families, the elderly and persons with disabilities. The business activities of these instrumentality entities will include, but may not be limited to, the provision of property management and consultant services, development of mixed use and mixed income real estate projects, and direction of social services and program activities for ECC/HANH owned and non-owned developments.

ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness, increasing family self-sufficiency, and increasing housing choice.

Major Redevelopment Initiatives

Completed projects to date include:

Development Name	PH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units
Eastview Terrace	0	102	102	0	102
Quinnipiac Terrace I	58	23	81	0	81
Quinnipiac Terrace 2	56	23	79	0	79
Quinnipiac Terrace 3	17	16	33	0	33
Brookside Phase I	50	51	101	0	101
Brookside Phase II	50	51	101	0	101
Rockview Phase I	30	47	77	0	77
William T. Rowe	46	32	78	26	104
Wilmont Crossing	0	47	47	0	47
Monterey Place 1[1]	0	42	42	0	42

Monterey Place 2	0	7	7	0	7
Monterey Place 3	0	45	45	0	45
Monterey 4	0	42	42	0	42
Monterey 5	0	17	17	0	17
Monterey Phase 2R	0	28	28	0	28
William Griffin	0	4	4	0	4
Edith Johnson Towers	0	95	95	0	95
Twin Brook	0	94	94	11	105
Farnam Courts Phase I onsite	148	86	86	8	94
Farnam Courts-Fair Haven	0	57	57	0	57
Farnam Court Phase II onsite	92	87	87	24	111
Total	455	939	1303	69	1261

Major Redevelopment Efforts at West Rock (Previously Included Initiative 1.13)

ECC/HANH received HUD approval to dispose of the Brookside property in FY2010. ECC/HANH requested approval of disposal of Rockview in FY2012. Per HUD direction, Initiative 1.13 was folded into this Section V description since only single fund flexibility was required.

This project includes Brookside Phase I and II, Homeownership, 122 Wilmot and Rockview. During FY 2014, the Rockview Rental Phase I was completed and leased-up.

The West Rock revitalization is a project to redevelop two obsolete Public Housing developments, Rockview Terrace and Brookside, and one additional parcel that previously contained a commercial building. The 491 Public Housing units and the retail building that have stood on the three sites will be replaced with a mix of Project-Based Section 8/LIHTC rental, Public Housing/LIHTC rental and affordable homeownership housing totaling 472 units, along with 8,987 square feet of retail space at the 122 Wilmot site. The rental units will consist of 392 units, 352 family townhouse units and 40 senior units in a mid-rise building. The homeownership component will consist of 38 units.

The project will be carried out in multiple phases. The revitalization of the Brookside site will consist of two rental phases and one homeownership phase. The revitalization of the Rockview site will be carried out in two rental phases and two homeownership phases. The estimated cost of the revitalization of all three sites is $150-$200 million.

ECC/HANH has partnered with Michaels Development Company, a nationally known developer of affordable housing with a large portfolio, to redevelop the Rockview and Brookside public housing sites. Brookside, Rockview and the commercial space located at 122 Wilmot Road have all been demolished. During FY 2010, construction began on the infrastructure necessary for the Brookside rental and homeownerships phases.

The redevelopment of Rockview, Brookside and Wilmot Road are all part of ECC/HANH's MTW Plan. ECC/HANH's goals in undertaking the project are to replace the blighted public housing developments and commercial building on the three sites with high-quality, well-designed residential and commercial units, provide upgraded affordable rental and homeownership opportunities to residents, improved essential services to residents and improve the quality of the surrounding neighborhood and integrate it more fully into the surrounding city.

In FY2014, Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmont Road had been combined into this initiative. The following few paragraphs describe the additional activities formerly included in Initiative 1.13.

The Glendower Group, Inc., or an affiliate thereof, has developed a mixed-use facility at 122 Wilmot Road in accordance with 24 CFR 941, Subpart F and ECC/HANH's MTW Agreement Attachment C, Section 14 of the Amended and Restated MTW Agreement. The 122 Wilmot Road is a part of the West Rock Redevelopment efforts of ECC/HANH. The mixed-use facility will provide for the Glendower Group Inc., or an affiliate thereof, an opportunity to develop one or more cooperative ventures to facilitate economic growth and create wealth in the West Rock community.

During FY2013, Glendower began a new initiative to provide for working capital to cooperative corporations through the purchase of shares which may also entail the making of loans to the cooperative corporations. These cooperative ventures will serve the West Rock community that includes the following ECC/HANH developments: Brookside I, Brookside II, Rockview I, Ribicoff Cottages and Extension, Westville Manor, McConaughy Terrace, 122 Wilmot Road, Valley and Waverly Townhouses.

In FY2014 ECC/HANH/Glendower continued to outreach to the community for businesses that would be interested in being housed in the Crossings at Wilmont Road and started to explore the feasibility of a cooperative venture being housed in the facility.

In FY2015, ECC/HANH/Glendower closed on the redevelopment of Ribicoff Cottages and Ribicoff Cottages Extension.

The Authority successfully completed Brookside Phase 1, Brookside Phase 2, Rockview Phase 1, and Brookside Homeownership. The Authority closed on the Ribicoff 4% and Ribicoff 9% development deals. Ribicoff 9% was occupied in December 2015 and Ribicoff 4% was occupied in the spring of 2016. The Rockview Phase II development will be an off-site component of the Westville Manor redevelopment. The Authority applied for a 9% tax credit application in November 2016 with a closing planned for Fall of 2018. This redevelopment effort will also include the redevelopment of the community center.

The following table shows which MTW initiative was utilized in each redeveloped property.

Buildings			**Redevelopment**	
Site	**Completed Construction**	**Lease up**	**TDC HCC Limits**	**PBV and Income**
122 Willmot Rd (WestRock)	10/31/2013	12/31/2013	x	x
Brookside Phase I (WestRock)	8/10/2012	7/23/2013	x	x
Brookside Phase II (WestRock)	11/1/2012	2/1/2013	x	x
Rockview Phase I (WestRock)	12/31/2013	2/28/2011	x	x
Ribicoff Cottage 9%	12/1/2015	12/30/2015	x	x
Ribicoff Cottages 4%	February 2015	April 2016	x	x
Rockview Phase 2	Preparing for financial closing by 9/18	Jannuary 2020	x	x
Valley Townhouses	Preparing financing	December 2020	x	x
Westville Manor	Under Design	N/A	X	x

Fulton Park Modernization

This initiative was approved in FY2011, placed on hold in FY2012, and was reactivated in FY2016. This development is included in the RAD conversion for FY2016. The Authority completed a RPCA and submitted a RAD application on 10.9.2015 for the rehabilitation of Fulton Park. The Authority received RAD approval in spring of 2016 and is in the process of converting. ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing cost effectiveness and increasing housing choice.

Initiative 1.8- Farnam Court Transformation Plan

This initiative was approved in FY2011 and was implemented in FY2012.

The Authority has conducted a community planning process regarding the redevelopment of this obsolete 240 unit housing development. This development's design lacks energy efficiency, positive urban design standards and has contributed to on-going crime issues in the area. It is surrounded by areas that are thriving or undergoing transformation and re-design of this property can better link it to its surroundings helping to create access and opportunity for residents. Farnam Court has been approved for conversion of the ACC units under the Rental Assistance Demonstration Program award.

As part of the transformation plan, ECC/HANH is proposing not only a redevelopment of the housing units at Farnam Court but transformation of the surrounding community into a community that supports the long term economic sustainability of our residents, as well as the long term economic sustainability of the City of New Haven along the Grand Ave./Mill River corridor. Through collaboration with other community partners, including the Economic Development Corporation, City of New Haven, the Board of Education and many more, the Authority anticipates to redesign the infrastructure to create more traffic flow through the community, redesign the housing units to be more spacious, remove barriers that individuals and families are facing by providing supportive services, and other critical components as they arise throughout the planning process. The supportive services may include, but are not limited to improved access to jobs, high quality early learning programs, public assets, public transportation, and high quality public schools and education programs. Additionally, the redevelopment will introduce market rate units.

Farnam Court will replace 240 units of housing originally built in the 1940s and most recently improved in the 1980s. The redevelopment will occur in phases resulting in 228 replacement units and introducing market rate units as well. The redevelopment includes new roads, streets, infrastructure, and utilities funded through a City of New Haven $8 million capital investment. The project will reconnect the Farnam Court neighborhood with the Grand Ave corridor and the vital Downtown and Wooster Square neighborhood. It also links to the Mill River neighborhood; a source of job opportunities.

<u>Farnam offsite –</u> Fair Haven consists of 57 units financed through 9% Low Income Housing Tax Credits. The 57 units exists on two sites located in the Fair Haven neighborhood, an area undergoing significant re-investment. The Chatham site includes 32 assisted units (Rental Assistance Demonstration Program). The Eastview Terrace Phase II site includes 23 RAD assisted units and two Project Based Assisted units. This development is completed and fully occupied.

<u>Farnam Court Phase I –</u> on site will involve the demolition of 148 units. These will be replaced with 2 mid-rise 5 story buildings housing 94 units --86 assisted and 8 market rate units situated on 1.1 acres. Additionally these buildings will house 7,400 sq. feet of commercial and community/program space. The community space will support a vibrant comprehensive economic self sufficiency program. This project is being financed through LIHTC 4% Bonds, a $4 million State of CT CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars and private equity. This development is completed and fully occupied.

<u>Farnam Court Phase II- on site</u> will include the demolition of the remaining 92 units and construction of 111 units -87 RAD assisted and 24 market rate units and a 3,600 sq. feet community center and park.

Under ECC/HANH's MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program. ECC/HANH will apply local TDC design standards, PBV income tiering and MTW Rent Standards that allow ECC/HANH to approve exception rents. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% without prior HUD approval. ECC/HANH will reexamine its MTW Rent Standards monthly to ensure that

ECC/HANH does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, tenant rent payments to landlords, and any utility allowance amounts.

ECC/HANH does anticipate changes to the metrics to remove REAC Scores and replaced with the Number of Work Orders and Emergency Work Orders. This initiative meets the statutory objective of increasing housing choice.

Westville Manor Transformation Plan

This initiative was approved in FY2014 and implemented in FY2016. It is the intent of the Authority to redevelop the Westville Manor development in the West Rock neighborhood pursuant to RAD or mixed-finance. With ECC/HANH investing in the redevelopment of Brookside Phase I and II, Rockview, 122 Wilmot Road and Ribicoff Cottages and Extension, the only remaining obsolete low income public housing development remaining in the West Rock community is Westville Manor. Westville Manor is a 150 unit family development with site, design and infrastructure issues that lend itself to a mixed finance redevelopment or RAD conversion and redevelopment. This transformation plan will include replacement units on the Westville Manor site as well as the Rockview Phase II parcel (Initiative 1.15) and the redevelopment of the West Rock Community Center located at 295 Wilmot Road.

Master planning for the redevelopment of this site into a mixed income and if feasible, a mixed-use community with rental and homeownership options is in process. Master planning may also result in the acquisition of available adjacent parcels to incorporate in the Westville Manor redevelopment.
ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. ECC/HANH will propose to combine Initiative 1.15 and 1.17 as they represent the collective Westville Manor Transformation Plan. This initiative meets the statutory objective of increasing housing choice.

Following activities that only required MTW funding flexibility have been closed:

Cap on Project-Based Units in a Project

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
Cap on Project-Based Units in a Project was implemented FY2010. This initiative was closed out in FY2012 and reported as closed in the MTW 2012 Report.

2. Provide the year the activity was closed out.
This activity closed out in FY2012 and was replaced by the initiative "Increase the Allowed Percentage of Project Based Units under Section 18 of the Housing Act of 1937 from 75 percent to 100 percent".

3. In the year the activity was closed out provide the following:
Subsequent approvals of the initiative "Increase the Allowed Percentage of Project Based Units under Section 18 of the Housing Act of 1937 from 75 percent to 100 percent" have made this initiative unnecessary. See Initiative 1.9 - Increase Cap on PBV units from 75 percent to 100 percent, the analysis of which is reported in this document in the Redevelopment section. No further analysis will be developed in this section.

i. Discuss the final outcome and lessons learned.
n/a

ii. Describe any statutory exceptions outside of the current MTW flexibilities that might have provided additional benefit for this activity.
None identified.

iii. Provide a summary table, listing outcomes from each year of the activity (since the execution of the Standard MTW Agreement).
n/a

iv. Provide a narrative for additional explanations about outcomes reported in the summary table. n/a

To: Board of Commissioners

From: Karen DuBois-Walton, Ph.D., Executive Director

Date: June 19, 2018

RE: Approval of MTW Annual Plan for FY 2019

ACTION:	Recommend that the Board of Commissioners adopt Resolution #06-61/18-S
TIMING:	Immediately.
DISCUSSION:	
	As a MTW agency, ECC/HANH is required, to provide an Annual MTW Plan and an Annual MTW Report. The MTW Annual Plan for FY 2019 was made available for public review on May 1, 2018; copies were made available on the Elm City Communities Website and at 360 Orange Street Reception area. The public hearing was held on June 4, 2018; No public comments were received. ECC/HANH submits for Board approval the MTW Annual Plan for Fiscal Year 2019. We request the Board's authorization for the Executive Director to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Plan for FY 2019 and all related or required certifications and HUD forms, of which the attached document is a part, as well as all necessary documentation and submissions of the Plan.
FISCAL IMPACT:	None.
STAFF:	Leasley Negron, Performance Auditor Office of Strategy, Policy and Innovation

Housing Authority of the City of New Haven

Resolution #06-61/18-S

APPROVING ECC/HANH'S MTW ANNUAL PLAN FOR FY 2019

WHEREAS, ECC/HANH is required, to provide an Annual MTW Plan and an Annual MTW Report; and

WHEREAS, The MTW Annual Plan for FY 2019 was made available for public review on May 1, 2018 and a public hearing was held on June 4, 2018; and

WHEREAS, ECC/HANH received no public comments; and

NOW, THEREFORE, BE IT RESOLVED THAT THE BOARD OF COMMISSIONERS hereby authorizes the Executive Director to submit to the U.S. Department of Housing and Urban Development (HUD) the Moving to Work Annual Plan for FY 2019 and make the following certifications and agreements with 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, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.

(21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present on June 19, 2018.

Karen DuBois-Walton
Secretary/Executive Director

6/26/18
Date

REVIEWED:
BERCHEM MOSES PC
GENERAL COUNSEL

By:
Rolan Joni Young ~~Smith~~, Esq.
A Senior Partner

Certificate of Compliance

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 Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning **10/01/2018**, 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).

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(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

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Elm City Communities, Housing Authority New Haven	CT004
MTW PHA NAME	***MTW PHA NUMBER/HA CODE***

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

Erik Clemons	Chairman
NAME OF AUTHORIZED OFFICIAL	***TITLE***
Erik Clemons	6/27/2018
SIGNATURE	***DATE***

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

Documentation of Public Hearing and Public comment Period

Elm City Communities, The Housing Authority of New Haven
Public Hearing: FY 2019 MTW Plan
Monday, June 4, 2018 @ 4:00 P.M.
360 Orange Street, New Haven, CT 05511

Those present included:

Leasley Negron, ECC/HANH
Catherine Hawthorne ECC/HANH
Evelise Ribiero ECC/HANH
Latoya McCrea ECC/HANH
Maribel Aguilar ECC/HANH

The public hearing was called to order at 4:00 p.m. by Leasley Negron.

Ms. Negron read the legal notice aloud which stated the reason the public hearing was being called.

This public hearing is for the first amendment to the Elm City Communities, Housing Authority of the City of New Haven's ECC/HANH's) 2019 Moving to Work Plan.

Section V(B) of the Authority's Moving to Work Agreement requires that before the Agency can file an amendment to the Annual Moving to Work Plan with the U.S. Department of Housing and
Urban Development fthe "HUD") , it must conduct a public hearing, consider comments from the public on the proposed amendments, and obtain approval from the Board of Commissioners.

