Moving to Work ANNUAL REPORT 2021

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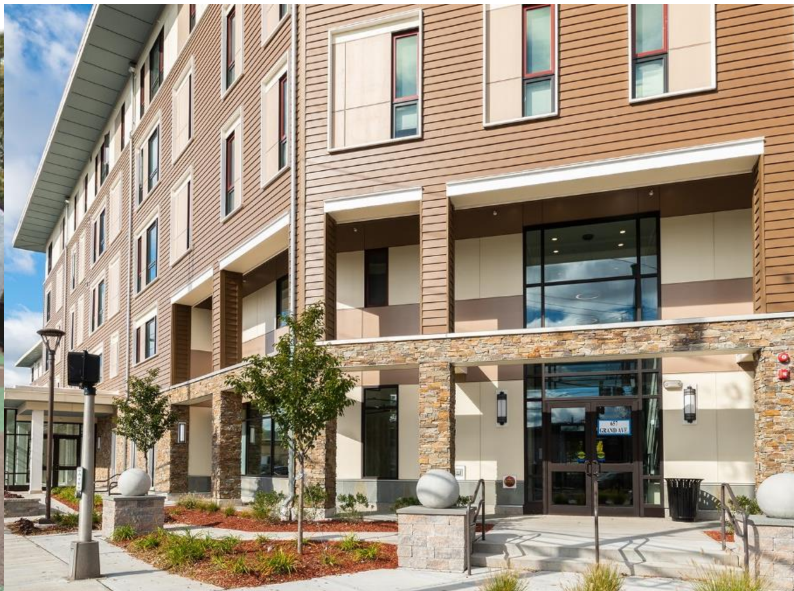

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I. INTRODUCTION

In 2001, the Elm City Communities/The 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 and reports that articulate ECC/HANH's key policies, objectives, strategies, impact and outcomes 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 FY 2021 MTW Annual Report (October 1, 2020 to September 30, 2021) states ECC/HANH's MTW progress toward achieving goals and objectives outlined in the FY2021 MTW Annual Plan.

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. The purpose of the MTW program, as established by Congress, is to identify innovative local approaches for providing and administering housing assistance that accomplish three primary goals:

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

Through the MTW program, MTW agencies may request exemptions or waivers from existing regulations to pursue strategies that may result in more effective operations and services for 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 to allocate resources according to local determinations of the most effective use of funds to address local needs.

Additionally, the MTW program 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 is limited to the following HUD programs:

- Public Housing Operating Fund
- Public Housing Capital Fund
- Section 8 (HCV) Program

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
- Rental Assistance Demonstration (RAD) Grants
- Any future HOPE VI Revitalization grants
- 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 Report for FY2021.

ECC/HANH's original MTW Agreement with HUD became effective retroactively on 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 area median income (AMI); therefore, ECC/HANH has executed the Second Amendment to its Restated and Amended Moving to Work Agreement with HUD that 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 to update and reinvigorate our agency's plans. ECC/HANH developed a Three-Year Strategic Plan from FY07 to FY09. 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. Since FY2018, ECC/HANH has introduced the strategic planning process of developing agency playbooks and has continued to update its playbook regularly.

DELIVER COST EFFECTIVE SOLUTIONS

1. Expand the rent simplification model
2. Invest in technology to add additional functionality – e.g., online housing applications; self-service access for applicants, residents and landlords; web-based payments to vendors and landlords
3. Provide services to local public housing agencies
4. Invest in energy efficiency
5. Complete RAD conversion opportunities within housing portfolio
6. Continue to expand streamlined process such as self-certification for HQS inspections

EXPAND HOUSING CHOICE

1. Complete revitalization of West Rock community through Rockview and Westville Manor and 34 Level St. redevelopments
2. Increase market-rate homeownership opportunities in West Rock
3. Partner with local government and non-profit entities to increase the supply of affordable housing
4. Complete planning and redevelopment of Farnam Court/Mill River and Westville Manor
5. Continue modernization and capital investment in current housing portfolio
6. Continue progress toward meeting goal of 10% Uniform Federal Accessibility Standards (UFAS) compliant units agency-wide

HELP FAMILIES REACH SELF-SUFFICIENCY

1. Fully implement MTW CARES initiative to move families toward self-sufficiency with program evaluation and documentation of impact findings
2. Support residents' entrepreneurial endeavors
3. Offer cost-effective training programs with increasing resident participation
4. Partner with local school system to support student academic progress and attainment
5. Support families' transition to self-sufficiency.

DELIVER COST EFFECTIVE SOLUTIONS

1. Streamline administrative functions in public housing and HCV program operations through transition to a paperless documentation system and electronic files
2. Continue progress of streamlined administration of HCV program
3. Explore regional provision of housing authority services on a fee-for-service basis
4. Complete disposition and/or conversion of remaining non-performing assets
5. Continue investment in technology to reduce administrative burden and create model wired and wireless communities
6. Continue investment in energy efficiency initiatives

EXPAND HOUSING CHOICE

1. Complete final revitalization effort of ECC/HANH's public housing stock through revitalization/redevelopment or disposition of remaining poor-performing assets
2. Address housing crisis experienced by marginalized populations
3. Promote housing opportunities in the public housing and HCV program for income-eligible work-able families
4. Use housing choice vouchers to promote development of mixed-income, mixed-finance housing opportunities in non-HANH developments

HELP FAMILIES REACH SELF-SUFFICIENCY

1. Develop transitional models of assistance that move families toward self-sufficiency and away from subsidized housing in progressive steps
2. Expand resident-owned business initiative to increase the number of ECC/HANH contracts executed with business enterprises and support these businesses to successfully compete for other external contracts
3. Expand cost-effective training programs and increase resident participation
4. Expand supportive services program – especially critical for effective management of Elderly/Disabled developments – to support families as they move toward self-sufficiency
5. Partner with local school system to support student academic progress and attainment

OVERVIEW OF MTW INITIATIVES						
Label	**Description**	**Cost Effective**	**Expand Housing Choice**	**Increase Self-Sufficiency**	**FY Approved**	**Status**
1.1	Development of Mixed-Use Development of 122 Wilmot Road		✓		2009	Closed[1]
1.2	Local Total Development Cost (TDC) Limits	✓	✓		2009	Ongoing
1.3	Fungibility of MTW Funds	✓			2012	Ongoing
1.4 & 1.10	Defining Income Eligibility for the Project-Based Voucher Programs	✓	✓		2012	Ongoing
1.5	HCV Preference and Set-Aside for Victims of Foreclosures		✓		2009	Ongoing
1.6	Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Programs)		✓		2008	Ongoing
1.7	Tenant-Based Vouchers for Supportive Housing for the Homeless		✓	✓	2010	Ongoing
1.8	Farnam Court Transformation Plan		✓		2011	Ongoing
1.9	Increase the Allowed Percentage of Project Based Voucher (PBV) Units from 75 Percent to 100 Percent in a Mixed-Finance Development	✓	✓		2012	Moved[2]
1.10	Income Skewing for PBVs in Mixed Finance	✓			2012	Moved[3]
1.11	Increase the Percentage of Housing Choice Voucher Budget Authority for the Agency that is Permitted to Project-Base from 20 Percent up to 25 Percent		✓		2013	Ongoing
1.12	Development of Replacement Public Housing Units with MTW Block Grant Funds		✓		2013	Ongoing
1.13	Creation of a Commercial Business Venture at 122 Wilmot Road	✓			2013	Closed[4]
1.14	Redevelopment of 99 Edgewood Avenue (Dwight Gardens)		✓		2013	Closed[5]

[1] Project completed
[2] Moved to "MTW Initiatives Requiring Funding Flexibility Only"
[3] Moved to join Initiative 1.4
[4] Project completed
[5] Project not being pursued

OVERVIEW OF MTW INITIATIVES						
Label	**Description**	**Cost Effective**	**Expand Housing Choice**	**Increase Self-Sufficiency**	**FY Approved**	**Status**
1.15-1.17	RAD Finance Development for Rockview Phase II Rental & Westville Manor Transformation Plan		✓		2014	Ongoing
1.16	Crawford Manor Transformation Plan		✓		2014	On Hold
2.1	Family Self-Sufficiency Program			✓	2007	Ongoing
2.2	Incremental Earned Income Exclusion			✓	2008	Ongoing
2.3	CARES (Caring About Resident Economic Self-Sufficiency)			✓	2012	Ongoing
2.4	Teacher in Residence			✓	2015	Ongoing
2.5	REACH			✓	2019	Ongoing[6]
3.1	Rent Simplification	✓			2007	Ongoing
3.2	UPCS Inspections	✓			2008	Closed[7]
3.3	Revised HQS Inspection Protocol	✓			2011	Closed[8]
3.4	Mandatory Direct Deposit for Housing Choice Voucher Landlords	✓			FY10	Closed[9]
3.5	HCV Rent Simplification/Cost Stabilization Measures	✓			FY14	Ongoing
3.8	Fulton Park Modernization		✓		FY11	Completed
3.9	LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families	✓			FY08	Closed
3.6	Expanded Jurisdiction		✓		FY19	Ongoing

[6] During FY2021 this initiative was implemented as a soft launch. Full implementation during FY2022 is planned.
[7] Initiative no longer requires MTW flexibility
[8] Initiative was revised and relaunched as item 3.5
[9] Initiative does not require MTW flexibility

OVERVIEW OF MTW INITIATIVES						
3.7	Non-traditional Supportive Housing Program		✓	✓	FY19	Ongoing

OVERVIEW OF MTW INITIATIVES REQUIRING FUNDING FLEXIBILITY ONLY[10]						
Label	**Description**	**Cost Effective**	**Expand Housing Choice**	**Increase Self-Sufficiency**	**FY Approve d**	**Status**
3.9F	Project Modernization – Various Projects		✓			Ongoing
3.10F	Vacancy Reduction – Various Projects		✓		2008	Ongoing
4.1F	Resident-Owned Business Development			✓	2009	Ongoing
4.2F	SEHOP Capital Improvement Program			✓	2010	Ongoing
4.3F	Prison/Community Reentry			✓	2009	Ongoing
4.4F	Resident Services for Elderly/Disabled			✓	2005	Ongoing
4.5F	Cap on Project-Based Units in a Project	✓	✓		2010	Closed
4.6F	Creation of New Instrumentality Entities to Support ECC/HANH Goals and Strategic Planning activities	✓			2019	Moved[11]
4.7F	REACH	✓		✓	2019	Ongoing
4.10F	Jumpstart Incentive Program		✓	✓	2020	Ongoing
	ECC Believes!		✓		2014	Ongoing

[10] Per HUD request in the FY20 MTW Plan, the MTW Initiatives Requiring MTW Flexibility Only have been numbered and labeled in accordance with the categorizations of the ongoing initiatives (Cost Effective, Expand Housing Choice, Increase Self-Sufficiency). These initiatives are also labeled with the letter "F" to indicate that they require MTW Flexibility Only.

[11] Moved to "MTW Initiatives Requiring Funding Flexibility Only"

II. General Operating Information

• GENERAL OPERATING INFORMATION
ANNUAL MTW REPORT

B. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based for the first time during the Plan Year. These include only those in which at least an Agreement to enter a Housing Assistance Payment (AHAP) was 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 NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
CT004000015 Fairmont Heights	98	97	Completed	Yes	RAD conversion of ACC units
CT004000011 McQueeney Towers	150	149	Completed	Yes	RAD conversion of ACC units
CT004000012 Winslow Celentano	65	64	Completed	Yes	RAD conversion of ACC units
CT004000015 Ruoppolo Manor	105	104	Completed	Yes	RAD conversion of ACC units
CT004000014 Farnam Courts	92	36	Completed	Yes	RAD conversion of ACC units
CT004000001 Westville Manor	62	0	In Progress	N/A	Planned Conversion of ACC units
CT004000005 Valley Townhouses	40	0	In Progress	N/A	Planned Conversion of ACC units

Planned	Actual	
612	450	**Planned/Actual Total Vouchers Newly Project-Based**

ii. Actual 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 was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Name	#	#	Status (below)	Yes/No	Description
Expanded Jurisdiction	19	0	Committed	No	New Initiative FY 19 Plan
PBV Fellowship I	18	18	Leased	No	100% Supportive Housing
PBV Fellowship II	5	5	Leased	No	100% Supportive Housing
PBV Also Cornerstone (Continuum of Care)	4	4	Leased	No	100% Supportive Housing
PBV Norton Court (Continuum of Care)	12	12	Leased	No	100% Supportive Housing
PBV Cedar Hill	4	4	Leased	No	100% Supportive Housing
PBV West Village	15	15	Leased	No	100% Supportive Housing
PBV QT Phase 1	23	23	Leased	No	LIHTC PBV units
PBV QT Phase 2	23	23	Leased	No	LIHTC PBV units
PBV QT Phase 3	16	16	Leased	No	LIHTC PBV units
PBV Eastview Phase I	49	49	Leased	No	LIHTC PBV units
PBV Brookside Phase I Rental	51	51	Leased	No	LIHTC PBV units
PBV Brookside Phase 2 Rental	51	51	Leased	No	LIHTC PBV units
PBV Rockview Phase I Rental	47	47	Leased	No	LIHTC PBV units
RAD Rockview Phase II	62	62	Leased	Yes	RAD/PBV units
PBV New Rowe Building	32	32	Leased	No	LIHTC PBV units
PBV 122 Wilmot Road	13	13	Leased	No	LIHTC PBV units
PBV Park Ridge	60	60	Leased	No	LIHTC PBV units
PBV Frank Nasti Existing	11	11	Leased	No	PBV units
PBV CUHO Existing	24	24	Leased	No	Scattered Site PBV families
PBV CUHO New Construction	5	5	Leased	No	Scattered Sites PBV families
PBV Shartenburg	20	20	Leased	No	PBV units
Mutual Housing Association New Construction	20	20	Leased	No	PBV units
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)	9	9	Leased	No	PBV Units
PBV Mutual Housing Existing	15	15	Leased	No	PBV units
PBV Casa Otonal	12	12	Leased	No	PBV units
New Haven Coliseum (previously Live Learn Play)	19	0	Committed	No	PBV units
RAD 122 Wilmot Road	34	34	Leased	Yes	RAD/PBV
RAD Eastview Phase I	53	53	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook)– 9%	44	44	Leased	Yes	RAD/PBV
Howe Street Single Room Occupancy	80	80	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook) -4%	51	51	Leased	Yes	RAD/PBV
RAD Fair Haven/ Farnam (Chatham)	55	55	Leased	Yes	53 RAD PBV Units and 2 PBV units
RAD Monterey Place-Edith B Johnson	95	95	Leased	Yes	RAD converted ACC units

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
RAD Monterey Place- William Griffin	4	4	Leased	Yes	RAD converted ACC units
RAD Monterey Place 1	42	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2	7	7	Leased	Yes	RAD converted ACC units
RAD Monterey Place 3	45	45	Leased	Yes	RAD converted ACC units
RAD Monterey Place 4	42	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 5	17	17	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2R	28	28	Leased	Yes	RAD converted ACC units
RAD Prescott Bush	56	56	Leased	Yes	RAD Converted ACC units
RAD Waverly Townhouses	51	51	Leased	Yes	RAD converted ACC units
RAD CB Motley	45	45	Leased	Yes	RAD converted ACC units
RAD Newhall Gardens	26	26	Leased	Yes	RAD converted ACC units
RAD Katherine Harvey Terrace	17	17	Leased	Yes	RAD converted ACC units
RAD Fulton Park	12	12	Leased	Yes	RAD converted ACC units
RAD Chamberlain Court (Justice Landing)	7	7	Leased	Yes	RAD converted ACC units
RAD Farnam Onsite I	86	86	Leased	Yes	RAD converted ACC units
Portsea Place	8	8	Leased	No	Supportive Housing for homeless young adults
Total: Planned Existing Project-Based Vouchers	**1544**	1506			

Please describe differences between the planned and Actual Existing Number of Vouchers Project-Based:

Projects with committed PBVs that are not yet under HAP agreement.

iii. Actual Other Changes to MTW Housing Stock in the Plan Year

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR

In preparation for the RAD conversion of an LIPH development. LIPH dwelling units were not re-occupied within 90 days of the RAD closing date. Those vacant units were used for swing units for relocation purposes during the construction phase of the RAD.

33 LIPH vacant units in non-RAD Project sites were used as swing units and/or master lease for RAD relocation purposes.

iv. GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR

MTW Plan Year 2021: General Description of All Actual Capital Expenditures

ECC/HANH's goal through its MTW status for this fiscal year was to provide housing of choice in the most cost-effective method possible. Given the funding limitations, our plan was to address the urgent operational needs within the LIPH portfolio remaining post-RAD conversion. MTW status has facilitated management of capital improvement project financing. ECC/HANH has been able to focus on physical needs at our LIPH properties in complement to the larger construction-redevelopment projects undertaken through RAD. Our ongoing objectives remain:

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

The plan for MTW FY 21 included receipt of CFP 2019 & CFP 2020 funds.

During FY21, ECC/HANH continued to execute projects that support these goals and improve the remaining portfolio. Properties planned for future redevelopment efforts were not prioritized for CFP projects; however, if there was a Life, Health and Safety challenge, we considered the needs across the entire portfolio. Several work items in the FY21 MTW Plan were continuation/implementation of MTW FY20 Plan projects that were not fully completed by the end of FY20. In FY 21, work took place at Crawford Manor, McConaughy Terrace, Essex Townhouses, Scattered Sites, McQueeney commercial, and common areas. Funds were also earmarked for Agency wide services and obligations.

Covid-19 delays have hindered our efforts to renovate. Design work for construction which required dislodging tenants in the midst of the pandemic was not encouraged, for good reason. Designs completed or underway had to be redesigned to exclude invasive work, at additional cost to ECC. We had limited response to bids for work on our properties which we infer was due to Covid. Bids which came in were way above the independent cost estimates. Projects which we got off the ground, are experiencing additional costs and delays due to supply line issues and even Covid protocols and PPE. Basic construction materials have long lead-times or are entirely unavailable. Appliances have multi-month waiting times so contractors must order immediately and pay warehousing fees to ensure completion can be "on time". Nevertheless, we persevered:

a) Crawford Manor ADA Storefront and Entry Access System Upgrades/Crawford Manor Fire Alarm Panel and Fire Pump Replacement

a. This project was planned to bring the building entryway into ADA compliance and provide COVID security. The current entry did not provide adequate turnaround area or pull-side clearance. Due to the lack of accessibility, the door was often propped open. The need for a secure entry was critical to provide residents in the Elderly-Disabled community with a much-needed sense of security, especially during the pandemic. The existing Fire Alarm panel and Fire Pump were at the end of their useful life. The Fire Alarm system code now requires inclusion of addressing features for smoke alarms. This critical equipment needed to be replaced to ensure safety for residents in the 15-story apartment tower. Due to COVID concerns, the project was repackaged as vestibule and fire pump first phase since this work could be performed without entrance into residential apartments. Bids were solicited in December 2020 and a contract awarded in March 2021. Construction on the project is ongoing. Accessible entry will be completed in October 2021, and the fire pump by Thanksgiving, 2021. The fire alarm system upgrade, along with other life, health and safety improvements identified in an A&E report (work that involves entry into occupied apartments) will be bid in October 2021 for implementation in FY 22. $240,721.88 spent.

b) McConaughy Terrace Sewer Replacement

a. Project implemented in FY20 and completed by May 2021 following a winter hiatus. McConaughy Storm and Sanitary Sewer Upgrade project was a major overhaul of the systems, clearing and replacing 73-year-old sewer components resulting in improved site drainage and reduction in frequency of extremely unsanitary plumbing backups on the grounds and inside residences. These improvements affect 201 families. $906,214.88 spent.

c) Renovations Associated with Lead Abatement

a. Renovations in units where lead abatement was being performed: Abatement was re-solicited in smaller quote-bid groupings. Three quote packages and one bid package awarded. All abatement work at Essex completed. Essex Townhouses is now entirely Lead Safe. Abatement work completed in 17 Scattered Sites West apartments. $250.00 spent on non-lead related repairs. More expenses anticipated in FY22.

d) Scattered Sites East & West: Replacement of Domestic Hot Water and Heating Ventilation and Air Conditioning Systems

Goals:

a. Replace antiquated inefficient oil-fired furnaces and boilers with gas-fired systems in one- and 2-family homes. This will save utility costs, Operations repair time and the inconvenience of running out of fuel and associated restart charges residents experienced. The removal of antiquated oil tanks also removes the potential for petroleum leaks, and environmental contamination.

b. Replace antiquated gas systems with energy-efficient new gas-fired systems. Some systems were at or near the end of their Estimated Useful Life.

c. Replace any antiquated electric heating and hot water systems with more energy-efficient systems. Project design initiated during FY19. Project re-bid and awarded during FY21. Work started spring 2021 and reached substantial completion in August 2021. Project included 18 units in 13 properties. Anticipated outcome: energy savings and improved resident comfort. $398,860.99 spent

e) Wolfe: Health and Safety Repairs Phases 1 and 2

a. ECC/HANH planned for major development upgrade at Robert T. Wolfe as a future RAD conversion project. In the interim, ECC/HANH identified more immediate health and safety needs to be addressed in FY21. Solicitation documents repackaged to address exterior and common area scopes of work first, until it was deemed safe to work in occupied apartments. In October 2020 bids were received not awarded as the overbudget, attributed to Covid. The common areas were re-bid in March 2021. The contract awarded in June 2021. Construction underway. Interior health and safety scope of work was solicited in June 2021; contract awarded August 2021. Work continuing into 2022. $184,213.50 spent.

f) Crawford Interior/Building Upgrades

a. Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings; appliances; windows, lighting, etc. Backlog of unfunded needs. Project identified needs, prioritizing life, health and safety factors and cost. Renovations will proceed based on targeted life, health and safety priorities including the addressable fire alarm system replacement. Expect to solicit bids in October 2021. $0 spent

g) McConaughy Interior/Building/Site Upgrades

a. Development needs major upgrade. Backlog of unfunded needs. Redevelopment alternatives were evaluated and in March 2021, ECC's Glendower Group received 9% and 4% tax credit awards for a combination of rehabilitation and new construction at McConaughy Terrace. McConaughy development upgrade is proceeding as a RAD conversion project. $0 spent

h) Scattered Sites Interior/Building/Site Upgrades

a. It is more costly per unit, to maintain individual residences in scattered sites across New Haven, than it is to maintain one building with multiple units. For this reason, maintenance has been historically deferred, in favor of renovations which could affect more residents with fewer dollars. It is, however, essential that ECC support Housing of Choice which includes neighborhood choice. The less racially impacted Scattered Site neighborhoods enable residents' access to a variety of amenities, including food, transportation, green spaces, private yards and importantly, greater school choice through proximity. Scattered Sites properties are one of LIPH's answers to racial and economic segregation in New Haven.

b. Scattered Sites West Interior Building/ Site Upgrades

- Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors appliances; fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, associated environmental abatement, etc. Backlog of unfunded needs. New needs assessments in progress. Needs assessment findings will assist ECC/HANH in decision-making regarding scattered site properties. Also, in combination with the HUD Lead Based Paint grants we have received, additional work to improve the units has been identified, but is not funded under the grant. $0 spent.

c. **Scattered Sites East Interior/Building/Site Upgrades**
    - Non-RAD conversion development. Units need kitchen and bathroom upgrade; interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, associated environmental abatement, etc. Backlog of unfunded needs. New needs assessments in progress. Needs assessment findings will assist ECC/HANH in decision-making regarding scattered site properties. Also, in combination with the HUD Lead Based Paint grants we have received, additional work to improve the units has been identified, but is not funded under the grant. $0 spent.

d. **Scattered Sites Multifamily Interior/Building/Site Upgrades**
    - Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, associated environmental abatement, etc. Backlog of unfunded needs. Includes, unscheduled project, 425 Eastern Street Burn Unit, provides for new roofing and renovation of fire damage in a 2-story unit. New needs assessments in progress. Needs assessment findings will assist ECC/HANH in decision-making regarding scattered site properties. $0 spent

i) Essex Interior/Building/Site Upgrades

a. Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors, appliances; fences, sidewalks, lighting, building envelope and exterior repairs, asbestos abatement, etc. Backlog of unfunded needs. Due to COVID, priority placed on addressing basement abatement, fences, and exterior building envelope (roofs, siding, windows, gutters) until it was deemed safer to perform work in occupied apartments. In March 2021, ECC/HANH solicited for rear patio separation fences and basement asbestos abatement. Bids received with no award--clarification needed in non-technical section of solicitation. Bids re-solicited in June 2021. Contract awarded August 2021. Also, in June 2021, bids solicited for exterior envelope, bathrooms, floors and other interior scope of work. Contract awarded September 2021. Construction on both contracts to be performed in FY 22. $0 spent

j) COVID-19 CARES Separation Projects

a. Separation panels installed for staff safety in office locations. $5,086.67 spent

k) Continuation of Lead-Based Paint Abatement at McConaughy, Essex, SS West & SS East, funded by HUD Lead Based Paint Grants, 2017 and 2020

a. Lead paint abatement where it was identified by inspection-risk assessment. Difficulty attracting bidders. Repackaged in smaller groupings to facilitate response. With 2017 lead paint grant, three quotes and one bid awarded in FY 21 and work progressed. Essex Townhouses is Lead Safe. Multiple Scattered Sites West houses have been abated. More groupings pending solicitation and award. During FY21, ECC/HANH awarded a second lead paint grant that will enable lead paint removal instead of encapsulation, and re-siding as a more enduring alternative to liquid encapsulation. The re-siding will also have an added insulation factor which will support our energy saving efforts. $373,517.99 spent

l) McQueeney Commercial, Finance and Breakroom Upgrades; Finance Workstations

- **a.** Upgrades to offices and common areas planned for completion early in FY21 were designed to increase efficiency of operation in the Finance Department, bringing all Finance staff to one area. Breakroom area serves all 3 commercial floors. Use limited until use is deemed COVID safe. Work completed in December 2020. $137,478.24 spent

The following are agency-wide funding projects:

a) Agency-Wide Vacancy Reduction

- a. Funds were allocated for abatement costs and vacancy reduction efforts during FY21 to supplement work performed by Operations staff. Completed 8 Crawford units, 2 SS East units, 14 McConaughy units, 8 Wolfe units, 3 Westville units, 2 Essex units, 1 SS Multi unit. Abated 2 of the 14 McConaughy units. $82,060.23 spent

b) Agency Wide Abatement

- a. Abated one occupied unit at Essex (plumbing leaks) and Wolfe lobby (plumbing leaks) Both sources of damage and similar conditions will be addressed in the upgrades in these two properties, listed above. $5,867.80 spent

c) **Indefinite Quantities Contracts**

Two (2) types of contracts form the backbone of our Planning & Modernization and Glendower Design team. These services provide us a quicker procurement time as projects unfold, as well as the ability to continually select the best, most cost-effective design solution. These services have supported most of the Planning and Modernization projects listed in this section.

- **a. Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services** $378,943.52 spent
- **b. IQC Environmental Consulting Services** $145,393.05 spent

d) Administration Salaries & Benefits (CFP only)

- **a.** Staff salaries and benefits in support of CFP FY21 activities. $311,766.86 spent

e) CFFP Bond Debt

- **a.** ECC/HANH leveraged CFP funds for development of Brookside Phase 1 Rental. Bond Debt is paid from Capital Fund allocations in accordance with HUD repayment schedule. $363,150 spent

f) RAD Group 4 First Year Funding

- **a.** As required by HUD, CFP formula funds in the amount of $122,941 was to be allocated at closing for RAD Group 4 (Fairmont and Ruoppolo) for Housing Assistance Payment (HAP) contract effective date of October 1, 2020. HAP effective date modified to April 1, 2021. Initial funding year amount recalculated to $368,823 to reflect new HAP effective date. $245,882 spent

ECC/HANH's Reference to most Recent HUD-approved Five-Year Plan: Updated rolling five-year plan for FY2021-2025 submitted in EPIC March 25, 2021 and approved May 12, 2021. Five-Year Plan Revisions for competitive awards for 2017 lead paint, 2020 Lead Based Paint grant and 2020 Housing-Related Hazards grant also are approved in EPIC.

Long-term outcomes of the FY21 work will reflect the MTW Short Term Strategic plan goals to make further increases in Housing of Choice and Accessibility, to ensure Organizational Sustainability with development of housing through the Glendower Group, Inc. and to ensure Cost Effectiveness through reducing Total Development Costs and replacement of obsolete building systems. These systems are replaced, not only as a property management measure, but as a necessary and critical improvement in the lives of residents of our LIPH properties. Decisions made regarding our properties are results of a comprehensive analysis and coordinated effort between our Operations, Planning and Modernization and Development departments. The goal, as always, is to improve the lives of our residents.

LEASING INFORMATION

- **Actual Number of Households Served**

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED		NUMBER OF HOUSEHOLDS SERVED	
	Planned	Actual	Planned	Actual
MTW Public Housing Units Leased	13,200	10,656	1,100	978
MTW Housing Choice Vouchers (HCV) Utilized	79,200	57,240	6,600	4,956
Local, Non-Traditional: Tenant Based	N/A	N/A	N/A	N/A
Local, Non-Traditional: Property Based	N/A	N/A	N/A	N/A
Local, Non-Traditional: Homeownership	N/A	NA	NA	NA
Planned/Actual Totals	92,400	67,896	7,700	5,934

Please describe any differences between the planned and actual households served:

The planned number of units for LIPH was based on the number of units ECC/HANH expected to have by the end of the fiscal year based on:

1) expected completion of development projects
2) 95% to 98% occupancy rate
3) historical average number of new admissions
4) historical average number end of participations

- **Discussion of Any Actual Issues/Solutions Related to Leasing**

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned	Actual	Planned	Actual
Tenant-Based	N/A	#	#	#	#
Property-Based	N/A	#	#	#	#
Homeownership	N/A	#	#	#	#
	Planned/Actual Totals				

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	#	#

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	ECC/HANH held units offline to be used as swing units for RAD resident relocations during redevelopment. ECC/HANH experienced delays in unit turnovers as a result of COVID-19 impacts.

MTW Housing Choice Voucher	HCV addressed leasing issues resulting from stale waitlist during FY2021 through purging and exhausting of all waitlists and by reopening the waitlist. HCV participants experienced delays in leasing due to difficulty finding available units.
Local, Non-Traditional	N/A

- **WAITING LIST INFORMATION**

- **Actual Waiting List Information**

Snapshot information on the actual status of MTW waiting lists at the end 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	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Public Housing	Site Based	9,466	Open	Yes
MTW Housing Choice Voucher	Program Specific	16,882	Open	Yes

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, these are the actual number of applicants for each program.

- **Actual Changes to Waiting List in the Plan Year**

Please describe any actual 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 ACTUAL CHANGES TO WAITING LIST
Housing Choice Voucher (Tenant Based)	The HCV Waiting List (Tenant Based) was opened in February 2021 and will remain open.
Low-Income Public Housing	The LIPH waitlist was open and remains open

- **INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS**

- **75% of Families Assisted Are Very Low Income**

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based"; "Local, Non-Traditional: Property-Based"; and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	N/A
49%-30% Area Median Income	N/A
Below 30% Area Median Income	N/A
Total Local, Non-Traditional Households Admitted	**N/A**

- **Maintain Comparable Mix**

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)					
FAMILY SIZE	**OCCUPIED PUBLIC HOUSING UNITS**	**UTILIZED HCVs**	**NON-MTW ADJUSTMENTS ***	**BASELINE MIX NUMBER**	**BASELINE MIX PERCENTAGE**
1 Person	852	693	0	1545	32%
2 Person	435	726	0	1161	24%
3 Person	327	637	0	964	20%
4 Person	180	445	0	625	13%
5 Person	89	204	0	293	6%
6+ Person	87	152	0	239	5%
TOTAL	**1970**	**2857**	**0**	**4827**	**100%**

* *"Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.*

Please describe the justification for any "Non-MTW Adjustments" given above:

N/A

MIX OF FAMILY SIZES SERVED 2021				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	32%	2,450	41%	9%
2 Person	24%	1,371	23%	-1%
3 Person	20%	1,051	18%	-2%
4 Person	13%	608	10%	-3%
5 Person	6%	315	5%	1%
6+ Person	5%	170	3%	-2%
TOTAL	**100%**	**5,965**	**100%**	

** *The "Baseline Mix Percentage" figures given in the "Mix of Family Sizes Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)" table.*

^ *The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.*

^^ *The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.*

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

ECC/HANH saw an increase of 9% in 1 person families over baseline. This increase resulted from the construction of a new senior development at 122 Wilmot Road. The percentages have remained stable since that time.

- Number of Households Transitioned to Self-Sufficiency in the Plan Year
  Number of households, across MTW activities, that were transitioned to the MTW PHA's local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
CARES	11	Number of Households to receive zero subsidy at the end of year 6.
Prison Community Reentry	0	Live Independently and be lease compliant[12]
Family Self Sufficiency Program	7	7 new homeowners
	0	**(*Households Duplicated Across MTW Activities*)**
	18	**Total Households Transitioned to Self-Sufficiency**

** Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.*

[12] Includes graduates from reentry programs in HCV

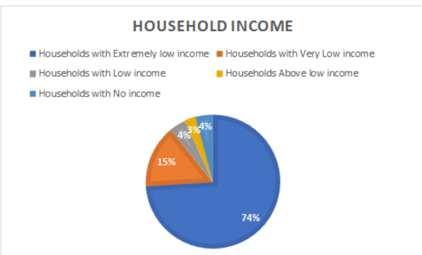
Who We Serve

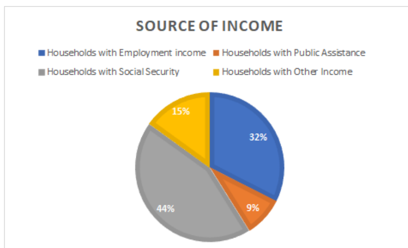
ECC/HANH served 5,923 families through its Low-Income Public Housing (LIPH) and Housing Choice Voucher (HCV) programs during FY 2021. 978 families were served through LIPH and 4,945 families through HCV program.

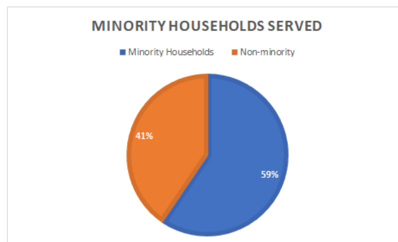
During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current numbers reflect an increase of approximately 23% (1,096 families), indicating that MTW status has allowed ECC/HANH to increase the number of families served.

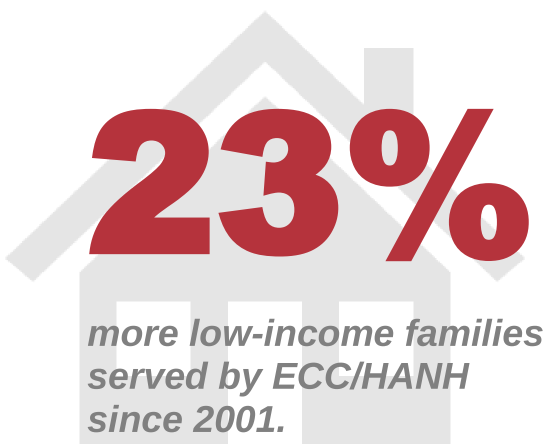
The vast majority of the families served by ECC/HANH can be categorized as Extremely Low Income (ELI). ELI households make up 77% of LIPH and 77% of HCV families. Households are predominantly composed of 1 to 3 persons, with 79% of LIPH and 82% of HCV households ranging from 1-person to 3-person families. 38% percent of LIPH families and 34% of HCV families earn wages. Only a small percentage of families report no income, accounting for 8% of LIPH and 4% of HCV households. Despite the challenges of the COVID-19 pandemic, we saw an increase in the number of LIPH families earning wage income.

A table on the following page summarizes the population demographics.









ECC/HANH Population Demographics -2021					
	LIPH		HCV		Total
Total Households	978	17%	4945	83%	5923
Total Individuals	2404	18%	10973	82%	13377
Average Income	$17,564		$17,060		
Average TTP	$398		$396		
Households with Extremely low income	752	77%	3821	77%	4573
Households with Very Low income	131	13%	807	16%	938
Households with Low income	40	4%	205	4%	245
Households Above low income	55	6%	112	2%	167
Households with No income	81	8%	174	4%	255
Households with Employment income	375	38%	1694	34%	2069
Households with Public Assistance	360	37%	189	4%	549
Households with Social Security	421	43%	2371	48%	2792
Households with Other Income	292	30%	670	14%	962
Minority Households	647	66%	2875	58%	3522
Non-minority	331	34%	2070	42%	2401

Elderly families	186	19%	1433	29%	1619
Disabled families	402	41%	2067	42%	2469
1 member	311	32%	2131	43%	2442
2 members	263	27%	1098	22%	1361
3 members	203	21%	831	17%	1034
4 members	100	10%	499	10%	599
5 members	68	7%	246	5%	314
6 members	18	2%	88	2%	106
7 members	11	1%	34	1%	45
8+ members	4	0%	18	0%	22

Low-Income Public Housing (LIPH)

At the end of FY2021, ECC/HANH had a total 1,124 public housing units. This total included:

- 734 site-based family units (65% of LIPH stock)
- 219 elderly/disabled units (20% of LIPH stock)
- 171 scattered site units (15% of LIPH stock)

Of the total LIPH units, post RAD-conversion, 19 units will remain approved as vacancies for units offline. These will be held for the following uses: Officers in Residence, Teachers in Residence, Asset Management offices, Tenant Resident Council offices/food banks.

During FY21, ECC/HANH planned to remove 486 units from the LIPH portfolio and convert them to RAD PBV. Due to delays in obtaining approval to remove 62 units at Westville Manor and delays in disposition planning for 6 scattered site units, 418 were removed.

Although ECC/HANH is decreasing the LIPH stock, it is important to note that the RAD stock has increased. The increase in RAD units means that residents are not losing housing opportunities, and as noted previously, twenty-three percent more families are now served through ECC/HANH's affordable housing programs than before ECC/HANH was granted MTW status.

The following table details the LIPH portfolio at the end of FY21.

Development Name	Development Type	Units beginning FY21	Planned Units to Add	Planned Units to Remove	Actual Units Added	Actual Units Removed	Total units at the end of FY21
Val Macri	Elderly/Disabled	17	0	0	0	0	17
Crawford Manor	Elderly /Disabled	109	0	0	0	0	109
Fairmont Heights	Elderly/Disabled	98	0	98	0	98	0
Ruoppolo Manor	Elderly/Disabled	105	0	105	0	105	0
RT Wolfe	Elderly /Disabled	93	0	0	0	0	93
Valley Townhouses	Family	40	0	40	0	0	40
Farnam Courts	Family	39	0	0	0	39	0
Westville Manor	Family	151	0	40	0	0	151
McConaughy Terrace	Family	201	0	0	0	0	201
Quinnipiac Terrace I	Family	58	0	0	0	0	58
Quinnipiac Terrace 2	Family	56	0	0	0	0	56
Quinnipiac Terrace 3	Family	17	0	0	0	0	17
Essex Townhouses	Family	35	0	0	0	0	35
New Rowe	Family	46	0	0	0	0	46
Brookside Phase 1	Family	50	0	0	0	0	50
Brookside Phase II	Family	50	0	0	0	0	50
Rockview Phase 1 Rental	Family	30	0	0	0	0	30
Scattered Site - Multi Family	Scattered Sites	96	0	0	0	0	96
Scattered Site – West	Scattered Sites	23	0	0	0	0	23
Scattered Site – East	Scattered Sites	52	0	6	0	0	52
Total		**1366**	**0**	**289**	**0**	**242**	**1124**

Housing Choice Voucher

At the end of FY2021, ECC/HANH had a total voucher count of 6,161 allocated to HCV purposes. This is consistent with ECC/HANH's plans to allocate at least 90% of HCV budget authority toward direct housing services through HCV programs. Previous tables detailed the PBV and RAD allocations. The following table provides breakdown of vouchers by program type.

Total Voucher Summary					
MTW Activities Summary	Description	2020 Vouchers	Actual units Removed	Actual units Added	Total Units at end of FY2021
MTW Tenant Based Voucher	Portable tenant-based assistance	3055	0	272	3327
Expanded Housing Choice	Support mobility and homeownership opportunities for residents	459	0	0	459
PBV Efforts to End Homelessness	Allocation to homeless providers	58	0	0	58
PBV Housing Development	Project Based Voucher Assistance for redevelopment projects	645	0	0	645
RAD	Conversion of LIPH Units and SRO Units to RAD Platform	897	0	450	1,347
TBV Supportive Housing Efforts	Subsidies for supportive housing efforts	203	0	0	203
HUD VASH	85 Veterans Supportive Housing	85	0	0	85
Emergency Housing Vouchers	COVID19 EHV	0	0	37	37
TOTALS		**5,402**	**0**	**759**	**6,161**

III. Proposed MTW Activities

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

IV. Approved MTW Activities

IMPLEMENTED ACTIVITIES

Initiative 1.2 – Local Total Development Cost (TDC) Limits

Approved in FY09 and implemented in FY10.

Cost Effective

Housing Choice

Description/Impact/Update

This initiative was approved in FY08 and implemented in FY09. This activity establishes Total Development Costs (TDC) and Housing Construction Costs (HCC) for ECC/HANH that are separate from HUD's standard limits to better reflect local real estate market conditions. ECC/HANH has determined that HUD's standard TDC and HCC limits do not reflect the local marketplace conditions for development and redevelopment activities for New Haven based on two factors: location and design standards.

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 FY09 Annual MTW Report. The alternate HCC and TDC uses historical data from recent ECC/HANH mixed-income developments by building type and bedroom size, in addition to current RS Means Building Cost Data by building type, gross square footage, and applicable hard costs. The data further confirmed that New Haven MSA construction costs are on par with those of Fairfield County (in Connecticut), like that of the New York City market. Given these costs, the data showed that it is necessary to use an alternate HCC and TDC. ECC/HANH used the approved FY09 TDC and HCC limits for the Rockview Phase II Redevelopment.

During FY12, ECC/HANH submitted revised TDC and HCC limits.

Location: HUD's TDC and HCC cost limit reflects a national industry average. However, construction costs in New Haven, with its proximity to the New York City construction market, are higher than the national average. Although higher costs can be challenging to accommodate, ECC/HANH uses higher quality building products to:

- remain marketable and competitive in the local rental market
- reduce maintenance cost
- increase durability
- enhance the quality of life of the residents

Design Standards: ECC/HANH's design standards include higher quality materials for long-term viability and durability. Using higher quality materials for development and redevelopment activities results in higher construction costs but also increases the quality, marketability, and sustainability of units, improves energy efficiency, and reduces the number of requests for emergency work orders. By using higher quality materials, ECC/HANH also anticipates faster lease ups and fewer unit turnovers.

Impact

ECC/HANH's MTW flexibility has allowed for an extensive redevelopment approach that has utilized the alternative TDC initiative to support the design and development of quality, energy efficient housing of choice that meets market demand and local standards. This is bolstered by the critical flexibility provided by the initiative, including the ability to leverage non-MTW funds through applications for competitive funding rounds. Each of the properties identified above included LIHTC that in turn allowed for the leverage of private financing. Of the past 14 redevelopments, 8 of 14 required use of the local TDC. TDCs ranges from $198k to

$380k per unit. Those that exceed HUD TDC limits exceeded by between $4700 and $78k. At no time did we exceed the HUD approved alternate TDC limits.

Since implementing this initiative, ECC/HANH has redeveloped thousands of units, leveraged significant non-federal dollars and created quality, cost and energy efficient housing opportunities. The alternate TDC has allowed for an increase of almost 300 hard units, improved occupancy rates to 93% overall and exceeding 97% in redeveloped sites, and significant reductions in utility costs. Electric costs decreased by over 85% and gas costs by 16%.

ECC/HANH anticipated reduced crime rates in redeveloped sites and improved REAC scores. During FY2021, ECC/HANH averaged 2 major crimes across all sites down from a high of 6 in FY2012.

While REAC inspections did not occur this year, ECC/HANH contracted for our own independent inspections. The average REAC-like inspection score across all redeveloped sites was 79.6 slightly down from an average REAC score of 80 the prior year. ECC/HANH has resumed regular unit inspections and routine maintenance work that was deferred during the height of the COVID-19 pandemic.

HC #2: Units of Housing Preserved				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 occupied units (baseline 2001)	Decrease of not more than 5% from previous year (limited to de minimus reduction)	2021: 2,246 units[13]	Yes

* ECC/HANH's baseline of LIPH occupied units was 1,970. As ECC/HANH repositions its portfolio units transfer from LIPH to other platforms. The benchmark is the combined number of LIPH and redeveloped units on the PBV, LIHTC and RAD platforms.

Internal Metric #6: Utility Expense Per Unit ****				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Reduction of utility expenses per unit, pre and post redevelopment – Electric	Valley/Waverly: $900 per unit/ per month in 2012	5% reduction; Electric utility expenses would reach approximately $855 per unit	Refer to Appendix 10, Electricity Utility Costs Per Unit Per Month.	Yes

[13] 1,124 LIPH units and 1,122 PBV and RAD redeveloped replacement units

Reduction of utility expenses per unit, pre and post redevelopment – Gas	Valley/Waverly: $60.83 per unit/ per month in 2012	5% reduction; Gas utility expenses would reach approximately $58 per unit	Refer to Appendix 10, Gas Utility Costs Per Unit Per Month.	Yes

TOTAL DEVELOPMENT COST BY DEVELOPMENT AND UNIT										
Development Name	Year Converted	LIPH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units	HUD TDC (2013) ~	ECC HANH TDC ~	TDC	TDC Per Unit
Eastview Terrace Phase 1	2009	53	49	102	0	102	$259,210	$351,621	$32,289,891	$316,567.56
Quinnipiac Terrace 3	2010	17	16	33	0	33	$259,210	$351,621	$9,384,480	$284,378.18
William T. Rowe	2010	46	32	78	26	104	$313,133	$428,328	$24,987,375	$240,263.22
Brookside Phase I	2011	50	50	100	0	100	$259,210	$351,621	$30,198,639	$301,986.39
Brookside Phase II	2012	50	51	101	0	101	$259,210	$351,621	$20,014,054	$198,158.95
Wilmot Crossing	2012	0	47	47	0	47	$313,133	$428,328	$13,109,292	$278,921.11
Rockview Phase I	2013	30	47	77	0	77	$259,210	$351,621	$21,790,445	$282,992.79
Ribicoff 9%	2014	0	44	44	11	55	$313,133	$428,328	$14,517,329	$263,951.44
Ribicoff 4%	2014	0	51	51	0	51	$259,210	$351,621	$13,457,150	$263,865.69
Farnam Courts-Fair Haven	2015	0	57	57	0	57	$259,210	$351,621	$19,203,991	$336,912.12
Farnam Court Phase I onsite	2016	0	86	86	8	94	$313,133	$428,328	$27,436,148	$291,873.91
Rockview Phase 2	2019	0	62	62	16	78	$298,901	$405,464	$22,736,473	$291,493.24
Farnam Courts-Phase 2**	2020	0	88	88	23	111	$259,210	$351,621	$33,394,964	$300,855.53
Westville Manor*	TBD	0	87	87	22	109	$313,133	$405,464	$41,420,000	$380,000.00
Total		**360**	**856**	**1216**	**45**	**1261**				

*- Proposed, ** Under Construction

Redevelopment Metrics				
Internal Metric #2: REAC Scores				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
REAC scores	REAC score of 80 for ECC/HANH's developments (those reflecting alternate TDCs)	At least a 10% increase. REAC scores would reach 88.	Refer to Appendix 8: ECC/HANH Development REAC Scores for specific data points.	No
Internal Metric #3: Average work order				
Work orders per property	N/A	Brookside Phase I: 1,000 (10 work/year) Brookside Phase II: 1,000 QT1: 560 QT2: 580 QT3: 170 Eastview: 1,020	Refer to Appendix 9: Work Orders, FY09 to FY19 for specific data points.	Yes

During FY2021, the following units were preserved/developed utilizing the alternative TDC: Rockview 2.

For Rockview 2, ECC/HANH replaced 62 units previously at Westville Manor which represents no more than a de minimus reduction in units and a preservation of formerly obsolete LIPH units thereby meeting the benchmark. In terms of utility costs and unit inspections, for Rockview 2, these will be reported on in future years as it hasn't yet been one year since stabilization.

For all other properties redeveloped with Local TDCs, the benchmarks were met.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

In reviewing the data for the metric HC#2 Units of Housing Preserved, errors were noted in the reporting of prior year units preserved. This has been corrected in this year's report.

In reviewing the Internal Metric #2, the redevelopments are no longer subject to REAC inspections. As such, we will evaluate the development life cycle through work orders generated as a course of business and those generated as a result of ECC/HANH's own yearly inspections

ECC/HANH's baseline of LIPH occupied units was 1,970. As ECC/HANH repositions its portfolio units transfer from LIPH to other platforms. The number of LIPH and redeveloped units on the PBV, LIHTC and RAD platforms exceeds the number of units at baseline by almost 300 units.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

There were no challenges or changes for FY21.

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

Approved in FY12 and implemented in FY13.

Cost Effective

Housing Choice

Description/Impact/Update

To be eligible to receive assistance under the Project-Based Voucher (PBV) program, a family must meet the following income limits under Section 8(o) (4) of the Housing Act of 1937. Recipients of PBV program assistance must be:

- a very low-income family.
- a family previously assisted under this title.
- a low-income family that meets eligibility criteria specified by the public housing agency.
- a family that qualifies to receive a voucher in connection with a homeownership program approved under Title IV of the Cranston-Gonzalez National Affordable Housing Act; or
- a family that qualifies to receive a voucher under section 223 or 226 of the Low-Income Housing Preservation and Resident Homeownership Act of 1990.

The PBV program promotes housing choice in developing communities with housing options for a wide range of incomes and reduces the cost of the program. ECC/HANH used the flexibility granted under Attachment C, Section C(3)(a) of the MTW Agreement to establish PBV program eligibility criteria under its Administrative Plan. The eligibility criteria require that:

1. 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 (AMI), adjusted for family size.
2. ECC/HANH will award up to 15 percent of the PBV's allocated for any mixed finance project to families with incomes between 50 and 80 percent of AMI for Brookside Phase 1 Rental.
3. 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.

This initiative includes the developments listed in the following chart.

Income Eligibility for Project Based Voucher Program in Mixed-Finance Developments							
Development	Units at or below 30% of AMI	Percent	Units at 31-49% of AMI	Percent	Units at 50-80% of AMI	Percent	Total Units
Brookside I	50	100%					50
Brookside II	21	41%	30	59%			51
Rockview I	19	40%	20	43%	8	17%	47
Rockview II	20	32%	42	68%			62
Total	**110**	**52%**	**92**	**44%**	**8**	**4%**	**210**

Impact

Since its implementation in FY13, this initiative has increased housing choice and cost effectiveness at the developments listed above: Brookside I, Brookside II, Rockview I and Rockview II. ECC/HANH has successfully redeveloped these properties, provided tiered income opportunities and not displaced our lowest income families.

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 occupied units (baseline 2001)	Decrease of not more than 5% from previous year (limited to de minimus reduction);	2021: 2,246 units[14]	Yes

* ECC/HANH's baseline of LIPH occupied units was 1,970. As ECC/HANH repositions its portfolio units transfer from LIPH to other platforms. The benchmark is the combined number of LIPH and redeveloped units on the PBV, LIHTC and RAD platforms.

Internal Metrics

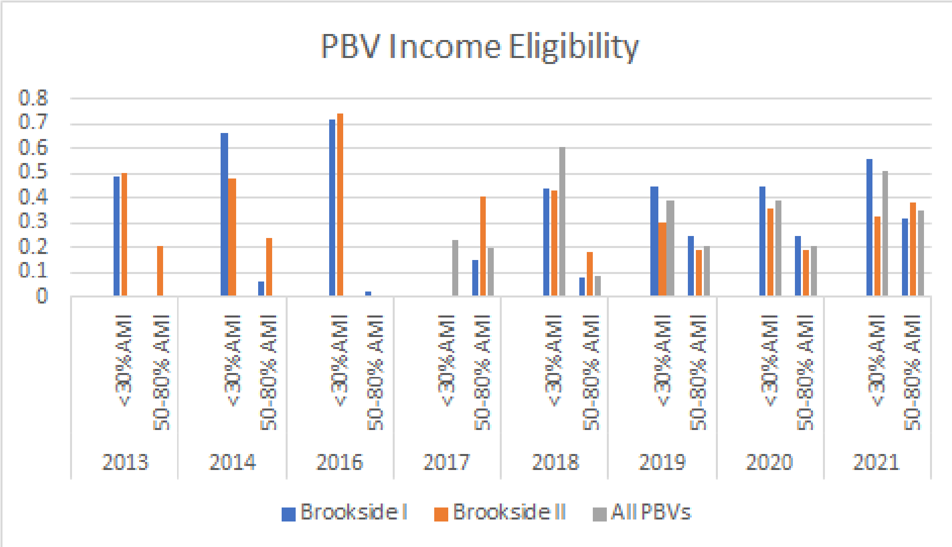
Internal Metric #9: Income eligibility				
Unit of Measurement	**Baselin e**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households at below 30% Area Median Income (AMI)	N/A	No less than 40% of the PBVs awarded in any year will be awarded to families with incomes at or below 30% of the area median income, adjusted for family size.	2021 • 45% of families in applicable developments have incomes below 30% AMI (see above Income Eligibility table for more information) • 6% of new PBV households at Brookside Phase I families were at or below the 30% AMI. • 56% of all households at Brookside Phase I are at or below 30% AMI. • 13% of new PBV households at Brookside	Yes

[14] 1,124 LIPH units and 1,122 PBV and RAD redeveloped replacement units

			Phase II were at or below 30% AMI. • 33% of all households at Brookside Phase II are at or below 30% AMI. 2020: • 39% of families in applicable developments have incomes below 30% AMI (see above Income Eligibility table for more information) • 0% of new PBV households at Brookside Phase I families were at or below the 30% AMI. • 45% of all households Brookside Phase I are at or below 30% AMI. • 0% of new PBV households at Brookside Phase II were at or below 30% AMI. • 36% of all households are at or below 30% AMI.	

Redevelopment Metrics (continued)				
Internal Metric #9: Income eligibility (continued)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households between 50% AMI and 80% Area Median Income (AMI)	N/A	15% of the PBVs may be allocated to families with incomes between 50 and 80% of AMI at Brookside Phase I rental 45% of PBV may be allocated to families with incomes between 50 and 80% AMI at Brookside Phase II rental	2021 • 4% of new PBV households at Brookside Phase I families were between 50% & 80% AMI. • 32% of total households at Brookside Phase I were between the 50% to 80% AMI. • 10% of new PBV households at Brookside Phase II were between 50% & 80% AMI. • 38% of total households at Brookside Phase II	Partial

			were between the 50% & 80% AMI. • 35% of families in applicable developments have incomes between 50% & 80% AMI. 2020: • 100% of new PBV households at Brookside Phase I families were between 50% & 80% AMI. • 25% of total households at Brookside Phase I were between the 50% to 80% AMI. • 100% of new PBV households at Brookside Phase II were between 50% & 80% AMI. • 19% of total households at Brookside Phase II were between the 50% & 80% AMI. • 21% of families in applicable developments have incomes between 50% & 80% AMI. • 6% of families in Brookside Phase I have incomes above 50% AMI • 24% of families in Brookside Phase II have incomes above 50% AMI	



This initiative is designed to achieve an income mix at redeveloped properties and has been successful in supporting the redevelopment of units and preservation of units while successfully increasing the income mix in these developments. As shown in the chart above, over time the income mix has increased creating the mixed income communities desired. ECC/HANH continues to serve our lowest income families. Importantly, ECC/HANH has maintained the priority for serving Extremely Low-Income families by ensuring that income mix does not equate to fewer ELI families served. Data suggests less turnover in units at the ELI income level resulting in years where no new families are leased at this income, however, the percentage of ELI families is not decreasing.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

In reviewing the data for the metric HC#2 Units of Housing Preserved, errors were noted in the reporting of prior year units preserved. This has been corrected in this year's report.

ECC/HANH's baseline of LIPH occupied units was 1,970. As ECC/HANH repositions its portfolio units transfer from LIPH to other platforms. The benchmark is the combined number of LIPH and redeveloped units on the PBV, LIHTC and RAD platforms.

Actual Significant Changes

None

Challenges in Achieving Benchmarks or Possible Strategies

There were no challenges or changes for FY2021

Initiative – 1.6 Deconcentration of Poverty (promoting expanded housing opportunities for HCV and PBV program)

Approved in FY08 and implemented in FY09. Updated in FY2020.

Housing Choice

Description /Impact/Update

This initiative was approved in FY2008 and implemented in FY2009 for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods.

ECC/HANH also provides mobility counseling services for voucher participants to assist their search for housing in non-impacted areas. ECC/HANH implemented MTW Rent Standards that allowed ECC/HANH to approve exception rents in the following cases up to 150% of the Voucher Payment Standard (VPS):

1. Wheelchair accessible units.
2. Large bedroom-size units, (4 bedrooms or larger).
3. Expanded housing opportunities in neighborhoods with low concentrations of poverty.
4. Housing opportunities in new development projects that include significant public investment to promote revitalization of neighborhoods; and
5. Mixed-income housing opportunities that promote expanded housing opportunities and de-concentration of poverty.
6. 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 are reviewed on a case-by-case basis. Under no circumstances may ECC/HANH approve an MTW rent standard above 150% of Fair Market Rent without prior HUD approval. ECC/HANH reexamines its MTW rent standards monthly to ensure that ECC/HANH does not exceed 120% of the fair market rents (FMR) in the mean rent standard, which includes HAP payments to landlords, HAP RAD Payments, tenant rent payments to landlords, and any utility allowance amounts.

In FY 2020, ECC/HANH updated this initiative and for FY21, ECC/HANH planned the following enhancements to the deconcentration initiative, enabled through the MTW status:

1) Mobility Counseling offered through the Glendower Group with a focus on educating and incentivizing families on rental options in non-impacted areas
2) Application fee assistance (paid for up to 3 applications with an anticipated cost of $30 per application or $90 per family)
3) Security deposit assistance (up to one month of contract rent or assistance with payment of past utility debts that would prevent a family from securing utilities in their own name, up to the voucher payment standard for family size)
4) Incentive fee for new property owners participating in HCV (based on census tract and size of the unit)
5) Incentive fee for property owners in the HAP contract length ((for PBV units-subject to availability, fees based on the number of years agreed to in the HAP Contract, with up to $2200 for five to nine years, and up to $3300 for 10 or more years)

All planned updates were not implemented during FY2021 as a result of the challenges presented by the pandemic. ECC/HANH began the mobility counseling and will implement fully during FY2022.

Impact

The deconcentration initiative expands housing choice for low-income families that would have difficulty accessing housing without the use of a housing voucher in "non-impacted areas." Non-impacted areas are also referred to as "neighborhoods of choice," characterized by a low concentration of poverty.

At the start of FY2021, 218 HCV participants resided in non-impacted neighborhoods. This represented 5% of all HCV participants. At the close of FY2021, ECC/HANH had assisted 0 residents in moving to non-impacted areas through the additional mobility supports. However, by the close of FY2021 225 HCV participants have leased up in non-impacted neighborhoods in New Haven, representing 5% percent of the 4,957 TBV/PBV in New Haven.

ECC/HANH measures increase in HCV moves to deconcentration areas seeking to improve by more than 2% over the prior year. FY 2021 data follows:

Sample Percent Increase Tracker	Previous FY Percentage (2020)	Current FY Percentage (2021)	Goal - Percentage Increase	2% of Previous Year (2020)	Is Current Percent Equal to or Greater than 2% of Previous Year?
FY2021	5%	5%	2%	7%	No

With an average household income of $18,052, families who live in non-impacted areas have a one percent higher income as compared to the entire ECC/HANH HCV-assisted population, at $17,892. This represents a non-significant income difference.

Outcomes

HUD-Required Metrics

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Annual number of incremental households leased-up in low poverty areas* because of the activity	0 (2008)	Greater than 2% increase over prior year	2021 0 2020- 13 families Average of prior years: 11.6	No

** Low poverty areas include the following U.S. Census Tracts: 1401, 1410, 1411, and 1428*
*** This benchmark is new as of FY17. It was reevaluated in FY19 and FY20 and the benchmark has been changed from "10" to "greater than 2% increase over the prior year", the SEMAP standard.*

Internal Metric: Exception Rents Granted					
Unit of Measurement		**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Annual number of incremental households with exception rents approved due to bedroom size issue because of the activity	0 (2008)	1**	Greater than 2% increase over prior year	2021 –0 2020-0 Average of prior years: 1	No
Annual number of incremental households with exception rents approved due to an accessibility issue because of the activity	0 (2008)	10***	Greater than 2% increase over prior year	2021 – 0 2020-0 Average of prior years: 1	No

ECC/HANH made revisions to the initiative in FY2020, in an attempt to increase the impact on resident moves. During FY 2021, we found that these efforts have not yet made an impact. This is partly due to the fact that the initiative was not fully implemented during FY2021 due to the impacts of the COVID-19 pandemic and need for additional staff training and orientation around this initiative. There were no additional changes in FY2021.