Pursuant to said Section, a public hearing is scheduled for Monday, June 4 at 4:00 PM, in the 3rd floor Board of Commissioners Conference Room located at 360 Orange Street, New Haven, CT 06511.

A copy of the plan will be made available for review starting Monday, May 1, 2018 on the Authority's website at www.elmcitycommunities.com and will be available for pick up at the front desk in the main lobby area at 360 Orange Street.

The public is invited to provide written comments addressed to ECC/HANH MTW 2019 Plan Amendment, Attn: Maza Rey, P.O. Box L972, New Haven, CT 06509-1912.

Any individuals requiring a reasonable accommodation to participate in the hearing should call Teena Bordeaux, Reasonable Accommodations Coordinator for ECC/ HANH at 498-8800
extension 1507 or at the TDD Number 497-8434.

At 4:00 p.m., the meeting was opened to take public comments.

Public Comments:

There were no attendees from the public and there were no public comments.

Adiournment:

Ms. Negron thanked the participants and the public hearing was adjourned at 4:15 p.m.

Progress on correction and elimination of observed deficiencies cited in monitoring visits, physical inspections, or other oversight and monitoring mechanisms

ECC/HANH is subject to no outstanding compliance issues related to prior Voluntary Compliance Agreements.

ECC/HANH has submitted a corrective action plan to HUD with regard to the collection of Tenant Accounts Receivables. This was submitted on May 2, 2016. Consistent progress has been made on reducing the TAR.

Results of Agency Directed Evaluations of Demonstration

ECC/HANH has contracted with Enterprise Community Partners to position the agency for a future evaluation of its MTW program and each of its initiatives. Enterprise has completed the first year of a three-year contract to complete ECC/HANH's MTW Plans and Reports each year and has coordinated with ECC/HANH's data collection software provider for optimal data collection. Enterprise has provided data collection recommendations to ensure ECC/HANH is collecting data for metrics to support proper reporting and support a future evaluation.

Lobbying Disclosures

Disclosure of Lobbying Activities (SF-LLL)
Certification of Payments (HUD-50071)

Appendix 1

ECC/HANH's local total development cost (TDC) limits as approved by HUD.

The following pages detail ECC/HANH'sAlternate TDCs.

HUD HCC 2013								
		0	**1**	**2**	**3**	**4**	**5**	**6**
Detached		$ 96,195	$ 122,916	$ 144,239	$ 170,801	$ 200,549	$ 219,593	$ 237,542
Row House		$ 78,165	$ 102,750	$ 121,542	$ 148,120	$ 176,091	$ 194,147	$ 211,074
Walk Up		$ 71,663	$ 97,219	**$ 123,709**	$ 161,949	$ 201,180	$ 226,579	$ 251,643
Elevator		$ 81,545	$ 114,163	$ 146,781	$ 195,708	$ 244,635	$ 277,253	$ 309,871
HUD HCC FACTORS								
		0	**1**	**2**	**3**	**4**	**5**	**6**
Detached		-33.31%	-14.78%	16.60%	18.42%	39.04%	52.24%	64.69%
Row House		-35.69%	-15.46%	-1.75%	21.87%	44.88%	59.74%	73.66%
Walk Up		-42.07%	-21.41%	0.00%	30.91%	62.62%	83.16%	103.42%
Elevator		-44.44%	-22.22%	0%	33.33%	66.67%	88.89%	111.11%
ECC/HANH HCC 2013								
		0	**1**	**2**	**3**	**4**	**5**	**6**
Detached		$ 145,318	$ 185,685	$ 217,896	$ 258,023	$ 302,962	$ 331,731	$ 358,846
Row House		$ 118,081	$ 155,221	$ 183,609	$ 223,759	$ 266,014	$ 293,290	$ 318,861
Walk Up		$ 108,259	$ 146,866	$ 186,882	$ 244,651	$ 303,915	$ 342,285	$ 380,149
Elevator		$ 109,828	$ 153,759	$ 197,690	$ 263,587	$ 329,483	$ 373,414	$ 417,346
HUD TDC 2013								
		0	**1**	**2**	**3**	**4**	**5**	**6**
Detached		$ 168,342	$ 215,103	$ 252,419	$ 298,901	$ 350,961	$ 384,288	$ 415,699
Row House		$ 136,788	$ 179,813	$ 212,699	$ 259,210	$ 308,159	$ 339,757	$ 369,380
Walk Up		$ 125,410	$ 170,134	$ 216,490	$ 283,411	$ 352,064	$ 396,513	$ 440,376
Elevator		$ 130,472	$ 182,661	$ 234,850	$ 313,133	$ 391,416	$ 443,605	$ 495,794

ECC/HANH TDC 2013

	0	1	2	3	4	5	6
Detached	$ 228,356.69	$ 291,789.97	$ 342,408.21	$ 405,464.41	$ 476,082.62	$ 521,291.12	$ 563,900.08
Row House	$ 185,556.06	$ 243,917.71	$ 288,527.99	$ 351,621.68	$ 418,022.08	$ 460,885.17	$ 501,067.76
Walk Up	$ 170,120.98	$ 230,789.37	$ 293,672.84	$ 384,451.85	$ 477,581.46	$ 537,876.94	$ 597,377.37
Elevator	$ 178,470.14	$ 249,858.09	$ 321,246.04	$ 428,328.23	$ 535,410.42	$ 606,798.37	$ 678,186.32

PERCENT CHANGE ECC/HANH TDC 2008-2013

	0	1	2	3	4	5	6
Detached	15.00%	13.00%	10.73%	9.54%	9.11%	9.20%	8.94%
Row House	1.50%	2.94%	2.73%	5.14%	6.20%	6.94%	7.49%
Walk Up	16.75%	16.65%	17.70%	18.47%	20.73%	21.86%	23.14%
Elevator	10.45%	10.45%	10.45%	10.45%	10.44%	10.45%	10.45%

PERCENT CHANGE COMPARISON HUD TO ECC/HANH TDC

	0	1	2	3	4	5	6
Detached	0.76%	0.74%	0.73%	0.64%	0.72%	0.72%	0.71%
Row House	0.66%	0.67%	0.67%	0.73%	0.69%	0.70%	0.70%
Walk Up	0.76%	0.76%	0.77%	0.79%	0.79%	0.80%	0.80%
Elevator	-0.20%	-0.20%	-0.20%	-0.20%	-0.20%	-0.20%	-0.20%

ECC/ HANH TDC 2017

	0	1	2	3	4	5
Detached	$ 258,686.46	$346,915.00	$420,699.00	$514,164.00	$604,941.00	$660,932.00
Row House	$ 237,989.56	$326,544.00	$397,097.00	$488,020.00	$579,524.00	$638,384.00
Walk Up	$ 237,989.56	$286,276.00	$363,110.00	$474,222.00	$590,780.00	$665,145.00
Elevator	$ 210,661.90	$294,926.29	$379,191.42	$505,589.28	$631,956.64	$716,250.81

Appendix 2

Local Asset Management Plan:

Under the First Amendment to the MTW Agreement 10-15-08, ECC/HANH is permitted to design and implement its own Local Asset Based Management Program so long as the ECC/HANH and HUD agree that the principles and understanding outlined in the Amendment are adhered to.

- ECC/HANH developed a program wherein Excess Operating Reserves are funded from the General Fund Account and will be used to cover deficits through a journal voucher once per year to ensure that the transfer of funds from the General Fund to a project to cover any operating deficits are reflected on the income and expense statement of the project.
- ECC/HANH uses project-based accounting and project-based budgeting for direct costs incurred by each property.
- ECC/HANH considers its cost allocation plan for the entire operation of the Agency, rather than a strict focus on only the MTW program. This cost allocation plan addresses the larger ECC/HANH operation as well as the specific information required related to the MTW Program.
- All associated activities funded under the MTW Single Fund authority are deemed as a single cost objective. The MTW Program cost objective includes the Asset Management Projects in the public housing program, housing choice vouchers – both project-based and tenant-based vouchers, development activities funded from MTW, resident services, case management services, capital fund program, and any other activity that is permitted under the Amended and Restated MTW Agreement.
- ECC/HANH's proposed cost allocation system is more comprehensive than HUD's Asset Management System, which is a fee-for-service approach specific to the asset management projects in the public housing program. In consideration of ECC/HANH's other programs such as business activities, ECC/HANH's proposed LAMP addresses much broader than public housing properties and includes the entire ECC/HANH operation.
- ECC/HANH will use a simple fee system of charging up to 10% of the project/program funds to cover the costs of the Central Office Cost Center (COCC). ECC/HANH views the up to 10% fee as reasonable when compared to the fees earned for administering other programs or non-profit affiliates.

Proceeds from the energy performance contracts and other non-federal sources to support project operations are not reflected in the operating statements for each project. The COCC operates on the allowable fees as described above. ECC/HANH systematically reviews information regarding the financial, physical and management performance of each project and identifies non-performing assets. All non-performing assets will have a management plan that includes a set of measurable goals to address. During FY 2009, ECC/HANH conducted an updated Physical Needs Assessment for each project. The work was completed in FY2010 and was fully reported in the FY10 report. Finally, ECC/HANH has implemented a Risk Management Program in accordance with §990.270.

The market demands have driven costs higher, but the Authority has been and will continue to be a good steward of public resources. The TDC cost limitations derived from (1) construction cost data obtained from RS Repair and Modeling Cost, and (2) an analysis of unit size and construction cost data obtained from a survey of local mixed income developments, and an analysis of other local factors and market conditions affecting the cost of the development of mixed income communities in the local market area.

The Housing Authority has the following developments in its pipeline: Rockview Phase II; Farnam Phase II 4%, Farnam Phase II 9%; Westville Manor Phase I, and Westville Manor Phase II. As it relates to our approved TDC, the aforementioned developments shall not exceed the approved TDC. These developments are in the predevelopment stages, with the exception of Rockview that is in the closing stage. Rockview's TDC aligns more closely with the HUD approved TDCs. This is in large part of not having a significant amount of infrastructure. The Authority continues to work diligently to find creative construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of the approved TDC.

MOVING TO WORK SUFFICIENCY PROGRAM

CARING ABOUT RESIDENT ECONOMIC SELF-SUFFICIENCY (CARES) PILOT PROGRAM FOR WEST ROCK REVITALIZATION INITIATIVES

PROCEDURES FOR PUBLIC HOUSING/HCV PROGRAM

Goals and Objectives of the Program

The Housing Authority of the City of New Haven (ECC/HANH) is a Moving to Work (MTW) Agency. The MTW Program provides MTW Agencies with an opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase affordable housing choices for low-income families. The Agency has been able to use the flexibility provided under the MTW Program to begin implementing a West Rock Revitalization Plan that will provide almost 500 units of housing and appurtenant commercial and community space. To help ensure the long-term success of this investment it is critical that the Agency address the social and economic issues that are vital to long-term sustainable growth in the Community.

The Authority has chosen to implement the CARES program in conjunction with the West Rock Revitalization Plan based upon statistical data from recent needs assessment conducted among the 187 former families of the Brookside and Rockview developments, where 31 residents responded. The results of this assessment show that 35.5 percent of families need job training, 29 percent need day care services and 22.6 percent need employment services. In order to realign the public assistance model and get more residents self sufficient, we need to address the everyday challenges that our current residents are faced with. ECC/HANH anticipates to achieve the largest impact by focusing on a sub-community that is most affected by the societal stigmas. Additionally, the poverty rate for the City of New Haven in 1999 was 24.4 percent as compared to 51 percent for the West Rock residents as a whole and 69 percent for the target residents of this program. Our goals are to increase the number of families in the West Rock community who are achieving household income and self-sufficiency to be able to attain a market rate unit or other affordable housing without assistance.

Eligibility/Threshold Requirements

To be eligible to participate in the CARES program, the following criteria must be met;

All adult members of the household 18 year of age or over must execute a CARES Addendum to the Standard PHA or HCV Lease Agreement;

Be current in all lease obligations to ECC/HANH ;

Be a resident in "good standing" as defined in the ACOP;

Have been employed at least 12 months out of the prior 36 months before applying for the CARES program;

Have a GED or High School diploma or be capable of obtaining such GED or High School diploma within 24-months of applying for program. Applicants for the program that do not have a GED or High School diploma must show progress towards meeting this goal;

Enroll in the Authority's FSS Program; and

Open an IDA account

Families will live at West Rock for up to 24-months with supportive housing to become self-sufficient and will be based upon their education level (GED or High School diploma or not); household income (above or below the Federal Poverty Level); the employability of each person based upon their employment history as well as the results of their employability assessment.

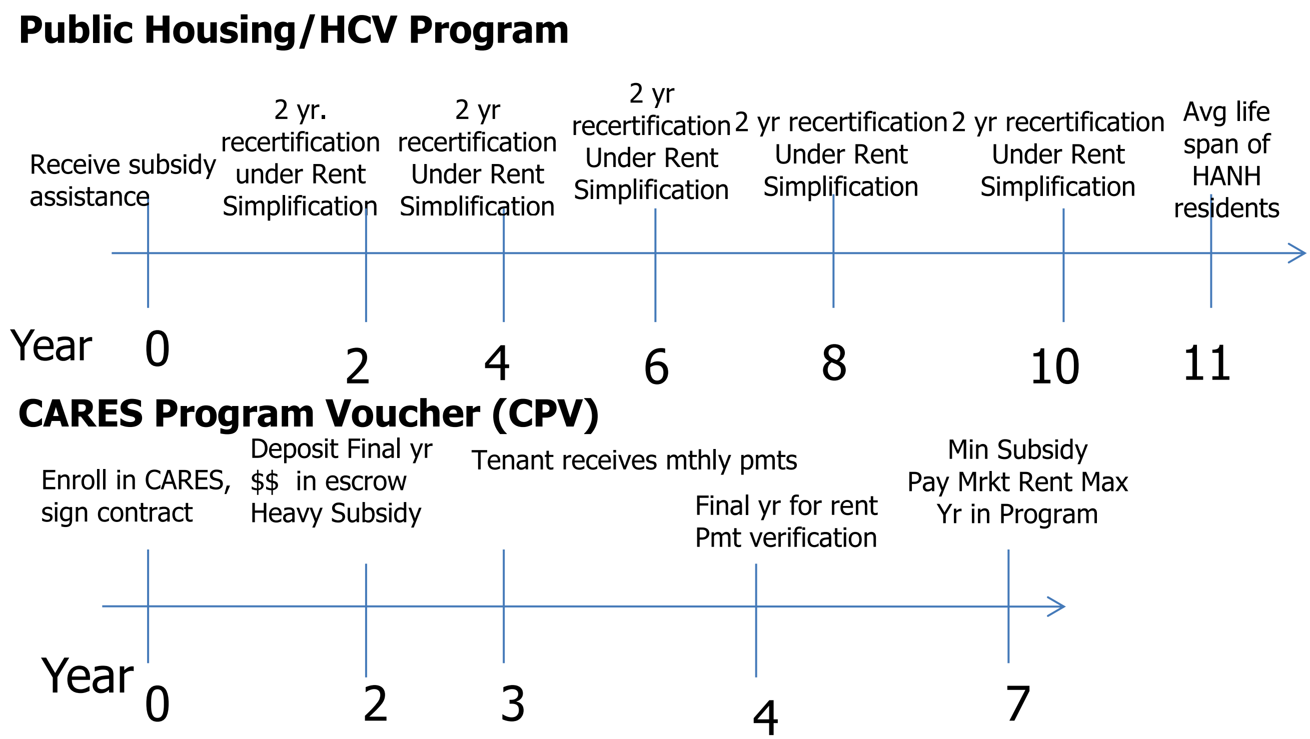
Program Overview

Brookside and Rockview families will be given the options, at lease up, to stay in a public housing program or reside in a Project Based Voucher (PBV) unit or to accept a Tenant Based CARES Program Voucher (CPV) as part of the CARES Program. Residents that opt to stay in public housing or a PBV unit will be given 72 months of rental assistance. After the 72 months have expired, residents who elect to stay in public housing or PBV units will be required to pay the Flat Rent (public housing) or Market rent (PBV), less prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt. Thus, if a family of four receives rental assistance (calculated as the difference between the Flat Rent and the TTP) and there are two adults and two children ages 12 and 15, and assuming that the prorated rental assistance for each member of the household is $200 per month, the family will have its rent increased by $400 per month after the end of the seven year period. During the term, the prorated amount of assistance would continue for the child over the age of 18 if that child was enrolled in a minimum of 3 hours or 3 credits in secondary or vocational education. Assistance for residents who are deemed exempt from the program by the case manager and the needs assessment will also continue to receive assistance. We recognize that there are individuals who to no fault of their own will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an ISP and case manager, and show progress towards the goals of the plan will continue to be able to receive assistance as long as they continue to make progress towards their goals. Life happens and families may experience unforeseen circumstances such as a loss of job, downturn in the economy or an unforeseen family circumstance that will hinder them from entering the CARES Program.