Actual Non-significant changes

None

Actual Changes to Metrics/Data Collection

Prior to this year, ECC/HANH calculated this metric as an increase of 10 or more families annually. This year we revised the metric to mirror the manner in which SEMAP measures deconcentration. This year's measure sought to increase the percent of families living in deconcentrated areas by more than 2% over the prior year. Baseline from last year was 5%. Our goal was 7% for FY 2021.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

It is important for families to have choices and opportunities to live in communities that provide a better quality of life and opportunities for better jobs, education, etc. Although, the movement of families to these neighborhoods and areas have been slow, this is an initiative that should be continued, and greater emphasis put on educating families about the opportunities and providing assistance to achieve these goals. FY 2021 was a challenging year due to COVID. Families who were assisted with mobility counseling did not move to the areas of deconcentration due to family issues, proximity to schools and access to public transportation.

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

Approved in FY10 and implemented in FY11.

Housing Choice

Self-Sufficiency

Description and Status

ECC/HANH has strategically allocated housing choice voucher resources to support the goal of ending homelessness in New Haven. ECC/HANH partners with the City of New Haven, regional entities, Continuum of Care agencies (COC), shelters, transitional and permanent housing providers to identify chronically homeless individuals and families. ECC/HANH has entered in Memoranda of Understanding (MOU) with community organizations that provide housing to homeless individuals and families and supportive services. These organizations assess and prioritize referrals to ECC/HANH to provide housing vouchers to the most vulnerable and chronically homeless individuals and families. housing vouchers to the most vulnerable and chronically homeless individuals and families.

At the beginning of FY21, ECC/HANH had 196 tenant-based vouchers allocated to serve individuals that meet one or more of the following criteria.

i. chronically homeless
ii. homeless families
iii. families receiving services from Child Protective Services
iv. formerly incarcerated individuals

The chart below details ECC/HANH's use of housing vouchers to end homelessness in New Haven.

TBV Supportive Housing Efforts	Description	2021 Voucher Baseline	Planned Units to be Removed	Actual Units Removed	Planned Units to be Added	Actual Units Added	Actual Units at end of FY	Actual Number of Vouchers Utilize	Percentage of Vouchers Utiliz
Tenant Based DHMAS Supportive – Housing First	Supportive Housing	10	0	0	0	0	**10**	10	100%
DMHAS Mental Health Transformation Grant – FUSE	Supportive Housing	10	0	0	0	0	**10**	7	70%
Family Options – Homeless	Supportive Housing	15	0	0	0	0	**15**	9	60%
Permanent Enrichment	Supportive Housing	10	0	0	0	0	**10**	7	70%
Family Unification Supportive Housing	DCF Family	20	0	0	0	0	**20**	12	60%
Homelessness/Imminent Danger of Homelessness	(Formerly Foreclosure PBV)	40	0	4	0	0	**40**	32	80%
Supportive Housing/Homelessness Prevention	Supportive Housing/Homelessness Prevention	51	0	4	0	0	**51**	**38**	75%
Project Longevity	20 vouchers for city initiative targeting homeless	25	0	0	0	5	**25**	18	72%
Re-entry Fresh Start	1 out of every 10 new admission	15	0	0	0	0	**15**	10	67%
Supportive Housing Efforts Subtotal		**196**	**0**	**8**	**0**	**5**	**196**	143	**73%**

In FY2021, ECC/HANH began to allocate vouchers differently in order to increase housing opportunities for unhoused and re-entry populations. Ten percent of the new admissions each year within the Housing Choice Voucher program and Low-Income Housing program will be allocated to participants on Reentry waitlist. During FY2021, in efforts to assure that 10% of each fiscal years' new admission are allocated to reentry, admission policies were changed to allow 1 out of every 10 New admissions per program (HCV & LIPH) to be filled with a family from the reentry waitlist.

Impact

This initiative provides housing services to one of the most vulnerable populations served by ECC/HANH. Of these families, 28 are formerly incarcerated individuals engaged with Project Longevity (18) and Fresh Start (10). During FY2021, 5 new re-entry families were housed. At this time, we are unable to determine if this change in allocation has allowed for us to house more families as we did not receive referrals over the allocated amount of 15 from FY2020. There are 28 housed families under the re-entry program. Delays in implementing the new admission process hampered our ability to significantly increase the number of families housed.

These families are now stably housed and focus on increasing their average household income which is in the Extremely Low category at $9,498. ECC/HANH has grown this program since inception and has recently transitioned to an admission preference system granting a percentage of all new admissions to providing housing for unhoused and re-entry populations. To date, significant increase in family income have not been noted partly due to the impact of COVID on employment and the high percentage of families living with disabilities.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average total household income for households affected by this policy in dollars	$12,643 (2013)	Steady increase in average household income over prior year	2021: $9,498 2020: $10,136 Prior years' average income: $12,294	No
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Percentage of homeless households enrolled in program receiving supportive services	0 (2010)	100% receiving supportive services	2021: 100%	Yes

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Additional permanent housing made available to homeless families	0 (2010)	At least 10 new families housed per year	2021: 11 2020: 1 Average number of families served in prior years: 22	Yes

Actual Non-Significant Changes

ECC/HANH has moved from a unit set aside model to a percentage of new admissions in order to provide greater and on-going access to housing services for these very vulnerable populations. As a result, despite the challenges presented during the COVID-19 pandemic significantly more families were housed in FY2021 than in prior years.

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

The COVID-19 pandemic created challenges in housing more families as there was less turnover in units and vouchers. Given that lease up to prioritized populations occur as a percentage of overall lease up, lower turnover means fewer new lease up opportunities. ECC/HANH expects to increase this number in FY2022 as the rental market and economy begin to stabilize.

Initiative 1.8 – Farnam Courts Transformation Plan

Approved in FY11 and implemented in FY12.

Description and Status

This initiative will result in the replacement of an aging and economically disadvantaged housing development with a resident-oriented, mixed-income, and mixed-use community, achieving the initiative's goal to transform an obsolete and unsustainable housing complex. The vibrant mixed-income, mixed-use development will maintain affordable housing opportunities for residents and offer new amenities through the creation of a central park with a community building. Through the combination of additional initiatives including TDC and the replacement of public housing units with MTW block grant funds, the Farnam Courts Transformation initiative demonstrates how MTW flexibility provides synergistic opportunities to meet initiative goals.

As part of the transformation plan, ECC/HANH is proposing not only the redevelopment of the housing units at Farnam Court, but also the transformation of the surrounding community. The Farnam Court transformation is intended to build a community that supports the long-term economic sustainability of ECC/HANH residents and promotes economic development along the Grand Avenue and Mill River corridor. Ultimately, the project will reconnect the Farnam Court neighborhood with the Grand Ave corridor, the vital Downtown and Wooster Square neighborhood, and the Mill River neighborhood, an area with job opportunities.

ECC/HANH planned to redesign the infrastructure to create more traffic flow through the community, redesign the housing units to be more spacious, introduce market rate units, and remove social and economic barriers that individuals and families are facing by providing supportive services and creating accessing to opportunities. New opportunities may include improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

Farnam Courts Transformation 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 additional market rate units. The redevelopment includes new roads, streets, infrastructure, and utilities funded through a $8 million capital investment from the City of New Haven.

This initiative involves multiple development sites and phases:

- Farnam offsite – Fair Haven consists of 57 units financed through 9% Low-Income Housing Tax Credits. The 57 units exist on two sites located in the Fair Haven neighborhood, an area undergoing significant reinvestment. The Chatham site includes 32 assisted units through the Rental Assistance Demonstration (RAD) 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.
- Farnam Court Phase I – onsite will involve the demolition of 148 units. These will be replaced with two mid-rise 5 story buildings housing 94 units (86 PBV assisted and 8 market rate units) situated on 1.1 acres. These buildings will also house 7,400 square feet of commercial and community/program space. The community space will support a comprehensive economic self-sufficiency program. This project is financed through LIHTC 4% Bonds, a $4 million Connecticut CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars, and private equity. This development is completed and fully occupied.

- Farnam Court Phase II- on site 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 square foot community center and park.

The following actions have been completed to date:

- Farnam Offsite Completed – 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.
- Farnam Court Phase I Completed – The first on-site phase included the demolition of 148 units. These where 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 house 7,400 square feet of commercial and community/program space. The community space will support a vibrant comprehensive economic self-sufficiency program. This project was 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.

Current actions include:

- Farnam Court Phase 2 – in progress-- During FY19, ECC/HANH received all necessary funding commitments to proceed to the completion of Phase 2. Phase 2 was bifurcated into a 4% LIHTC phase (45 total units, including 36 RAD units) and a 9% LIHTC Phase (66 total units, including 51 RAD units). ECC/HANH was successful in obtaining both 4% and 9% LIHTC through the Connecticut Department of Housing Competitive Housing Assistance for Multifamily Properties (CHAMP) funding round. Farnam 4% began construction during FY20 and Farnam 9% began construction during FY 21. The Phase 2 9% LIHTC phase will also include the construction of a community building and public park.

The impact of the completed project is expected to promote housing choice for low-income families by increasing occupancy, reducing density, creating a more marketable and sustainable housing development, reducing crime, and stimulating economic development of the surrounding neighborhood with new businesses and a renewed sense of community. All these factors are expected to improve the quality of life for current and future residents. Additionally, with a transformed place to call home, ECC/HANH anticipates an increase in participation in self-sufficiency programs, an increase that has been observed at other redevelopment efforts within the ECC/HANH portfolio.

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline***	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	240 units	57 units at Fair Haven 94 units at Farnam Courts Phase I	57 Units completed (55 RAD and 2 PBV units completed at Fair Haven) 94 Units completed (86 RAD and 8 Market units completed at Farnam Courts I)	Yes, redevelopment efforts on target for completion

		111 units at Farnam Courts Phase II	87 RAD units under construction at Farnam Courts Phase 2A and 2B	

Internal Metrics

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Internal Metric #6: Utility expenses per unit**				
Reduction of utility expenses per unit, pre and post redevelopment – Electric	Valley Waverly: $900 per unit/ per month in 2012	5% reduction Electric utility expenses would reach approximately $858.33 per unit	2021: $144.14 per unit/per month at Fair Haven $67.02 per unit/per month at Mill River	Yes
Reduction of utility expenses per unit, pre and post redevelopment – Gas	Valley Waverly: $60.83 per unit/ per month in 2012	5% reduction Gas utility expenses would reach approximately $65.83 per unit	2021: $18.83 per unit/ per month at Fair Haven $23.94 per unit/per month at Mill River	Yes
Internal Metric #7: Crime Rate**				
Crime rate statistics, pre and post redevelopment	Farnam Courts FY19: 1	10% reduction in number of major crimes	2021: 0 major crimes	Yes

** The baseline and benchmark were updated for specificity in FY17. They previously referred to the entire ECC/HANH portfolio, rather than only Farnam Courts.*
*** These baselines will be updated to Farnam Courts data beginning FY19, per the FY19 Annual Plan.*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were achieved, and no changes were made to this activity. ECC/HANH does anticipate changes to the metrics to remove REAC Scores and replace with the Number of Work Orders and Emergency Work Orders.

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

Housing Choice

Approved in FY12 and implemented in FY13.

Description/Impact/Update

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. To address this funding gap and help assure the long-term viability of the portfolio, ECC/HANH is using the PNA to develop an asset management strategy for each of its developments. Part of this strategy may include 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 analyzed the feasibility of converting Annual Contribution Contract ("ACC") units to Project-Based Units using criteria like those set forth under Section 22. ECC/HANH will increase its flexibility to allocate the number of units in a project from 75% (as previously approved by HUD) to 100%, which will allow for the conversion of ACC units to PBV units. This will provide the cash flow necessary to enable ECC/HANH to borrow private funds to rehabilitate aging developments in the portfolio. ECC/HANH also seeks to waive the requirement of one-year tenancy to allow participants greater flexibility.

Mobility is offered by allowing tenants the option to vacate the development during rehabilitation and to choose between returning upon the completion of the rehabilitation or to accept a Tenant-Based Voucher to relocate permanently. ECC/HANH will provide all the assistance and counseling as required under Section 18 or the Uniform Relocation Act, if applicable.

Attachment C. Section D(e) authorizes ECC/HANH to determine the percentage of housing voucher assistance that it is permitted to project-base. Section D(e) waives certain provisions of Section 8(o) (13) of the Act that prohibits ECC/HANH from awarding more than 25 percent of the dwelling units in any building with project-based assistance. In cases in which project-based units are needed to ensure viability of mixed-finance projects, ECC/HANH, under its 2010 Plan, received authorization to project-base up to 75 percent of the units in the development, provided the project leverages non-public housing authority investments and increases housing choices for low-income families. ECC/HANH continues to use its authorization to project-base up to 100 percent of the units in a public housing development that is disposed of in connection with the submission of a Section 18 disposition application to HUD.

ECC/HANH will limit the number of project-based units in non-mixed-finance projects to no more than 50 percent of the units in the project. ECC/HANH may project-base up to 75 percent of the units in such project, if the project meets the following criteria:

- Will provide replacement units for public housing units lost because of demolition or disposition.
- Is undertaken in an area where significant investments are being made.
- Will help to reduce the concentration of very low-income families, or
- Is in areas that provide increased access to transportation or employment opportunities.

Under the prior MTW Demonstration Agreement, ECC/HANH was specifically authorized to aid up to 50 percent of the units in a project. This authorization has been essential in helping to promote increased housing opportunities, as well as in leveraging private funds. HUD's development of the Rental Assistance Demonstration (RAD) Program has made this initiative unnecessary for projects approved for RAD conversion.

This initiative includes the following buildings:

- Ribicoff 9% closed during FY15
- Ribicoff 4% closed during FY15
- Fair Haven and Farnam Phase I closed during FY16
- Closed on Farnam Phase 2 4% during FY20. Phase 2 9% closed in FY2021.

Impact

This initiative helps to increase the supply of affordable housing in areas that: promote de-concentration of poverty, offer accessibility to employment, schools, shopping, and transportation, and are undergoing other significant investments. ECC/HANH has a development pipeline that utilizes this initiative. ECC/HANH exceeded the benchmark for leveraged dollars (with a 2:1 ratio) and saw a decrease in crime (by 10 percent).

With the advent of the Rental Assistance Demonstration Program and ECC/HANH's success utilizing this tool, the flexibilities provided under this initiative have not been needed to achieve the goal of preserving deeply affordable units while repositioning the LIPH portfolio. During FY2021, 450 LIPH units converted to PBV via RAD.

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 units (frozen 2001 base)	Decrease of no more than 5% from previous year	2021- 2,246 LIPH units	Yes

CE #4: Increase in Resources Leveraged (MTW Leverage Ratios)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Brookside I	1.7	2.0	2016: 2.3 2015: 2.3	Yes
Brookside II	1.7	2.0	2016: 7.5 2015: 7.5	Yes
Rockview I	1.7	2.0	2016: 4.6 2015: 4.6	Yes
122 Wilmot Road	1.7	2.0	2016: 3.2 2015: 3.2	Yes
Brookside Homeownership	1.7	2.0	2016: 1.7 2015: 1.6	Yes
Ribicoff I	1.7	2.0	2016: 6.1 2015: 6.1	Yes
Ribicoff II	1.7	2.0	2016: 1.2 2015: 1.2	No

Quinnipiac Terrace I	1.7	2.0	2016: 5.5 2015: 5.5	Yes
Quinnipiac Terrace II	1.7	2.0	2016: 8.6 2015: 8.6	Yes
Quinnipiac Terrace III	1.7	2.0	2016: 4.2 2015: 4.2	Yes
Eastview I	1.7	2.0	2016: 0.6 2015: 0.6	No
Rowe	1.7	2.0	2016: 4.5 2015: 4.5	Yes
Farnam Phase 1	1.7	2.0	2016: 3.1	Yes
Rockview Phase 2	1.7	2.0	2019:12.1	Yes

**Baselines taken from Quinnipiac Terrace/Quinnipiac Terrace 2*

Internal Metric #1: Increase in Agency Revenue*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Increase in Agency Revenue – Farnam Phase 1 Redevelopment Fees	$0	$0	2017: $890,453	Yes
Increase in Agency Revenue – Ribicoff 9% Redevelopment Fees	$0	$0	2016: $2,000,000	Yes
Increase in Agency Revenue – Ribicoff 4% Redevelopment Fees	$0	$0	2016: $2,077,570	Yes
Increase in Agency Revenue – Fair Haven Redevelopment Fees	$0	$0	2016: $2,905,743	Yes
Increase in agency revenue - Rowe redevelopment fees	$0	$0	2014: $893,374	Yes
Increase in agency revenue - Brookside Phase I redevelopment fees	$0	$0	2014: $1,081,094	Yes
Increase in agency revenue - Brookside Phase II redevelopment fees	$0	$0	2014: $725,704	Yes
Increase in agency revenue - Rockview Phase I redevelopment fees	$0	$0	2014: $744,389	Yes
Increase in agency revenue - Rockview Phase II redevelopment fees	$0	$0	2019: $2,551,148	Yes
Increase in agency revenue - 122 Wilmot Road redevelopment fees*	$0	$0	2014: $1,419,767	Yes

** ECC/HANH has created a new stream of revenue from redevelopment activities. The redevelopment fees and ECC/HANH administrative costs are reimbursed by the development budget and revenue is reinvested in future redevelopment efforts.*

Internal Metrics

Redevelopment Metrics				
Internal Metric #7: Crime rate				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Crime rate statistics, pre and post redevelopment	Quinnipiac major crimes in FY 2003: 13. West Rock (122 Wilmot, Brookside I and II) major crimes in FY 2005: 47	10% reduction in number of major crimes.	Refer to Appendix 12: Number of Major Crimes.	Yes

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

The benchmarks were achieved, and no changes were made to this activity.

Initiative 1.11 – Increase the Percentage of Housing Choice Voucher Budget Authority for the Agency that is permitted to Project-Base from 20 Percent up to 25 Percent

Housing Choice

Approved in FY13 and implemented in FY14.

Description and Status

This initiative continues redevelopment efforts of underperforming public housing assets and increases housing choices for residents. This authority allows ECC/HANH to use up to 25% of housing vouchers to leverage funds for redevelopment of ECC/HANH's aging public housing stock.

This initiative was considered prior to the advent of the RAD program. The percentage of MTW project-basing did not include the full conversion of ACC sites to PBVs. The adoption of RAD increased the proportion of the portfolio allowable for project-basing.

ECC/HANH's current percentage of non-RAD project based MTW vouchers is 11%, equivalent to a total of 703 vouchers.[15]

Impact

ECC/HANH uses its ability to project-base vouchers in order to increase the availability of quality affordable housing options. During FY2021, ECC/HANH awarded PBVs to an additional 4 providers for 100 units of affordable housing. ECC/HANH has managed the percent of PBV to 11% currently continuing to maximize the choice feature of the HCV program. ECC/HANH anticipates continued ability to invest in worthwhile development opportunities making use of PBV ability given funding availability.

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 units (frozen 2001 base)	Decrease of not more than 5% from previous year	2021: 2,246 units	Yes
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (non ECC/HANH projects)		Annual PBV awards consistent with ECC/HANH MTW Annual Plan	2021: 100 units awarded 2020: 100 units awarded	Yes
CE #4: Increase in Resources Leveraged				
Brookside I	1.7	2.0	2016: 2.3 2015: 2.3	Yes
Brookside II	1.7	2.0	2016: 7.5 2015: 7.5	Yes

[15] *FY21 HANH divided the total number of Project Based Vouchers into the Total Voucher Authorization to come up with the percentage of Non-RAD PBV units (703/6,161).*

Rockview I	1.7	2.0	2016: 4.6 2015: 4.6	Yes
122 Wilmot Road	1.7	2.0	2016: 3.2 2015: 3.2	Yes
Brookside Homeownership	1.7	2.0	2016: 1.7 2015: 1.6	Yes
Ribicoff I	1.7	2.0	2016: 6.1 2015: 6.1	Yes
Ribicoff II	1.7	2.0	2016: 1.2 2015: 1.2	No
Quinnipiac Terrace I	1.7	2.0	2016: 5.5 2015: 5.5	Yes
Quinnipiac Terrace II	1.7	2.0	2016: 8.6 2015: 8.6	Yes
Quinnipiac Terrace III	1.7	2.0	2016: 4.2 2015: 4.2	Yes
Eastview I	1.7	2.0	2016: 0.6 2015: 0.6	No
Rowe	1.7	2.0	2016: 4.5 2015: 4.5	Yes
Farnam Phase 1	1.7	2.0	2016: 3.1	Yes
Fair Haven	1.7	2.0	2015: 3.1	Yes

**Baselines taken from Quinnipiac Terrace/Quinnipiac Terrace 2*

Internal Metrics

Redevelopment Metrics				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Internal Metric #12: HCV Budget Authority for the Agency that is Permitted to Project-Base				
Overall ECC/HANH percentage of PBV/HCV**	11% (FY13)	Up to 25%	2021: 11%	Yes

* ECC/HANH has created a new stream of revenue from redevelopment activities. The redevelopment fees and ECC/HANH administrative costs are reimbursed by the development budget and revenue is reinvested in future redevelopment efforts.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

Units preserved metric was adjusted to reflect ECC/HANH accurate baseline number.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

No changes.

Initiative 1.12 – Development of Replacement Public Housing Units with MTW Block Grant Funds Approved in FY13 and implemented in FY14.

Housing Choice

Description and Status

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 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. With the absence of HOPE VI, Choice Neighborhoods, or other similar funding authority, MTW flexibility has proven an invaluable tool in the ongoing replacement of obsolete public housing units. MTW flexibility has allowed ECC/HANH to undertake the large-scale redevelopments identified below by providing capital funding as well as RAD PBV overhang funding. This infusion of MTW funds allows us to structure funding proposals that maximize non-MTW funds to the greatest extent possible. ECC/HANH is committed to maximizing all non-MTW funding sources for every development activity. ECC/HANH's three most recent redevelopment projects, Rockview Phase 2, Farnam Phase 2, and Valley Street all include highly competitive 9% Low Income Housing Tax Credits made possible by the infusion of MTW funds.

The infusion of MTW funds through capital or PBV overhang is necessary due to the extraordinary costs related to these redevelopment activities. Redevelopment activities necessitate the demolition of all existing buildings, abatement of hazardous materials, soil remediation and often completely reconstructed infrastructure. In addition to new water, sewer, and storm water service, new roadways will need to be constructed. As traditional sources have decreased, MTW funding allows us to successfully compete for third party funds while also assuring that construction is completed using high-quality, sustainable, and energy efficient design. The following table illustrates how ECC/HANH has maximized the use of MTW funds over time. MTW leverage ranges from 3-1 to over 10-1. These 14 projects have a combined overall development cost of $482 million with an MTW infusion of $75.6M, for a leveraged amount of $407 million.

Development Name	Year Converted	LIPH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units	Overall Development Costs	MTW Share	MTW Per Unit	MTW Leverage
Eastview Terrace Phase 1	2009	53	49	102	0	102	$43,110,362	$3,591,481	$35,210.60	12
Quinnipiac Terrace 3	2010	17	16	33	0	33	$15,013,613	$836,120	$25,336.97	18
William T. Rowe	2010	46	32	78	26	104	$40,710,905	$7,907,927	$76,037.76	5
Brookside Phase I	2011	50	50	100	0	100	$40,618,730	$6,625,828	$66,258.28	6
Brook. Phase II	2012	50	51	101	0	101	$29,798,133	$1,633,849	$16,176.72	18
Wilmot Crossing	2012	0	47	47	0	47	$18,806,305	$1,626,517	$34,606.74	12
Rockview Phase I	2013	30	47	77	0	77	$33,407,238	$5,791,932	$75,219.90	6
Ribicoff 9%	2014	0	44	44	11	55	$22,469,185	$4,075,502	$74,100.04	6
Ribicoff 4%	2014	0	51	51	0	51	$21,551,269	$10,101,565	$198,069.90	2
Farnam Courts-Fair Haven	2015	0	57	57	0	57	$29,814,177	$6,895,829	$120,979.46	4
Farnam Court Phase I onsite	2016	0	86	86	8	94	$42,410,000	$13,511,025	$143,734.31	3
Rockview Phase 2	2019	0	62	62	16	78	$34,047,566	$2,635,483	$33,788.24	13
Farnam Courts-Phase 2*	2020	0	88	88	23	111	$53,309,246	$3,720,000	$33,513.51	14
Westville Manor*	TBD	0	87	87	22	109	$57,661,000	$6,742,000	$61,853.21	9
Total		**246**	**767**	**1013**	**106**	**1119**	**$482,727,729**	**$75,695,058**		

In FY13, 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 pursued this initiative at certain sites in FY13, including Farnam Courts and Abraham Ribicoff Cottage and Extension, but intended to use this same model at other sites to be identified in the future. We've continued this process with Rockview Phase 2, Farnam Phase 2, and the proposed Westville Manor initiative.

ECC/HANH uses MTW block grant funds, 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 are 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 used 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 like the project-based voucher program. Among other things, this approach allows 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 revised required forms to provide for this mix of applicable rules and sought the necessary HUD approvals.

Development Name	PH Units[16]	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units
Eastview Terrace	**53**	**49**	**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**	**50**	**100**	**0**	**100**
Brookside Phase II	**50**	**51**	**101**	**0**	**101**
Rockview Phase I	**30**	**47**	**77**	**0**	**77**
William T. Rowe	**46**	**32**	**78**	**26**	**104**
Wilmot Crossing	**0**	**47**	**47**	**0**	**47**
Monterey Place	**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**
Ribicoff 9%	**0**	**44**	**44**	**11**	**55**
Ribicoff 4%	**0**	**51**	**51**	**0**	**51**
Farnam Courts - Fair Haven	**0**	**57**	**57**	**0**	**57**
Farnam Court - Phase I onsite	**0**	**86**	**86**	**8**	**94**
Farnam Courts - Phase 2 onsite* (partially completed)	**0**	**88**	**88**	**23**	**111**
Rockview Phase 2	**0**	**62**	**62**	**16**	**78**
Westville Manor* (planned)	**0**	**87**	**87**	**22**	**109**
Total	360	856	1216	45	1261

Several actions related to the replacement of public housing units occurred this fiscal year. ECC/HANH successfully obtained all necessary funding for Farnam Phase 2 onsite (111 units/86 RAD) through competitive funding rounds sponsored by the Connecticut Housing Finance Agency and the State Department of Housing. Farnam Phase 2 4% closed

[16] Public Housing Units at Eastview Terrace has since converted to RAD.

in FY 20 and Farnam Phase 2, 9% closed in FY 21. Leased units will be achieved during FY 22. Rockview Phase 2, the off-site, first Phase of the Westville Manor redevelopment completed construction and lease-up. ECC/HANH has also obtained City of New Haven approval to undertake the transformation of Westville Manor (see initiative 1.17). ECC/HANH's plan is to apply for LIHTC equity and other funding for the first phase of Westville Manor during CY 2022.

Impact

The replacement of public housing units under this initiative will have the impact of promoting housing choice for low-income families by reducing density therefore improving the quality of housing, a more marketable housing development, reduction of crime, an increase in occupancy, and economic development of the surrounding neighborhood with new businesses and a renewed sense of community. Additionally, with a renewed place to call home, ECC/HANH anticipates an increase in self-sufficiency participation, which has been shown at other redevelopment efforts within our portfolio. This initiative will result in the replacement of an aging and economically disadvantaged housing development with a resident oriented mixed income and mixed-use community. Though the use of MTW funding plays a vital role in the repositioning of unsustainable LIPH developments, ECC/HANH has created a process to maximize the leverage of MTW funds. This leverage ranges from 3-1 to over 10-1, demonstrating the maximization of non-MTW funding sources. ECC/HANH accomplished this through an ambitious and rigorous process to assure that all non MTW resources are leveraged to the greatest extent possible by competing for and receiving competitive funding through the 9% LIHTC, 4% LIHTC, State of Connecticut programs and other funding.

The goal of this initiative is to transform obsolete and unsustainable housing developments with vibrant new developments while maintaining affordable housing opportunities for our residents. The use of MTW block funds have produced over 1,200 quality affordable housing units. The ability to reposition the aging LIPH stock utilizing MTW Block funds allows for cost effectiveness by maximizing the leveraging of non-MTW funding.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

No changes

We've successfully achieved our benchmarks and have continue to manage challenges by strategizing local and federal funding opportunities, and proactively engaging residents around relocation early in the redevelopment process.
relocation early in the

Initiative 1.15-1.17 – RAD Finance Development for Rockview Phase II Rental and Westville Manor Transformation Plan

Approved in FY14 and implemented in FY17.

Housing Choice

Description and Status

ECC/HANH has strategically redeveloped the West Rock neighborhood at four low-income public housing sites. To date, redevelopment at Brookside, Rockview, Ribicoff Cottages and Wilmot Crossing has all been completed, transforming obsolete public housing and commercial sites into vibrant mixed-income communities. Westville Manor, a 150-unit LIPH development is the only community not yet redeveloped and represents the final phase of redevelopment. The redevelopment effort has brought 300 units of affordable and market rate rental housing, new homeownership units, and upgraded community space and commercial space into the West Rock community. ECC/HANH has also worked successfully with the City of New Haven and the Town of Hamden to open a long-closed road, creating an access way into the community from the Town of Hamden.

Impact

West Rock Community: The West Rock community, which originally included Rockview Terrace, Brookside Manor, and Ribicoff Cottages, was developed as affordable housing in the 1950s and 1960s in what at that time was an outlying area with little access to public service or job opportunities. Westville Manor was constructed in the Westrock neighborhood in the 1980s. ECC/HANH's goal has been to redevelop these aged and poor performing assets with a viable, sustainable, and connected community known as the Westrock Redevelopment Plan. To date, Rockview Terrace, Brookside Manor, and Ribicoff Cottages have all been demolished and reconstructed through a series of development projects funded through mixed finance vehicles. In addition to these three redevelopments, ECC/HANH also developed Wilmot Crossing on a gateway location to the Westrock neighborhood. Wilmot Crossing includes senior and disabled housing, a community store, and a full-service medical clinic. These activities have transformed obsolete public housing into vibrant mixed-income communities that brought 300 units of affordable and market rate rental housing, homeownership, associated community space and commercial space into the West Rock community. To assure connectivity, ECC/HANH worked successfully with the City of New Haven and the Town of Hamden to open a long-closed road creating an access way into the community from the Town of Hamden, providing access to retail and employment opportunities.

Westville Manor Transformation Plan: Westville Manor is a 150-unit low-income public housing development, and the only ECC/HANH property in the West Rock neighborhood that has not yet been redeveloped. Westville Manor was targeted for redevelopment for several reasons: the development is challenged for access, egress and security due to poor design, and has a lack of defensible space as it is surrounded by the densely forested West Rock Ridge State Park. The development is situated in steep terrain with poor drainage leading to water infiltration issues. Due to these design flaws Westville Manor has become increasingly obsolete.

The Westville Manor transformation plan will include the demolition of all units and the replacement units either onsite or at Rockview Phase 2 (Initiative 1.15), within walking distance of Westville Manor. Rockview Phase 2, which has been approved by HUD as an offsite component of Westville Manor, is currently under construction with a completion in the summer of 2020 (described above). Westville Manor will contain 62 HUD approved replacement units, leaving a balance of 81 RAD replacement units to be constructed on the current site of Westville Manor. The redeveloped property will tie into the West Rock State Park trail system, allowing residents to take full advantage of the location's natural setting.

It is the intent of ECC/HANH to fully redevelop Westville Manor development in the West Rock neighborhood under a RAD/mixed finance model. ECC/HANH has prioritized the redevelopment of the West Rock neighborhood through a series of investments and redevelopments that have completely replaced the obsolete public housing developments located in this neighborhood. The redevelopment of Westville Manor will necessitate the phased demolition of all existing buildings, abatement of hazardous materials, the construction of 109 units including 87 townhouse style units, and completely reconstructed infrastructure. In addition to new water, sewer, and storm water service to alleviate groundwater and runoff issues, a series of three new roadways will be constructed which will be conveyed to the City of New Haven upon completion of the development. The long-term sustainability achieved through high construction standards and passive house design will likely require that the TDC initiative be triggered and that the MTW flexibility be used to provide capital costs and to supplement operating costs through a “RAD PBV overhang” to allow for the maximization of private financing. ECC/HANH will make every effort to maximize the leverage of non-MTW resources through the 9% LIHTC, state funding programs, and private financing.

To initiate the Westville Manor redevelopment plan, ECC/HANH contracted with a Master Planner entity to lead and design the planning process. A series of community meetings and a design charrette were conducted in August and September of 2018 to obtain community and resident input. Residents, several community-based organizations and private supporters of Westville Manor helped shape the framework of the redevelopment vision. A major participant group were current Westville Manor residents. Residents played a key role in multiple charrette committees and were an invaluable resource in the design and layout of the overall development as well as unit. The process included break –out sessions and drop-ins where residents voiced their opinions on several aspects of the vision. The three- day design charrette was an intensive and productive workshop with effective community participation and real time feedback resulting in a consensus plan.

In addition to supporting the provision of high quality affordable rental housing to the residents of the Westville Manor community, input from the community has focused on providing comprehensive, high quality supportive services programming for residents, promoting long-term economic self-sufficiency and providing residents with access to training, educational opportunities and employment.

The on-site units will be replaced through a bifurcated process to assure that resident displacement will be minimized, and that unit demolition will occur in phased manner upon receipt of funding. The on-site redevelopment plans include the incorporation of 20% market rate units to assure that the replacement development is not only sustainable but also a neighborhood of choice. It is the intention of ECC/HANH to seek 9% LIHTC funding in the fall of 2021 for the first 50-unit phase and in 2022 for the second 59-unit phase.

ECC/HANH received the approval from both the City of New Haven City Plan Commission and the Board of Alders for the Westville Manor Planned Development District (PDD). These approvals allow ECC/HANH to proceed with the completion of architectural plans and other required development documents.   HUD has an approved a CHAP for this development. The project architect and construction manager at risk have been procured and the pre-construction process is proceeding as planned.

<u>Development of Rockview Phase 2:</u> As an off-site component of Westville Manor, Rockview Phase 2 is a critical component of ECC/HANH’s long-term redevelopment of the West Rock neighborhood as the first phase in the Westville Manor redevelopment. Rockview Phase 2 is a 78-unit townhouse development located on a portion of the site of the former Rockview Terrace. HUD has approved using the 62 RAD units as an off-site component of Westville Manor, furthering the ECC/HANH initiative of replacing public housing units with MTW block grant funds. ECC/HANH constructed 62 RAD units and 16 non-income restricted units. Rockview Phase 2 will crosscut and coordinate with several other initiatives, including TDC, the development of replacement public housing units, and the aforementioned Westville Manor.

MTW flexibility is required to complete both Rockview Phase 2 and the Westville Manor on-site redevelopment. These developments will trigger the requirement for TDC flexibility. Both are being constructed per ECC/HANH’s design standards. These design standards require the inclusion of more costly, yet sustainable, construction standards including but not limited to cementitious siding, quality flooring, and energy efficient HVAC and design component. These townhouse units are being constructed to meet full HERS compliance. In addition to sustainable design standards, the project includes the construction of new infrastructure including, water, sanitary sewer, storm sewer, and the construction of two new streets which will be conveyed to the City of New Haven upon completion. MTW flexibility through the provision of capital funds and RAD PBV overhang is required to assure that the funding application would be competitive under competitive 9% LIHTC competition. For Rockview Phase 2, these assistance vehicles allowed ECC/HANH to maximize the leverage of non-MTW funding sources, including a HUD 221(d) loan and State of Connecticut capital funding. The same financial structure is anticipated for Westville Manor. The financial closing for Rockview Phase 2 occurred on June 20, 2019 and construction is complete and units are fully leased.

The goal is to transform an obsolete housing complex into a vibrant mixed-income housing choice development that would both maintain affordable housing opportunities for our residents while creating a vibrant new neighborhood that will include a public park and the construction of a community centric low-rise 20 unit building that will include community meeting space, management offices, and various social service offices. The impact of the completed project is expected to promote housing choice for low-income families by eliminating a poor-performing housing option and improving housing choice options, reducing density and therefore improving the quality of housing and making the development more marketable, improving the lease-up rate and decreasing turnover and increasing connectivity to commercial and job centers through expanded bus service being added in conjunction with the redevelopment. ECC/HANH also anticipates a reduction in crime and an increase in occupancy, which also supports development of the surrounding neighborhood with new businesses and a renewed sense of community.

Outcomes

HUD-Required Metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI because of this activity (increase)	150 units	143 units	N/A In planning	N/A
HC #2: Units of Housing Preserved *				
Number of new housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 (frozen 2001 base)	2,246	N/A	N/A

** Per FY19 Plan, HC#3 will no longer be reported on under this initiative beginning FY19.*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

ECC/HANH plans to submit an application for LIHTC in the FY2022 round. Redevelopment along the current plans is dependent upon successful award. Failure to receive funding will require a revision to the redevelopment timeline.

Self Sufficiency

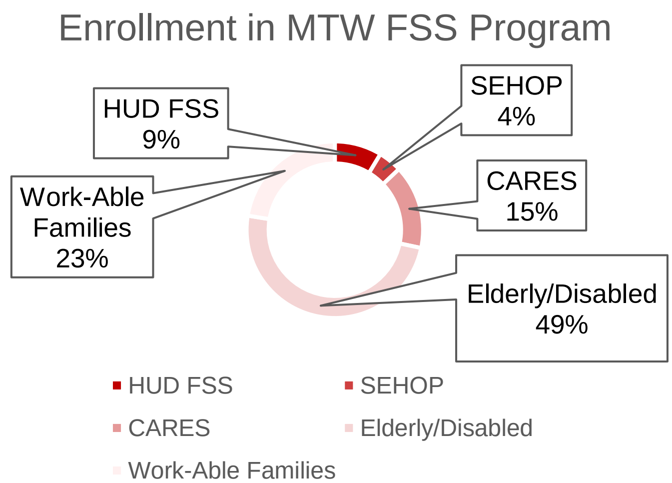
Initiative 2.1 – Family Self-Sufficiency (FSS) Program
Approved and implemented in FY07.

Description and Status

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. Adding new services has allowed ECC/HANH to provide much needed support to a larger number of LIPH and Section 8 residents. Service referrals focus on: education, literacy, GED preparation, vocational and job skills and financial management.

The MTW FSS program serves over 1,150 families. This includes:

The following table details the number of enrollment slots for each program.



Program	Number of Slots	Benefits from Escrow	Owner	Supports
HUD FSS Grant Funded Slots	150	Yes	FSS Coordinators	RSCs, CED Managers & Supervisors, MSW
CARES Program	Up to 178	Yes	CARES Coordinator	CED Managers & Supervisors, MSW
Work-able families	60 200	Yes Yes	Program Managers FSS Coordinators	FSS Coordinators, CED Managers & Supervisors, RSCs & MSW
Elderly/Disabled	570	No	RS Coordinators	CED Managers & Supervisors, MSW, Recreational therapist, FSS coordinators
TOTAL	**1158**			

Impact

This initiative is expected to increase the self-sufficiency of residents through employment, specialized training, higher education and increased earnings. In a year impacted by the COVID pandemic, focus was on assisting residents in functioning in the virtual world, maintain income, wellness and emotional well-being and supports for academic engagement and achievement. Despite the challenges, many of our residents made great progress toward their goals and achieved self-sufficiency.

During FY 2021, one hundred new families were enrolled in the Connect Home Initiative. Program attendance remained consistent as options were presented virtually with over 229 residents attending over 45 workshops and programs. Through the agency's FSS program, 19 families became new homeowners in FY 21.

Examples of our successes include a resident who began in the FSS program in 2014 working full time as a dental technician earning $23,400 and graduating this year, 7 years later as a homeowner earning $61,131. Additionally, she graduated with $14,119 in Escrow which she utilized towards her closing costs. She continued with her dream of becoming an entrepreneur and is in the process of finalizing a loan with ECC/HANH through the Resident Owned Business Program as she prepares to open her own dental lab.

Another resident began in the FSS program in 2015 with zero earned income. He was unemployed with his only source of income being state assistance and food stamps. In 2016, he secured full time employment and began earning $30,516. During his time in FSS he worked with the department on his budgeting, credit and continued increasing his savings, graduating in FY21 with over $9,466 in savings plus $16,132 that he accrued in his FSS escrow account and now earning $49,075. He is currently in the process of purchasing a home.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earnings (wages) of households enrolled in FSS Program**	$4,082 (2013)	Steady increase in average household earnings. Long-term Goal: meet or exceed NH AMI	2021: $32,864 2020: $33,633 Prior years' average income: $24,072	Yes

SS #3: Increase in Positive Outcomes in Employment Status				
Employed full-time*** Employed part-time Enrolled in an educational program Enrolled in job training program Unemployed Other	2014 - Employed FT: 22 - Employed PT: 93 - Enrolled in education: 228 - Enrolled in job training: n/a - Unemployed: 113 - Other: N/A	Steady increase in full-time employment for FSS participants	2021: - Employed FT: 55 - Employed PT: 14 - Enrolled in Education: 103 - Enrolled in Job Training: 10 - Unemployed: 585 2020: - Employed FT: 68 - Employed PT: 15 - Enrolled in Education: 107 - Enrolled in Job Training: 9 - Unemployed: 591	Partial

SS #3: Increase in Positive Outcomes in Employment Status				

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of FSS households that have taken vocational and computer classes (excluding Specialized Training)	155 (2013)	200	2021 - 103 2020: 107 Prior years' average: 150	No

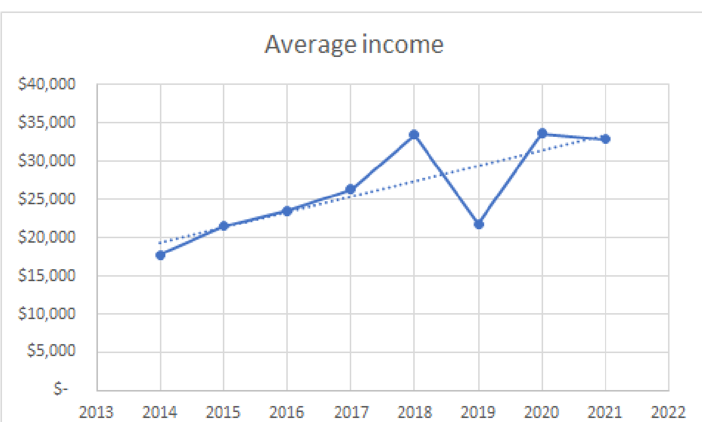
** This data excludes SEHOP, CARES, elderly/disabled, resident-owned business services, and specialized services*
*** Average earnings include wages and other earnings. Note that 20% of FSS participants did not have income in FY17, but 50% in FY14 and 52% in FY13. In FY19 this average includes Work-able, FSS, & CARES Families.*
**** Full-time employment if earned income (wages + self-employment) equates to 30 hours/week at CT minimum wage; unemployed assumes no wages. All FSS participants in FSS Log considered to be enrolled in educational program.*

SS #8: Households Transitioned to Self-Sufficiency				
Number of households who achieve homeownership	10	Steady increase in new homeowners annually	2021: 19 2020: 18	Yes

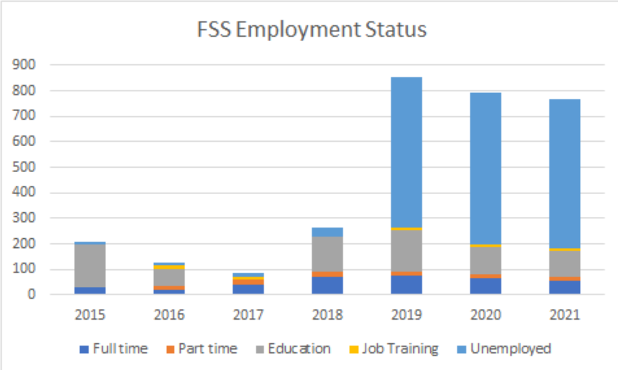
**The outcome includes all programs under the FSS initiative*

At baseline ECC/HANH's FSS program was serving approximately 450 families and has grown to almost 800. At baseline 25% of the families were employed and 25% were unemployed. As the program has grown, we have specifically targeted unemployed families and they now make up over half of the families served. Due to this targeting, our metric for employment status shows an increase in unemployed families this year.

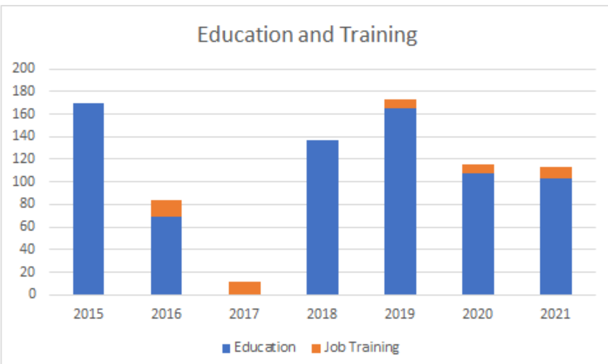
Families participating in FSS have demonstrated growth in annual family income trending toward New Haven AMI of $42,222.



Data reflects growth in the program and our specific targeting of unemployed families. Yet and still, full time employment for our FSS families has increased over baseline. The past two fiscal years have presented challenges to our families with regard to employment as a result of the COVID pandemic.



Similarly, the past two fiscal years have been challenging with regard to families enrolling in education and vocational programming. The majority of enrollment is in education programs. Computer classes and job skills were the most popular classes amongst our families. This year marked zero graduates from GED classes.



Actual Non-significant Changes

None

Actual Changes to Metrics/Data Collection

Beginning in FY2021 ECC/HANH will collect data on SS#8: Households Transitioning to Self-Sufficiency

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

A key challenge for the FSS program is around promoting literacy for residents. One challenge has been in securing community partnerships to offer onsite programming for Adult Literacy and GED courses, as it has been difficult to meet the minimum number of participants required. Additionally, a survey administered by CED to residents revealed that many are uncomfortable admitting needs and taking onsite programs for literacy and GED, as it makes them feel vulnerable in the community. To better connect and serve participants, ECC/HANH is currently working with an organization known as Literacy Volunteers as well as Adult Education in New Haven to create a referral chain that will provide residents with confidentiality when connecting with and participating in literacy or GED programs. Participant surveys have also indicated a high need and interest in providing onsite English as a Second Language (ESOL) courses.

Self-Sufficiency

Initiative 2.2 – Incremental Earned Income Exclusion

Approved and implemented in FY08.

Description and Status

This initiative was introduced in 2008 as a pilot incentive for FSS Program participants. The intention was to allow participants to begin saving funds resulting from earned income exclusions, as applicable. Given the anticipated upfront savings, the aim of the program was to enable FSS Program families to save for and achieve their goals of higher education, credit repair, entrepreneurship, savings, homeownership, among other goals.

The Incremental Earnings Exclusion was structured through phased increases in earned income over the five-year term of a family's participation in the FSS program. For example, during the first year, ECC/HANH excludes 100% of any incremental earnings from wages or salaries earned by any family member from the determination of annual income and corresponding rent calculations.

- Earned income increases (from the effective date of contract) of participants are 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 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 years based on the rent increase and income exclusions.

Impact

After almost 10 years of implementing this initiative, it was found to be confusing for residents and administratively difficult to manage. ECC/HANH proposed and was approved to transition out of this initiative and this was replaced by the REACH grant program. As such, new families were not enrolled and enrollment has declined over time as the initiative is phased out. The number of individuals eligible for the Earned Income Exclusion in FY21 was 3 households compared to 19 in FY20.

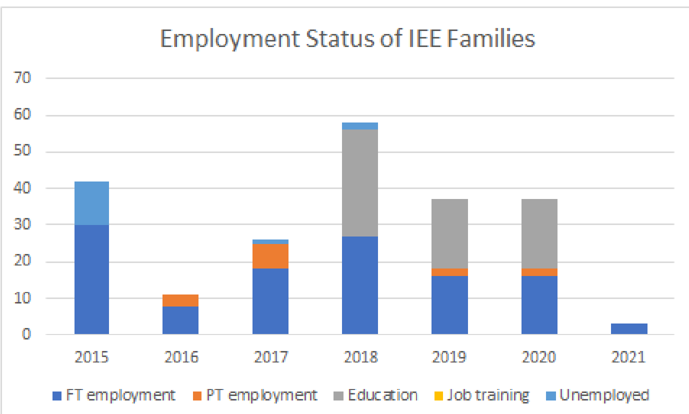
The average income of households affected by this policy has had a relatively steady increase since the year of 2018, with a large jump from 2020 to 2021. The large jump is due to the decrease in participation, as this program is phasing out, which creates a lower number used to calculate the average. The income per household has increased 57% which equates to a $22,449 difference from the previous year.

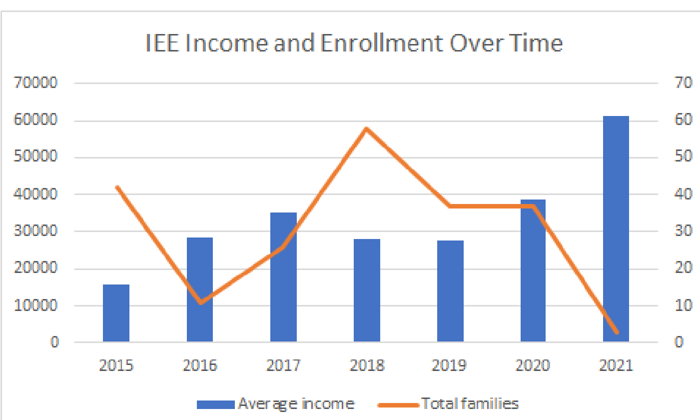
As a result of low participation and the inability to connect self-sufficiency outcomes to this initiative, ECC/HANH stopped adding new participants beginning in FY 19. FSS Coordinators continue to exclude incremental earnings from wages or salaries earned by family members for those 3 families that remain eligible.

All participants currently receiving the benefit will continue to do so until one of the following occurs: the clock on the program timeline runs out, meaning the benefit is used up in its entirety by the participants; the individual exhausts the benefit; or the individual forfeits the benefit by not meeting the IEE program requirements. With each year, ECC/HANH the number of individuals eligible decreases as families reach the program time limit. The final three families are enrolled at this point. Their total earned income totaled $184,234 with an average earning per family of $61,411. This exceeds that area median income for the New Haven area.

Year	% new earnings disregard	# of families
1	100%	
2	75%	
3	50%	
4	25%	3
5	0%	
Total		3

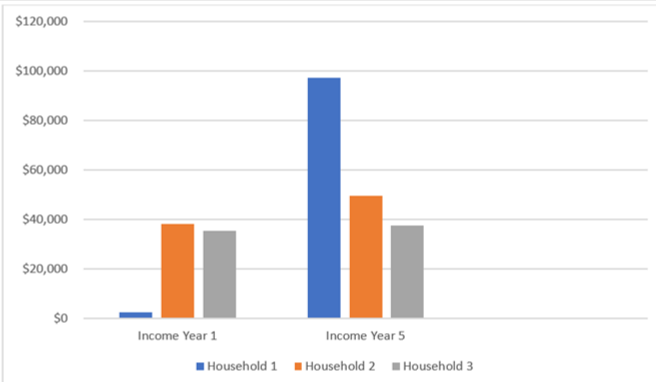
Program enrollment has fluctuated over time and is declining as the program is phasing out. Enrollment peaked in 2018 with 58 families enrolled. Fulltime employment and individuals enrolled in education programs have consistently made up the largest percentages of families. Income was lowest in periods when enrollment was highest and has peaked in these final years as enrollment is declining. While the program proved administratively complicated and difficult to manage, the families in the final cohort are showing income growth over time.





In FY 21, there was 100% full time employment amongst the participants, which is an increase of 16% from last year. Even though the increase satisfied the benchmark qualification, it was rendered from a pool of only 3 participants versus the 19 from the previous year. The pool is substantially smaller due to the program phasing out and no new participants being enrolled.

Household income for the 3 participants has increased from year 1 to year 5. There is an average increase of 142% increase from year 1 to year 5 for the remaining 3 households.



Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average income of households affected by this policy in dollars	$15,363 (2008)	Steady increase in average household income	2021: $61,411 2020: $38,962	Yes
SS #3: Increase in Positive Outcomes in Employment Status				
Employed full-time Employed part-time Enrolled in an educational program Enrolled in job training program Unemployed Other	2008: Employed FT: 27 Employed PT: N/A Enrolled in education: N/A Enrolled in job training: N/A Unemployed: 10 Self-Employed: 1	Steady increase in the percentage of participants who are employed full-time	2021: (100%) - Employed FT: 3 - Employed PT: 0 - Self-employed: 0 - Enrolled in Education: 3 (all required to attend FSS workshops/educational sessions) -Enrolled in job training: 0 -Unemployed: 0 2020 (84%) - Employed FT: 16 - Employed PT: 2 - Enrolled in Education: 19 - Enrolled in Job Training: n/a - Unemployed: 0 - Self-Employed: 1	Yes

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Number of households enrolled in Earned Income Exclusion	57 (2008)	Steady increase from previous year	2021: 3 2020:19 2019: 19 2018: 29 2017: 28 2016: 14 2015: 45	N/A (program is phasing out, so no new participants are allowed)

** Full-time employment if earned income (wages + self-employment) equate to 30 hours/week at CT minimum wage; unemployed assumes no wages.*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

As a result of low participation, administrative complexities and the limited number of clear self-sufficiency outcomes from this initiative, ECC/HANH began to phase out the Incremental Earnings Exclusion (IEE) beginning in FY19. As of October 1, 2018, no new participants have been added to the IEE program. All 3 current FSS participants received notification of the phase out. For those who are still eligible, FSS Coordinators will continue to exclude incremental earnings from wages or salaries earned by family members. All participants currently receiving the benefit will continue to do so until one of the following occurs:

- the individual exhausts the benefit.
- or the individual forfeits the benefit by not meeting the IEE program requirements.

ECC/HANH is replacing this Initiative with a new initiative known as REACH. Under the terms of the IEE Program, that agency assumed the costs of the discounted rent for all program participants, regardless of whether they met the objectives of the initiative. With a more targeted approach to financial incentives, the REACH program is expected to result in agency cost savings through reduced costs per resident.

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

Approved in FY12 and implemented in FY13.

Self-Sufficiency

Description and Status

Implemented in 2013, 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 and Rockview Rental development that encompassed HUD's continued mission to increase self-sufficiency among residents and promote accountability. 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 who are exempt under the program requirements, will be subject to a 72-month time limit on receiving rental assistance. The second component of the program requires certain individuals to participate in an extensive 24- month case management, supportive services program designed to overcome barriers to becoming self-sufficient. Residents returning to Brookside Phase I after redevelopment are exempt but can voluntarily participate in the program. ECC/HANH will use its MTW flexibility to fund the required social services component of this program.

Prior to signing a lease at the newly redeveloped Brookside Phase II Rental site, 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 a flat rent (public housing) or market rent (PBV), less any prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt, as described in the plan.

ECC/HANH recognizes 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 rental assistance if they continue to make progress towards their goals. There are two levels of engagement in the program: Full CARES and Transition CARES. This engagement is outlined here:

Full CARES Participant

- Has education and job skills that match demand in labor market
- Typically works full-time and earns a livable wage

Transition CARES Participant

- Does not have education and/or job skills that match demand in labor market
- Typically works part-time and/or needs job training to obtain higher wages or full-time employment

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 escrow account funds (including subsidy dollars). In addition to the intensive supportive services for 24 months during the 72-month rental period, residents also receive a lump sum payment. The amount is deposited into an escrow account (REEF) and released upon graduation from CARES. The monthly subsidy payment will be pre-determined at an initial assessment conducted prior to lease up.

The funds in the REEF (accessible at or after 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 one-time payment not to exceed $3,000 after all other options have been exhausted)
- costs to start a small business (a one-time payment not to exceed $2,500 after all other options have been exhausted)
- purchase of a computer
- enrollment in higher education, subject to the approval of ECC/HANH

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

During FY2020, program changes were made in recognition of the global pandemic. This allowed for rent adjustments and withdrawals from REEF savings.

Impact

The CARES program continues to provide case management, resources and tools to support participants in reaching self-sufficiency. At the end of FY20, 115 participants were enrolled in the CARES program. Based on the total number of units at both Brookside II & Rockview, the program can hold up to 177 participants at any given time, however, the number can be higher if families who transfer from Brookside II or Rockview to Brookside I decide to continue to participate. Currently there are 5 participants at Brookside phase I who transferred to units from Brookside phase II and Rockview and opted to continue to participate in CARES. Additionally, our total number of participants include families who participated at any time throughout the year who either became exempt or moved out. The total count for FY 2021 included 130 participants of which 117 remained at the end of the FY. The total includes all families who participated in CARES throughout the year including those who graduated, moved out or became exempt. There are currently 57 units that have residents who are exempt from the program.

Historical program participation is as follows:

	Number of Transition CARES	Number of Full CARES	% Program Compliant
2013	38	24	83%
2014	68	48	98%
2015	92	83	90%
2016	82	56	46%
2017	63	64	100%
2018	73	75	46%
2019	51	69	94%
2020	47	68	97%
2021	36	81	95%

The table below outlines the breakdown of families at these sites during FY2021.

CARES Participation End of FY21		
Program	Participants	Notes
Full CARES	81	14 out of 68 are BSI
Transition CARES	36	
Total at end of FY21	**117**	**101 BSII/ROCKVIEW**
Exemption	57	
Vacancy	8	

During FY21, the average income of all CARES participants was $27,970. Comparatively, in Brookside Phase I LIPH units, which is not under the CARES program, residents have an average earned income of $15,256. This represents an 58.82% difference when comparing average earned incomes between CARES and a non-CARES group. When looking only at families in the Full CARES program, the income data is even more promising with an average annual income for the 81 Full CARES families at $41,923.

In FY21, the CARES program included an opportunity for families to request a rent adjustment during COVID19 and any similar pandemic or emergency affecting a significant number of families in the community. Families who experience a loss of income as a result of a natural disaster, local, state or national emergency such as COVID19 or the like, may have the opportunity to submit a request for interim rent change. The family must be able to provide documentation that proves that the loss of income is related to this a specific situation listed under this category.

In FY21 the approximate amount of funds in each participant's REEF account was $10,911. Historically, the average amount requested by CARES participants to cover costs is $3,000, which suggests that residents utilize an average 27.5% of the REEF account if they tap into it prior to graduation. Requests to cover costs are submitted and reviewed by a CARES committee with representatives from ECC/HANH and local agency partners.

In FY21 there were no requests from CARES participants to access the REEF account.

Below is a table highlighting the historical requests from CARES residents to utilize their individual REEF accounts to cover the following costs:

Request to Cover Cost	Total Amount Requested	Total Amount Approved	Request to Cover Cost
Purchase of a vehicle (16)	$49,500.00	$49,500.00	Purchase of a vehicle (17)
Down payment on a home (1)	$10,448.11	$10,448.11	Down payment on a home (1)
Purchase of a Computer (1)	$500.00	$349.00	Purchase of a Computer (1)
Enrollment in Higher Education (6)	$14,449.00	$14,449.00	Enrollment in Higher Education (6)
Start a small business (1)	$1,000.00	$1,000.00	Start a small business (1)
A hardship (4)	$13,066.00	$12,491.47	A hardship (4)
Other (7)	$13,100.00	$11,184.51	Other (7)
Denied requests (3)	$8,000.00	$0.00	Denied requests (3)
Total Requests (39)	**$110,063**	**$99,422.09**	**Total Requests (40)**

Currently every participant in the CARES program is receiving on-going support and assistance through Family Self Sufficiency programs, Resident Owned Business training, Connecticut Association Human Services support, CONNCAT Training School and external Homeownership programs which includes HUD Homebuyer seminars as well as other resources in hopes of reaching self-sufficiency.

CARES is proving successful as we are seeing residents graduate with significant escrow savings, consistent and full time, well-paying employment. In FY21, 11 CARES residents graduated the program early with 5 entering homeownership and 6 entering the market rate rental market. Each resident successfully graduated before the 72-month CARES limit.

CARES Early Graduates + Disbursements from REEF

	Costs covered from REEF before graduation	Amount Disbursed from REEF
Participant 1	0.00	$14,262.45
Participant 2	0.00	$13,492.60
Participant 3	$3,000.00 (collections Debt)	$13,919.29
Participant 4	$3,000.00 (Car)	$3,185.80
Participant 5	0.00	$8,184.70
Participant 6	$1,200.00 (C.N.A Course)	$5,742.14
Participant 7	0.00	$4,889.21

Participant 8	$2,500.00 (Business)	$10,290.28
Participant 9	$3,000.00 (schooling)	$6,093.04
Participant 10	0.00	$19,313.73
Participant 11	$3,000.00 (Car)	$1,889.21

An example of a CARES success story includes a resident who was initially indecisive about the CARES program. ECC/HANH staff helped our resident understand that paying over $1,000 in rent meant that he and his family could afford a home of their own. Staff gave him more information about CARES and explained that he could receive an exemption because a member of his household is disabled. ECC/HANH staff ensured that he understood the financial incentives of the program, including the stabilized rent and REEF account. Our resident agreed to participate and started to pay down his debt and increase his credit score. In just two years, he managed to save close to $7,000 by utilizing the stabilized rent and worked with a credit coach to tackle his credit score. To improve his debt-to-income ratio he decided to pay off his car loan completely before applying for a mortgage pre-approval. The family closed on their new home in Hamden, CT in December 2020.