Residents who elect to take the CPV option will be given up to two years to transition in to the CARES Program and a total of seven years to reach self sufficiency based upon their income and job readiness at the signing of their lease. The first two years will enable residents the time to meet the basic requirements of the program. At the end of the seven year program, participating residents will no longer receive rental assistance. ECC/HANH will determine the amount of assistance the family is eligible to receive over the term of the CPV assistance, and assistance will be adjusted annually for inflation (Exhibit A). In the third year of the program, an amount equal to the sum of the rental assistance that the family would have otherwise received in the final year will be deposited into a Resident Enrolled Escrow Fund (REEF). For the duration of the program the funds in the REEF may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted), purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of ECC/HANH . If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance. A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the Executive Director's office, the Director of Operations or designee, the Service Center Director or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

The first step to self-sufficiency is encouraging families to seek affordable housing and manage their household expenses on a fixed income which will empower them to make their own choices. At the time of enrollment into the program, each family will sign a CARES Addendum and go through an assessment process where income, bedroom size, and family composition will be evaluated. For the first 24 months of the program, residents who elect to enroll in the CARES Program will be required to live in the newly redeveloped West Rock community to receive the supportive services and management needed to allow them to become self-sufficient. During this time the monthly subsidy payments will be made directly to the landlord. Beginning in year 3, the families will undergo a recertification to determine the monthly subsidy for the remaining five years in the CARES Program and the REEF income disallowance basis, be responsible for paying the landlord in full, and to provide ECC/HANH with payment receipts for 12 consecutive months to ensure compliance with the program. The families will receive a pre-determined subsidy payment each month, instead of the traditional method of payments being made to the landlord, based on the assessment. ECC/HANH will do periodic reviews to make sure funds are being spent to cover housing costs; however, there are no income exclusions, deductions or utility allowances necessary since the HAP data already takes this information into account (Exhibit A). Subsidy amounts paid to the families will be adjusted to reflect cost of living increases annually. These stepped requirements will eliminate the need for recertification and verification of income. The established subsidy payment schedule for the term of the program enables ECC/HANH to assist the families with the most support in the early years where it is needed. Providing this oversight and acceleration in subsidy in the early years of the program along with the development of the skills necessary for long-term self-sufficiency will increase the independence of the residents over time and result in a gradual declining need for subsidy.

HCV 7 Year Cash Payment Schedule



Additionally, participating residents will also establish Individual Development Accounts (IDA) if they elect to take the CPV option. ECC/HANH's contribution will be the resident's income disallowance portion to be contributed to the IDA based upon the initial Individual Services Plan and income verification process that is established by the families and a case manager at the time of lease up. If a family's income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent. Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent. For families enrolled in ECC/HANH's optional income disallowance, participants can elect to opt out of ECC/HANH's disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

ECC/HANH is embarking on this CARES pilot program in the West Rock community to help promote economic self-sufficiency of the residents of this revitalized community as a stepping stone to a new paradigm in the affordable housing market for low income families. We believe that the comprehensive program discussed above, combined with the development of unassisted rental units, will be effective in achieving housing and economic transitions for a substantial numbers of West Rock families.

Exhibit A - Housing Choice Voucher - HAP 7 Year Schedule

Family Size		1	2	3	4	5	6
Median Household HAP to Owner (9/10)		795	895	1000	1090	1147	1214
Median Utility Allowance		122	292	357	362	425	430
Median Monthly Cash Payment Assistance		**917**	**1187**	**1357**	**1452**	**1572**	**1644**
Years in Program	Cost of Living Increase	Subsidy Value					
1 Supportive Component **Monthly**	Lease up Year	917.00	1,187.00	1,357.00	1,452.00	1,572.00	1,644.00
Annually		11,004.00	14,244.00	16,284.00	17,424.00	18,864.00	19,728.00
2 Supportive Component **Monthly**	3%	944.51	1,222.61	1,397.71	1,495.56	1,619.16	1,693.32
Annually		11,334.12	14,671.32	16,772.52	17,946.72	19,429.92	20,319.84
3 Tenant Based Component **Monthly**	3%	972.85	1,259.29	1,439.64	1,540.43	1,667.73	1,744.12
Annually		11,674.14	15,111.46	17,275.70	18,485.12	20,012.82	20,929.44
4 Tenant Based Component **Monthly**	3%	1,002.03	1,297.07	1,482.83	1,586.64	1,717.77	1,796.44
Annually		12,024.37	15,564.80	17,793.97	19,039.68	20,613.20	21,557.32

5 Tenant Based Component **Monthly**	3%	1,032.09	1,335.98	1,527.32	1,634.24	1,769.30	1,850.34
Annually		12,385.10	16,031.75	18,327.79	19,610.87	21,231.60	22,204.04
6 Tenant Based Component **Monthly**	3%	1,063.05	1,376.06	1,573.13	1,683.27	1,822.38	1,905.85
Annually		12,756.65	16,512.70	18,877.62	20,199.19	21,868.55	22,870.16
7 Tenant Based Component **Monthly**	3% (Amount deposited into Escrow)	1,094.95	1,417.34	1,620.33	1,733.76	1,877.05	1,963.02
Annually		13,139.35	17,008.08	19,443.95	20,805.17	22,524.60	23,556.26
Total Cash Assistance		84,317.73	109,144.11	124,775.53	133,510.74	144,544.69	151,165.05

Program Steps
Orientation
Prior to executing a lease to move to the revitalized development, the family must attend an orientation where they will be informed of the CARES program requirements, the availability of supportive services to enable them to fulfill their obligations under this program and the consequences of the failure to meet the requirements under this program.

CARES Addendum to Replace HAP Contract
At the time of lease up, families moving to West Rock will make their voluntary decision to enter into the CARES program. A CARES Addendum to the lease agreement will be signed which will go into effect at the beginning of year three. This addendum will replace the HAP Contract as monthly rental payments will no longer be sent directly to the landlord and HAP contracts are between ECC/HANH and the landlord. A monthly cash payment will be sent directly to the resident per the CARES addendum between ECC/HANH and the resident.

Needs Assessment
Each family member will complete a needs assessment prior to lease up to establish a baseline of current educational levels, abilities, skills, interests, aptitude, and program goals. The subsidy amounts will be established based upon family composition, bedroom size, and household income during the assessment as well. Upon completion and review of the assessment the families, along with a case manager, will create a comprehensive Individual Service Plan (ISP) that will consist of short-term and long-term goals in the aforementioned categories, as well as, work and youth educational requirements under this program. It is important to note that those residents who do not meet the Eligibility/Threshold requirements under the CARES program and are categorized under one or more of the exemptions described in “5. Exemptions for Residents Residing in Public Housing or HCV units”, will have the opportunity to reside in the development under the traditional Public housing or HCV units

Individual Services Plan (ISP)
Once the assessment has been completed, the case manager and the family will develop an ISP that is designed to help the family meet the work requirement of this program within a 72-month timeframe. The plan must be completed within 90-days of moving into the new unit in the West Rock Community. The ISP will include the identified needs and agreed upon goals established during the needs assessment and be completed within 60-days after moving into the new rental unit. Families who are enrolled in the program will have to participate in the HUD mandatory income disallowance program and to enroll in the optional CARES REEF disallowance

program. If it is determined that the family cannot obtain or sustain earnings over a 72-month period at or above self-sufficient income levels to obtain a market rate unit or other affordable unit on their own, the case manager may determine that the person cannot meet the goals of the program and that person may be exempted from the CARES program. If deemed exempt, that person will be required to enroll and to remain enrolled in the Authority's Family Self Sufficiency (FSS) Program. The ISP shall address the following areas of concern.

a. Family stability
b. Well-being
c. Education & training
d. Financial management
e. Employment & Career management

Exemptions for residents remaining in Public Housing or Project Based Voucher Units

There are exemptions to the program for not having to pay the Flat Rent/Market Rent but who elect to remain in Public Housing or PBV units in the West Rock development. Persons disabled or deemed unemployable, and returning residents that have a right to return under the MOA between the former residents of Brookside and Rockview and ECC/HANH which will grandfather them in to return to the property and not be subject to the CARES program unless they voluntarily choose to.

Families that meet one or more of the following criteria are exempt from having to pay flat rent at the end of the 72 months:

The adult is precluded from obtaining or maintaining employment due to domestic violence or other circumstance beyond his or her control; or

The adult is employed and unable to pay their pro-rata share of the flat rent due to (1) a documented medical impairment that limits his/her work hours, or (2) the need to care for a disabled or elderly member of the household; or

The adult has a documented and substantive barrier to employment such as severe mental or physical health problems, one or more severe learning disabilities, domestic violence, or child who has serious physical or behavioral health problems; or

Enrolled in a bona-fide employment or adult educational or literacy training program for a minimum of 16 hours per week or two full time classes.

If any adult in the family meets one of the following exemption criteria, the family is not subject to the CARES Program. A person is exempt if:

He/she is incapacitated (as recognized by the Social Security Administration); or

Age 50 or older; or

Responsible for the care of an incapacitated family member; or

A non-parent caretaker relative; or

Caring for a child under the age of 2.9 (subject to include children at the time of initial move-in); or

Pregnant, if a physician has certified that she is unable to work; or

Unemployable (defined as "not able to hold or find a job")

An adult who believes that he/she is exempt under one or more of the aforementioned criteria must provide documentation to the Authority to support their position.

Hardship Policy and Guidelines

i. **Hardship Policy:**

Prior to imposition of any change in rent, the household will be provided with advanced notice as required by their lease and/or governing documents. Households that are notified of a rent increase will also be informed, in writing, of their ability to seek a waiver based on financial hardship provided that the hardship is related to extraordinary deductions or extraordinary cost of living (rent, utilities, medical expenses, child care expenses).

ii. **Hardship Criteria:**

The following criteria will trigger a review for consideration of a Hardship cash disbursement from the REEF.

Extraordinary Cost of Living:

In the CARES program, a hardship review will be conducted if the monthly total shelter costs (rent plus utilities), when combined with un-reimbursed monthly medical, disability, and dependent costs, exceeds forty percent (40%) of a household's monthly income (monthly income is defined as annual income divided by twelve).

Medical, Disabled Expenses of $6,000.00 or more:

In the CARES program, hardship review may be conducted if a household's total unreimbursed medical, disability, and dependent expenses of $6,000.00 or more per year. This includes the full cost of Medicare and private insurance.

Persons with disabilities always retain the right to request Reasonable Accommodations.

iii. **REEF Cash Disbursement Request Process:**
All REEF cash disbursement requests must originate with the household and must be submitted to Property Manager or Occupancy Specialist within thirty (30) calendar days of the date of the rent adjustment notification or hardship event, whichever occurs first. It will be the responsibility of the household to complete an "Application for Hardship Waiver" form and to provide all documentation required to show eligibility.

Once the Property Manager or the Occupancy Specialist receives the required documentation, the information shall be forwarded to the Director of Operations.

At the applicant's option, the Hardship Review Committee shall include a public housing resident.

In cases of hardship based on income loss, the Hardship Review Committee shall consider whether or not the applicant has made a good faith effort to secure alternative income sources. In addition, the Committee shall consider whether or not the loss of income is due to circumstances beyond the applicant's control.

The Hardship Review Committee shall render a decision on the request and a written decision shall be forwarded back to the Executive Director for signature. The Executive Director may sustain or decline the recommendation of the Committee. After signature by the Executive Director, the Director of Operations or Service Center Director, as applicable, will inform the parties of the decision. The written decision shall inform the parties as to the relief granted as well as the term of the relief. Households that disagree with the decision may request a grievance through the ECC/HANH grievance process. In cases where an appeal is sought, no action shall be taken by the ECC/HANH until the grievance process is completed.

iv. **Hardship Committee Remedies:**
The Hardship Review Committee will examine each family's circumstances on a case-by-case basis. The Hardship Review Committee has a choice of four remedies it can recommend as it deems appropriate. Depending on income, deductions and family circumstances the Committee may take action including, but not limited to:
Give exceptional expenses cash payment from the REEF account for rent payments and un-reimbursed utility expenses due to job loss, not to exceed a 90 day period.
Give exceptional expenses cash payment from the REEF account for medical expenses of $6,000 or more after all other options have been exhausted.
Permanent exclusion from CARES due to a disability or other exemption listed under the definitions of exemptions above and re-entry into Public Housing or PBV units.
Appropriate combination of remedies listed above.

The Hardship Committee shall require that all family, except elderly and disabled families reapply to the Hardship Committee after the end of the 90 day period for which the exceptional expenses cash payment is granted if the family wants the exemption to continue for more than 90 days.

Cash Payments to Tenants
As a result of implementing a CARES Addendum to the lease agreement, which will replace HAP contracts, residents who enroll and participate in the CARES Program will begin receiving a monthly cash payment to cover their rental payments and utility expenses. This is in lieu of receiving a utility allowance reimbursement and a direct rental payment to the landlord. For the duration of the program the funds in the REEF may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted), purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of ECC/HANH . If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance. A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the Executive Director's office, the Director of Operations or designee, the Service Center Director or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.
Individual Development Accounts (IDA)
Program participants must establish an Individual Development Account. The amount that the family must contribute toward this account will be determined by mutual agreement between the case manager and the individual. ECC/HANH's contribution will be the resident's income disallowance portion as a contribution to the IDA based upon the initial Individual Service Plan and income verification process that is established by the families and a case manager at the time of lease up to move to West Rock. If a family's

income increases, they can voluntarily deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that can experience an increase in earned income will be allowed to exclude the increase from Annual Income for four years at 100 percent. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

REEF Cash Deposit

In addition to the traditional IDA account, which we are calling a REEF for delineation of the CARES Program; ECC/HANH will deposit an amount equal to 12 months of cash payments that would have otherwise been received in the final year of the program into the REEF account. This money will be available to access

CARES Income Disregard

If a family's income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent. Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent. For families enrolled in ECC/HANH's optional income disallowance, participants can elect to opt out of ECC/HANH's disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

Case Management

All CARES program participants must enroll in ECC/HANH's FSS program. Case management is the key to any successful Community and Supportive Services Plan (CSSP). The case management model will be provided through a **collaborative approach** that will include a variety of specialized CSS Partners. The case manager will coordinate all case management, assist residents in assessing their needs and ensuring that required services are provided, and serve as the primary provider of these services. Other CSS Partners like the Connecticut Department of Social Services and the New Haven Board of Education may serve as case managers for specific residents like those on the Temporary Financial Assistance (TFA) or those enrolled in Early Childhood Learning Program with whom they maintain an existing and positive relationship.

The goal of case management is to ensure positive outcomes for the residents which may vary depending upon the resident being served. Expected outcomes of our case management activities include resident education, information, advocacy and empowerment. By collecting and analyzing data through a web based tracking system, the case manager can make decisions based upon sound and unbiased information. The case manager will be responsible for sharing information with the CSS Team and CSS Partners, government agencies, families, et al, while at the same time protecting the confidentiality and privacy of the residents. The CSS Team and CSS Partners will have access to this system to accurately and timely assess a resident's needs to measure his/her progress towards achieving his/her self-sufficiency goals. This is a critical component to successful case management.

Progress Meetings

The case management provider will conduct a minimum of two progress meetings each month, one of which shall be at the resident's apartment. The purpose of these meetings is to ensure that progress is being made towards economic self sufficiency and to ensure a higher level of coordination of all services. Quarterly Review of Compliance with Individual Service Plans will be conducted, as well.

Early Graduation from CARES Program

Residents can graduate from the program earlier than the seven years allocated if they meet the income levels required to obtain a market rate unit or other affordable unit on their own. The case manager will give them an early assessment to ensure that self-sufficiency can be sustained. As incentive to accelerate out of the program early, residents will receive the final year subsidy bonus as a cash payment to use as they deem necessary.

Coordination of Supportive Services Initiatives

The supportive services that will link residents include but are not limited to, the following initiatives:

- Programs that help eliminate barriers to self sufficiency.
- Educational activities that promote learning and serve as the foundation for young people from infancy through high school graduation, helping them to succeed in academia and the professional world. Such activities, which include early childhood education, after-school programs, mentoring, youth leadership development and tutoring, must be created with strong partnerships with public and private educational institutions.
- Adult educational activities, including remedial education, literacy training, tutoring for completion of secondary or postsecondary education, assistance in the attainment of certificates of high school equivalency, and English as a Second Language courses, as needed.
- Readiness and retention activities, which frequently are keys to securing private sector commitments to provide jobs.
- Employment training activities that include results-based job training, preparation, counseling, development, placement, and follow-up assistance after job placement.

- Programs that provide pre- apprenticeships in construction, construction-related, maintenance, or other related activities by providing GED classes and OSHA certifications to prepare for an entry-level, registered apprenticeship program. An entry-level, registered apprenticeship program is one that has been registered with a State Apprenticeship Agency recognized by the Department of Labor's (DOL).
- Training on topics such as parenting skills, consumer education, family budgeting, and credit management.
- Homeownership counseling so that, to the maximum extent possible, qualified residents will be ready to purchase new homeownership units when they are completed. The Family Self-Sufficiency program can also be used to promote homeownership, providing assistance with escrow accounts and counseling.
- Coordinating with health care providers or providing on-site space for health clinics, doctors, wellness centers, dentists, community health worker initiatives, and other health-related initiatives (e.g., With Every Heart Beat Is Life initiative, which is part of the National Heart, Lung, and Blood Institute's (NHLBI's) Educational Resources to Address Health Disparities initiative).etc., that will primarily serve the public housing residents.
- Substance and alcohol abuse treatment and counseling.
- Activities that address domestic violence treatment and prevention.
- Child care services that provide sufficient hours of operation to facilitate parental access to education and job opportunities, serve appropriate age groups, and stimulate children to learn.
- Transportation, as necessary, to enable all family members to participate in available CSS activities and to commute to their places of training and/or employment.
- Entrepreneurship training and mentoring, with the goal of establishing resident-owned businesses.

Violations of the CARES Program

Circumstances that constitute a violation of the CARES Program include but are not limited to the following:

Misappropriation of funds;

Fraudulent acts, as set forth in the ACOP and Administrative Plan respectively; and

Non-compliance of CARES Program per the CARES Contract

Any resident that is notified of a program violation will have the opportunity to appeal the claims being made against them as set forth in the aforementioned paragraph "5. Appeals Process".

Any resident who is found in violation can receive disciplinary action up to and including termination of their lease agreement which can result in Mandatory Bar that states that residents can no longer receive subsidy rental assistance for 10 years.

Appeal Process

A family who receives an adverse finding from ECC/HANH regarding the CARES Program has the right to appeal to ECC/HANH under the Authority's Grievance Process.

Moves

As outlined in the FY2015 MTW Plan (Initiative 2.3), ECC/HANH will be initiating a policy to limit moves for CARES participants (those who elected to take the CPV option) unless an extraordinary situation exists. Limiting CARES moves to only extraordinary situations will allow participants to follow-through on the commitment they made at program entry and will give ECC/HANH data to evaluate the program as it was intended. Extraordinary situations could include moves to be closer to work, medical care, or full-time school, or to care for sick or disabled family member and will be evaluated by a ECC/HANH-appointed committee.

Appendix 4

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE PUBLIC HOUSING PROGRAM

Public Housing Program Rent Simplification

ECC/HANH believes there is a better way to administer essential housing programs, one that encourages long-term self-sufficiency for both the program participants as well as the agency.

Rent Simplification: Equity & Efficiency

The proposed system rewards families who increase their incomes, and provides them with more opportunities to save while easing ECC/HANH burden of administering these housing programs.

Everyone Should Contribute

ECC/HANH believes that every family should contribute towards their housing. Under Rent Simplification, the criteria under which a family can claim zero income and not pay any rent are not changed. What will change is the amount of time families will be permitted to request an interim adjustment. The minimum rent will remain at $50.00 per month.

Fiscal Equity for ECC/HANH

Rent Simplification is forecast to be revenue-neutral. In other words, the implementation of Rent Simplification will not increase the amount of rental revenue to the ECC/HANH

Approvable Method

Rent Simplification allows all stakeholders to easily understand how tenant rents are determined, and armed with some basic income data, anticipate what future rents will be. This will allow families to easily plan for future expenses and savings.

Measurable Reduction in Administrative Time

By simplifying the rent determination and deduction procedures in Federal Public Housing, Rent Simplification makes the job of recertifying tenants significantly easier.

Transition to Avoid Hardships

ECC/HANH has devised a system that is not only revenue neutral for the organization, but will not result in any undue hardship to our families. There will be a transition period of one year from the current income based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy. Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification

Asset Exclusion

Asset exclusion is raised to $50,000.00. Increasing the asset exclusion amount allows residents to accumulate more assets before they are calculated as income. Families will self certify that they do not have assets in excess of $50,000.00.

Earned Income Disallowance

The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program. The maximum amount of time a family can be enrolled in the Federal EID is 24 months with a start/stop clock of 48 months.

Other Exclusions

All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (x11) as the $480 dependent deduction is eliminated. All income earned by full-time college students will no longer be included in the determination since there will no longer be the $480 dependent deduction to offset income.

Annualized Income Calculation

Prospective and past income may be used to calculate resident rents, especially for families with irregular or sporadic employment histories. For families with income of up to and including $5,000.00 we will accept a self-certification. For families earning more than $5,000.00 of wages and salaries we want pay stubs covering the most recent four weeks of employment or a W-2 or 1099 within 180 days of the effective date of recertification. We must complete EIV or other UIV as required by HUD.

Annual Reexaminations

Reexaminations are currently conducted every year for non-elderly households and every two year for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. ECC/HANH must perform more than 3,200 LIPH reexaminations every year. This is inordinately time consuming and an exceedingly complex process. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all of their increased earnings between annual reexaminations. Note that families with individuals who are subject to the eight hour community services requirement will be reviewed annually for all household members exempt from having to meet the community services requirement. During the first year all families will be recertified. This process will be phased in over a three-year period.

Effective FY2015 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn't meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).

ECC/HANH believes this new definition more closely matches the spirit of a "work-able" family since all work-able families would have at least one work-able adult. Under the prior definition, an elderly/disabled family only needed a head, co-head, or spouse to be elderly or disabled which led to some families with work-able adults being categories as elderly/disabled. This change will also give ECC/HANH the ability to better track earnings and employment for work-able families; and the better population division will give ECC/HANH the flexibility to implement work-able specific rent policy changes in the future if it so chooses.

Deductions for Exceptional Expenses

Excess resources are dedicated to verifying deductions for child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second and first party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

Households with exceptional expenses may request a rent reduction. This includes large families (with more than two (2) dependants). It also includes families with high medical expenses, disability assistance expenses, or childcare expenses.

The amount of expense is set in $2,000.00 tiers. This allows ECC/HANH to move away from verifying every last dollar. Tenants are not required to provide documentation of every dollar of expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier.

The amount of monthly rent reduction is established at the mid-range of the tier.

Households with exceptional expenses will receive a direct reduction of the monthly rent. However, no tenant's rent will be reduced below a rent of $50.00 as a result.

Tiered Amount of Expenses	Monthly Rent Reduction
$ 2,000 - $ 3,999	$ 75 (equivalent to $3,000 deduction)
$ 4,000 - $ 5,999	$ 125 (equivalent to $5,000 deduction)
$ 6,000 +	Hardship Review

Changes in Family Composition

Residents are still required to get permission from the Housing Manager and the Director of Housing, Management to add anyone to a household and to report changes in family composition. A family's rent is recalculated if the addition or subtraction of a household member results in an income change of $200.00 per month or more, or that causes the family to move from one income tier to another. This increase in rent does not count as an interim reexamination.

Mandatory Interim Reexaminations Policy

Residents must request an interim reexamination if any of the following conditions occur:

- Change in family composition that affects the voucher size or bedroom size.
- The addition of a family member 18 years of age or older
- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.
- Addition of a live-in aid
- Income increase following an interim rent reduction
- If ECC/HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to ECC/HANH.

Optional Interim Reexaminations Policy

Residents have the option to request three (3) interim reexaminations during every twelve (12) month period. Interims may be granted in the following instances:

- Decrease in family income that is expected to last 90 days or more if it will result in a change in the family's income tier (exclude seasonal workers; see below)
- Increase in Exceptional Expenses of at least $2,000.00

Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed.

Households receiving a requested interim rent reduction must report any subsequent income increase to ECC/HANH within thirty (30) days of occurrence. Failure to report the change within thirty (30) days results in retroactive rent changes, and depending on the severity of the circumstances, lease termination.

Seasonal workers who are employed for a period of time less than 12 months annually will have their rent calculated over a 12 month period using the 9 or 10 months of income earned. During the months the worker is not actively working, the family will not be able to request a rent reduction as the rent has already been adjusted over a 12 month period.

Permanent loss of income (i.e., death of an income earner) results in a permanent, rather than interim, rent reduction. This decrease in rent does not count as an interim reexamination. Under this circumstance, the family is not required to report a subsequent increase in income until the next scheduled certification.

Verification of Annual Income from Wages and Salaries and Assets

To reduce the administrative burden associated with the verification of income ECC/HANH has amended its Admission and Continued Occupancy (ACOP) to specify that:

- For earnings from wages and salaries where Annual Income for the prior period of up to and including $5,000.00, self certification from family is all that shall be required as verification of income.
- For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third party source of Upfront Income Verification.
- Self-certification of all sources of Annual Income shall be required in all cases.
- For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands

Rents are based on $1,000.00 income bands starting at $2,500.00. Using a band-based rent schedule allows the ECC/HANH and residents to move away from verifying every last dollar earned and deducted. (See Exhibit A)

At January 31, 2007, both the median and mode percentage of Total Tenant Payment (TTP) to annual income is 28.5 percent. That is, most families pay 28.5 percent of their family income (before utility allowance) as rent. Fifty two (52) percent of households pay 28 percent or more of annual income for TTP; six percent pay less than 10 percent; 13 percent pay between 10 and 20 percent; and 26 percent pay between 20 and 27 percent of income as TTP.

Rent will be set at 28.50 percent of income for income tiers of $1000.00 starting at $2,500.00. The rent will be calculated at the lower end of each tier. For example, for the $2,500.00 to $3,499.00 tier, the rent will be calculated at 28.50 percent of $2,500.00. Families with incomes below $2,500.00 will be charged the minimum rent. Families will be permitted to apply for a hardship if verifiable proof is provided that there total expenses exceed $2,000.00

Minimum Rents and Flat Rents

Families with annual income below $2,500.00 will pay a minimum rent of $50.00. In no event shall any family pay less than 25 percent of its Annual Income for TTP.

All residents at a rent of $50.00, except for the elderly and persons with disabilities, are referred to the Family Self Sufficiency (FSS) Program for job or benefit counseling. Families may still choose the existing Flat Rent option for public housing.

Zero Income Households

Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent with the exception of elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.

All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self sufficiency.

ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirements. Residents will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to tenants at lease-up and at each recertification appointment and mailed to residents at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in tenant rent change notifications, the form lease agreement and all form documents related to the exemption process.

Criteria for Hardship Exemption From Minimum Rent Requirement

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family's circumstances fall into any one of the following criteria:

1. When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
2. When the family would be evicted because it is unable to pay the minimum rent;
3. When the income of the family has decreased because of changed circumstances, including loss of employment;
4. When a death in the family has occurred; or
5. Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirement.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long-term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.

Once the Authority identifies a resident's need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

5. Hardship Review Committee

All "Applications for Exemption from Minimum Rent" shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family's option, the Hardship Review Committee may include one (1) resident of ECC/HANH who is in good standing.

The Application for Exemption from Minimum Rent shall originate from the family or from a ECC/HANH employee whenever evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption.

When a resident submits an application or a ECC/HANH employee submits an application on behalf of a resident, ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days.

The resident cannot be evicted for nonpayment of minimum rent while resident's Application for Exemption from Minimum Rent is pending or during the 90 day period of suspension, whichever is longer.

The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:

(a) that ECC/HANH has received an Application for Exemption from Minimum Rent,

(b) that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,

(c) that there can be no eviction for non-payment of rent during the suspension period;

(d) the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and

(e) that, with the exception of elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

1. If the Committee determines that ***the hardship is of a temporary nature (the hardship is expected to last less than 90 days)***, at the end of the 90-day period, the resident's rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

2. If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days),*** the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

   ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement, if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation with regard to this requirement.

   Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

3. If the ***hardship is determined to be non-existent,*** the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

1. <u>If the hardship exemption is determined to be temporary</u>:

(a) that a temporary hardship exemption was granted;

(b) the effective dates of the exemption;

(c) the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and

(d) that the resident has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

2. <u>If the hardship exemption is determined to be long-term</u>:

(a) that a long-term hardship exemption was granted;

(b) whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place;

(c) that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and

(d) that the resident must notify ECC/HANH within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.

3. <u>If the hardship is determined to be non-existent</u>:

(a) that a hardship exemption was denied;

(b) the reason for such determination; and

(c) the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any resident who disagrees with the decision may request a grievance in accordance with ECC/HANH's grievance procedures, a copy of which will be included with the written decision. In cases where a grievance is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

Mixed Families

For mixed families, where some households include members with citizenship or eligible immigration status as well as those without, rents are calculated using the simplification model; subsidy is then prorated using current methods.

Fraud Prevention

After two or more instances of job loss or income drop within ninety (90) days of a scheduled reexamination (based on current and prior reexamination history), ECC/HANH sets a rent based on the past year's W-2 or other information available for income verification. Households are advised that this is a potential fraud issue and that they have the right to grieve through the normal process to more fully explain the reasons for the pattern of income loss. ECC/HANH will set the rent after the Conference Panel review.

Households with two or more instances of job loss or income drop within ninety (90) days of a scheduled certification do not have access to the Hardship Review Committee.

Rent Simplification Implementation - Public Housing

Residents will receive notice of the new policy on July 1, 2007 and the policy will take effect on January 1, 2008 for all reexaminations with an anniversary effective date on or after January 1, 2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.

A staggered approach is used to integrate the two-year and three year reexamination cycles.

- Initially in fiscal year 2008, all families will be re-examined during the first year.
- In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
- In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.

Rent Simplification is expected to be fully implemented by December 31, 2010.