There is also a noted decrease in the number of families receiving TANF with zero Brookside residents and one Rockview residents currently in receipt of temporary cash assistance.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average Income for Full Cares and Transition CARES participants*	Average income of population: $16,897 in Fiscal Year 2013	Average family income of $45,000 by program completion (Full CARES)	2021: BSII Transition: $13,375.00 BS II Full: $39,729.00 Rockview I Transition: $14,963.08 Rockview I Full: $44,116.00 2020: BSII Transition: $17,586 BS II Full: $36,734 Rockview I Transition: $12,453 Rockview I Full: $36,412 Prior years' average income BS II Transition $15,404 BS II Full: $32,046 Rockview I Transition: $18,166 Rockview I Full: $36,871	No

SS #2: Increase in Household Savings				
Unit of Measurement	**Baseline**	**Benchmark****	**Outcome**	**Benchmark Achieved?**
Average amount of savings/escrow of participants affected by this policy in dollars (REEF accounts)	Zero	$8,000 per participant	2021: Brookside: $10,811 Rockview: $11,659.73 2020: Brookside: $10,483	Yes

			Rockview: $10,920 Prior years' average savings: $9,308	

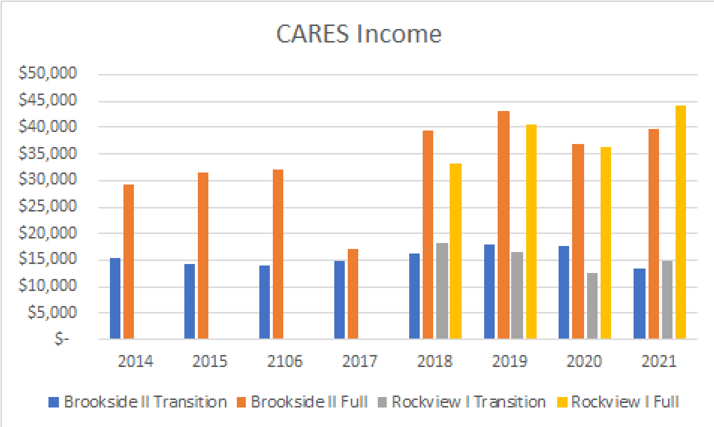
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of participants enrolled in education /job development training	Zero	10% annual increase in enrollment of education/job development classes	2021 – 117 total with 33 attending education and job training programs 4 ROB- Resident Owned Business 2 CNA - Certified Nursing Program 4 CDA child development associate 5 Adult Education 18 4-year college/trade school 2020- 108 participants total (may have attended more than one education job/training below) with 36 attending education and job training programs 19 in 4-year colleges/trade schools 7 in adult education 21 in homebuyer education course 10 in Healthy Start series 25 in Financial Empowerment Center 16 in ALICE Saves Initiative 10 in ROB entrepreneurship training	Yes

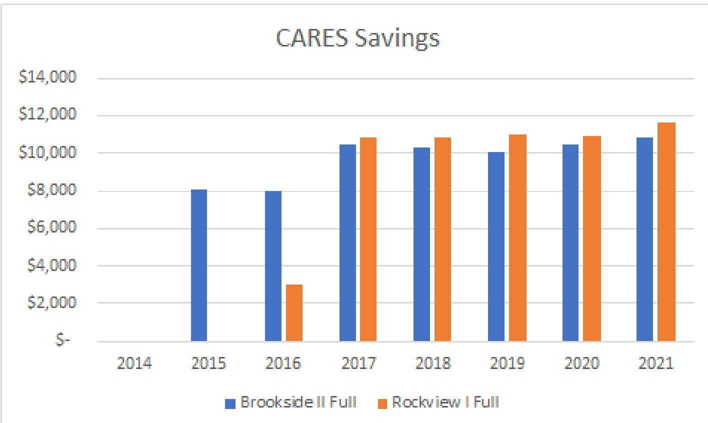
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Percentage of households receiving TANF assistance	2013: 4 (11% of Transition CARES)	Reduction by 20% of prior year households receiving TANF	2021 Total: Brookside Transition: 0 Brookside Full: 0 Rockview Full: 0 Rockview Transition: 1 Reduction percent: 75% 2020 Total: Brookside Transition: 4 Brookside Full: 0 Rockview Full: 0 Rockview Transition: 0	Yes

SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Number of participants receiving services aimed to increase self-sufficiency (participants who have completed CARES action plans)	Zero	10% annual increase	2021: 120 2020: 130 Prior years' average: 130	No
SS #8: Households Transitioned to Self-Sufficiency				
Number of households who receive zero subsidy at the end of year six	Zero	12 by the end of the program; Estimated length of the program is six years in total	2021: 11 (includes 5 homeowners) 2020: 13 2019: 8 2018: 0	Yes
SS #8: Households Transitioned to Self-Sufficiency*****				
Number of households transitioned to self-sufficiency*	Zero	20 transitioned households	2021: 144 2020: 211 2019: 96	Yes

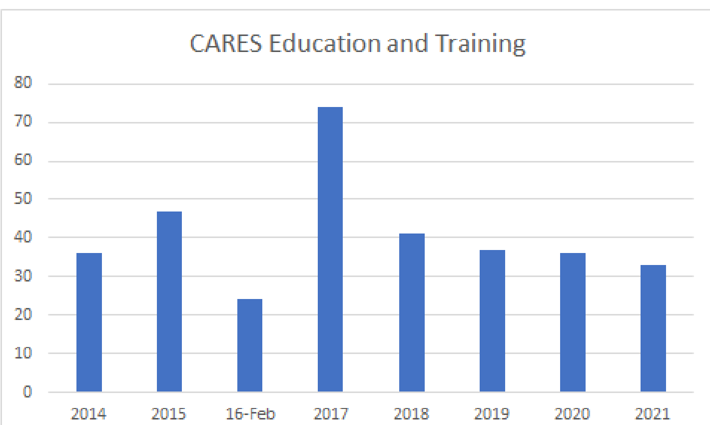
** Weighted income figures across Brookside and Rockview participants*
*** Benchmark was created in FY17 and may be reevaluated in FY22.*
**** While this benchmark has been met, it may be reevaluated in FY22 to reflect the idea that there will always be a certain percentage of new participants on TANF and the goal of transitioning those participants off TANF after enrollment.*
***** This benchmark may be reevaluated in FY22 to reflect the fact that participation is capped by the number of residents in the two developments.*
****** Self-sufficiency in this context is referring to the number of households that completed their FY 21 specific goals.*

During FY2021, 11 families transitioned to self-sufficiency, graduating early. Five families became homeowners. An analysis of CARES income data shows that families entering the program at CARES Transition are entering at around $15,000 in annual income and this has remained consistent over the years. However, by the time families move to Full CARES, annual income has doubled and has been consistently increasing with the exception of the past two years which were impacted by COVID-19. Looking at CARES savings data shows that our families are consistently earning between $10,000 and $12,000 in their REEF accounts and that they are saving that money allowing for use at graduation.

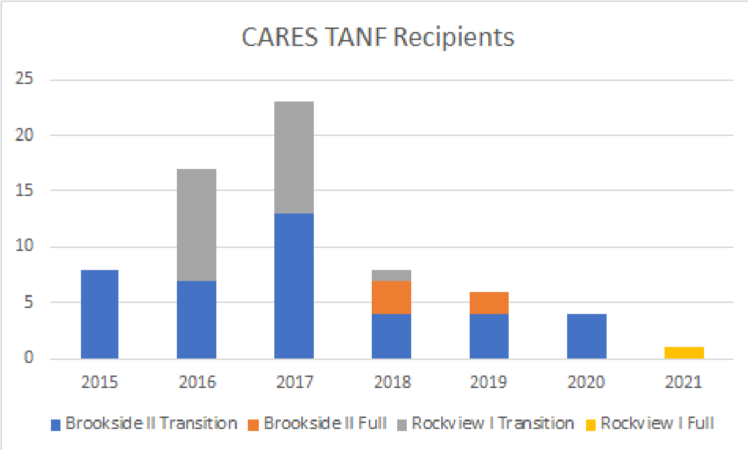




CARES participants have access to a full range of programming designed to support their self-sufficiency. Program enrollment for education and training programs has averaged 42 participants annually. Program attendance peaked in 2017 and then declined slightly as a result of a staffing change. Participation has remained steady since then. Notably during FY2020 and 2021, years impacted by the pandemic, participation remained steady for this programming.



Additionally, ECC/HANH CARES families are successfully transitioning from TANF. After reaching a peak in 2017 of 23 families receiving benefits, we have consistently seen these numbers drop. During FY2021, only one CARES family was receiving TANF benefits.



Internal Metrics

Enrollment				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of Full CARES participants	Zero	25% Increase in Full CARES	2021: 81 2020: 68 Prior years' average: 59	No
Number of Transition CARES participants	Zero	25% Reduction in Transition CARES	2021: 36 2020: 47 2019: 51 Prior years' average: 67	Yes
Compliant with program requirements				
Number of participants compliant with the program's requirements	Zero	60% of new participants will remain compliant	2021: 11 (94.9%) 2020: 129 (97%) Prior years' average: 80%	Yes

** These benchmarks may be reevaluated in FY22 to reflect the fact that participation is capped by the number of residents in the two developments and the importance of serving new residents who may be fit for Transition CARES. In the future, the benchmark may focus on the percentage of new participants who are transitioned to Full CARES within a certain amount of time.*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

Program Compliance: Although the number of new participants who are complaint with program requirements (90%) has exceeded the benchmark of 60% of participants, this nonetheless represents a program challenge. Program staff are working toward ensuring 100% program compliance.

Initiative 2.4 Teacher-in-Residence

Approved in FY15 and implemented in FY16.

Self-Sufficiency

Description and Status

The Teacher-in-Residence program is part of an ECC/HANH youth initiative known as ECC Believes. The initiative is based on the premise that although some young people growing up with limited resources can rise above their circumstances to advance academically, personally, and professionally, most require intensive supports from an array of service providers and community-based organizations. ECC/HANH is leveraging a new housing policy to advance academic outcomes for student residents. The initiative is also a motto that ECC/HANH believes in—that each of our students can achieve excellence through individual and family supports to help them on their way towards success. ECC Believes includes academic supports and afterschool programming to reduce the achievement gap, parent and family engagement in children's education and increasing program opportunities that support post-secondary education.

Launched in FY16, as part of ECC Believes, ECC/HANH sought to make academic supports readily available to the approximately 2,000 school-age youth residing in our developments. Modeled after the Officer-in-Residence program implemented through HUD approval, ECC/HANH proposed a new MTW initiative that would offer housing to teachers in exchange for the delivery of homework help and tutorial services for our youth. Teachers housed through ECC Believes are called "Teachers-in-Residence."

The initiative aims to serve both ECC/HANH youth and their families. First, the initiative focuses on necessary academic assistance. Second, having the Teacher-in-Residence onsite also aims to help bridge an historical divide between educators and our families, working to build community and shift traditional relationships between teachers and parents. In turn, the program creates space for experiential learning, living, and communication. By grounding support where families live, the initiative aims to build 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 at two properties: McConaughy Terrace and Valley Townhouses. The teacher is currently housed at the McConaughy Terrace development.

The Educational assistance provided by each Teacher is defined as follows:

A. Conduct a site-based homework help program at the developments in which the Teacher in Residence resides, in conjunction with ECC/HANH staff, throughout the school year.

B. Provide homework help and/or tutoring for students in their respective ECC/HANH developments.

C. Facilitate site-based meetings for parent residents, in conjunction with ECC/HANH staff, so that parents may better understand how to navigate the New Haven public schools; and

D. Participate in the Tenant Resident Council.

Impact

During FY 21, the Teacher-in-Residence program operated at McConaughy Terrace. Children from the neighboring Valley Townhouses were also invited to attend the afterschool program, allowing the program to reach a larger number of ECC/HANH youth across developments. The Teacher-in-Residence program targets school-aged youth between the ages of 6 through 13. There are 243 youth living at McConaughy Terrace, 156 are schooled aged. There are 31 youth living at Valley Townhouses that are considered school-aged. That is a total of 187 youth who are eligible to participate in afterschool programming. The goal is to serve 121 (65%) of those children.

The initiative is designed to include a data sharing agreement between the public schools and ECC/HANH. In FY19, to circumvent challenges in securing data on students' academic outcomes from the school system, the Teacher-in-Residence began to incorporate the Math and Reading IXL program into the curriculum. This enabled the teacher to access data on students' progress that is aligned with school assessment measures in reading and math. This also allowed the teacher to assess and track individual academic growth in reading and writing, as well as highlight challenging areas in both subjects.

Due to COVID, New Haven Public School closed in March 2020 and remained unopened throughout Spring of 2021. ECC/HANH also needed to adjust its programming to a virtual model. The Teacher in Residence (TIR) created engaging, fun, and supportive spring and summer experiences for the children at both McConaughy and Valley Townhouses. Using Zoom, Google Meet, and FaceTime, ECC/HANH's TIR was able to work with a small group of students to complete assignments using their school issued Chromebooks and ECC/HANH issued devices. Most sessions were scheduled 1:1 as this made the most sense given the mechanics of Google Meet. The TIR was available remotely for afterschool support daily during previously onsite scheduled program time. They continued to offer Office Hours to assist parents via phone, video and text. Toward the summer, she began to physically walk the neighborhood once per week while engaging social distance to outreach to families in the area who may be outside.

Despite these efforts, program participation suffered during FY2021. Through family surveys we noted that 50% of parents reported they are uncomfortable with their children participating in any youth programming during COVID, including virtual, hybrid and in-person. Families were also surveyed to ask about use of the ECC/HANH tablet and satisfaction with academic supports provided. 100% of the families with youth in the program are reporting that tablets provided by the agency are being utilized to complete schoolwork through Google Chrome.

Outcomes

HUD-Required Metrics

SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Number of households receiving consultation and/or technical assistance	0	65% of school-aged children	2021: 6 (4%) 2020: 16 (10%)	No

Internal Metrics

Enrollment				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of children at each session	10	10% Annual Increase	2021: 4 (60% decrease) 2020: 10	No
Minimum of 15 children enrolled over the course of the year	20	5% Annual increase	2021: 6 (40% decrease) 2020: 10	No
Increase student achievement in Literacy				

Improvement in individual reading levels	N/A	80% of students will increase one reading level (equivalent to one year's growth)	2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A
Increase student achievement in Mathematics				
Improvement in individual mathematics levels	N/A	80% of the students will increase one math level (equivalent to one year's growth)	2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

It has been a challenge to have 65% of the youth in the development participate. This goal was originally set when the TIR program was designed with a teacher at Waverly and a teacher at McConaughy. Our first lease up occurred at Waverly and the goal was to serve 65% of the 57 children living there (37 eligible youth). This seemed to be an achievable goal and average program enrollment in the first three years, as 24 youth would've achieved the 65% benchmark. Now that the teacher has been moved and two new developments are targeted with much higher number of children, the benchmark of serving 65% of the youth needs to be re-evaluated. The benchmark will be reevaluated in FY 22.

During the pandemic, parents in the community were extremely reluctant to send their children to programming. They also stated that virtual was difficult for families given the requirement to have parental participation for each session with a student. Parents were also hesitant about allowing the teacher to engage 1:1 in their home given the COVID19 virus.

Obtaining academic outcomes also proved to be an overall challenge for the afterschool program. In FY21, the plan was for the TIR to focus mainly on school assignments and homework to try and add additional support to basic student learning that many were missing due to being out of the classroom. There was also no way to accurately report out on progress for literacy and mathematics as report cards were either not received or demonstrated a "pass" or "fail" for grades versus traditional letters.

ECC/HANH will continue to evaluate family comfort with this program delivery method.

Initiative 2.5 REACH Grant. Incentive Grant Program for ECC/HANH Residents Participating in Agency's Family Self Sufficiency Program.

Approved FY19 and Implemented in FY21

Activity Description

The REACH program is an establishment of an 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).

In FY 19 ECC/HANH proposed to phase out and replace the Earned Income Exclusion program with the REACH Grant Program. The REACH program will allow ECC/HANH residents that have elected to participate in the agency Non-HUD FSS Program, the ability to apply for and receive up to $500 per year, for up to 5-years, to support the achievement of goals that they have established for themselves as part of the Individuals Self Sufficiency Plan. These funds will be managed by FSS Case Managers.

The REACH Grant Program is designed 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 from one year to the next, places an emphasis of goal achievement during each year of participation. This is a departure from previous programs that the Agency has established, for example, the CARES Program and the traditional HUD FSS Program, where participants can become eligible to build or grow dollars in escrow accounts. The funds from the escrow accounts can be used to purchase automobiles, as a down payment for home purchase or for educational expenses.

Instead, the REACH Grant is aimed to support our residents in different ways. This grant will assist in making the first or next step in a resident's pursuit of their goals possible, without a great deal of bureaucracy, but with full transparency.

REACH Grant Funds can 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

Impact

During FY 21, preparations were made to prepare and implement a soft launch of the REACH grant incentive program. This program was created to assist in the long-term success and investment in our Residents. ECC/HANH's goal is to address the social and economic issues present in the lives of the residents. Given the higher-than-average poverty levels in the City of New Haven, ECC/HANH anticipates having a positive impact through case management, goal setting, and asset building support for residents.

During the soft launch of the program, there was one Resident who applied for the REACH grant and was approved by the REACH Board. The Resident applied requesting the maximum amount of $500 for automobile repairs in order to get her children to and from school and to look for employment. As a result of the grant, the Resident was able to transport her children to school and after school extra activities while being able to take job development courses. In addition to receiving the grant funding, the Resident also received wrap around services from the CED department. These supports are through case management and coordination of services that are beneficial to the self-sufficiency of the household.

In FY 22, ECC/HANH can expect to see an increase in participation and interest in the program. During assessments, staff will offer the REACH incentive program to assist Residents reach their goals towards self-sufficiency. ECC/HANH expects to have an 5% increase in the average income outcome totaling $14,700 in FY 22.

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average Income for REACH participants	Average income of population: $14,000 (for non-HUD FSS)	5% Increase in Household Income for Non-HUD FSS Participants in the REACH Grant Program	2021: $4,160 (1 participant)	No

SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Number of participants receiving services aimed to increase self-sufficiency	Zero	50% annual increase	2021: 1	No

SS #7 - Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total Household contributions towards housing assistance	$990	5% Decrease in PHA MTW TBV Subsidies to Non-HUD FSS Participants in the REACH Grant Program	2021: $990	No

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

During the soft launch, it appeared that some of the Residents were hesitant to complete the application process. Non-HUD FSS Residents are typically the hardest to engage, even if the engagement or follow through is to their benefit. During follow up, we learned that most of the hesitancy seemed to be due to lack of understanding the program. FSS staff will utilize the Resident Service Coordinators to assist in providing clarity and removing any other household barrier.

ECC will continue to review and adjust accordingly the approach and notification to Residents through the CED quarterly newsletters, notifications to families from the CED department, social media and during 1:1 assessments. This will ensure the program is understood and embraced by participants.

Cost Effectiveness

Initiative 3.1 – Rent Simplification

Approved in FY07 and implemented in FY08.

Cost Effective

Description and Status

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

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

1) **Multi-year recertification cycles**. 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 every three years. MTW families that do not meet the definition of elderly or disabled definition will be considered work-able families.

    a. Triennial cycle (every three years) for elderly/disabled households (defined as head, co-head, or spouse is elderly and/or disabled)

    b. 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 on an annual basis. Given this consistency, there is little financial incentive for ECC/HANH to verify the income of elderly/disabled families annually. Work-able families will also 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 resident satisfaction and reduced need for interim recertifications.

2) **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.

3) **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 and are instead expected to 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. Regardless of the reduction, 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. Additionally, 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.

4) **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 a $0 rent payment. To qualify, individuals must meet with the ECC/HANH Hardship Committee to determine the nature and length of the hardship. 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 neither elderly nor 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.

5) 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.

- **a.** Year 1: No family will have an increase in TTP
- **b.** Year 2: No family shall be subject to an increase in TTP greater than $25/month
- **c.** Year 3: No family shall be subject to an increase in TTP greater than $50/month
- **d.** Year 4: No family shall be subject to an increase in TTP greater than $75/month
- **e.** 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 FY21 there were 2,485 HCV recertifications scheduled. This is a 32% 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 1,522 interim recerts completed for HCV in FY21.

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 51% 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 FY21, 20 applications were received and 18(90%) 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 92% 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. There has been a 34% decrease in staff time since 2007 and a 1.4% decrease in staff time from 2020.

Outcomes

HUD-Required Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Savings related to staff reduction due to implementation of multi-year recertification*	$0	($133,000)	2021: $195,312 2020: $189,624 2019: $184,101 2018: $178,739 2017: $173,533 2016: $168,479 2015: $163,572 2014: $158,808 2013: $154,182 2012: $149,691 2011: $145,332 2010: $141,099 2009: $136,990 2008: $133,000	Yes, in 2008 there was a LIPH Director and HCV Director; The LIPH Director position was eliminated. HCV director position (salary + benefits) in 2008 position was combined.
Total annual cost of printing and mailing documents related to annual recertification (excluding staff time; PH and HCV combined). *	$26,923 (2007)	$13,750	2021 $13,242 2020: $17,282 2019: $11,964 2018: $16,123 2017: $14,344 2016: $17,391 2015: $12,705 2014: $14,927 2013: $13,338 2012: $16,924 2011: $14,597 2010: $23,639 2009: $26,340 2008: $26,175	Yes

*Annual HCV Director Salary from previous year multiplied by 3% increase.

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total annual staff time in hours to complete annual recertifications (PH and HCV combined) **	12,238 (2007)	5,000 annual staff hours	2021: 8,120 2020: 8,240 2019: 4,671[17] 2018: 15,138 2017: 5,998 2016: 7,273 2015: 5,313 2014: 6,133 2013: 4,850 2012: 6,154	No

[17] Total number of annual staff time for HCV includes all HCV certs under Rent Simplification. Number of units where rent simplification is not utilized were backed out of the total annual cert count.

			2011: 5,308 2010: 8,596 2009: 9,578 2008: 9,518	
CE #3: Decrease in Error Rate of Task Execution				
Average percentage error rate in calculating rents in annual recertifications (% files reviewed with errors)	11% of files (2011)	5% of files	2021: 5% of Files LIPH 2020: 0% of Files LIPH 2019: 10% of files (HCV) 2018: 0% of files (HCV) 2017: 1% of files (HCV) 2016: 1% of files (HCV) 2015: 24% of files (HCV) 2014: 24% of files (HCV) 2013: 15% of files (HCV) 2012: 10% of files (HCV)	Yes

** 4,895 PH+HCV recertifications (2007); 2,310 (2015); 3,162 (2016); 2,000 (benchmark); $5.50 total cost per recertification packet: $2.50 average cost of postage and $3.00 printing (60-page recertification packet at $.05 per page) per recertification pre- and post-new schedules.*
*** 4,895 PH+HCV recertifications (2007); 2,714 (2014); 3,162 (2016); 2,500 (benchmark); 2.5 hours average staff time (both PH and HCV) per recertification pre-rent reform per 2007-time study and 2.3 hours post-rent reform from 2014 HCV activity time study (average of work-able and elderly/disabled households recertification processing time)*

Internal Metrics

Rent Simplification Initiative Metrics				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome***	**Benchmark Achieved?**
Number of hardships approved and hardship applications	2012: 122 approved/ 243 applications No baseline data available prior to 2012	No significant increase in hardships	2021: 18 approved /20 received 2019: 18 approved/18 received 2018: 35 approved/102 applications 2017: 67 approved /73 applications 2016: 55 approved/94 applications 2015: 42 approved/111 applications 2014: 40 approved/213 applications 2013: 54 approved/195 applications	Yes

Rent Simplification Initiative Metrics (continued)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome***	**Benchmark Achieved?**
Number of families on minimum rent	28 (HCV - 2010) 170 (PH - 2007)	Decrease in minimum	2021: 397 (HCV); 101 (PH) 2020: 378 (HCV); 103 (PH) 2019: 246 (HCV); 246 (PH)	No

		rent households	2018: 412 (HCV); 165 (PH) 2017: 380 (HCV); 171 (PH) 2016: 360 (HCV); 233 (PH) 2015: 348 (HCV); 213 (PH) 2014: 341 (HCV); 233 (PH) 2013: 314 (HCV); 212 (PH) 2012: 287 (HCV); 180 (PH) 2011: 227 (HCV); 183 (PH) 2010: 28 (HCV); 153 (PH) 2009: 33 (HCV); 147 (PH) 2008: 121 (HCV); 161 (PH)	
Number of annual interims processed (PH and HCV combined)	1,280 (2007)	1,300	2021: 1491 1,351 (HCV); 140 (LIPH) 2020: 2305 2,075 (HCV); 230 (LIPH) 2019: 1746 1,522 (HCV) 194(LIPH) 2018: 1231 949 (HCV); 282 (LIPH) 2017: 2493 2016: 2497 2015: 1551 2014: 1539 2013: 1363 2012: 1967 2011: 1598 2010: 1196 2009: 1364 2008: 1140	No

** The 2016 number of hardship applications and approvals was updated to the correct number.*

The biennial and triennial recertifications have eased the burden for most LIPH residents and HCV participants, particularly the elderly/disabled residents/participants who have little change to income The rent tiers and elimination of standard deductions have also reduced the administrative burden for staff and the participant. The reduction in the number of pages for the recertification packet has reduced the cost of printing and time for the participant to fill out the packet and staff to review. Now that the initiative has completed a few full cycles, continual monitoring is needed to determine any additional tweaks that can be made to simplify the recertification process.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

ECC/HANH will be evaluating the metrics for this initiative during FY22. As more units are undergoing RAD conversion and not subject to MTW Rent Simplification the anticipated savings will be adjusted.

Initiative 3.5 – HCV Rent Simplification/Cost Stabilization Measures

Approved and implemented in FY08. Updated in FY14.

Cost Effective

Description

ECC/HANH enacted Rent Simplification measures consistent with the FY08 MTW Plan. This initiative expands upon those streamlining measures. This initiative replaced previous Initiative 3.3 (closed out) and was transitioned once HCV organizational changes and caseload optimization were completed.

This activity has three components:

Part 1. HQS Inspections on Biennial/Triennial Schedule

Unit inspections and rent increases are placed on a schedule consistent with recertifications to coincide. However, HCV participants and landlords can request a special inspection, if necessary, at any point that deficiencies are suspected.

a. **Rationale**: History has demonstrated that most units inspected annually pass on the first inspection. It is reasonable to assume that given high pass rates, the quality of the housing lends itself to less frequent inspections.

b. **Expected impact**: Savings in staff time related to inspection scheduling and a reduction in cost of the inspection contract with the City of New Haven are expected.

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

ECC/HANH will use a self-certification process to follow-up with non-life threatening HQS inspection violations. Landlords and participants will be able to self-certify and submit documentation of corrected deficiencies for regularly scheduled HQS inspections. All participants retain the right to request a special inspection at any time.

- **Rationale**: Currently, approximately 860 HQS inspections fail for items that are not health and safety related. The cost of these inspections is approximately $61,000.00.

c. **Expected impact:** The number of re-inspections related to minor fails that are not health and safety related is expected to decrease.

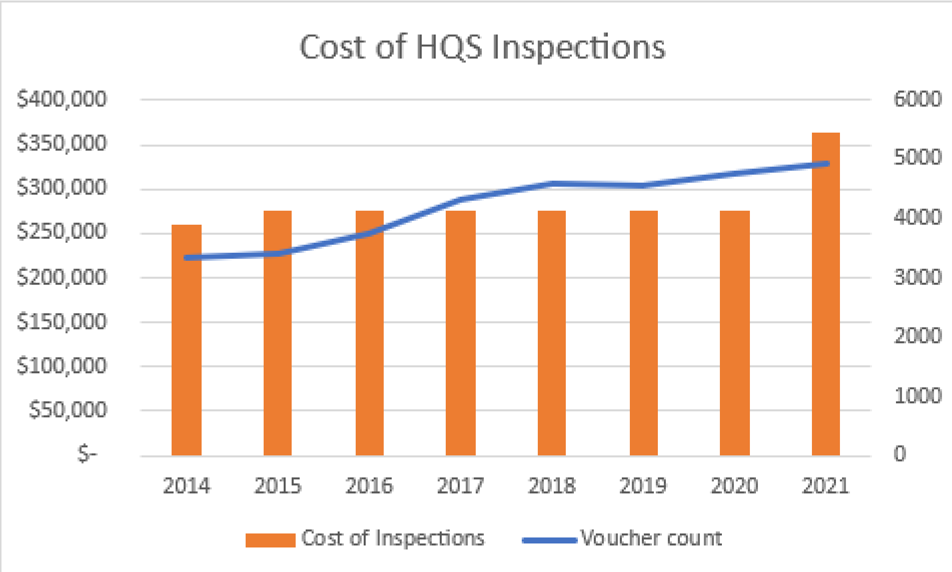
Part 3. Landlord Rent Increases on Biennial/Triennial Schedule

Landlord rent increases are only 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 are placed on the same schedule as HCV recertification. Since HCV caseload optimization will change recertification dates, HQS inspection dates have changed correspondingly. See Initiative 3.1 for definitions of Elderly/Disabled and work-able families.

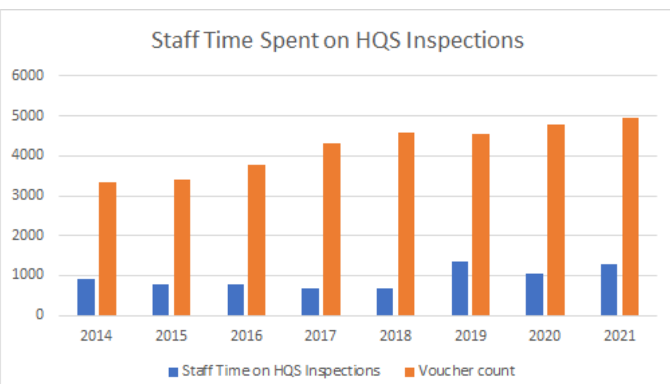
- **Rationale**: Requests for rent increases were allowed annually. Among the 3,500+ landlords, an average of 700 rent increases were requested and approved annually. This represents 20% of the assisted units, which suggests that most landlords are not requesting annual increases.
- **Expected impact**: Savings in HCV staff time is expected because of reduction in the number of requests related to landlord rent increases.