Low Income Public Housing (LIPH) Program
Rent Simplification Rent Tier Schedule

Rent Tier						
Income Range						
$0	$2,499	$50		$36,500	$37,499	$867
$2,500	$3,499	$59		$37,500	$38,499	$891
$3,500	$4,499	$83		$38,500	$39,499	$914
$4,500	$5,499	$107		$39,500	$40,499	$938
$5,500	$6,499	$131		$40,500	$41,499	$962
$6,500	$7,499	$154		$41,500	$42,499	$986
$7,500	$8,499	$178		$42,500	$43,499	$1,009
$8,500	$9,499	$202		$43,500	$44,499	$1,033
$9,500	$10,499	$226		$44,500	$45,499	$1,057
$10,500	$11,499	$249		$45,500	$46,499	$1,081
$11,500	$12,499	$273		$46,500	$47,499	$1,104
$12,500	$13,499	$297		$47,500	$48,499	$1,128
$13,500	$14,499	$321		$48,500	$49,449	$1,152
$14,500	$15,499	$344		$49,500	Above	$1,176
$15,500	$16,499	$368				
$16,500	$17,499	$392				
$17,500	$18,499	$416				
$18,500	$19,499	$439				
$19,500	$20,499	$463				
$20,500	$21,499	$487				
$21,500	$22,499	$511				
$22,500	$23,499	$534				
$23,500	$24,499	$558				
$24,500	$25,499	$582				
$25,500	$26,499	$606				
$26,500	$27,499	$629				
$27,500	$28,499	$653				
$28,500	$29,499	$677				
$29,500	$30,499	$701				
$30,500	$31,499	$724				
$31,500	$32,499	$748				
$32,500	$33,499	$772				
$33,500	$34,499	$796				
$34,500	$35,499	$819				
$35,500	$36,499	$843				

Hardship Waiver Policy and Guidelines

Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent with the exception of elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.

All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self sufficiency.

ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirements and in accordance with the provisions set forth herein. Residents will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to tenants at lease-up and at each recertification appointment and mailed to residents at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in tenant rent change notifications, the form lease agreement and all form documents related to the exemption process.

1. Criteria for Hardship Exemption from Minimum Rent Requirement

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family's circumstances fall into any one of the following criteria:

1. When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
2. When the family would be evicted because it is unable to pay the minimum rent;
3. When the income of the family has decreased because of changed circumstances, including loss of employment;
4. When a death in the family has occurred; or
5. Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirement.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long-term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.

Once the Authority identifies a resident's need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

2. Initiation of Hardship Exemption Review

An Application for Exemption from Minimum Rent may originate from either a ECC/HANH employee or the resident family.

ECC/HANH employees must complete and submit an Application for Exemption from Minimum Rent on behalf of a resident family whenever any evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption (as set forth above).

A resident family also has the right to request a hardship exemption from minimum rent. Such request must be in writing and must state the family circumstances that qualify the family for a hardship exemption.

3. Notification of the Right to a Hardship Exemption

ECC/HANH will notify all families of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the Application for Exemption from Minimum Rent, a copy of which will be provided to residents at lease up and at each recertification appointment or mailed to residents for interim recertifications.

ECC/HANH will also notify all families in writing of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the following documents: resident rent change notifications when monthly rent is set at the minimum rent, the form lease agreement and all form documents related to the hardship exemption process.

ECC/HANH will also notify all families in all of the above documents that all families that are exempt from the minimum rent requirement will be referred to the Family Self Sufficiency (FSS) Program in order to assist the family in moving toward self sufficiency. Elderly and disabled families are not required to participate in the FSS program.

4. Hardship Review Committee

All "Applications for Exemption from Minimum Rent" shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family's option, the Hardship Review Committee may include one (1) resident of ECC/HANH who is in good standing.

The Application for Exemption from Minimum Rent shall originate from the family or from a ECC/HANH employee whenever evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption.

When a resident submits an application or a ECC/HANH employee submits an application on behalf of a resident, ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days.

The resident cannot be evicted for nonpayment of minimum rent while resident's Application for Exemption from Minimum Rent is pending or during the 90 day period of suspension, whichever is longer.

The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:

(a) that ECC/HANH has received an Application for Exemption from Minimum Rent,

(b) that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,

(c) that there can be no eviction for non-payment of rent during the suspension period;

(d) the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and

(e) that, with the exception of elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

1. If the Committee determines that ***the hardship is of a temporary nature (the hardship is expected to last less than 90 days)***, at the end of the 90-day period, the resident's rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

2. If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days),*** the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement, if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation with regard to this requirement.

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

3. If the ***hardship is determined to be non-existent,*** the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

4. **If the hardship exemption is determined to be temporary:**

(a) That a temporary hardship exemption was granted;

(b) the effective dates of the exemption;

(c) the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and

(d) that the resident has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

5. If the hardship exemption is determined to be long-term:

(a) that a long-term hardship exemption was granted;

(b) whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place;

(c) that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and

(d) that the resident must notify ECC/HANH within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.

6. If the hardship is determined to be non-existent:

(a) that a hardship exemption was denied;

(b) the reason for such determination; and

(c) the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any resident who disagrees with the decision may request a grievance in accordance with ECC/HANH's grievance procedures, a copy of which will be included with the written decision. In cases where a grievance is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

7. Termination of Long-Term Exemptions

ECC/HANH may conduct periodic reviews of all long-term hardship exemptions to determine if the hardship continues to exist and, for non-elderly and non-disabled residents, whether the resident is complying with FSS requirements.

If ECC/HANH determines that a family is no longer eligible for a long-term hardship exemption (because the hardship no longer exists or the non-elderly/non-disabled tenant has not complied with FSS requirements), ECC/HANH shall notify the family of the proposed termination of the long-term hardship exemption, the effective date of the proposed termination, and the reason for such proposed termination. This letter shall be delivered to the resident by first class mail no later than thirty (30) days prior to the effective date of the proposed termination. Any resident who disagrees with the proposed termination may request a grievance in accordance with ECC/HANH's grievance procedures, a copy of which will be included in the notice of termination. In cases where an appeal is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

The Executive Director may waive any or all of these requirements in cases where he/she determines that the hardship conditions are likely to be permanent.

EXCEPTIONS TO LIPH REGULATIONS

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Annual Income	24 CFR Part 5.609(a)(4) 5.609(c)(8)(x11	Any income derived from an asset to which any member of the family has access Adoption assistance payments for any child in excess of $480.00 received.	Excludes asset from the determination of annual income to the extent the amount does not exceed $50,000. All income earned by fulltime student will be excluded who is over18. Students who are HOH or spouse are not excluded. All income earned by a family from adoption assistance will be excluded.
Income Exclusion for Person Enrolled in FSS Program	24 CFR Part 5.609(b)(1)	Incremental earnings and benefits resulting in any family member from participation in a qualifying **State or local employment training** programs (including training programs not affiliated with a local government) and training of a family member as resident management staff.	Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member during the first year of FSS program participation, 75% in 2nd year, 50% in 3rd year, 25% in 4th year and 0% in 5th year, as long as the household is enrolled in the FSS Program. This will not exceed 5 years. A family's eligibility to receive this optional income disallowance is limited to a total of 48 months. In addition, for families that qualify and receive the federal EID, the total number of months that a family may receive the optional income disallowance provided for under this subparagraph and under the Federal Earned Income Disregard (EID) may not exceed 48 months. In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving the federal EID as set forth in 24 CFR Part 5.617. Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying **federal** program, whether or not the member is enrolled in the FSS program
Business Income for Resident Owned Businesses	24 CFR Part 5.609(b)(2)	The net income from the operation of a business or profession is included in determining annual income.	Exclude 100 Percent of any net income derived from the operation of a businesses; provided the business qualifies as **a resident owned business** under 24 CFR Part 963.5. During the first year of enrollment in FSS program 100 percent; 75 percent in the second year; 50 percent in the third year; 25

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
			percent in the fourth year; 0 percent exclusion thereafter.
Earned Income Disallowance	24 CFR Part 960.255	Incremental income earned by a family member, provided the increase in income is the result (1) of employment of a family member was previously unemployed for one or more years prior to employment; (2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families	ECC/HANH will continue to implement the Earned Income Disregard (EID) for LIPH families. The maximum amount of time a family may participate in the programis 48 months.
Mandatory Deductions	24 CFR Part 5.611	(1) $480 for each dependent; (2) $400 for any elderly family or disabled family; (3) The sum of the following to the extent the sum exceeds three percent of annual income: (i) Un-reimbursed medical expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.	Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions
Additional (Exception) Expenses Deductions	24 CFR 5.611	A PHA may adopt additional deductions from annual income. ECC/HANH had none	Families with verifiable deductions in excess of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must exceed $2,000 and shall be the sum of (1) Mandatory Deductions determined in accordance with Section 5.611 (2), plus non-reimbursed utility expenses (except telephone and cable)

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Total Tenant Payment	24 CFR 5.628	(a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent, as determined in accordance with Sec. 5.630.	The Total Tenant Payment (TTP) will be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually.
Hardship Provision for Exceptional Expenses	24 CFR 5.611(2))	A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.	A family may be exempt from minimum rent as follows; (a) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program, including a family that includes a member who is a non-citizen (b) When the family would be evicted because it is unable to pay the minimum rent (c) When the income of the family has decreased because of changed circumstances, including loss of employment. Family whose shelter expenses, plus un-reimbursed medical, childcare and disability expenses exceed 40 percent of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek a deduction in rent for exceptional expenses.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Minimum Rent	24 CFR 5.630	A family may be exempt from minimum rent of $50.00 as follows: (i) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances; (iv) a death has occurred in the family's household; (v) any other circumstances to be considered by the PHA to be reason to waive the minimum rent requirement.	A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No. Change. ECC/HANH will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughy Terrace and all Scattered Site properties.
Annual Reexamination of Income and Family Composition	24 CFR 960 Part 257	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of income will occur every three years for Elderly and Disabled families and every two years for all other families. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually. Additionally the Community Service requirement will be reviewed annually for all household members who are not disabled, working less than 20 hours per week or enrolled in classes under the FSS program.
Interim Reexamination	24 CFR 960 Part 257	A family may request an interim reexamination of family income because of any changes since the last examination. The owner must make the interim reexamination within a reasonable time after the family request. Currently, family must report any change in income that amounts to $200 or more a month.	A family can request only three interim re-examinations each 12 months with the exceptions of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled or a family enrolled in FSS may make **one** request for an **interim** for a hardship exemption each 12 months.
Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000	24 CFR 5.659	The owner must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available :(1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors	Only a self-certification will be required for income up to and including $5,000.00. For income above $5,000.00 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		that affect the determination of adjusted income.	Asset exclusion is raised to $50,000.00 and only self certification will be required.
Determination of Tenant Total Payment (TTP)	24 CFR 5.628	a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent	TTP based upon income-tiered approach. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed more than $50 during the third year; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately preceding the implementation of Rent Simplification. The families TTP after the fifth year shall be whatever amount is determined under Rent Simplification. These limitations on rent increase shall only apply to increases in TTP that result from the imposition of Rent Simplification and not for increases that result from changes in family composition or changes in family income.

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE SECTION 8 MTW VOUCHER PROGRAM

Housing Choice Voucher Program Rent Simplification

ECC/HANH believes there is a better way to administer essential housing programs, one that encourages long-term self-sufficiency for both the program participants as well as the agency.

The Rent Simplification policies apply only to the Housing Choice Voucher (HCV) Program included under the agency's MTW Program. The Moderate Rehabilitation Program, Mainstream for Elderly, Welfare to Work and Enhanced Vouchers are not covered by these policies.

Rent Simplification: Equity & Efficiency

The proposed system rewards families who increase their incomes, and provides them with more opportunities to save while easing ECC/HANH's burden of administering these housing programs.

Everyone Should Contribute

ECC/HANH believes that every family should contribute towards their housing. Under Rent Simplification, the criteria under which a family can claim zero income and not pay any rent are not changed. What will change is the amount of time families will be permitted to request an interim adjustment. The minimum rent will be increased from $25.00 per month to $50.00 per month for the HCV Program.

Fiscal Equity for ECC/HANH

Rent Simplification is forecast to be revenue-neutral. In other words, the implementation of Rent Simplification will not increase the amount of rental revenue to the ECC/HANH.

Approvable Method

Rent Simplification allows all stakeholders to easily understand how tenant rents are determined, and armed with some basic income data, anticipate what future rents will be. This will allow families to easily plan for future expenses and savings.

Measurable Reduction in Administrative Time

By simplifying the rent determination and deduction procedures in Federal Public Housing, Rent Simplification makes the job of recertifying tenants significantly easier.

Transition to Avoid Hardships

ECC/HANH has devised a system that is not only revenue neutral for the organization, but will not result in any undue hardship to our families. There will be a transition period of one year from the current income based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy. Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification.

Asset Exclusion
Asset exclusion is raised to $50,000.00. Increasing the asset exclusion amount allows residents to accumulate more assets before they are calculated as income. Families will self certify that they do not have assets in excess of $50,000.00.

Earned Income Disallowance
The Earned Income Disallowance (EID) under Sec. 5.617 for all HCV participants for Self-Sufficiency incentives for persons with disabilities who experience increases in annual income is eliminated.

Other Exclusions
All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (v) as the $480 dependent deduction is eliminated. All income earned by full-time college students will no longer be included in the determination since there will no longer be the $480 dependent deduction to offset income.

Annualized Income Calculation
Prospective and past income may be used to calculate resident rents, especially for families with irregular or sporadic employment histories. For families with income of up to and including $5,000.00 we will accept a self-certification. For families earning more than $5,000.00 of wages and salaries we want pay stubs covering the most recent four weeks of employment or a W-2 or 1099 within 180 days of the effective date of recertification. We must complete EIV or other UIV as required by HUD.

Annual Reexaminations
Reexaminations are currently conducted every year for non-elderly households and every two year for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all of their increased earnings between annual reexaminations. During the first year all families will be recertified. This process will be phased in over a three-year period.

Effective FY2015 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn't meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).

ECC/HANH believes this new definition more closely matches the spirit of a "work-able" family since all work-able families would have at least one work-able adult. Under the prior definition, an elderly/disabled family only needed a head, co-head, or spouse to be elderly or disabled which led to some families with work-able adults being categories as elderly/disabled. This change will also give ECC/HANH the ability to better track earnings and employment for work-able families; and the better population division will give ECC/HANH the flexibility to implement work-able specific rent policy changes in the future if it so chooses.

Deductions for Exceptional Expenses
Excess resources are dedicated to verifying deductions for child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second and first party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

Households with exceptional expenses may request a rent reduction. This includes large families (more than two children). It also includes families with high medical expenses, disability assistance expenses, or childcare expenses. Combined, exceptional expenses must total no less than $2000.00 in order for family to qualify for the additional monthly rent deduction.

The amount of expense is set in $2,000.00 tiers. This allows ECC/HANH to move away from verifying every last dollar. Tenants are not required to provide documentation of every dollar of expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier.

The amount of monthly rent reduction is established at the mid-range of the tier.

Households with exceptional expenses will receive a direct reduction of the monthly rent. However, no tenant's rent will be reduced below a rent of $50.00 as a result.

Tiered Amount of Expenses	Monthly Rent Reduction
$ 2,000 - $ 3,999	$ 75 (equivalent to $3,000 deduction)
$ 4,000 - $ 5,999	$ 125 (equivalent to $5,000 deduction)
$ 6,000 +	Hardship Review

Changes in Family Composition

Residents are still required to get permission from the Housing Choice Voucher staff to add anyone to a household and to report changes in family composition. A family's rent is recalculated if the addition or subtraction of a household member results in an income change of $200.00 per month or more, or that causes the family to move from one income tier to another. This increase in rent does not count as an interim reexamination.

Mandatory Interim Reexaminations Policy

Residents must request an interim reexamination if any of the following conditions occur:

- Change in family composition that affects the voucher size or bedroom size.
- The addition of a family member 18 years of age or older
- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.
- Addition of a live-in aid
- Income increase following an interim rent reduction
- If HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to HANH.

Optional Interim Reexaminations Policy

Residents have the option to request three (3) interim reexaminations during every twelve (12) month period. Interims may be granted in the following instances:

- Decrease in family income that is expected to last 90 days or more if it will result in a change in the family's income (exclude seasonal workers; see below)
- Increase in Exceptional Expenses of at least $2,000.00

Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed.