Impact

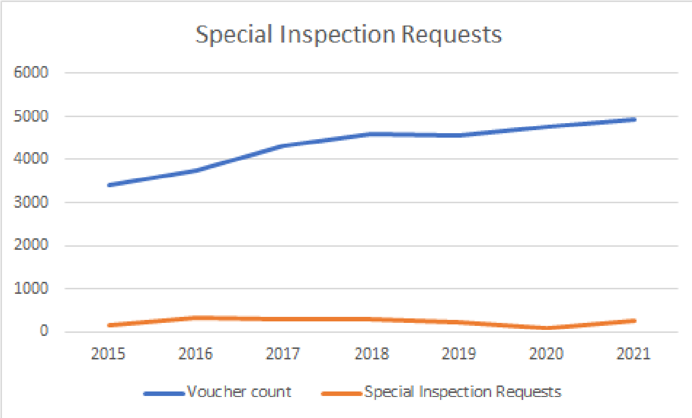
ECC/HANH has seen a significant increase in voucher utilization over time. ECC/HANH's HQS inspection was meant to create administrative savings while not sacrificing the quality of housing offered to families. By inspecting units every two or three years we anticipated reduced inspection costs. To date, ECC/HANH has seen a 48% increase in utilization and only a 40% increase in inspection costs. Cost per inspection has fallen from $77 to $73 from FY 2015 to FY2021 with an avoided cost of over $20,000.



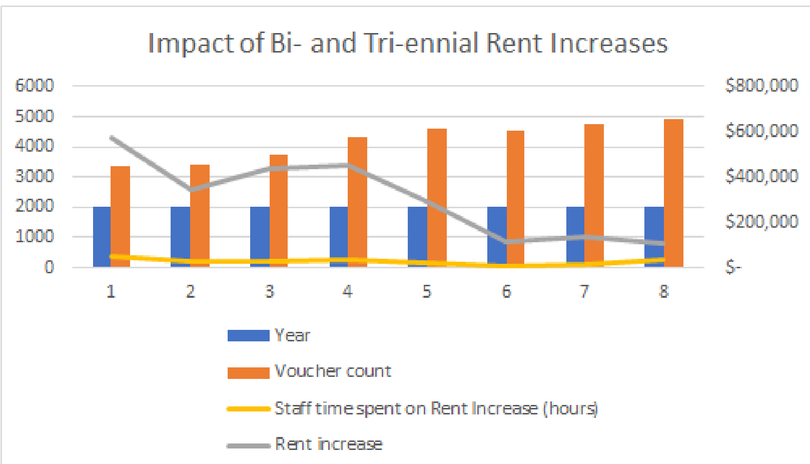
Similarly, savings in staff time spent on HQS inspections has been reduced. As vouchers increased significantly from FY2014 to FY2018, we saw staff time spent on HQS inspections drop precipitously with almost 600 hours of staff time saved in FY2018. During FY19 we saw an increase in staff time spent, however, this was corrected in FY2020 and since then has continued to show reductions despite the growing number of vouchers. It is important to note that ECC/HANH has seen a significant increase in RAD voucher utilization since FY2019 and these vouchers are not subject to the alternate year inspections. As more and more of ECC/HANH's portfolio becomes RAD (non-MTW) vouchers, the impact of this initiative may lessen.



ECC/HANH wanted to ensure that the quality of housing did not diminish as we lessened our inspections. As such, we have tracked participant need for special inspections. At baseline, approximately 5% of units required a special inspection. This percentage has not changed significantly over time and at the close of FY21 the rate remained 5%.



Finally, ECC/HANH has tracked savings related to bi- and tri-ennial rent increases. Expense stabilization has been noted here as well. The amount of annual rent increases has decreased by 81% over baseline and the amount of staff time spent on rent increases has been minimized.



Outcomes

HUD-Required Metrics

Metrics Related to Inspections Components (1,2) of Activity				
CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Cost of inspection contract with City of New Haven	$259,000 (2014) *	25% reduction of inspection contract cost with City	2021: $363,550 2020: $275,379 2019: $275,379 2018: $275,379 2017: $275,379 2016: $275,379 2015: $275,379	No

Total HANH internal staff inspection scheduling time (annual hours) **	904 hours (2014)	367 hours	2021: 1,274 hours 2020: 1,039 hours 2019: 1,352 hours 2018: 674 hours 2017: 670 hours 2015: 778 hours	No

2. ** ECC/HANH's current (2014) inspection contract with the City of New Haven costs $259,000. This number includes 860 inspections for fail items that are not health and safety related. These inspections cost $61,000 to process. The proposed policy will allow self-certification for these issues.*
3. *** # of HCV program inspections under current MTW inspection policy is 2,484. # annual HQS inspections expected to be further reduced to 1,467 due to proposed MTW elderly/disabled population change and proposed biennial/triennial inspection protocol; Staff spend 15 minutes scheduling "annual" HQS inspections. FY 2015 inspections = 3,111; 3,616 in FY 2014. Note that the outcomes include the initial and special inspections.*

Metrics Related to Biennial/Triennial Landlord Rent Increase Component (3) of Activity				
CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Cost (in annual HAP) of processing landlord rent increases	$573,000 (2014) *	$200,000 Proportionate reduction of 40%	2021: $107,240 2020: $136,428 2019: $115,140 2018: $296,520 2017: $453,324 2016: $437,580 2015: $343,932 2014: $573,000	Yes
CE #2: Staff Time Savings				
Annual staff time (hours) spent processing landlord rent increases	401 hours (2014) **	Reduce by 40%	2021: 264 hours 2020: 98 hours 2019: 70 hours 2018: 141 hours 2017: 278 hours 2016: 232 hours 2015: 210 hours	No

** ECC/HANH processed 401 annual landlord rent increases in FY14 with average annual HAP increase of $1,429 ($119 per month). ECC/HANH processed 210 HCV landlord rent increases in FY15.*
*** ECC/HANH processed 401 annual landlord rent increases in FY14. 2014-time study found that landlord rent increases take an average of one hour to process.*

Internal Metrics

Special Inspections				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of HCV special inspections	157 special inspections (2015)	No significant increase over baseline	2021: 265 2020: 82 2019: 208 2018: 277 2017: 274 2016: 338 2015: 157	No

**Self-certifications inspections were implemented mid-year 2017.*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

Due to COVID there were periods of times during the FY2021 where HQS annual inspections were suspended. Since units did not receive the scheduled cycled inspection it led to higher number of special inspection request. ECC/HANH anticipates this number to be lower during FY2022 as restrictions have been lifted.

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

Proposed and Approved in FY2019

Description/Impact/Update

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 (over 25% 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.

During FY 2021, ECC/HANH identified a partner agency through its competitive PBV RFP to develop housing in the neighboring town of Branford CT. ECC/HANH awarded 40 units of PBV to this developer for the redevelopment of a formerly elderly only development into family affordable housing of which 40 will be subsidized by ECC/HANH vouchers for families currently on the ECC/HANH waitlist. It is anticipated that financing closing will occur during FY2022 with lease up during FY2023.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	zero	Not to exceed 5% of ECC/HANH's total non-RAD voucher authority	40	yes

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None noted to date.

Not Yet Implemented

Initiative 3.7 Non-Traditional Supportive Housing with Time Limited Support for Families Transitioning from Homelessness

Approved in FY19.

Housing Choice | Self-Sufficiency

Description

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 first project developed under this proposed initiative would be a 19-unit development owned by Christian Community Action (CCA). 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, with a maximum period of housing subsidy support for 36 months. This activity will be a 10-year PILOT program and at the conclusion of the pilot period, ECC/HANH will determine if it will make this Initiative a permanent activity.

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's 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**

Impact

The Authority worked with the CCA, a community provider, on a timeline for rehabilitation and financing. Construction was completed during FY2021. Program guidelines were developed and approved. Lease up is scheduled to begin in FY2022.

Outcomes

HUD-Required Metrics

SS#1: Increase household income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Family income	As families are enrolled baseline household income will be determined. At baseline, family income will be below levels required for unassisted housing	33% of families will experience an increase in family income	N/A	N/A

SS#3: Increase positive outcomes in employment status				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Enrollment in part- and full-time employment	At baseline, all families will be engaged in workforce training or educational program, part time employment or full-time employment	The number of families enrolled in PT and FT employment will increase	N/A	N/A

SS#8: Households transitioned to self sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Transition to access housing without assistance	At baseline, no families will meet economic self-sufficiency measures as indicated by ability to lease unassisted in the market	About 33% of families are anticipated to reach self-sufficiency goals in year one	N/A	N/A

HC#1: Additional units of housing made available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Housing units	At baseline, 0 units of term limited nontraditional housing are available.	By year one, 18 new units of term limited nontraditional housing units will be available	N/A	N/A

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None

ACTIVITIES ON-HOLD

Initiative 1.16 – Crawford Manor Transformation Plan

Approved in FY13, implemented in FY16, and placed on hold in FY17.

Housing Choice

Description and Status

As one of the older, more blighted developments in the ECC/HANH portfolio, Crawford Manor is an ideal focus for a neighborhood transformation plan. As such, ECC/HANH applied for a Choice Neighborhoods Initiative (CNI) Planning Grant, which would have allowed for a comprehensive approach to neighborhood transformation. If awarded, CNI would have provided for up to $500,000 in funding to develop a transformation plan to revitalize Crawford Manor and the surrounding neighborhood.

As part of the transformation plan, ECC/HANH proposed not only a redevelopment of the housing units at Crawford Manor, but also the transformation of the surrounding community to promote the self-sufficiency of ECC/HANH residents and economic development along the nearby Route 34 corridor. Through collaboration with other community partners, including the Economic Development Corporation, City of New Haven, and the Board of Education, ECC/HANH had expected to: (1) redesign the infrastructure to create more traffic flow through the community, (2) redesign the housing units to be more spacious, (3) remove barriers that individuals and families face by providing supportive services, and (4) address other critical components raised throughout the planning process. The supportive services would have included improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

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. During FY08, ECC/HANH began to implement MTW Rent Standards that allow ECC/HANH to approve exception rents. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% FMR 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.

Impact

ECC/HANH was not successful in receiving the Choice Neighborhood Initiative Planning Grant. As a result, this initiative has been placed on hold. ECC/HANH continues to investigate opportunities to redevelop this property. Designed by famed architect Paul Rudolph, Crawford Manor is listed on the National Register of Historic Places. ECC/HANH has initiated discussions with the State Historic Preservation and Historic Tax Credit Office regarding potential state and federal historic tax credits for this property to supplement LIHTC and private financing. This initiative continues to be on hold as of FY20.

CLOSED OUT ACTIVITIES

Activity	Plan Year Approved/ Implemented	Year Closed Out
Initiative 1.1 – Development of Mixed-Use Development at 122 Wilmot Road	Approved in FY09. Development was completed and occupied in September 2013.	FY14
Initiative 1.3 – Fungibility	Approved in FY12 and implemented in FY13. HUD provided guidance that this was no longer required to be listed as an MTW initiative.	FY13

Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road	Approved in FY13. MTW authorization no longer required.	FY14
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.	Approved in FY13. Never implemented.	FY14
Initiative 3.2 – UPCS Inspections	Approved and implemented in FY08. MTW authorization no longer required.	FY13
Initiative 3.3 – Revised HQS Inspection Protocol	Approved and implemented in FY11. Replaced with Initiative 3.5.	FY15
Initiative 3.4 – Mandatory Direct Deposit for Housing Choice Voucher Landlords	Approved and implemented in FY10. MTW authorization no longer required.	FY14
LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families	Approved in FY08. Placed on hold in FY14 and closed out in FY16.	FY16
INITIATIVE 1.5—HCV Preference and Set-aside for Victims of Foreclosure	Approved in FY09. Implemented in FY10. Closed out in FY19.	FY19

V. PLANNED APPLICATION OF MTW FUNDS

(V) SOURCES AND USES OF MTW FUNDS
ANNUAL MTW REPORT

- **ACTUAL SOURCES AND USES OF MTW FUNDS**

- **Actual Sources of MTW Funds in the Plan Year**

  The MTW PHA shall submit unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system.

UNAUDITED/SINGLE AUDIT SUBMISSION TO FASS-PH, FY2020		
LINE ITEM #	**DESCRIPTION**	**TOTAL**
290	Total Assets and Deferred Outflow of Resources	$39,452,108
600	Total Liabilities, Deferred Inflows of Resources and Equity - Net Assets/Position	$39,452,108
70000	Total Revenue	$104,615,402
96900	Total Operating Expenses	$24,114,524
97000	Excess of Operating Revenue over Operating Expenses	$80,500,878
10000	Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	$2,740,498

Line 10000 includes $2,155,389 of depreciation expense. Excluding depreciation expense Line 10000 would show an excess of revenues over expenses of $4,895,887. These funds were used to fund non-MTW development activities.

- **Actual Uses of MTW Funds in the Plan Year**

  The MTW PHA shall submit unaudited and audited information in the prescribed FDS format through the FASPHA, or its successor system.

- **Describe Actual Use of MTW Single Fund Flexibility**

ACTUAL USE OF MTW SINGLE FUND FLEXIBILITY
Single fund flexibility is made possible by the MTW program. This 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 residents through the SEHOP Capital Improvement Program as well as the Resident Services for elderly/disabled.

Activities Requiring Funding Flexibility Only

Vacancy Reduction

Implemented in FY08.

Description of Activity

ECC/HANH currently uses the funding flexibility to reduce vacancy by performing more unit turnover. To reduce vacancy, ECC/HANH has set a standard time period for unit turns by bedroom size. Typically, a 0- or 1-bedroom unit turn should occur within a 1-week period. A larger 3 to 5-bedroom unit may take several weeks longer, particularly if hazardous materials such as asbestos or lead have been found in the unit. MTW funding allows ECC/HANH to bulk, abate hazardous materials, renovate the unit, and manage all administrative functions supporting vacancy reduction.

Impact

During FY2021, a total of 95 LIPH unit vacancy turnovers were completed ending the year with an occupancy rate of 89%. Progress was delayed due to impact of COVID-19 pandemic when staffing levels were reduced and work in units was deferred. ECC/HANH through its vacancy reduction and repositioning strategies has increased our available units significantly over baseline (14%). ECC/HANH LIPH portfolio continued to include some developments slated for redevelopment so although our vacancy turn work was helpful for overall building inspection scores, the inclusion in the portfolio of these developments in need of investment depressed the average scores.

Outcomes*

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 units (frozen 2001 base)	No more than a decrease of 5% from previous year	2021: 2,246 units and 95 units turned	Yes

Internal Metrics

Internal Metric #2: REAC Scores				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
REAC scores	REAC score of 80 for ECC/HANH's developments (those not reflecting local or increased TDCs)	10% increase. REAC scores would reach 88.	Refer to Appendix 8: ECC/HANH Development REAC Scores for specific data points.	No. The average REAC score for the ECC/HANH portfolio in FY21 was 78.

Internal Metric #3: Average work order				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Work orders per property	Average portfolio wide: 671 work orders per property	reduce volume by 50% or more over baseline	Average portfolio wide: 275 work orders per property Refer to Appendix 9: Work Orders, FY09 to FY21 for specific data points.	Yes
Internal Metric #8: Occupancy				
Occupancy	FY01: Brookside Phase I: 85% Brookside Phase II: 0% Quinnipiac I: 83% Quinnipiac II: 0% Quinnipiac III: 0% FY08: Rowe: 76%	95%	Refer to Appendix 11: LIPH Occupancy for specific data points.	No. The overall occupancy for all ECC/HANH properties was 89% in FY21.

** Metrics will be revaluated and updated in FY19, per the FY19 plan.*

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

None.

Resident-Owned Business Development Program

Implemented in FY11.

Description

Implemented in FY11, ECC/HANH continues to strengthen the Resident-Owned Business (ROB) Development program by providing educational, financial management and other business growth training and technical services. Under this program, ECC/HANH serves residents that start their own businesses by providing technical assistance services. It is expected that ROBs will operate primarily in construction trades. 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. ECC/HANH anticipates an increase in the economic well-being of those residents who successfully start and sustain their own businesses.

Impact

The ROB program has increased the economic well-being of residents who have successfully started and sustained their own businesses. For FY21, the average income of ROB households is $22,892 compared to $24,403 in FY19, a decrease of 6.2 percent.

During FY2021, the Resident Owned Business (ROB) program served 15 participants, all of whom received individual assessments and entrepreneurship consultation and/or ongoing training. To date, the ROB program has launched 29 businesses. The businesses range in interests and include a cleaning services, livery service and relocation service. Of the 29 residents who have launched a business through the ROB program, three were in operations prior to COVID and one reports to be actively operating at the end of FY21. Despite the pandemic, ROB household income remained consistent with prior year. No new ROB loans were issued this year.

In FY21, one ROB participant graduated from the CARES program and purchased a home. He paid off his outstanding ROB loan and is no longer a resident of ECC/HANH. Another ROB participant who operated a residential cleaning position pivoted during the pandemic and transitioned to a commercial cleaning and crime scene clean up company. She has been featured on a nationally syndicated reality television show and received local contracts.

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households or individuals affected by this policy in dollars	$38,785 (2014)	$24,850*	2021: $23,436 2020: $24,403 Prior years' average: $21,262	No
SS #5: Households Assisted by Services that Increase Self Sufficiency				
Number of households receiving consultation and/or technical assistance	7 (2012)	10	2021: 15 2020: 36 Prior years' average: 27	Yes
Number of households receiving training**	7 (2012)	10	2021: 27 2020: 31 Prior years' average: 13	Yes

** The benchmark represents a 30% AMI published by HUD for a household of 4 individuals living in New Haven, CT.*
*** Training includes topics such as cost estimating, owning a business, business planning, financial management, contracts and proposals, etc.*

Internal Metrics

	New loans issued	Dollar value of new loans	Amount outstanding	Amount under contract with ECC/HANH
2011		$ 33,093		]
2012		$ -		
2013	2	$ 74,423	$ 29,959	$ 800,000
2014	1	$ -	$ 10,541	
2015	1	$ -	$ 7,382	
2016	1	$ 7,382	$ 6,700	
2017	1	$ 22,000	$ 16,400	
2018	1	$ 12,000		
2019	1	$ -	$ 8,000	
2020	1	$ -	$ 5,222	
2021	0	$ -	$ -	$ 3,392
Total	9	$ 148,898		$ 803,392

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

During FY2021. ECC/HANH had to transition its contract for the ROB consultant unexpectedly, causing some delay in service delivery. Additionally, COVID-19 impacted residents plans to launch and build their businesses in negative ways. Despite this, some residents were able to pivot and reposition their businesses, obtain pandemic relief dollars and persevere.

Initiative 4.2F. **SEHOP CAPITAL IMPROVEMENT PROGRAM**

SEHOP CAPITAL IMPROVEMENT PROGRAM

Implemented in FY10

Description of Activity

Implemented in FY10, this program supports SEHOP homeowners with necessary capital improvements that arise after being in the home for a minimum of three years. The program was created to increase the livability and value of recently purchased homes. 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. On a monthly basis, from the time of a SEHOP homeowner purchase, 1% of the purchase price of the home is deposited into the account to be available for capital improvements. Homeowners can access the funds after owning the home for three years.

Only those SEHOP homeowners with a current contract will have access to the program until the contract expires, or program participation ends.

Following an evaluation of the program in FY18, it was recommended that the SEHOP program be removed as an MTW Initiative, with 27 eligible homeowners grandfathered into the benefit at that time. In reviewing this initiative, ECC/HANH has determined that the need for this service is low. ECC/HANH is closing and phasing out this initiative as the program is underutilized and is not directly related to the achievement of any resident self-sufficiency goal or outcome.

Since the review, three homeowners had the SEHOP contract expire and 24 remain eligible in FY21. A total of 24 households are receiving the allowance and zero households received a disbursement in FY21 for capital improvements.

In FY21, the capital improvement allowance account balance was $224,757.38 and reflects disbursements to homeowners who utilized the benefit to cover structural repairs and emergency flooding in their homes

FY21 SEHOP Capital Improvement

Number of Households	Amount Disbursed	Capital Improvement Balance
24	$0	$224,757.38

In FY21, four (4) SEHOP participants inquired about utilizing SEHOP funds. Two (2) of those requests were not emergency repairs, one (1) is currently in the process of looking for quotes and the other submitted documents to ECC/HANH for approval. Repairs and disbursement will take place in early FY22.

Overall SEHOP Capital Improvement

Number of Households	Total Amount Disbursed Since Program Started to Date	Times Utilized
9	$61,587.73	6 households utilized once 2 households twice 1 household utilized three times

Since the inception of the program, 9 households received disbursement for various capital improvements such as plumbing, foundation, tree removal, demolition and deck replacement with the total cost of improvements at $61,587.73.

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

Several SEHOP homeowners stated that due to COVID restrictions, they were uncomfortable having contractors in their home to perform any potential capital improvements to their homes.

Prison Community Reentry

Implemented in FY10.

Description

ECC/HANH serves individuals who have reentered society following incarceration by offering mentoring, training, and housing. ECC/HANH Reentry program candidates are referred by the City of New Haven and partner organizations. Participants are assessed and work to develop an action plan. ECC/HANH provides case management services to assist in meeting goals. Additionally, ECC/HANH's returning residents who join an existing household as part of our reunification reentry program may access these case management services also.

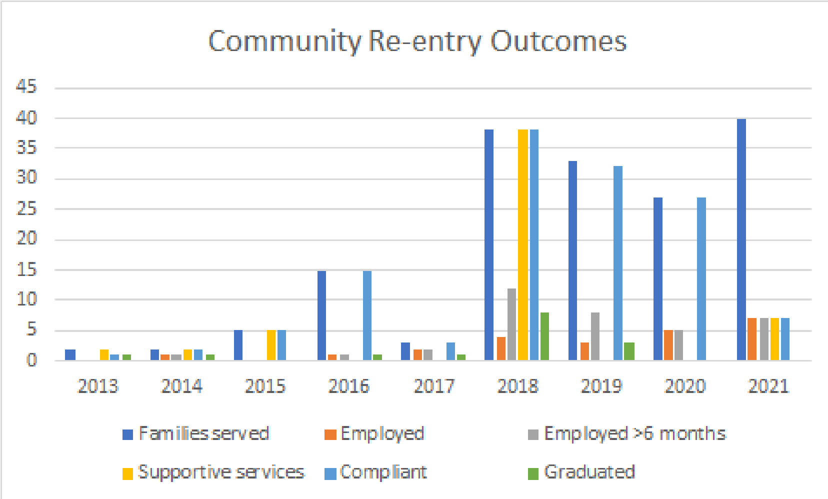
When the Reentry Program was initiated in June 2010, ECC/HANH established a preference for a maximum of 12 Low-Income Public Housing (LIPH) units. Additionally, re-entry is provided through the set-aside of HCV vouchers for use with returning residents through city program partners. Subsequently, the program's maximum capacity was increased to 16 housing units. ECC/HANH expects to enable participants to begin a journey toward self-sufficiency through remaining stably housed, gaining employment, and avoiding recidivism. This is hugely beneficial to the individual and his/her family, and to the community through gaining a productive member and reducing criminal behavior and prison-related expenses.

Given the significant need for housing for this population, ECC/HANH has transitioned to a waitlist management process where a percentage of all new admissions are targeted for re-entry applicants. This enables us to house more families without reliance on freeing an existing slot.

Impact

During FY 2021, there were no new admissions in the LIPH segment and there were 7 new admissions in the HCV segment. Due to COVID-19 and the need for LIPH units for relocations due to redevelopment efforts, there were significantly fewer lease ups this year. During FY22, ECC/HANH anticipates fully implementing the new wait list management approach.

ECC/HANH has increased the number of families served over time and the vast majority of families housed remain lease compliant and compliant with their action plans. Employment outcomes are low as the majority of families are living with disabilities and employment is not the goal.



SS #3: Increase in Positive Outcomes in Employment Status*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Percentage of families with employment income as of 9/30/2021	0 (2010)	50% would be employed	2021: 7/40 (18%) 2020: 5/27 (19%)	No
Percentage of individuals remained employed for more than six months	0 (2010)	50% will be employed for more than six months	2021: 7/40 (18%) 2020: 5/27 (19%)	No
SS #5: Households Assisted by Services that Increase Self Sufficiency				
Percentage of individuals referred for services**	0 (2010)	All individuals will be enrolled in Family Support Service or FSS Program	2021: 07/40 (18%) 2020:0/27 (0%)	No

SS #5: Households Assisted by Services that Increase Self Sufficiency (continued)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Percentage of individuals compliant with plan	0 (2010)	50% will be compliant with Service Plan***	2021: 7/40 (18%) 2020: 27/27 (100%)	No
SS #8: Households Transitioned to Self Sufficiency******				

Participant program graduation during fiscal year (LIPH segment)	0 (2010)	50% will Graduate the program	2021: 0/40 (0%) 2020: 0/27 (0%)	No

** Employed is defined as "living directly from an individual's profession or business." ECC/HANH includes part-time work in this definition.*

*** ECC/HANH includes in "referred for services" services such as compResident Services for Elderly/Disabled*

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

A significant percentage of our re-entry population are people living with disabilities causing a reevaluation of the goals around employment and self-sufficiency. The participants do not utilize the full program initiatives such as job readiness and higher education. However, participants are achieving the goals of stable housing and are remaining lease compliant.

Changes in waitlist management which are geared toward housing more families under this initiative may also prove to house more work able families. The goals for these families will be to work with case management, remove any barriers and achieve self-sufficiency.

4.4F Resident Services for Elderly/Disabled

Implemented in FY2003, Updated in FY2007.

As of 2003, ECC/HANH implemented its Resident Services for Elderly/Disabled initiative in one of the buildings. The initiative was then extended to three additional sites in 2007. As of FY19, resident services have been expanded to all Elderly/Disabled Developments.

Description/Impact/Update

The initiative began with the goal of supporting the quality of life for residents who are elderly, at age 62 and older, or living with a disability, and ensuring that residents are able to live independently and maintain self-sufficiency. The case management services received continues to help residents to live independently in ECC/HANH communities, avoid eviction, and delay or prevent a move to a higher level of care. To carry out Elderly/Disabled programming, the Resident Services Coordinators (RSCs) take on a number of responsibilities to ensure a high quality of life for Elderly/Disabled residents. To begin, RSCs conduct needs assessment on each resident. Depending on their individual needs, residents are placed in a "high, medium or low" category of case management. Once a needs assessment is conducted, RSCs then develop an Individual Service Plan. On average, intensive case management is provided to an approximate 40 residents on a monthly basis. In addition, the RSCs also provide educational programming tailored to the resident, such as financial literacy to learn to manage a budget.

Impact

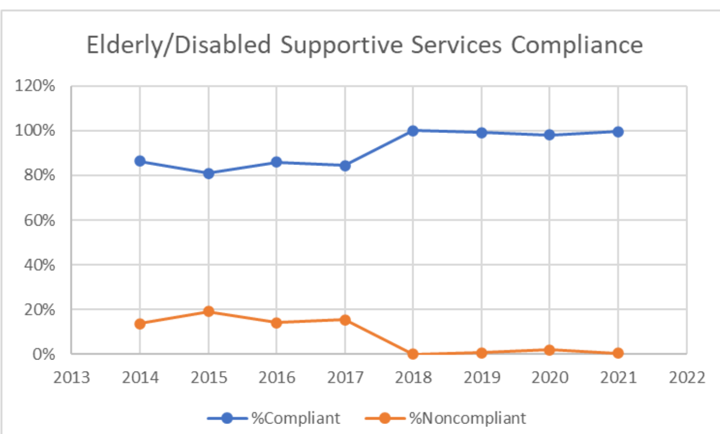
The RSC role is funded in part through the Resident Opportunities and Self-sufficiency (ROSS) Grant, a HUD funded program that provides funding to hire and maintain service coordinators who work with residents living in public housing. Additional funding for RSCs and program services is through MTW flexible funding. Currently, there are two RSCs that work with the elderly/disabled residents. Each RSC manages a case load of about 340 residents across two to three buildings and begins the service provision process by working through an Assessment with residents. The assessment helps to identify overarching needs, specify goals for future development, and illuminate any barriers that prevent residents from achieving self-sufficiency. Support for residents typically falls into two categories: intensive support, for those with substance abuse disorders or those who require regular medical care, and minimal support, for those who have infrequent medical care such as occupational therapy or require a one-time service such as nutrition education.

The number of residents served through this has steadily increased. During fiscal year (FY) 2014, an average of 126 outreach efforts were made per month. By FY2021 outreach totaled 3,000 quarterly efforts. Resident compliance with their action plans increased over prior years. This is demonstrated by an increase in Action Plan compliance that went from an already significant 95 percent in FY 2015 to 98 percent in 2021.

ECC/HANH also estimates certain cost savings based on the services provided. For example, the RSCs receive approximately six referrals per month for assistance with rent collection and eviction prevention. By helping residents access the support they need to make their rental payments and remain stably housed, ECC/HANH administration prevents an unnecessary eviction. This saves the housing authority the cost of eviction and unit turnover which can cost approximately $4,000 per unit.

Program services were interrupted during FY2021 as a result of the COVID-19 pandemic and staff turnover.
As a result, the number of monthly group members was lower than anticipated. The team shifted to virtual service delivery and ensured regular contact with residents in this manner. Additionally, new service partnerships were implemented.

Internal Metrics



**Action Plan is a document that contains goals - it is prepared by a case manager after interviewing a resident. Compliance with the action plan is evaluated by the case manager*

ECC/HANH has assisted hundreds of residents residing in our elderly and disabled housing remain lease compliant through delivery of supportive services. MTW funding allows us to significant expand these efforts beyond that which would be possible through ROSS grant funding alone. Non-compliance rates have dropped from approximately 20% to less than 2%.

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

ECC/HANH experience challenges during FY2021 as a result of the COVID-19 pandemic. All services were transitioned to virtual. Residents had less opportunity for group activities and in person meetings. Additionally, staff turnover impacted service delivery. In return ECC/HANH launched new partnerships and implemented virtual check ins with residents. Despite this disruption, ECC/HANH was able to continue to serve a comparable number of residents and residents-maintained lease compliance.

Additionally, despite the vulnerability of the population, intervention services were successful in meeting resident basic needs and implementation of COVID-19 safe procedures. It is notable that COVID-19 cases were minimal amongst this population in contrast to overall community spread in the city of New Haven.

ECC Believes!