Households receiving a requested interim rent reduction must report any subsequent income increase to ECC/HANH within thirty (30) days of occurrence. Failure to report the change within thirty (30) days results in retroactive rent changes, and depending on the severity of the circumstances, lease termination.

Seasonal workers who are employed for a period of time less than 12 months annually will have their rent calculated over a 12 month period using the 9 or 10 months of income earned. During the months the worker is not actively working, the family will not be able to request a rent reduction as the rent has already been adjusted over a 12 month period.

Permanent loss of income (i.e., death of an income earner) results in a permanent, rather than interim, rent reduction. This decrease in rent does not count as an interim reexamination. Under this circumstance, the family is not required to report a subsequent increase in income until the next scheduled certification.

Verification of Annual Income from Wages and Salaries and Assets

To reduce the administrative burden associated with the verification of income ECC/HANH will amend its Admission and Continued Occupancy (ACOP) to specify that:

- For earnings from wages and salaries where Annual Income for the prior period is up to and including $5,000.00, self certification from family is all that shall be required as verification of income.

- For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third party source of Upfront Income Verification.

- Self-certification of all sources of Annual Income shall be required in all cases.

- For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands

Rents are based on $1,000.00 income bands starting at $2,500.00. Using a band-based rent schedule allows the ECC/HANH and residents to move away from verifying every last dollar earned and deducted. **(See Exhibit A)**

Currently, almost 58 percent of the families in the HCV Program pay 25 percent or more of Annual Income for TTP; approximately 18 percent pay between 20 and 25 percent of Annual Income for TTP; approximately 17 percent pay between 10 and 20 percent of Annual Income for TTP; and approximately 7 percent pay less than 10 percent of Annual Income for TTP.

Currently, the median TTP is $251.00 per month. The median Housing Assistance Payment is $725.00 per month. The median Tenant Rent (TTP minus utility allowance) to owner is $121.00 per month. One of the goals of the Rent Simplification is that it be revenue neutral.

Total Tenant Payment for HCV families shall be set at 28.5 percent of the lower range of each income band. For example, for a family with Annual Income between $2,500.00 and $3,499.00, the TTP rent will be calculated at 28.5 percent of $2,500.00. Families with incomes below $2,500.00 will pay the minimum rent of $50.00. Families will be permitted to submit documentation for Additional or Excess Deductions where they have verifiable proof that total deductions as defined herein equal or exceed $2,000.00

Minimum Rents

Families with annual income below $2,500.00 will pay a rent of $50.00.

Zero (0) Income Households

A family claiming zero ($0) rent is automatically exempt from the minimum rent requirements for a 90 day period when the family's circumstances fall into any one f the following criteria:

6. When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
7. When the family would be evicted because it is unable to pay the minimum rent;
8. When the income of the family has decreased because of changed circumstances, including loss of employment;
9. When a death in the family has occurred; or
10. Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long term exemption from the minimum rent requirement and the HAP will be adjusted accordingly.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long tern hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a participant is elderly, disabled or is enrolled in ECC/HANH's Family Self-Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the FSS Program). Elderly and disabled families are not required to enroll in the FSS Program.

Once ECC/HANH identifies a participant's need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

Hardship Review

All "Applications for Exemption from Minimum Rent" shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family's option, the Hardship Review Committee may include one (1) participant of ECC/HANH who is in good standing.

The Application for Exemption from Minimum Rent shall originate from the family or a ECC/HANH employee if the family experiences any one of the Criteria for Minimum Rent Exemption.

When a participant submits an application or a ECC/HANH employee submits an application on behalf of a participant. ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days and adjust the HAP payment accordingly.

The participant's assistance cannot be terminated for nonpayment of minimum rent while participant's Application for Exemption from Minimum Rent is pending or during the 90 day period of suspension, whichever is longer.

The Hardship Review Committee shall send a letter to all participant families who have applied for Hardship Exemption from Minimum Rent stating:

(f) that ECC/HANH has received an Application for Exemption from Minimum Rent,

(g) that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,

(h) that there can be no termination of assistance for non-payment of rent during the suspension period;

(i) the date for a meeting with the participant to discuss the hardship exemption request, giving the participant family at least ten days advance notice of such meeting and informing the participant that he or she may have one opportunity to reschedule the meeting; and

(j) that, with the exception of elderly and disabled families, the participant family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

4. If the Committee determines that ***the hardship is of a temporary nature (the hardship is expected to last less than 90 days***), at the end of the 90-day period, the participant's rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The participant will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

5. If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days),*** the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

   ECC/HANH may deny a participant a long term exemption from the minimum rent requirement, if the participant fails to attend the scheduled meetings with the Hardship Review Committee. ECC/HANH will provide each participant one opportunity to reschedule the meeting. If the participant fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting, shall inform participants that persons with disabilities are entitled to reasonable accommodation with regard to this requirement.

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirements for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS program within 30 days from the date of the Application of Exemption from Minimum Rent.

6. If the hardship is determined to be nonexistent, the participant will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. Participant will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

7. If the hardship exemption is determined to be short term:
   (e) , that a short-term hardship exemption was granted;

   (f) the effective dates of the exemption;

   (g) the basis for the decision to grant a short-term exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and

   (h) that the participant has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

8. If the hardship exemption is determined to be long term:

   (e) that a long-term hardship exemption was granted;

   (f) whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place; and

   (g) that all non-elderly, non-disabled participants are required to comply with FSS requirements as a condition of the receipt of a long term exemption; and

   (h) that the participant must notify ECC/HANH within 10 days if the hardship ceases to exist because the participant has obtained a source of income sufficient to pay (at least) the minimum rent.

9. If the hardship is determined to be non-existent:

   (d) that a hardship exemption was denied;

   (e) the reason for such determination; and

   (f) the terms and condition on which the participant family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any participant who disagrees with the decision may request an informal hearing in accordance with ECC/HANH's hearing procedures, a copy of which will be included with the written decision. In cases where a hearing is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

Mixed Families

For mixed families, where some households include members with citizenship or eligible immigration status as well as those without, rents are calculated using the simplification model; subsidy is then prorated using current methods.

Fraud Prevention

After two or more instances of job loss or income drop within ninety (90) days of a scheduled reexamination (based on current and prior reexamination history), ECC/HANH sets a rent based on the past year's W-2 or other information available for income verification. Households are advised that this is a potential fraud issue and that they have the right to grieve through the normal process to more fully explain the reasons for the pattern of income loss. ECC/HANH will set the rent after the Conference Panel review.

Households with two or more instances of job loss or income drop within ninety (90) days of a scheduled certification do not have access to the Hardship Review Committee.

Rent Simplification Implementation – Housing Choice

Residents will receive notice of the new policy on July 1, 2007 and the policy will take effect on January 1, 2008 for all reexaminations with an anniversary effective date on or after January 1, 2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.

A staggered approach is used to integrate the two-year and three year reexamination cycles.

- Initially in fiscal year 2008, all families will be re-examined during the first year.
- In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
- In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.

Rent Simplification is expected to be fully implemented by December 31, 2010.

SEMAP WAIVERS

The SEMAP verification methods and ratings are set forth under 24 CFR Part 983. As a result of the Rent Simplification Plan many of these indicators will either no longer be relevant or the Authority and/or HUD will be unable to measure ECC/HANH's performance; therefore, ECC/HANH will request a waiver of the following SEMAP indicators beginning October 1, 2007.

- Sec. 985.3(c). **Determination of Adjusted Income**.
  Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000in the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required.

- Section 985.3(j) **Annual reexaminations**.
  This indicator shows whether the PHA completes a reexamination for each participating family at least every 12 months (24 CFR 5.617). A waiver of this indicator is required since ECC/HANH will no longer reexamine every family each year.

- Section 985.3(m) **Annual HQS Inspections**.
  This indicator shows whether the PHA inspects each unit under contract at least annually. (24 CFR 982.405(a). ECC/HANH will no longer inspect every unit every year, but will instead inspect units according to the families' biennial or triennial recertification schedule.
- Section 985.507(m) **Rent to Owner: Reasonable Rent**

- Section 985.3(n) **Lease-Up**.
  This indicator shows whether the PHA enters HAP contracts for the number of units reserved under ACC for at least one year. Due to the funding fungibility under MTW, Section 8 funds are used according to the priorities set forth in the MTW Annual Plan.

Alternative Inspection Schedule

ECC/HANH will no longer inspect each unit every year, but will instead inspect units according to the families' biennial or triennial recertification schedule, unless:

- The participant or landlord requests a special inspection due to violations noticed by either party.

Hardship Waiver Policy and Guidelines

Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent with the exception of elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.

All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self sufficiency.

ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirement and in accordance with the provisions set forth herein. Participants will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to participants at lease-up and at each recertification appointment and mailed to participants at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in participant rent change notifications, Application for Exemption from Minimum Rent and all form documents related to the exemption process.

Criteria for Hardship Exemption from Minimum Rent Requirement.

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family's circumstances fall into any one f the following criteria:

1. When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
2. When the family would be evicted because it is unable to pay the minimum rent;
3. When the income of the family has decreased because of changed circumstances, including loss of employment;
4. When a death in the family has occurred; or
5. Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long term exemption from the minimum rent requirement and the HAP will be adjusted accordingly.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long tern hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a participant is elderly, disabled or is enrolled in ECC/HANH's Family Self-Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the FSS Program). Elderly and disabled families are not required to enroll in the FSS Program.
Once ECC/HANH identifies a participant's need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

Initiation of Hardship Exemption Review

An application for Exemption from Minimum Rent may originate from either a ECC/HANH employee or the participant family.

ECC/HANH employees must complete and submit an Application for Exemption from Minimum Rent on behalf of a participant family whenever any evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption (as set forth above).

A participant family also has the right to request a hardship exemption from minimum rent. Such request must be in writing and must state the family circumstances that qualify the family for a hardship exemption.

Notification of the Right to a Hardship Exemption

ECC/HANH will notify all families of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the Application for Exemption from Minimum Rent, a copy of which will be provided to participants at lease up and at each recertification appointment or mailed to participants for interim recertifications.

ECC/HANH will also notify all families in writing of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the following documents: participant rent change notifications, the Application for Exemption from Minimum Rent and all form documents related to the hardship exemption process.

ECC/HANH will also notify all families in all of the above documents that all families that are exempt from the minimum rent requirements will be referred to the Family Self Sufficiency (FSS) Program in order to assist the family in moving toward self sufficiency. Elderly and disabled families are not required to participate in the FSS program.

Exceptional Expenses

1. **Applicability**- Deductions permitted under 24 CFR Part 5.611(a) shall be permitted only to the extent the sum of anticipated deductions permitted under said Part 5.611(a) for the year are expected to equal or exceed $2,000. Families with Exceptional Expenses that equal or exceed $2,000 may request a rent deduction. The amounts of expenses are set in $2,000 tiers. This allows ECC/HANH to move away from having to verify every dollar of every deduction. Participants will no longer be required to provide documentation for every dollar of expenses, but, instead, participants need only provide documentation sufficient to the expenses of the appropriate tier.

   The amount of the rent deduction is established at the mid-range of each tier. Families with Exceptional Expenses will receive a reduction in the rental payment as set forth on the following table:

   Families must have more than two qualifying dependents in order to qualify for additional Dependent Deductions

   The Elderly/Disabled deductions shall not be used in determining Exceptional Expenses.

   Dependent deduction shall only be allowed for families with more than two dependents since the standard amount of this deduction has been included in the determination of the percentage used to calculate tenant rent.

Tiered Amount of Exceptional Expenses	Monthly Rent Reduction
$ 2,000 - $ 3,999	$ 75 (equivalent to $3,000 deduction)
$ 4,000 - $ 5,999	$ 125 (equivalent to $5,000 deduction)
$ 6,000 +	Hardship Review

Elderly persons and persons with disabilities always have the right to request a Reasonable Accommodation(s).
Rents are determined in accordance with the methods and income measures set forth in ECC/HANH's Public Housing Rent Simplification Policies.

EXCEPTION TO HCV REGULATIONS

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
Annual Income	24 CFR Part 5.609(a)(4)	Any income derived from an asset, to which any member of the family has access.	Excludes assets, from the determination of annual income, to extent the amount is $50,000 or less. All income earned by a fulltime student will be excluded. All income earned by a family from adoption assistance will be excluded.
Income Exclusion for Person Enrolled in FSS Program	24 CFR Part 5.609(b)(1)	Incremental earnings and benefits to any family member, received from participation in a qualifying State or local employment training program, (including training programs not affiliated with a local government); and training of a family member participating as resident management staff.	Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member during the first year of FSS program participation, 75% in 2nd year, 50% in 3rd year, 25% in 4th year and 0% in 5th year, as long as the household is enrolled in the FSS Program. This will not exceed 5 years. Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying federal program, whether or not the member is enrolled in the FSS program.
Business Income for Resident Owned Businesses	24 CFR Part 5.609(b)(2)	The net income from the operation of a business or profession is included in determining annual income.	During the first year of enrollment in the FSS program, exclude 100 percent of any net income derived from the operation of a business; provided the business qualifies as a resident owned business under 24 CFR Part 963.5. • 50 percent exclusion during the second year; • 25 percent exclusion the third year.
Earned Income Disallowance for Persons with Disabilities	24 CFR Part 5.617(a)	Incremental income earned by a previously unemployed disabled person in the 12 months prior to becoming employed, provided the increase in income is the result of; employment of a family member, previously unemployed for one or more years prior to employment;	Eliminated from HCV program

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
		(2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families.	
Mandatory Deductions	24 CFR Part 5.611	(1) $480 for each dependent; (2) $400 for any elderly family or disabled family; (3) The sum of the following, to the extent the sum exceeds three percent of annual income: (i)Un-reimbursed medical expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.	Eliminate all mandatory deductions.
Additional (Exception) Expenses Deductions	24 CFR 5.611	None	Families with verifiable deductions that or exceed of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must equal or exceed $2,000 and shall be the sum of: Mandatory Deductions determined in accordance with Section 5.611 (a), plus non-reimbursed utility expenses (except telephone).
Total Tenant Payment	24 CFR 5.628	Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (a) 30 percent of the family's monthly adjusted income; (b) 10 percent of the family's monthly income; (c) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically	TTP to be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
		designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (d) The minimum rent, as determined in accordance with Sec. 5.630.	
Hardship Provision	24 CFR 5.630(b)	A family may be exempt from minimum rent as follows: (i) When the family has lost eligibility or is waiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances, including loss of employment.	A family whose shelter expenses, plus un-reimbursed medical, childcare and disability expenses exceed 40 % of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek hardship.
Minimum Rent	24 CFR 5.630	$25.00 for HCV. $50.00 for LIPH	HCV increased from $25.00 a month to $50.00 a month so that LIPH and HCV have same minimum rent amount.
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No change. Tenant paid utilities to be deducted from TTP to determine tenant rent.
Medical Deductions	24 CFR 5.611(c)		No longer applicable unless they exceed applicable threshold.
Annual Reexamination of Income and Family Composition	24 CFR 982.516	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of family income will occur every three years for Elderly or Disabled families and every two years for all other families, instead of every year. Reexamination of family composition will only occur if a family notifies ECC/HANH of a change in family composition since this will affect the determination of appropriate size unit. . Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually.