Proposed and implemented in FY2014

Description and Status

In 2014, the City of New Haven and the New Haven Public Schools (NHPS) introduced the School Change Initiative with the goal of closing the achievement gap for public school students from low-income households across the city of New Haven. ECC/ HANH supported the reform initiative and recognized the need to supplement the activities of the school district for students living in ECC/HANH housing. To complement the citywide school reform initiative, ECC/HANH created the Elm City Communities Believes! Initiative (ECC Believes!). ECC Believes! programming starts in early childhood and supports student residents throughout high school and beyond by providing resources to prepare them for college and future careers. Throughout the ECC Believes! program, ECC/HANH is committed to creating a culture of achievement and fostering student success. This commitment is articulated in the ECC Believes Theory of Change. ECC provides educational supports not only to NHPS students living in ECC/HANH housing, but also to ECC/HANH residents enrolled in early childhood programs, local charter schools, as well GED and other postsecondary programs.

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. ECC/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.

Impact

In FY 21, ECC Believes! has expanded and provides a range of valuable services to student residents and their families. ECC Believes! is structured in a "cradle to career" pipeline model that starts with access to education supports in early childhood and continues throughout secondary school and into postsecondary education and employment preparation. The cradle to career pipeline includes five program focus areas that each include different partnerships and opportunities for residents: 1. Early childhood (Prenatal to 5 years old); 2. Family engagement (all ages); 3. Attendance and school engagement (Students K-12); 4. Academic supports and afterschool programming (Students K-12); and 5. Postsecondary preparation (Students 9-12).

Early Childhood

In FY 21, ECC established many partners to Care coordinators located at sites throughout the city where pregnant mothers are most likely to visit and have ensured that they are connected to pre-natal care services. Services at this stage include the Health Start Initiative; Access to Early Childhood Referral Services; School Readiness Program; and Summer Reading Program and Early Learning Literacy Campaign. As a part of our partnership with Healthy Start, ECC/HANH refers pregnant residents to the program on an ongoing basis and facilitates initial interactions with Healthy Start Coordinators. On average, 25 families attend each of the workshops provided through the initiative. Through a partnership with NH ChILD, ECC/ HANH is focusing on early childhood outcomes through improving quality of care received. ECC/HANH received a grant to work with up to 20 residents who are employed in early childhood care settings to help them receive their Childhood Development Associate (CDA) credential at no cost. The goal of this program is to improve early childhood outcomes and provide workforce development support to resident families. Classes are provided by the local Gateway Community College (GCC) and held onsite at an ECC/HANH property. As a part of the program, all national certification costs are covered, and participants receive a stipend to assist with other associated costs including books and childcare. Also, as a part of the program, participants receive access to free mental health support services from Integrated Wellness throughout the 7-month certification process. The program will offer an intensive and culturally responsive learning opportunity.

Family

Parent Workshops and Trainings. Workshops are led by community groups that have included: • United Way; • New Haven Promise; • CfAL; • Healthy Start; and • Clifford Beers. Residents receive a quarterly catalog outlining all available workshops, trainings, and information sessions for the coming months. The sessions were traditionally held in person but transitioned to a virtual platform during the COVID-19 pandemic. Future sessions will be offered using a hybrid model of both virtual and onsite trainings. as there was a 500% increase in program attendance and offers flexibility to families.

Attendance and School Engagement

ECC/HANH is committed to minimizing chronic absenteeism by working directly with students and families. Two programs, YouthStat and Homework Help promoted attendance and school engagement. In FY 21, the homework help program averaged around 65 student participants. These services were coordinated between the Teacher in Residence, afterschool programming and partners. In school, tutoring services are offered at two schools: Common Ground High School, a 9-12 environmental charter school and ACES Wintergreen Interdistrict Magnet School, a K-8 school.

Post-Secondary Preparation

In FY 21, youth employment has increased by 6% from FY 20. The Student Training Employment Program (STEP), the partnership with Youth@Work, and after-school job shadowing and apprenticeships at ECC/HANH. In FY 2021, ECC/HANH launched a new class of 13 STEP students with a renewed focus on the following components: • Employment and Career Development Training • Ensuring academic success and increasing program graduation rates by providing academic and case management support • Financial Wellness with safe banking practices, partnerships with local banks such as Key Bank, and providing financial wellness training courses through Partnerships with the Connecticut Association of Human Resources • Creating meaningful mentor relationships between STEP supervisors and students by providing both staff and students trainings on how to have the best experience. Also, in FY 21 ECC partnered with Southern Connecticut State University (SCSU) and was granted a grant from the Council for Large Public Housing Agencies (CLPHA) to support post-secondary outcomes for residents who are accepted to the college. The grant is a part of a larger CLPHA initiative to convene housing and education partners that are collaborating to improve postsecondary achievement for students served by housing authorities. The leadership institute will support the creation of and strengthen existing postsecondary initiatives for ECC/HANH residents through leveraging capacity, resources, and expertise of CLPHA, its members, and postsecondary partners.

Youth engagement has increased over the last FY by 7% serving 1,351 of the 5,406 youth in the ECC portfolio. As the ECC Believes! initiative grows, ECC/HANH will continue to broaden community partnerships and identify new areas where they can support residents from cradle to career.

Outcomes

Internal Metrics

Engagement				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Youth Engagement	1,263	Steady Annual Increase	2021: 1,351 -7 % increase (25% youth served within ECC portfolio) 2020: 1263	Yes
Academics				
School Attendance	N/A	Steady annual increase	2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A
Academic Achievement GPA/ D&F's	N/A	Students will increase GPA	2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A
Employment				
Youth Employment	65	Steady Annual Increase	2021: 69 (6% increase) 2020: 65	Yes

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

One of the main challenges within ECC Believes!, is tracking student academic progress with quantitative metrics. This was especially difficult during FY21 when district schools provided only pass/fail data due to extended time in remote learning as a result of the pandemic. One way to monitor student progress is with grades and test scores, however ECC/HANH has relied on school partners to provide this information. Even when a data sharing MOU is in place, it can still be a challenge to acquire data. Another way ECC has collected data is directly from families, but many are hesitant to report the data to ECC/HANH. Some families have stated that they are uncomfortable with ECC/HANH having academic information about their children and choose not to provide the information. ECC/ HANH continues to work with local schools and organizations to develop and manage data tools and resources, in a way that balances family preferences, student privacy, and useful data metrics.

Initiative 4.6F: Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities

Approved and implemented in FY17

Description/Impact/Update

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 the ECC/HANH portfolio of 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:

- Property management and consultant services
- Development of mixed-use and mixed-income real estate projects
- Social services and program activities for ECC/HANH owned and non-owned developments.

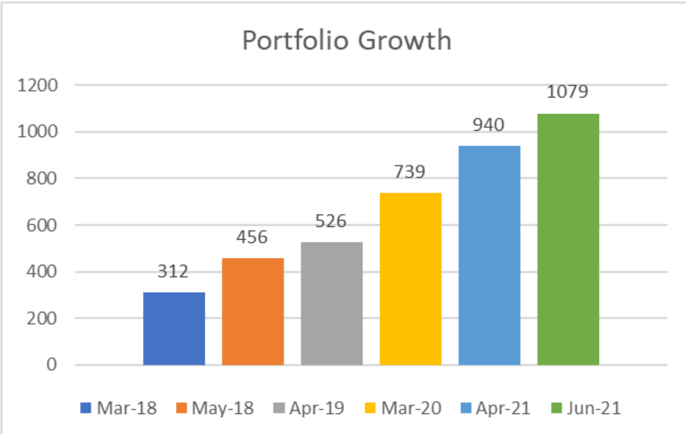
Through the establishment of new affiliate entities, ECC/HANH seeks to achieve the following:

- Reduce costs and achieve greater cost effectiveness of federal expenditures.
- Give incentives to families with children whose heads of household are working, seeking work, or are participating in job training or other programming that assists in obtaining employment and becoming economically self-sufficient.
- Increase housing choices for low-income families.

Since proposing this initiative, ECC/HANH has launched the non-profit property management company -The 360 Management Group Company. The ECC Board of Commissioners, on January 17, 2017, adopted a resolution authorizing the creation of 360 Management Group, a property management instrumentality entity. The purpose of this instrumentality is to:

1) Act as a third-party property management agent for former LIPH units being converted to RAD-HCV units, PBV-HCV units, LIHTC and market rate units.
2) Support the preservation of affordable housing within the City of New Haven and within other municipalities or jurisdictions that have adopted a similar mission or have similar needs.

The property management instrumentality received its 501 (c) (3) status in March 2018, and it assumed the property operations and compliance management of 456 units including RAD 1 Group and Twin Brook. Since that time, 360 Management has increased its staff to 41 employees and expanded its reach now providing property management services to 1079 units in 20 developments.



List of Developments Managed by 360 Management Group as of September 30, 2021.

Community	Units
Charles T. McQueeney	149
Constance B. Motley	45
Eastview Terrace I	102
Eastview Terrace II	25
Fairhaven-Chatham	32
Fairmont Heights	103
Fulton Park	12
Katherine Harvey Terrace	17
Matthew Ruoppolo Manor	98
Mill River Phase 1	94
Mill River Phase 2A (4%)	45
New Hall Gardens	26
Prescott Bush Mall	56
Stanley Justice	7
TwinBrook 4 (Ribi 4)	51
TwinBrook 9 (Ribi 9)	44
TwinBrook Market (Ribi 9)	11
Waverly Gardens	51
Wilmont Crossing	47
Winslow-Celentano	64
Total	1079

Outcomes

During FY21, 360 MGT developed and implemented COVID-19 protocols that prevented closures and allowed staff to provide critical services to our residents throughout the pandemic crisis.

- Reduction of costs – The authority's redevelopment strategic goal was to achieve at least a 10% savings on total operating expenses. 360 Mgt. continued to achieve at least a 10% savings on total operating expenses for RAD I (14%) and RAD II (82%).

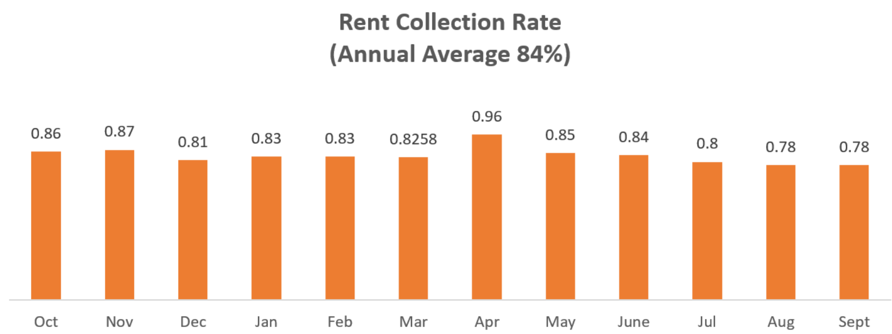
RAD Group I - Converted June 2018							
Prescott Bush, CB Motley, Katherine Harvey, Newhall Gardens							
Unit of Measurement	Fiscal Year 2018 Baseline (Pre-RAD)	Benchmark	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Benchmark Achieved
Fiscal Year 2021			YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	
Savings in property management dollar as a result of 360 picking up this function	$627,480	NA	$ 187,806	$ 44,147	$ 122,906	$ 259,874	
Total Operating Costs	**$1,286,696**	10% (Percent Difference)	**$ 1,071,336**	**$ 152,601**	**$ 203,148**	**$1,127,219**	14%
Property Operates on a Calendar FY; 4th Q Annualized							

RAD Group II - Converted April 2019								
Fulton, Stanley, Waverly								
Unit of Measurement	Fiscal Year 2018 Baseline (Pre-RAD)	Benchmark	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	4th Qtr	Benchmark Achieved
Fiscal Year 2021			YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	YTD Outcome (Post RAD)	
Savings in property management dollar as a result of 360 picking up this function	$627,480	NA	$ 156,615	$ 23,085	$ 61,863	$ 98,206	$ 130,941	
Total Operating Costs	**$1,286,696**	10% (Percent Difference)	**$ 742,863**	**$ 152,601**	**$ 364,534**	**$ 530,917**	**$ 707,889**	**82%**
Property Operates on a Calendar FY; 4th Q Annualized								

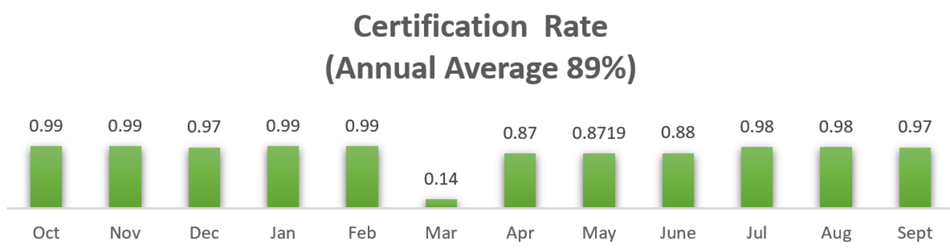
- RAD III and RAD IV were still under renovations during FY21 and are not operating under stabilized conditions. After renovations and lease-up is finalized, RAD III will be poised to achieve cost savings. Similarly, RAD IV was under renovations during the 3rd and 4th quarters of FY21 but early trends show that RAD IV is also poised to achieve cost savings when full post-renovation operations begin.

Internal Performance Metrics

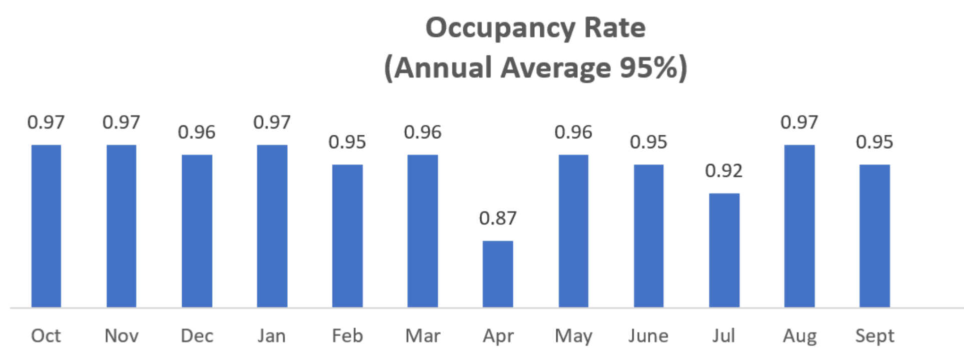
- Rent collection rates averaged 84%. 360 Mgt. worked with residents to enter into repayment agreements and apply for UniteCT's rent relief program.



- Certification rates averaged 89%. Utilizing COVID waivers and technology (e.g., telephone interviews, email, and virtual meetings), assisted residents to remain compliant with Low Income Housing Tax Credit requirements for eligibility.



- Occupancy rates averaged 95%. Generally, vacancies occurred due to families transitioning out of the program with mobility vouchers or into nonsubsidized housing. Unfortunately, there were also several deaths in our communities.



The MTW 2022 goals of 360 Management Group Company is to continue to reduce costs and increase cost efficiency by improving operations, increasing rent collection rates, and reducing vacancy rates to align with affordable housing industry standards. 360 Mgt. anticipates managing 1346 units in 22 developments by the close of FY2022 and 1386 units in 23 developments by FY23, according to the Glendower Group pipeline schedule.

Total Projected Units			
Description	**#Units**	**FY 22**	**FY 23**
Base Units	1079	1346	1386
Valley	40	0	40
Mill River 3 9%	66	66	0
McConaughy	201	201	0
Anticipated Units		**267**	**40**

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

The Rental Assistance Demonstration (RAD) conversion process and COVID continued to present many challenges this fiscal year such as:

- the RAD III and RAD IV conversions were particularly difficult due to construction delays related to supply chain limitations caused by the pandemic.
- additionally, there were many challenges leasing up from RAD III and RAD IV waitlists for a variety of reasons including applicants declined the units because of the size of the units, tenants who were relocated during construction declined their right to return or died, and applicants received Tenant Based Vouchers.
- introducing 360 Management staff to residents who may not understand the changes in personnel and procedures despite frequent written and oral notifications.
- the need to communicate virtually, via phone, or email during COVID with residents that have limited technology.
- providing ongoing maintenance services during construction while residents are still in the building because the extra effort required to maintain common areas with fewer staff than under LIPH.
- additional maintenance issues caused by construction activities e.g., leaks, power outages, and increased traffic in the building.
- keeping maintenance staff safe from COVID exposure while performing routine and emergency work orders.
- obtaining initial certification documents from residents required for Low Income Housing Tax Credits (LIHTC) and Project Based Vouchers (PBV). Residents are often reluctant to provide documents because they feel they have already provided them in the past. Or residents feel that they are filling out documents or providing the same information multiple times for both LIHTC and PBV, even though 360 Mgt and HCV have coordinated this effort. This is exasperated when closings are delayed. The Compliance Team is then required to update certifying documents that must be current within 120 days of closing for the LIHTC and 60 days for PBV.
- coordinating move ins with HCV, Relocation and CED, while keeping staff and residents safe.
- managing resident morale because of closing community spaces and limiting social contact.
- incurring additional, unanticipated expenses such as temporary workers needed to properly clean and sanitize the buildings, and the purchase of cleaning supplies and personal protective equipment due to COVID.
- selecting applicants from the waitlist, obtaining certifying documents and the delays in the approval process due to COVID. Waivers from HUD improved the process.

The Formation of a Resident Services Instrumentality

ECC/HANH is exploring the creation of a resident services entity to provide services to families with children whose heads of household are working, seeking work, or are participating in job training or other programming that assists in obtaining employment and becoming economically self-sufficient. Currently these services are coordinated by ECC/HANH's Community and Economic Development division that provides educational and workforce training, job placement, after-school youth and teen programs, mentoring, youth employment – all to link community resources to the families to achieve health and wellness, and financial literacy. In addition, ECC/HANH strives to connect Elderly/Disabled residents to resources and supportive services, in the areas of health and wellness, financial literacy, education and socialization to ensure residents remain independently housed, and achieve maximum quality of life through the provision of a variety of supportive care services. Resident services are also integral to improving the performance of ECC/HANH's public housing and affordable housing properties by reducing turnover, evictions, and preserving vibrant and well-maintained communities.

In accordance with Strategic Plan 2016-18, ECC/HANH MTW 2020 goal was to establish a nonprofit 501(c)3 Resident Services instrumentality. The purpose of the instrumentality is to create a social services affiliate organization dedicated to supporting and serving low-income residents of New Haven and surrounding communities, particularly those living in Elm City Communities' affordable housing communities. This organization will provide services to residents directly and will coordinate activities with other community-based partners.

A primary purpose of establishing a Resident Services instrumentality is to pursue revenue-generating opportunities that may not be available to a public housing authority. Using federal MTW funds, ECC/HANH currently supports a wide range of services for residents. However, in light of changes or the expansion of ECC/HANH 's MTW funded initiatives, continued funding for resident services will be limited. The Strategic plan anticipates that the Resident Services instrumentality will ultimately secure funding through non-MTW funds to support at least 50% of residents' services currently funded MTW sources.

Description/Impact/Update

The creation of a legal entity was postponed. However, the SVP for 360 Management Group, the SVP for Operations, and the Director of CED did collaborate on developing a business model to justify a business imperative to establish a resident services instrumentality. Discussions centered around the structure the social services non-profit for maximum flexibility including marketing, staffing, salaries, and size so that it is fully funded by professional service fees and other non-MTW funds within 5 years.

The guiding questions were:

- What would be the business imperative for a separate resident services instrumentality?
- Was it best to create an affiliate structure or an instrumentality?
- Would the resident services instrumentality be able to compete with other social service agencies in New Haven already providing resident or supportive services?
- Would the resident services instrumentality compete the ECC/HANH CED program?
- What professional staff structure would be required to provide supportive services?
- What credentials would be required for the instrumentality to be recognized as supportive service organization in Connecticut.

Actual Non-Significant Changes

The MTW 2022 goal is to complete a due diligence process, which will include details about the need for the instrumentality's services (a needs assessment), the likelihood that certain funding will be available (a feasibility study), and (competitive analysis) describing what other entities may be providing similar services in the instrumentality's service and mission areas. Upon completion for the due diligence process, a decision will be made to proceed or reconsider the formation of a Resident Services instrumentality.

Actual Changes to Metrics/Data Collection

None.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None

Initiative 4.10F Jumpstart Initiative – incentivizing higher income families to exit subsidized program

Approved and Implemented in FY20

Description/Impact/Update

This initiative has been created to assist higher income residents and participants to exit subsidized programs in advance of required program termination for over-income status. This initiative is designed to offer families the incentive and the resources needed to enter the private rental market or obtain unassisted homeownership.

National estimates indicate that 40% of US households cannot manage a $400 emergency expense. This highlights a national issue around families having sufficient savings to create a safety net for themselves. The lack of such savings makes it difficult for otherwise income ready families to exit subsidized housing. In order to rent in the private market in New Haven, landlords often charge one-month security and first and last month's rent. Typical security deposits held by ECC/HANH are $246. The gap between what a family may get back upon moving out and the amount needed to lease an unassisted unit may prove prohibitive to residents seeking their first apartment.

Meanwhile, ECC/HANH has an extensive waitlist of over 10,000 families waiting for opportunities to access needed supports through the LIPH and HCV programs. Currently, on an annual basis, 150 LIPH families and 100 HCV families end participation in the program. At this rate, it would take almost 40 years to work through the existing families on the waitlist.

At baseline there are 51 LIPH and 130 HCV families reporting an income above the Low-Income Limit. This is the targeted universe for the Jumpstart initiative (181 families). By offering families a one-time incentive payment based upon the average amount needed to rent in the private market, we seek to accelerate the move out/end of participation of higher income families allowing us to house a family off the waitlist.

Payments will be made to families upon execution of the agreement along the following schedule and in amounts not to exceed the amounts below which are based upon currently Fair Market Rents[18]:

Jumpstart Initiative Payment Program

BR size	Security deposit	1st month	Last month	Subtotal	ECC/HANH refund	# families above low income	Total exposure	% anticipated to enroll		Total cost
0	$ 965	$ 965	$ 965	$ 2,895		72	$ 209,598	25%	18	$ 52,400
1	$ 1,074	$ 1,074	$ 1,074	$ 3,222		42	$ 134,132	25%	10	$ 33,533
2	$ 1,299	$ 1,299	$ 1,299	$ 3,897		33	$ 126,964	25%	8	$ 31,741
3	$ 1,662	$ 1,662	$ 1,662	$ 4,986		20	$ 99,271	25%	5	$ 24,818
4	$ 1,979	$ 1,979	$ 1,979	$ 5,937		14	$ 85,968	25%	4	$ 21,492
						181	$ 655,933	25%	45	$ 163,983

Impact Analysis

During FY 21, we focused on LIPH families. 46 families were income eligible for Jumpstart. Of these, 13 families were noted to be over the 80% AMI. All 46 families who qualified for this initiative were noted to have been impacted by COVID. Families referred were noted to have lost income. Families are being followed by supportive services and participating in the FSS program. The FSS program is closely monitoring the 13 families who were noted prior to COVID over the 80% AMI.

[18] FMRs will be adjusted annually.

Activity Metrics Information

SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase). Total number of households receiving services under the jumpstart program per FY.	At baseline 0 of the 180 income eligible families	2021: 45 or 25% of the total number of families with income at or above the 80% AMI.	2021: 46	yes

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Families who transitioned to self-sufficiency (graduated from the program). This includes families who transitioned to a market rate unit in the community or purchased a home without subsidized assistance.	At baseline 0 of the 180 income eligible families	2021: 45 or 25% of the total number of families with income at or above the 80% AMI.	2021: 0	no

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). Number of units/vouchers made available as a result of families graduating to self-self-sufficiency under the Jumpstart Initiative.	2019: At Baseline we are ending participation for 250 families annually.	45 New Families housed annually as a result of housing made available when families in jumpstart transition to Self Sufficiency.	2021: 0	no

Actual non-significant changes

None

Actual changes to metrics and data collection

None

Actual signficant changes

None

Challenges

Families that qualify for this program were impacted by COVID, ECC will continue to monitor.

Fulton Park Modernization

Housing Choice

Approved in FY11. Completed and closed out in FY2021.

Description/Impact/Update

This initiative was approved in FY11, placed on hold in FY12, and reactivated in FY16. The Fulton Park development was included in the RAD 2 conversion for FY16. ECC/HANH completed a RPCA and submitted a RAD portfolio application which included the rehabilitation of Fulton Park on October 9, 2015. The Authority received RAD approval in spring of 2016. The Fulton Park project was included in the RAD 2 conversion and construction was completed and occupied during FY21.

MTW fungibility allowed ECC to complete the substantial rehabilitation of the 12-unit Fulton Park development as part of a RAD portfolio award. Without this fungibility and the ability to convert to a RAD Project Based Voucher model, ECC would not have had the ability to complete this rehabilitation and the much-needed family housing units would have remained at risk of becoming obsolete. Fungibility allowed for this moderate to substantial rehabilitation which included new siding, windows, roofs, kitchen, baths, flooring and upgraded electrical service that assured long-term sustainability of these family units. Actual non-significant changes

Actual changes to metrics and data collection

None

Actual significant changes

None

Challenges and Changes

ECC/HANH does not anticipate any changes to the initiative or metrics and does not require different authorizations from what was initially proposed. The Fulton Park Modernization has been completed and this initiative will be moved to the Closed Initiative Section for the FY2022 MTW Report.

LOCAL ASSET MANAGEMENT PLAN

i. **Did the MTW PHA allocate costs within statute in the Plan Year?** No

ii. **Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?** Yes

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

iv. **If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.**

In FY19, ECC/HANH changed the LAMP to charge each program a management fee to COCC, equivalent to 10% of program revenues or expenses. This was approved as part of our 2019 MTW plan and was implemented accordingly. No other changes have been made.

VI. ADMINISTRATIVE

1 **Reviews, Audits and Inspections**
ECC/HANH completed its annual financial audit. It was a clean audit with no compliance items to report. All prior CHRO and HUD VCA requirements have been met. During FY2021 no REAC inspections were completed, however ECC/HANH conducted pre-REAC on 79% of LIPH developments. ECC/HANH has worked closely with HUD Field Office around issues of occupancy and TAR reduction.

2 **Results of Agency-Directed Evaluations of Demonstration.**
ECC/HANH contracted with an outside consultant, Enterprise, on program evaluation. Analysis of our CARES, ECC Believes! and Elderly/Disabled Resident Support Services. Additionally, through a partnership with Yale School of Management, we received technical assistance around our Resident-Owned Business initiative. ECC/HANH has partnered with True North Consultant, LLC around an evaluation of agency-wide security.

HOTMA Reporting requirements

HOTMA 120%							
	FY19	**FY20**	**FY21**	**FY22**	**FY23**	**FY24**	**FY25**
Number of Families residing in Public Housing Administered by the agency who had incomes exceeding the applicable Income limitation (120% AMI)	3	3	3				
Number of Families on the LIPH waitlist as of the end of the FY	4461	4461	9466				

3 **Certification that ECC/HANH has met the three Statutory Requirements**

- **75% of families assisted must be below 50% of AMI at admission**
  In FY21, 96.9% of the families receiving ECC/HANH assistance are below 50% AMI at admission. Thus, ECC/HANH has met the requirement that 75% of families assisted be below 50% of AMI at admission. ECC/HANH has met this requirement every year since becoming an MTW organization.

New Admissions Only – FY07 through FY21												
	FY07	**FY08**	**FY09**	**FY10**	**FY11**	**FY12**	**FY13**	**FY14**	**FY15**	**FY16**	**FY17**	**FY18**
Total number of newly admitted families assisted	344	329	344	425	433	447	238	402	560	676	947	673
Number of families with incomes below 50% AMI	332	310	322	387	394	410	229	372	522	606	872	650
Percentage of families with incomes below 50% AMI	96.5%	94.2%	93.6%	91.0%	90.9%	91.7%	96.2%	92.5%	93.2%	90.0%	92.1%	96.5%

	FY19	FY20	FY21	FY 22	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30
Total number of newly admitted families assisted	347	609	498									
Number of families with incomes below 50% AMI	318	580	483									
Percentage of families with incomes below 50% AMI	91.6%	95.2%	96.9%									

- **Baseline for the Number of Eligible Low-Income Families to Be Served**
  ECC/HANH has served considerably more families since achieving MTW status, primarily through its modernization and redevelopment efforts made possible by MTW flexibility. During FY21, ECC/HANH served 24% more families than at baseline.