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
Interim Reexamination	24 CFR 982.516	A family may request an interim reexamination of family income for any changes since the last annual reexamination. ECC/HANH must conduct the interim reexamination within a reasonable time period after the family request. Currently, family must report any change in income that exceeds $200 or more a month.	A family may request a maximum of three interim re-examinations within a 12-month period, with the exception of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled, may only make one request for an interim for a hardship exemption each 12 months, unless one (1) household member is enrolled in the FSS program..
Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000	24 CFR 5.659	ECC/HANH must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available: (1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.	Only a self-certification will be required for income up to and including $5,000. For income above $5,000 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV.
Determination of Tenant Total Payment (TTP)	24 CFR 5.628	Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) if the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent	TTP based upon income-tiered approach. No family shall be subject to an increase in TTP greater than $25.00 a month during the second year family is of the Rent Simplification Policy. The increase in TTP during the third year of the Rent Simplification Policy shall not exceed $50 a month. The increase in TTP during the fourth year of the Rent Simplification Policy shall not $75 a month. The increase in TTP during the fifth yearshall not exceed $100 a month above the monthly TTP in the year immediately preceding the

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			implementation of Rent Simplification Policy. • These limitations on rent increase shall only apply to increases in TTP that result from the implementation of the Rent Simplification Policy and not rent increases that result from changes in family composition or changes in family income.
Annual Inspections	24 CFR Part 982.405(a)	ECC/HANH must inspect each unit annually during Section 8 assisted occupancy. 24 CFRP Part 982.405 (a) states that : The PHA must inspect the unit leased to a family prior to the initial term of the lease, at least annually during assisted occupancy, and at other times as needed, to determine if the unit meets the HQS. (See §982.305(b)(2) concerning timing of initial inspection by the PHA.)	ECC/HANH will no longer inspect every unit every year, but will instead inspect units every two years, unless the first unit inspection conducted after the implementation of the Rent Simplification Policy shows that the unit; (1) failed an inspection, or (2) the unit had a failed inspection in the three years prior to the implementation of the Rent Simplification Policy. A unit must have three consecutive years without a failed inspection to qualify for the bi-annual inspection. Units for which landlords are requesting increases in HAP payment will also be inspected prior to ECC/HANH granting any such increase.
Waiver of SEMAP Indicator	24 CFR Part 985.3(c).		Determination of Adjusted Income. Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000 is the determination

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required by HUD.
Waiver of SEMAP Indicator	24 CFR Part 985.3(m)		Annual HQS Inspections. This indicator shows whether the PHA inspects each unit under contract at least annually. (24 CFR 982.405(a). ECC/HANH will no longer inspect every unit every year, but will instead inspect a unit every two years unless the unit's inspection history indicates a need for an annual inspection as set forth above.
Waiver of SEMAP Indicator	24 CFR Part 985.3 (n)		Lease-Up. This indicator shows whether or not ECC/HANH enters HAP contracts for the number of units reserved under ACC for at least one year. ECC/HANH currently has a waiver of this provision and request that it be extended until September 30, 2008
Portability procedures	24 CFR Part 983.355 (c) (1)	ECC/HANH would like to have the ability to re-determine the eligibility of adult household members by performing a background check to ensure that family members do not have a criminal background.	

Housing Choice Voucher (HCV) Program
Rent Simplification Rent Tier Schedule

			Income Range			
$0	$2,499	$50		$34,500	$35,499	$819
$2,500	$3,499	$59		$35,500	$36,499	$843
$3,500	$4,499	$83		$36,500	$37,499	$867
$4,500	$5,499	$107		$37,500	$38,499	$891
$5,500	$6,499	$131		$38,500	$39,499	$914
$6,500	$7,499	$154		$39,500	$40,499	$938
$7,500	$8,499	$178		$40,500	$41,499	$962
$8,500	$9,499	$202		$41,500	$42,499	$986
$9,500	$10,499	$226		$42,500	$43,499	$1,009
$10,500	$11,499	$249		$43,500	$44,499	$1,033
$11,500	$12,499	$273		$44,500	$45,499	$1,057
$12,500	$13,499	$297		$45,500	$46,499	$1,081
$13,500	$14,499	$321		$46,500	$47,499	$1,104
$14,500	$15,499	$344		$47,500	$48,499	$1,128
$15,500	$16,499	$368		$48,500	$49,449	$1,152
$16,500	$17,499	$392		$49,500	Above	$1,176
$17,500	$18,499	$416				
$18,500	$19,499	$439				
$19,500	$20,499	$463				
$20,500	$21,499	$487				
$21,500	$22,499	$511				
$22,500	$23,499	$534				
$23,500	$24,499	$558				
$24,500	$25,499	$582				
$25,500	$26,499	$606				
$26,500	$27,499	$629				
$27,500	$28,499	$653				
$28,500	$29,499	$677				
$29,500	$30,499	$701				
$30,500	$31,499	$724				
$31,500	$32,499	$748				
$32,500	$33,499	$772				
$33,500	$34,499	$796				

Appendix 5

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

ECC/HANH BELIEVES: YOUTH INITIATIVE!

Housing Authority of the City of New Haven Background

From the Housing Authority of the City of New Haven to Elm City Communities

The Housing Authority of the City of New Haven (ECC/HANH) was established in 1938 by the City of New Haven in response to the United States Housing Act of 1937. Elm Haven, ECC/HANH's first housing development, planned in 1939, was one of the earliest public housing projects in the nation, a forward-thinking trend that still exists within ECC/HANH's philosophy today.

Quinnipiac Terrace and Farnam Courts were subsequently completed in 1941. As wartime labor flooded into New Haven, these family developments were noted for their effective use of space in a city facing a housing crisis. Again, ECC/HANH had prepared for the future.

The post-World War II population increased the housing shortage and the Housing Authority was the leading builder of new units in the city, which included moderate-income housing at McConaughy Terrace, Brookside and Rockview developments. In the 1950s and '60s, ECC/HANH completed expansion construction at Elm Haven and Farnam Courts.

In 1989, Elm Haven was rebuilt as the Monterey Place neighborhood, and in 2001, ECC/HANH received HUD status as a Moving to Work (MTW) agency, one of fewer than 36 MTW agencies in the nation at that time. In 2003, ECC/HANH received a grant for the reconstruction of Quinnipiac Terrace, and has since completed significant work at West Rock and Eastview Terrace.

MTW has enabled ECC/HANH to renovate senior housing, increase its number of accessible units to accommodate the needs of New Haven residents with disabilities, and has transformed its public housing stock into housing of choice. MTW has enabled ECC/HANH to provide a robust self sufficiency program.

In 2009, the Housing Authority changed its name to "Elm City Communities" (ECC) to better capture the essence of that to which the Housing Authority of New Haven aspires: creating affordable, safe, decent neighborhoods with stability and positive opportunities for all our residents.

Today, Elm City Communities' developments and scattered sites provide affordable community living and quality of life services for more than 1,900 families comprising low- and middle-income households, families with children, seniors, disabled, young couples starting out, people in career transition and those saving to buy a home of their own. Since its inception, the Housing Authority of New Haven has continuously demonstrated its commitment to the people of New Haven with foresight, dedication and sensitivity.

ECC/HANH Believes

Placing a premium on youth

Elm City Communities/Housing Authority of the City of New Haven's (ECC/HANH) mission is to provide, now and in the future, affordable communities of choice and opportunities for greater self-sufficiency for residents of the City of New Haven. In the spirit of its original creation, Elm City Communities continues to find new ways to serve the ever-changing needs of an ever-growing population.

As a MTW agency, we not only have the flexibility to pilot programs that support families ability to gain self-sufficiency, it is our responsibility as a MTW agency to demonstrate innovative policies and programs that support our mission as well as model in this effort for public housing authorities around the country.

We, at Elm City Communities, are proud of our accomplishments to date but know we must do more if we are to truly help the majority of our families become self-sufficient; it is not enough to simply help the adults within our households. We must support our youth and by placing a premium on our young people's success, we achieve the results public housing authorities across the nation seek—higher turnovers and a shrinking waitlist.

A youth initiative focused on academic achievement

Elm City Believes is a new youth initiative that leverages smart housing policy and programs in order to advance academic outcomes for student residents so that we may see success among New Haven's young people through increased high-school graduation, postsecondary completion, and employment attainment. Launched as ECC/HANH Believes in April of 2014, Elm City Believes provides a cradle-to-career pipeline of learning resources for children and youth and sustains the notion that our children's success relies on supportive in-school and out-of-school experiences. Elm City Believes has the potential to stop the cycle of poverty among the families utilizing ECC/HANH and in so doing we have the opportunity to build a new, vibrant middle class in New Haven.

Elm City Believes is comprised of supports that expand upon the good work ECC/HANH has been doing as well as enhance what the nationally recognized New Haven Public Schools are doing. Programs are research-based and best practice supported as well as founded on feedback from ECC/HANH residents, ECC/HANH staff, and community stakeholders. As such, we focus our youth initiative on 1) academic supports and afterschool programming to reduce the achievement gap; 2) parent and family engagement in their children's education; and 3) increasing New Haven Promise[10] admittance and other programs that support post-secondary opportunities. In addition to the array of ECC/HANH-wide programs, ECC/HANH has school-specific partnerships that cater to individual student needs (e.g. Tutoring and small group homework help, whole-family wraparound evaluations and mental health supports, student attendance and engagement assistance).

Why now?

Although some young people are able to rise above the circumstances of birth and family structure in order to advance academically, personally, and professionally, most do not without intensive supports from an array of service providers and caring, community based organizations.

Students are not hopeful: 46% students surveyed[11] lack hope for the future, reporting they feel stuck in their lives (32%) or discouraged about the future (14%).

Students are not success-ready: Only 33% of U.S. students surveyed[12] in grades 5 through 12 are success-ready, meaning students have hope[13], are engaged[14], and their well-being[15] is thriving—things that significantly relate to student performance and influence outcomes such as grades, credits earned, achievement scores, likelihood to stay in school, and future employment. The fact of the matter is that students in the U.S. become less engaged every year and we are in essence creating psychological dropout factories.

Students are not workforce-ready: Less than 30% of Americans (3 in 10)[16] feel high school graduates are prepared for college, and less than 20% (2 in 10)[17] of Americans feel graduates are ready to enter the labor force. Employers now rank reading and writing as top deficiencies in new hires—one in five U.S. workers reads at a lower skill level than their job requires;[18] written communications tops the list of applied skills found lacking in high school and college graduates alike.[19]

Poverty rate in New Haven is too high (population ≥ 25 years) [20]
25.0% of residents that have less than a high school degree
10.8% of residents that have high school graduates
3.8% of residents that have bachelor's degree or higher

Connecticut saw a 50% increase in child poverty since 1990[21]

The average earnings for a high school dropout is $22,165

The average earnings for a high school graduate is $33,137

The average earnings for a college graduate is $55,722

42.2% of residents aged 25 years and over have a high school diploma / equivalent or less

The average earnings for a ECC/HANH family is $14,091

[10] New Haven Promise is a scholarship and support program for New Haven Public School students that reside in New Haven, which provides full tuition to any in-state public university or college: http://newhavenpromise.org/
[11] 2013 Gallup poll of more than 600,000 students in grades 5 through 12 from school districts across the country
[12] Ibid.
[13] Student *hope* is defined by how students view their future. It's their belief that they can, and will, succeed at school and beyond.
[14] Student *engagement* is defined by the non-cognitive engagement—paying attention in class, how students feel, overall behavior, etc.
[15] Student *well-being* is defined by how students evaluate their lives and the extent to which they report positive daily experiences.
[16] 2013 Phi delta Kappa/Gallup poll
[17] 2013 Phi delta Kappa/Gallup poll
[18] http://arts.gov/sites/default/files/ToRead.pdf
[19] http://arts.gov/sites/default/files/ToRead.pdf
[20] http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_S1701.
[21] http://datacenter.kidscount.org/data#CT

ECC/HANH Believes School Partnerships	Leverage opportunities for ECC/HANH to Address Mutual Challenges and Concerns as Part of ECC/HANH Believes	ECC/HANH Interventions and Strategies	Indicators
Common Ground High School	• Coordinate with school to identify child-level needs • Individualized case management for students and families	• Homework help and tutoring • Attendance assistance • Technology assistance • Whole-family evaluations • Mental health support for students and families	• Academic increase on state standardized tests • Decrease in Ds and Fs • School attendance increase • School discipline decrease • Number of students graduating • Number of students matriculating to college • Number of students graduating from college
Wintergreen Interdistrict Magnet School (WIMS), an ACES K-8 school	• Coordinate with school to identify child-level needs • Individualized case management for students and families	• Homework help and tutoring • Attendance assistance • Whole-family evaluations • Mental health support for students and families	• Academic increase on state standardized tests • School attendance increase • School discipline decrease • Number of students matriculating to 9th grade
Lincoln Bassett preK-6 School (Partnership w/ ConnCAT in discussion for SY 2015-16)	• Coordinate with school to identify child-level needs • Increased supports for students and families	• Homework help and tutoring • After school enrichment, Coding program for grades 5-6 • Parent engagement • Parent supports	• Academic increase on state standardized tests • Number of students matriculating to 7th grade
New Haven Public Schools	• Coordinate with school to identify child-level needs • Increased enrollment in schools of choice	• Youth Stat • TBD	• TBD
Adult Education (In partnership w/ existing work and Project MORE in discussion for SY 2015-16)	• Coordinate with school to identify student-level needs • Coordinate with school to identify family-level needs	• Attendance assistance • Whole-family evaluations • Mental health support for students and families • Parent engagement • Parent supports • Family supports	• School attendance increase • Number of students age 17-30 receiving GED • Number of formerly incarcerated students age 17-30 completing GED

ECC/HANH Believes Programs	Leverage Opportunities that Addresses Challenges and Concerns as Part of ECC/HANH Believes	ECC/HANH interventions and Strategies	Indicators
Academic Supports and Afterschool Programming to Reduce Achievement Gap	• Partner or administer out-of-school enrichment programs to support achievement in identified academic areas of need • Use housing authority developments to support high quality out of school enrichment programs • Raise awareness among parents about out-of-school academic programs • Leverage role as Housing Authority to drive quality programs	• Dinner Pilot during standardized testing window ***AGR** • After school program w/ ConnCAT: for 40 kids in Grades 5-8 ***AGR** • After school program w/ Solar Youth: for 86 kids in Grades k-12 ***AGR** • After school program w/ BGCNH: for 125 kids in Grades k-8 ***AGR** • After school program w/ Leap for Kids: for 20 kids in Grades k-12 ***AGR** • Nonprofit Evaluations ***AGR** • Homework Clubs @ every site ***AGR** • Computer Labs @ every site ***AGR** • Middle College for remediation: Wilbur Cross, Coop, and NHA ***AGR** • Technology for blended learning and flipped classrooms ***AGR**	• Increase in student participation in community programs and improved quality of community programs • Percent of 12th graders receiving a high school diploma • Increase in 12th grade cohort • Academic increase on state standardized tests • Decrease in Ds and Fs • School attendance increase • School discipline decrease • Number of students graduating • Number of students matriculating to college • Number of students graduating from college
Access to High-Quality Early Learning and High-Quality Childcare ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Karen DuBois-Walton**	• Leverage role as Housing Authority to encourage more youth to read, especially at an early age with parents • Leverage role as Housing Authority to advocate for the importance of high-quality early learning • Leverage role as Housing Authority to advocate for the importance of high-quality early childcare • Leverage role as Housing Authority to advocate and change policies that support parents and families w/ OEC	• Summer Read Program ***AGR, PFE** • Early learning and literacy campaign ***AGR, PFE** • Regulation and/or legislation changes to Care 4 Kids ***AGR** • Regulation and/or legislation changes to public transportation ***AGR**	• Percent of 2-5 year olds that enroll in quality early learning programs • Percent of 2-5 year olds that complete quality early learning programs • Pre-K Oral Language assessment • Percent of students entering Kindergarten age-level expectations in all 6 areas: social-emotional, physical, cognitive, language, literacy, math

	• Leverage role as Housing Authority to advocate and change policies that support parents and families w/ DOT		
Parent and Family Engagement in Children's Education	• Organize formal and informal platforms for engaging families around the importance of education and academic opportunities for their children and parental engagement with the school system. • Demonstrate cultural competency and offer translation services to parents and families with limited English-speaking abilities • Educate parents on the importance of school and classroom stability	• Parent Support Network ***PFE** • Summer BBQs ***PFE** • Sports League ***PFE** • Parent workshops and trainings ***PFE, AGR** • Parent Ambassadors ***PFE** • Facts for Families ***PFE** • Text 4 Education *** PFE, AGR**	• Attendance of parents in school sponsored events and conferences • Stable numbers of Parent Ambassadors • Increase numbers of parents who attend workshops and/or trainings • Increase numbers of parents who have leadership opportunities around the city • Increase numbers of parents who have leadership opportunities within their child's school and influence on decision making at their school or district

Student Attendance, Truancy, and Discipline ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Sheila Allen-Bell**	• Leverage role as Housing Authority to improve student attendance • Leverage role as Housing Authority to improve student truancy • Leverage role as Housing Authority to reduce student discipline	• Direct case management work w/ NHPS students through Youth Stat ***AGR, PFE** • Direct case management work w/ identified ECC/HANH students attending NHPS ***AGR, PFE** • Homework help ***AGR** • Whole-family evaluations ***AGR, PFE** • Mental health support for students and families ***AGR, PFE**	• School attendance increase • School discipline decrease • Decrease in chronic absence, defined as missing 10% or more of the school year • Percent of K-5 students missing fewer than 10 days • Percent of 9th graders triggering early warning indicators (e.g., six or more absences and one or more course failures; one or more suspensions or expulsions)
New Haven Promise Informational Sessions and other Programs to Support Postsecondary Opportunities	• Offer support during academic transitions: middle to high; high to postsecondary; postsecondary to employment and self-sufficiency • Leverage role as Housing Authority to create postsecondary avenues • Leverage role as Housing Authority to provide adult relationships through youth employment • Leverage role as Housing Authority to celebrate youth • Provide supports for completion of a postsecondary degree or credential	• NHP informational sessions for parents ***PSO, AGR, PFE** • NHP informational sessions for students ***PSO, AGR** • NHP applications for 8th graders ***PSO, AGR, PFE** • PSAT and SAT supports ***PSO, AGR** • ECC/HANH apprenticeship program ***PSO, AGR** • Afterschool job shadow program ***PSO, AGR** • Student Training and Employment Program (STEP) ***PSO, AGR** • Graduation gift ***PSO, AGR, PFE** • Youth Leadership Council (YLC) and STEP alumni group ***PSO, AGR**	• Percent of eligible students that complete the New Haven Promise application • Percent of graduating college bound students that complete the FAFSA • Developmental assets data (savings) • Increase in percent of seniors that take the PSAT and SAT • Percent of students receiving New Haven Promise awards • Percent of graduates that enroll in postsecondary college or technical school • Percent of students at state universities, community colleges, and technical colleges enrolling in pre-college and/or remedial coursework

			• Percent of students continuing past the first year of postsecondary • Percent of students that graduate from 2- and 4-year colleges and universities
College Week ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Emily Byrne**	• Leverage role as Housing Authority to avail students of the fact that postsecondary is a viable option for after high school graduation • Offer support during academic transitions: middle to high; high to post-secondary; post-secondary to employment and self-sufficiency • Offer support during the winter break when school is not in session	• 5 days of intensive supports during winter break for grades 9-12 that is geared toward postsecondary ***PSO, AGR, PFE** • Early years will be large groups; if there is more interest it will be separated into grade cohorts ***PSO, AGR, PFE** • Student Ambassadors ***PSO, AGR**	(Same as above)

System issues that need to be addressed

- **MOUS, Data Sharing Agreements, Consent Forms, and FERPA**

- **Culture of high expectations and excellence at ECC/HANH**
- **Moving to Work status**

• **Start-up funds** • **Financial sustainability**
• **Culture change among academic, community and stakeholder partners** • **Sustainable social capital between schools and families**

Appendix 6

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

POLICIES FOR MIXED FINANCE DEVELOPMENT

NON-MTW ACTIVITY
Policy is entered in the plan to inform the public of Policies of Mixed Finance Developments.

ECC/HANH's public housing portfolio presently includes fifteen mixed finance developments: Monterey Place Phase 1, 2, 3, 4, 5 and 2R, Eastview Terrace Phase 1, William T. Rowe, Brookside Phase 1, Brookside Phase II, Rockview Phase 1 Rental, 122 Wilmot Road and Quinnipiac Terrace Phase 1, 2 and 3. The housing in all developments is owned and managed by private companies, according to management agreements, which have established their own policies for admissions and occupancy, according to the following guidelines:

The management agent of the mixed finance development must establish written policies for admissions and occupancy. The admissions and occupancy policies for the mixed finance development must be submitted to, and approved by ECC/HANH.

The admissions and occupancy policies for the mixed finance developments must comply with HUD regulations and federal fair housing and civil rights requirements. The aforementioned mixed-finance developments have had their admissions and occupancy plans and policies set forth in previous MTW plans.

The West Rock Redevelopment consists of the Brookside Phase 1 Rental, Brookside Phase 2 Rental and Rockview developments. As such, pursuant to the MOA these units are subject to the Preferences indicated below, however, notwithstanding the method of selection for new admissions, the Owner is permitted to transfer families among and in between Brookside Phase 1, Brookside Phase 2 and Rockview Rental Phase 1; provided that such transfers are in accordance with the Transfer Procedures set forth in Priorites 1-6 below:

1. Relocation due to modernization

Where modernization activities will make units uninhabitable during construction, the Owner will require residents to relocate, either temporarily or permanently, and relocation options may include transfer to another PHA Assisted unit owned and managed by the Owner.

The relocation options of resident families will be specified in a Relocation Plan, and all Owner relocation activities will be conducted according to the requirements of the Uniform Relocation Act and implementing regulations. Resident families are entitled to all the rights specified in the URA and implementing regulations, including proper notice, offers of comparable units, and payment of certain relocation costs.

If a resident family refuses or has failed to relocate after 2 appropriate unit offers, provided that the Owner has complied with the requirements of the URA(and its implementing regulations, including requirements for proper notice, the Owner will begin lease termination proceedings against the family.

2. Families occupying units with accessibility or other special features that are not needed by the occupant family

The Owner has a limited number of accessible units with special features suited to persons with mobility-related disabilities. According to this ACOP, accessible units will be assigned first to current resident families or applicants in need of accessibility features. If there are no current residents nor applicants in need of the unit's accessibility features, the unit may be offered to another family that does not need that unit's accessibility features. However, as a condition of admission, the occupant family is required to consent to transfer to another appropriately-sized unit when/if the Owner has a resident or applicant in need of the unit's accessibility features. Families who are admitted to an accessible unit, but who do not require the unit's accessibility features, are required to sign a lease addendum to this effect. The Owner will maintain a list of households residing in accessible units but not needing their apartments' accessibility features, who will be required to transfer when the Owner has a resident or applicant in need of the apartment's accessibility features.

If an accessible unit (or unit with other special features) is occupied by a family that doesn't require the unit's accessibility features, when the Owner identifies that there is a need for the unit's accessibility features, the Owner will require the unit's occupant family to transfer to another, appropriately sized unit. The Owner will provide at least 30 days written notice that, when a unit of the proper size becomes available, the family will be expected to consent to a transfer.

Families required to transfer under this policy will be offered 1 comparable unit of the appropriate size for the household. If a family has rejected the unit offer, the Owner may begin lease termination proceedings against the family.

3. Emergency transfers due to un-inhabitability of unit

The Owner will prioritize, and may require, transfers in cases where the resident's unit has been damaged by fire, flood, or other causes to such a degree that the unit is not habitable, provided the damage was not the result of an intentional act, carelessness, or negligence on the part of the resident or a member or guest of the resident's household.

The Owner may, at its discretion, permit continued occupancy and permit and prioritize a transfer in cases where the damages that resulted in the unit's un-inhabitability were a result of carelessness or negligence of the resident or a member or guest of the resident's household, provided that the resident has, in writing, accepted the responsibility for such damage and has agreed to make restitution to the Owner for the expense of repairing such damage.

4. Protection of victims and witnesses

The Owner will authorize emergency transfers in cases where the Owner has received sufficient documented evidence of an emergency situation in which the family is subject to risk of violence and that a transfer to a different HANH public housing development will be effective in reducing the family's risk of threatened violence. Emergency transfers due to risk of violence may be provided in the following circumstances:

- Residents who are participants in a government-sponsored witness protection program.
- Residents who have been subjected to domestic violence.

  Households who have provided documentation that indicates a reasonable probability of threatened violence due to fear of retaliation for witnessing an incident, or providing testimony in an eviction or criminal proceeding.
- Residents who are victims of hate crimes.

Before considering an administrative transfer based on threats of violence, the Owner will require documentation that (1) there is a reasonable probability of violence, (2) the risk of violence is not due to the lease violations or other actions of family members, and (3) the family has taken any available actions to reduce its vulnerability to threats of violence (such as police involvement with documented reports, restraining orders, criminal trespass, etc.). In addition, the family must demonstrate that a transfer to another unit at the Brookside Phase 1 Community or HANH public housing unit or development will effectively reduce the family's risk of violence.

In cases in which the Owner determines that the risk of violence is valid (and sufficiently documented and that transfer to another public housing development will effectively end the threatened violence), and after approval by Owner the application will be forwarded to HANH for approval. HANH will prioritize this transfer to the next available unit of the appropriate size. HANH will also consider issuing a voucher on a case-by-case basis. The family is permitted to reject this unit and maintain its priority emergency transfer status only if:

- The resident provides evidence that the threatened violence would continue in this new site, or
- The offered unit does not have accessibility or other special features to accommodate a disability, which features were present in the resident's current apartment and/or were requested and approved through HANH's reasonable accommodations procedures.

Otherwise, if a family has requested an emergency transfer due to threats of violence but has rejected a unit offer that would address their emergency needs, the family will be removed from consideration as an emergency transfer and will be offered the opportunity to request a transfer based on good cause.

In cases in which HANH determines that there is a reasonable probability of violence that is sufficiently documented and that transfer to another public housing unit would not at all be effective in reducing the threat of violence, HANH may, at its discretion, refuse to transfer a family and, instead, may offer the family a Section 8 voucher so that they could relocate in the private market. This is an exceptional measure, and HANH will grant a Section 8 voucher to families under these circumstances only when (a) it is clear that transfer to another public housing development would not reduce the family's vulnerability to documented threats of violence, (b) relocation into the private apartment market with a voucher may effectively reduce the family's vulnerability to documented threats of violence, and (c) the family has taken steps necessary to reduce the family's vulnerability to threatened violence, including police reports, restraining orders, criminal trespass procedures, etc.

5. Under-housed or over-housed.

The Owner may initiate or require transfers of households who are under-housed by a degree of 2 bedrooms, or who are over-housed, according to the Owner's occupancy standards.

At the Brookside Phase 1 Community, the household is over or under-housed by a degree of two bedrooms. Over and under housed transfers by a degree of one bedroom shall also be considered on a case by case basis for reasons of good cause. Transfers to larger units may be approved only when the family size has increased through birth, marriage, legal adoption, award of custody (permanent or temporary custody greater than six (6) months), reconciliation of separated co-heads, return of a minor to legal custody of the household, or for approved medical or disability purposes.

If the Owner determines a resident family is over or under housed, the Owner will inform the resident in writing that when a unit of proper size becomes available, the Resident will have to move.. The resident will receive at least 30 days notice of the date by which the transfer must be complete.

6. Emergency Transfers

HANH may permit or require a transfer in emergencies, such as severe medical needs, upon approval of the Executive Director or her designee.

CARES – Brookside Phase II and Rockview Phase 1 Rental – the following preferences was approved by the ECC/HANH Board of Commissioners via Resolution # 11-225/11-R and Resolution # 01-02/13-S respectively: The following modifications will be made to the ECC/HANH ACOP specific to the Brookside Phase 2 and Rockview Phase 1 Rental Mixed Finance Development:

- An admission preference for "working families" for all PBV units;
- An admission preference for former and current West Rock residents for all ACC units will apply pursuant to the agreement between the Tenant Resident Council ("TRC") for West Rock and the Developer and is as follows:
  - **First preference** –all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development,
  - **Second preference**—all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH,
  - **Third preference**—all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH,
  - **Fourth preference**—applicants in accordance with all other preference set forth in the ACOP.
- In accordance with the MOA, all relocated residents that are in "good standing" as defined in the ACOP will be permitted to exercise their right to return.
- Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to families on the Authority's transfer waiting list, then to families on the Authority's accessible waiting list.
- Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.
- In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment any deal-specific management documents and this ACOP those documents shall control. Provided however that in all events notwithstanding anything in this addendum to the contrary the applicable public housing requirements shall control.
- Income tiering in accordance with the ACOP such that 100 percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income.
- Rent determination for returning families will continue to be done in accordance with ECC/HANH's Rent Simplification Policies under ECC/HANH's Alternative Rent Determination Policy.
- Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.
- Flat Rent determination for new families shall be done annually.
- CARES (Caring About Resident Economic Self-Sufficiency) as further defined in Exhibit C attached hereto.

- Definition of "Tenant in Good Standing" for "returning residents" who have preference are as follows (i) ECC/HANH deems a household not to be in good standing if ECC/HANH has taken legal action against the household and has obtained an execution for possession, allowing it to evict the household. At this stage of the legal process, all rights to cure the lease violation have been exhausted, and so have the appeals processes through both the Housing Court and the Housing Authority's internal grievance procedure; (ii) Households which have reached court-stipulated agreements with the Housing Authority to cure lease violations (such as nonpayment of rent) are considered to be in good standing as long as they abide by the terms of the stipulated agreement; (iii) Households which have received a pre-termination notice or notice to quit or are at any subsequent stage of eviction process are still considered to be in "good standing" for the purposes of the MOA until they have "exhausted all rights to cure and appeals", this means that households under eviction remain in good standing until ECC/HANH obtains an execution for eviction.

In addition, the policies governing the 122 Wilmot Road development were approved via Resolution 12-243/11-R and included the following: Thirteen (13) PBV units will be designated for the elderly with preference for former West Rock residents pursuant to the agreement between the Tenant Resident Council ("TRC") for West Rock and the Developer and is as follows:

THE PREFERENCE SYSTEM

a) An Admission preference does not guarantee admission.
b) Preferences establish the order of applicants on the waiting list.
c) Every applicant must still meet the Wilmot Crossing at West Rock's Selection Criteria as set forth in the ACOP before being offered an apartment.
d) Verification must be submitted in order to be given a preference.
e) Preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer (prior to execution of a lease), have the oldest application date on the waiting list for the size and type of unit sought.
f) An admission preference for the thirteen (13) Project Based Section 8 (PBV) units are set forth below:

    a. The thirteen (13) PBV units are designed Elderly Only.
        i. Preference for these 13 PBV units are as follows:
            1. First preference – all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development;
            2. Second preference - all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
            3. Third preference - all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
            4. Fourth preference - applicants in accordance with all other preference set forth in the ACOP.

g) Within the aforementioned preferences, the following preferences will prevail:
    a. Displaced Persons as defined under Section II Housing Glossary Terms of the ACOP.
    b. Documented victims of domestic violence, dating violence or stalking.
    c. Local preference based on Income Targeting 24 CFR 960.202. The Owner and ECC/HANH have agreed pursuant to the Regulatory and Operating Agreement.
h) Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to a family on the Authority's transfer waiting list, then to the Authority's accessible waiting list.

i) Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.

j) In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment, any deal-specific management documents and this ACOP, those documents shall control. Provided however, that in all events notwithstanding anything in this addendum to the contrary, the applicable public housing requirements shall control.

k) Income tiering in accordance with the ACOP such that 100% percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income and that public housing units shall be leased to families with income above 30 percent of the area median income if households below 30% area median income are not available and eligible for occupancy so that vacant units are not unoccupied.

l) Rent determination for returning families will continue to be done in accordance with ECC/HANH's Rent Simplification Policies under ECC/HANH's Alternative Rent Determination Policy.

m) Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.

n) Flat rent determination for new families shall be done annually.