Families Served in FY2018 Compared to Baseline		
Baseline number of families to be served (total number of families)		4827
Total number of families to be served this fiscal year	HCV: 4770	5658
	LIPH: 888	
Numerical difference above baseline		1179
Percentage difference above baseline		17.21%

ECC/HANH (CT004)								
	FY01	**FY02**	**FY03**	**FY04**	**FY05**	**FY06**	**FY07**	**FY08**
Families Served through MTW Public Housing	1,970	2,086	1,895	1,737	1,640	1,553	1,531	2,359
Families Served through MTW Vouchers	2,857	2,889	2,994	3,176	3,454	3,312	3,106	3,030
Other Families Served through MTW	0	0	0	0	0	0	0	0
NUMERATOR – Total Families Served	**4,827**	**4,975**	**4,889**	**4,913**	**5,094**	**4,865**	**4,637**	**5,389**
Number of Families (Public Housing)	1,970	1,970	1,852	1,852	1,575	1,432	1,490	1,365
Incremental Increase to Baseline	0	36	0	0	0	58	28	28

Incremental Decrease to Baseline	0	-1540	0	-277	-143	0	-153	-90
Number of Families (Vouchers)	2,857	2,857	2,934	2,934	2,934	2,992	3,026	3,026
Incremental Increase to Baseline	0	77	0	0	58	34	0	0
Incremental Decrease to Baseline	0	0	0	0	0	0	0	0
TOTAL FAMILIES SERVED	**4,827**	**4,786**	**4,786**	**4,509**	**4,424**	**4,516**	**4,391**	**4,329**
% TOTAL	**100%**	**104%**	**102%**	**109%**	**115%**	**108%**	**106%**	**124%**

ECC/HANH (CT004)								
	FY09	**FY10**	**FY11**	**FY12**	**FY13**	**FY14**	**FY15**	**FY16**
Families Served through MTW Public Housing	1,898	2,017	2,294	2,310	2,174	2,235	2,241	2,204
Families Served through MTW Vouchers	3,042	3,075	3,089	3,175	3,303	3,408	3,534	3,774
Other Families Served through MTW	0	0	0	0	0	0	0	0
NUMERATOR – Total Families Served	**4,940**	**5,092**	**5,383**	**5,485**	**5,477**	**5,643**	**5,775**	**5,978**
Number of Families (Public Housing)	1,303	1,061	1,061	1,060	1,110	1,194	1,031	911
Incremental Increase to Baseline	53	0	0	50	84	30	0	0
Incremental Decrease to Baseline	-295	0	-1	0	0	-193	-120	-55
Number of Families (Vouchers)	3,026	3,026	3,032	3,041	3,041	3,041	3,041	3,136
Incremental Increase to Baseline	0	6	9	0	0	0	95	321
Incremental Decrease to Baseline	0	0	0	0	0	0	0	0

TOTAL FAMILIES SERVED	**44,093**	**4,093**	**4,101**	**4,151**	**4,235**	**4,072**	**4,047**	**4,313**
% TOTAL	**121%**	**124%**	**131%**	**132%**	**129%**	**139%**	**143%**	**139%**

ECC/HANH (CT004)								
	FY17	**FY18**	FY19	FY20	FY21			
Families Served through MTW Public Housing	1882	1,694	1,505	1,310	-			
Families Served through MTW Vouchers	4,279	4,496	4,680	4,674	-			
Other Families Served through MTW	0	0	0	0	-			
NUMERATOR – Total Families Served	**6,161**	**6,190**	**6,185**	**5,984**				
Number of Families (Public Housing)	856	274	92	21	-232			
Incremental Increase to Baseline	0	0	0	0	0			
Incremental Decrease to Baseline	-582	-182	-71	-253	-			
Number of Families (Vouchers)	3,457	3,324	4,055	4,125	4,374			
Incremental Increase to Baseline	367	231	170	-249	-			
Incremental Decrease to Baseline	0	0	0	0	0			
TOTAL FAMILIES SERVED	**4,098**	**4,147**	**4,146**	**4,142**	**4,142**			
% TOTAL	**150%**	**149%**	**149%**	**144%**	**0%**			
Compliance Determination	**C**	**C**	**C**	**C**	**-**			

Incremental Increases/Decreases to Baseline			
Reason for Change	**Program**	**Year of Change**	**Change Amount**
Voucher Baseline - ECC/HANH gives "Section 8 Participant Demographics" on page 184 of their FY2002 Annual MTW Report. This number is given as of the beginning of FY2002 (which would be October of 2001). This is very close to when ECC/HANH signed their MTW Agreement. Best number available.	HCV	FY01	2,857
Public Housing Baseline - ECC/HANH gives public housing households served as 1,146 (families) and 824 (elderly) at the beginning of FY2002 (which would be October of 2001). This is very close to when ECC/HANH signed their MTW Agreement. Best number found.	PH	FY01	1,970
Public Housing - 154 actual unit demo/dispo in 2002. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY02	-154
Public Housing - 36 HOPE VI public housing units added in 2002. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY02	36
Vouchers - 77 Enhanced Vouchers became part of MTW program on 8/1/02.	HCV	FY02	77
Public Housing - 277 actual units demo/dispo in 2004. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY04	-277
Vouchers - Housing Conversion for Ethan Gardens (28 in 01/05). Housing Conversion for Eastview Terrace (30 in 05/05).	HCV	FY05	58
Public Housing - 143 actual units demo/dispo in 2005. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY05	-143
Vouchers - Housing Conversion for Canterbury Gardens (34 in 12/05).	HCV	FY06	34
Public Housing - 58 HOPE VI public housing units added in 2006. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY06	58
Public Housing - 153 actual units demo/dispo in 2007. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY07	-153
Public Housing - 28 HOPE VI public housing units added in 2007. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY07	28
Public Housing - 90 actual units demo/dispo in 2008. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY08	-90
Public Housing - 28 HOPE VI public housing units added in 2008. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY08	28
Public Housing - 53 new units brought online at Eastview Terrace.	PH	FY09	53

Incremental Increases/Decreases to Baseline			
Public Housing - 295 actual units demo/dispo in 2009. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY09	-295
Vouchers - Housing Conversion for 77-79 Orchard Street Apartments (6 in 08/10).	HCV	FY10	6
Vouchers - William T. Rowe Apartments (9 in 7/11).	HCV	FY11	9
Public Housing - ADJUSTMENT - Demo/dispo report for FY2010 was updated to show one actual unit demolished.	PH	FY11	-1
Public Housing - 50 new units brought online at Brookside Phase I.	PH	FY12	50
Public Housing - 34 new units brought online at The Wilmont Crossing at West Rock and 50 new units at Brookside Phase II.	PH	FY13	84
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY14	-193
Public Housing - 30 units brought online at Rockview Phase 1 Rental (11/30/13 Actual DOFA Date)	PH	FY14	30
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY15	-120
Vouchers - 95 PH units converted to RAD PBV (44 units at Ribicoff Cottages 9%, 51 units at Ribicoff Cottages 4%).	HCV	FY15	95
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY16	-55
Vouchers - Termination opt Out (198 units in 4/16, 15 units in 6/16, 53 units in 8/16)	HCV	FY16	266
Vouchers - 55 units converted to RAD PBV at Farnam - Fair Haven 9%	HCV	FY16	55
Vouchers - PH Conv to PBV (86 units at Farnam 4%, 42 units at Monterey 4, 28 units at Monterey Place Phase 2R, 210 units at Monterey 1B)	HCV	FY17	367
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 8.31.18	PH	FY17	-582
Vouchers	HCV	FY18	276
Public Housing	PH	FY18	124
Vouchers	HCV	FY19	148
Public Housing	PH	FY19	-26
Vouchers RAD Conversions	HCV	FY20	2,801
Public Housing removal of LIPH transferring units to RAD	PH	FY20	-1082

Data Source for Number of Families Served				
2001 - Vouchers - Pulled from page 184 of ECC/HANH's FY 2002 Annual MTW Report.	FY01	2,857	Baseline 4827 total Families Served	
September 2001 - Public Housing - Pulled from last page of ECC/HANH's FY 2002 Annual MTW Report.	FY01	1,970		
FY 2002 - Vouchers - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY02	2,889	101.12%	
FY 2002 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY02	2,086	105.89%	1.030660866
FY 2003 - Vouchers - Pulled from September 2003 VMS Report that includes 2,946 MTW and 48 All Other.	FY03	2,994	104.80%	1.012844417

FY 2003 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY03	1,895	96.19%	
FY 2004 - Vouchers - Pulled from September 2004 VMS Report that includes 3,176 MTW.	FY04	3,176	111.17%	
FY 2004 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY04	1,737	88.17%	1.017816449
FY 2005 - Vouchers - Pulled from September 2005 VMS Report that includes 3,333 MTW and 121 HOPE VI.	FY05	3,454	120.90%	
FY 2005 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY05	1,640	83.25%	1.05531386
FY 2006 - Vouchers - Pulled from September 2006 VMS Report that includes 3,306 MTW, 1 All Other and 5 Tenant Protection.	FY06	3,312	115.93%	1.007872385

FY 2006 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY06	1,553	78.83%	
FY 2007 - Vouchers - Pulled from September 2007 VMS Report that includes 3,106 MTW.	FY07	3,106	108.72%	
FY 2007 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY07	1,531	77.72%	0.960638077

FY08 - Vouchers - Pulled from September 2008 VMS Report that includes 3,030 MTW.	FY08	3,030	106.06%	
FY08 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY08	2,356	119.59%	1.115806919
FY09 - Vouchers - Pulled from September 2009 VMS Report that includes 3,042 MTW.	FY09	3,042	106.48%	
FY09 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY09	1,898	96.35%	1.023409985
FY10 - Vouchers - Pulled from September 2010 VMS Report that includes 19 Homeownership, 2,873 MTW, 168 Ports and 15 Tenant Protection.	FY10	3,075	107.63%	
FY10 - Public Housing - Pulled from ECC/HANH FY10 Annual MTW Report (page 11).	FY10	2,017	102.39%	1.054899524
FY11 - Vouchers - Unit month average pulled from VMS (see third tab).	FY11	3,089	108.12%	
FY11 - Public Housing - Pulled from Development Detail Report for September 27, 2011. Includes 178 units approved for demo/dispo. This is out of 2,542 (occupancy rate of 90%).	FY11	2,294	116.45%	1.115599751

Data Source for Number of Families Served (continued)				
2001 - Vouchers - Pulled from page 184 of ECC/HANH's FY 2002 Annual MTW Report.	FY01	2,857	Baseline 4827 total Families Served	
September 2001 - Public Housing - Pulled from last page of ECC/HANH's FY 2002 Annual MTW Report.	FY01	1,970		
FY 2002 - Vouchers - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY02	2,889	101.12%	
FY 2002 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY02	2,086	105.89%	1.030660866
FY 2003 - Vouchers - Pulled from September 2003 VMS Report that includes 2,946 MTW and 48 All Other.	FY03	2,994	104.80%	1.012844417
FY 2003 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY03	1,895	96.19%	
FY 2004 - Vouchers - Pulled from September 2004 VMS Report that includes 3,176 MTW.	FY04	3,176	111.17%	
FY 2004 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY04	1,737	88.17%	1.017816449
FY 2005 - Vouchers - Pulled from September 2005 VMS Report that includes 3,333 MTW and 121 HOPE VI.	FY05	3,454	120.90%	
FY 2005 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY05	1,640	83.25%	1.05531386
FY 2006 - Vouchers - Pulled from September 2006 VMS Report that includes 3,306 MTW, 1 All Other and 5 Tenant Protection.	FY06	3,312	115.93%	1.007872385

FY 2006 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY06	1,553	78.83%	
FY 2007 - Vouchers - Pulled from September 2007 VMS Report that includes 3,106 MTW.	FY07	3,106	108.72%	
FY 2007 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY07	1,531	77.72%	0.960638077

FY08 - Vouchers - Pulled from September 2008 VMS Report that includes 3,030 MTW.	FY08	3,030	106.06%	
FY08 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY08	2,356	119.59%	1.115806919
FY09 - Vouchers - Pulled from September 2009 VMS Report that includes 3,042 MTW.	FY09	3,042	106.48%	
FY09 - Public Housing - Pulled from ECC/HANH FY09 Annual MTW Report (page 22).	FY09	1,898	96.35%	1.023409985
FY10 - Vouchers - Pulled from September 2010 VMS Report that includes 19 Homeownership, 2,873 MTW, 168 Ports and 15 Tenant Protection.	FY10	3,075	107.63%	
FY10 - Public Housing - Pulled from ECC/HANH FY10 Annual MTW Report (page 11).	FY10	2,017	102.39%	1.054899524
FY11 - Vouchers - Unit month average pulled from VMS (see third tab).	FY11	3,089	108.12%	
FY11 - Public Housing - Pulled from Development Detail Report for September 27, 2011. Includes 178 units approved for demo/dispo. This is out of 2,542 (occupancy rate of 90%).	FY11	2,294	116.45%	1.115599751

FY12 - Vouchers - Pulled from ECC/HANH's FY12 Annual MTW Plan. (Page 8)	FY12	5,119	179.17%	
FY12 - Public Housing - Pulled ECC/HANH's FY12 Annual MTW Plan. (Page 8)	FY12	2,094	106.29%	1.49430288
FY13 - Vouchers - Pulled from ECC/HANH's FY13 Annual MTW Plan. (Page 8)	FY13	3,025	105.88%	
FY13 - Public Housing - Pulled ECC/HANH's FY13 Annual MTW Plan. (Page 8)	FY13	2,094	106.29%	1.06049306
FY14 - Public Housing - Pulled from Elite dated November 5, 2014.	FY14	2,141	108.68%	
FY14 - Vouchers - Pulled from Elite dated November 5, 2014.	FY14	3,338	116.84%	1.135073545
FY15 - Public Housing- Pulled from Elite dated November 24, 2015.	FY15	3,410	173.10%	
FY15 - Vouchers- Pulled from Elite dated November 24, 2015.	FY15	2,181	76.34%	1.158276362
FY16 - Public Housing- Pulled from Elite dated October 28, 2016.	FY16	2,134	108.32%	
FY16 - Vouchers- Pulled from Elite dated October 28, 2016.	FY16	3,762	131.68%	1.221462606
FY17 - Public Housing- Pulled from Elite dated September 30, 2017.	FY17	1,774	90.05%	
FY17 - Vouchers- Pulled from Elite dated September 30, 2017.	FY17	4,315	151.03%	1.261446033
FY18 - Public Housing- Pulled from Elite dated September 30, 2018.	FY18	1,589	76.17%	
FY18 - Vouchers- Pulled from Elite dated September 30, 2018.	FY18	4,591	158.91%	1.280298322
FY19 - Public Housing- Pulled from Elite dated September 30, 2019.	FY19	1,441	73.14%	1.2442

FY18 - Vouchers- Pulled from Elite dated September 30, 2020.	FY20	4,470	66.95%	
FY19 - Public Housing- Pulled from Elite dated September 30, 2020.	FY20	888	121.84%	1.35

Baseline for the Mix of Family Sizes to Be Served

Since baseline, ECC/HANH's portfolio has had several changes as a result of redevelopment efforts prior to RAD and more recently as a result of ongoing RAD conversion efforts. As can be seen, depending on the agency's development projects each year, the number of families served per member size can either increase or decrease. During FY21 ECC/HANH saw a 24% increase in the total number of households served.

Baseline Family Sizes Served by ECC/HANH							
Baseline	**1 person**	**2 people**	**3 people**	**4 people**	**5 people**	**6+ people**	**Total**
Ratio of family sizes to be maintained	32%	24%	20%	13%	6%	5%	100%
Number of families served by family size	2448	1374	1061	613	314	196	6006
Ratio of families served by family size	41%	23%	18%	10%	5%	3%	100%
Percentage Difference	9%	-1%	-2%	-3%	-1%	-2%	0

VII. APPENDICES

Appendix 1: Documentation of Public Hearing and Public Comment Period

Elm City Communities/Housing Authority of the City of New Haven
Public Hearing: Elm City Communities/Housing Authority of the City of New Haven
Moving to Work (MTW) Report FY2021
Monday, November 29, 2021 @ 3:00 p.m.
360 Orange Street, New Haven, CT 06511
(Via RingCentral teleconference)

Those present included:

Evelise Ribeiro, ECC
Cathy Hawthorne, ECC
Damaris Guzman-Diaz, The Michaels Group
Jocelyne Barsczewski, ECC
Karen DuBois-Walton, ECC
Shenae Draughn, ECC
Latweeta Smyers, ECC
Haley Vincent, ECC
Hannah Sokal-Holmes, ECC
Itsuannette Torres, ECC
Damaris Guzman-Diaz, The Michaels Group

The public hearing was called to order at 3:01 p.m. by Evelise Ribeiro, Director of Compliance.
Ms. Ribeiro read the legal notice aloud which stated the reason the public hearing was being called. She noted that the notice was in English and Spanish and both versions would be submitted for the record.

Section V (B) of the Authority's Moving to Work Agreement {the "Agreement") requires that before the Agency can file its Approved Annual Moving to Work Plan & Report to the U.S. Department of Housing and Urban Development (the "HUD") that it must conduct a public hearing, consider comments from the public on the proposed amendments, obtain approval from the Board Of Commissioners, and submit the amendments to HUD.
Copies of the Moving To Work (MTW) FY2021 Report, will be made available on Monday, November 1, 2021 on the agency website www.elmcitycommunities.org or via Twitter, www.twitter.com/ECCommunities or via Facebook www.facebook.com/ElmCityCommunities.

You are invited to provide written comments addressed to: ECC/HANH, Moving To Work FY2021 Annual Report, Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 or via email to: eribeiro@elmcitycommunities.org.

Pursuant to said Section V (B), a public hearing where public comments will be accepted and recorded is scheduled for Monday, November 29, 2021 at 3:00pm via RingCentral: https://meetings.ringcentral.com/j/5274955065. Or dial:(773) 231-9226, Meeting ID: 527 495 5065.

Any individual requiring a Reasonable Accommodation to participate in the hearing may call the Reasonable Accommodation Manager (203) 498-8800, ext. 1507 or at the TDD Number (203) 497-8434.

La Sección V (B) del Acuerdo de Mudanza al Trabajo de la Autoridad (el "Acuerdo") requiere que antes de que la Agencia pueda presentar su Plan e Informe Anual Aprobado de Mudanza al Trabajo al Departamento de Vivienda y Desarrollo Urbano de EE. UU. (El "HUD") que debe llevar a cabo una audiencia pública, considerar los comentarios del público sobre las enmiendas propuestas, obtener la aprobación de la Junta de Comisionados y presentar las enmiendas al HUD.

Las copias del Informe Moving To Work (MTW) FY2021 estarán disponibles el lunes 1 de noviembre de 2021 en el sitio web de la agencia www.elmcitycommunities.org o vía Twitter, www.twitter.com/ECCommunities oa través de Facebook www.facebook.com/ElmCityCommunities.

Se le invita a proporcionar comentarios por escrito dirigidos a: ECC / HANH, Moving To Work FY2021 Annual Report, Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 o por correo electrónico a: eribeiro@elmcitycommunities.org.

De conformidad con dicha Sección V (B), una audiencia pública donde se aceptarán y grabarán los comentarios públicos está programada para el lunes 29 de noviembre de 2021 a las 3:00 pm a través de RingCentral: https://meetings.ringcentral.com/j/5274955065. O marque: (773) 231-9226, ID de reunión: 527495 5065.

Cualquier individuo que requiera una Adaptación Razonable para participar en la audiencia puede llamar al Gerente de Adaptación Razonable (203) 498-8800, ext. 1507 o al número TDD (203) 497-8434.

At 3:04 p.m., the meeting was opened to take public comments.
There was a second call for public comments.
There was a third call for public comments.
There was a fourth call for public comments.
There was a fifth call for public comments.
There was a sixth call for public comments.
Ms. Ribeiro stated that we would wait a few minutes before closing out the public hearing.
3:14pm – one last call for public comments.

Public Comments:

No Public comments

Adjournment:

Ms. Ribeiro stated the attendees' names for the record.
She then thanked the participants and the public hearing was adjourned at 3:15 p.m.

Board Resolution

TO: **Board of Commissioners**

FROM: Karen DuBois-Walton, Ph.D., President

DATE: DECEMBER 21, 2021

RE: **Approval of Moving to Work (MTW) Annual Report for FY 2021**

ACTION:	Recommend that the Board of Commissioners adopt Resolution Number 12-105/21-R
TIMING:	Immediate.
DISCUSSION:	ECC/HANH is requesting authorization to submit the FY2021 Moving to Work Report to the U.S Department of Housing and Urban Development (HUD). The Report was made available for Public Review and Comment for a period of 30 days, starting on November 1, 2021 to November 30, 2021, and a public hearing was held on November 29, 2021 at ECC/HANH. No public comments were received. Attached is a copy of ECC/HANH's MTW FY2021 annual report. This resolution requests the Board's authorization to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Report for FY2021 with all required and related certifications and documents.
STAFF:	Evelise Ribeiro, Director of Compliance

MTW Report Resolution FY2021

Housing Authority of the City of New Haven

RESOLUTION NUMBER 12-105/21-R

APPROVAL OF MOVING TO WORK (MTW) ANNUAL REPORT FOR FY 2021

WHEREAS, ECC/HANH is requesting authorization to submit the FY2021 Moving to Work Report to the U.S Department of Housing and Urban Development (HUD); and

WHEREAS, The MTW report lists progress and challenges in achieving the objectives established in the FY2021 Annual Moving to Work Plan and is a combination of metrics, stories, hard work and commitment of the services provided by staff throughout the agency and the many successes of the residents and families who have participated in these programs; and

WHEREAS, The Report was made available for Public Review and Comment for a period of 30 days, starting on November 1, 2021 to November 30, 2021 and a public hearing was held on November 30, 2021 at ECC/HANH. No public comments were received. Attached is a copy of ECC/HANH's MTW FY20 annual report; and

WHEREAS, this resolution requests the Board's approval to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Report for FY2021, and all required and related certifications, documents and HUD forms.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN that the Board Authorizes the President to take such actions and execute such documents as necessary to finalize and submit to the U.S. Department of Housing and Urban Development ECC/HANH's MTW Annual Report for Fiscal Year 2021, including all required certifications, documentation, and HUD forms, of which this Board Resolution is a part.

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 December 21, 2021.

Karen DuBois-Walton, Ph. D.
Secretary/President

Date 12/21/21

REVIEWED:
MCCARTER & ENGLISH LLP
GENERAL COUNSEL

By:
Rolan Joni Young, Esq.
A Partner

Certificate of Compliance

MTW 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 MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/1/2020), hereinafter referred to as "the MTW Supplement", 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 MTW Supplement and implementation thereof:

(1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.

(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 MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.

(5) The MTW Supplement 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 MTW Supplement 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 MTW Supplement is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at24 C.F.R. Part 146.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender 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.

(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 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

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

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.

(23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement 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 MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of New Haven
MTW PHA NAME

CT004
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
NAME OF AUTHORIZED OFFICIAL

Board Chairman
TITLE

SIGNATURE

December 21, 2021 12/21/21
DATE

* ***Must be signed by either the Chairperson 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 Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

Appendix 2: Alternative TDC and HCC Limits

ECC/HANH's local total development cost (TDC) limits as approved by HUD.
The following pages detail ECC/HANH's Alternate 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	$228,357	$291,790	$342,408	$405,464	$476,083	$521,291	$563,900

Row House	$185,556	$243,918	$288,528	$351,622	$418,022	$460,885	$501,068
Walk Up	$170,121	$230,789	$293,673	$384,452	$477,581	$537,877	$597,377
Elevator	$178,470	$249,858	$321,246	$428,328	$535,410	$606,798	$678,186

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%

RECENT 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%

Appendix 3: Local Asset Based Management

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.

Appendix 4: ECC/HANH MTW Evaluation

Executive Summary

A 2015 evaluation of ECC/HANH's MTW program found the following:

- MTW has been used extensively by ECC/HANH to assist in redeveloping many of its properties. Various MTW flexibilities related to fungibility, income limits, project-based vouchers, and development and construction cost limits have been used to help redevelop over 800 affordable units. Through these projects ECC/HANH was also able to earn nearly $5 million in developer fees.

- ECC/HANH has had success using MTW flexibilities to implement activities that have led to 40K hours of staff time savings and over $500K in cost savings. Key activity drivers of these savings include rent simplification's biennial/triennial reexam schedules, biennial/triennial HQS inspections, mandatory direct deposit for HCV landlords, and limiting HCV landlord rent increases to once per reexam cycle.

- MTW flexibility has also been used to create special programs that serve sub-populations with unique challenges including families facing homelessness and foreclosure and former prisoners who are re-entering the community. ECC/HANH has also aided families seeking to move into lower poverty areas through its Deconcentration initiative.

The evaluation provided the following recommendations:

- Improve core self-sufficiency activities by advancing case management and classes.
- Streamline the number of self-sufficiency programs and review service alternatives.
- Transform MTW data collection and reporting by advancing data management and streamlining processes.
- Enhance staff involvement in setting and meeting MTW goals.
- Continue to streamline administrative processes.
- Evolve MTW rent policy to enhance motivations for work-able families to work.
- Raise awareness for MTW programs with clients and partners.

ECC/HANH has been working toward these recommendations. In 2016, the agency contracted with Enterprise Community Partners to position the agency for future evaluation of its MTW program and each of its initiatives. Enterprise has completed its 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 to support a future evaluation.

Enterprise Community Partners found the following:

ECC/HANH continues to support housing choice for their residents by redeveloping and repositioning aging low-income public housing developments, replacing demolished units with a variety of affordable housing types, increasing participation in the RAD program, renovating offline units, upgrading units, and making accessibility improvements. These efforts could produce positive ripple effects throughout the city of New Haven, especially near the West Rock Neighborhood where ECC/HANH is working to redevelop all public housing properties. Positive community impacts are being reported at the two ECC/HANH properties for which crime data was analyzed, both of which have had reductions in the number of major crimes. ECC/HANH's efforts to provide housing choice for vulnerable populations continues to increase.

ECC/HANH continues to work toward improving its self-sufficiency programming, especially for particularly vulnerable populations. To assist the most vulnerable, ECC/HANH continues to serve a high proportion of very low-income households.

The self-sufficiency programs saw decreased participation in FY 2021, including FSS, Teacher in Residence, and Resident Owned Business due to COVID19, however ECC/HANH continues to focus on efforts on increasing participation.

ECC/HANH has demonstrated continued cost effectiveness by deriving agency revenue from redevelopment fees, leveraging private investment through the mixed-finance process, and reducing administrative burden. The Rent Simplification initiative has saved an average of nearly 7,000 hours of staff time per year since 2008, while the HCV Rent Simplification/Cost Stabilization Measure initiative saved over 200 hours of staff time in 2015 and 2016. Since 2008, ECC/HANH has saved over $221,000 in printing and mailing costs alone by changing the annual recertification schedule. In 2016, ECC/HANH implemented a new quality assurance process that decreased their average error rate for calculating recertifications to just 1%, reducing administrative burden even further.

Despite efforts to increase the cost effectiveness of its development activities, ECC/HANH still faces challenges due to the high construction costs of the area. To drive down costs, ECC/HANH have improved development design, adhered to competitive bidding procedures, and encouraged competition among contractors. However, according to RS Means cost data for 2014, construction costs in the New Haven metropolitan area were 110.2% of the national average.[1] Comparatively, many much more populous cities experience construction costs lower than the national average: Atlanta (87.5%), Denver (93.3%), Los Angeles (107.3%), Phoenix (88.7%) and Washington, DC (97.7%). The 2014 construction costs in New Haven increased by 0.05% from 2010, suggesting that 2017 costs may be even higher than 110.2% of the national average.[2]

ECC/HANH has also focused on further engaging staff with the MTW reporting process and updating their data collection processes and infrastructure. In 2016, Enterprise Community Partners presented metrics and data collection recommendations to ECC/HANH leadership and held listening sessions with ECC/HANH data stewards, which resulted in better tailored metrics and data collection recommendations. ECC/HANH continues to work with the team at Enterprise to evaluate programs, and metrics and to administer case studies.

[1] The costs represented in the RS Means cost data publications are based on national averages for materials and installation.

[2] At time of the submission of this report, ECC/HANH did not have access for the 2017 RS Means data for the New Haven metro area. Because 2010 construction costs increased by .05% from 109.7% of the national average in 2010 to 110.2% of the national average in 2014, so ECC/HANH expects that 2017 construction costs are even higher than 110.2% of the national average.

Appendix 5: Procedures for Rent Simplification for the Public Housing Program

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 more than $50,000.00.

Earned Income Disallowance (EID)
This benefit is embedded into the Rent Simplification rule so the provision of EID, of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit; however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. 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. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/triennial certification comes up. In many cases the 48-month window will not be used as most families will receive the Rent Simplification benefit throughout the life of the EID; for the most part eliminating the need to stop or re-start the EID clock.

When individuals are up for bi/tri certs, anyone who would have benefited from the EID will have the months checked off in Elite for tracking purposes, however, a reduction from 100 to 50 does not occur, therefore, a family will generally benefit from a minimum of 48 months of discounted wage increases at 100% EID.

Families on Bi-annual updates who would have an income increase at year two; benefiting from a full 2 years at 100% discounted Income, & Families on Tri-annual Updates who would have an income Increase at year three, benefiting from a full 3rd year of 100% discounted income.

It is still required that at time of Bi-annual or Tri annual cert: The specialist enters EID dates in Elite, dating back to the Start of when benefit would have started, as well as end date.

ECC/HANH staff will still utilize the worksheet as needed to determine if a person qualified, in order to check off boxes in Elite for PIC submission purposes, however, annual tracking and tracking at time of interim change would be eliminated in efforts to streamline the interim and certification process, relieving staff of the additional burden and allowing families to benefit from the full extent of Rent Simplification as written. Tracking in Elite will only occur at time of bi/tri certifications.

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 years 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 their increased earnings between annual reexaminations. CSSR requirements will be reviewed at time of bi-tri certification for families and individuals who are not exempt and required to complete the

required 96 hours per year. Household members exempt from having to meet the CSSR will be required to certify exemption at time of bi-tri certification. This change relieves staff of the additional burden of annual tracking and allowing families to benefit from the full extent of Rent Simplification as written. Tracking in Elite will only occur at time of bi/tri certifications

Effective FY15 (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 childcare, 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) dependents). 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 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.

Rent Simplification Interims:
Rent Simplification in both LIPH and HCV will include a request to adjust rent during COVID19 and any similar pandemic or national, state, or local emergencies that affect many families in the community. In order to prevent staff having to reprocess files when families go back to work during a time like this, ECC/HANH will create a letter which advises the families of the decrease to their rent for 3 months, as a result of loss or decrease in income. At the end of the 3 months, the rent will be adjusted back to what it was before the decrease. Staff would process 2 actions, the decrease, and a second action (effective on the 1st day of the 4th month) which would be an increase back to previous amount. This way, families will not need to report the increase and staff can give 30-day notice of the potential increase change at the same time they are giving the decrease notice.

If families are not yet back to work or the change is permanent, they must report the change to ECC/HANH as soon as they are aware so that the second interim may be cancelled or adjusted. This change does not cancel or supersede the current interim change rule where families are not required to report a new income or increase in income if the previous decrease was associated with an annual certification. In other words, 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.

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 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 their 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. The Flat Rent option certification form will only be signed at time of bi-tri certification; however, families will have the opportunity to switch to the Flat rent once a year. Annual notice will go out to families, but signature will not be required except for at time of scheduled bi/tri certification. This change is in line with efforts to streamline the certification process; relieving staff of the additional burden and allowing families to benefit from the full extent of Rent Simplification as written.
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 except for 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, apart from 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:
- When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program.
- When the family would be evicted because it is unable to pay the minimum rent.
- When the income of the family has decreased because of changed circumstances, including loss of employment.
- When a death in the family has occurred; or
- 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.

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 an 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:

- that ECC/HANH has received an Application for Exemption from Minimum Rent,
- 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,
- that there can be no eviction for non-payment of rent during the suspension period.
- 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
- that, except for 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.

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.

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 about 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.

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:

If the hardship exemption is determined to be temporary:

- that a temporary hardship exemption was granted.

- the effective dates of the exemption.

- 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

- 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.

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

- that a long-term hardship exemption was granted.
- whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place.
- 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
- 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.

Minimum Rent Hardship during COVID19 and any similar pandemic or national, state, or local emergencies that affect many families in the community:
The three-month hardship time-frame will be increased to four months during COVID19 and any similar pandemic or national, state or local emergencies that affect a large number of families in the community.
Additionally, families who fall under the hardship repayment requirement will not be required to repay hardship. Referrals to FSS are not required because of this type of decrease.

If the hardship is determined to be non-existent:

- that a hardship exemption was denied.
- the reason for such determination; and
- 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 explain the reasons more fully 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 except for 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, except for 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:

When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program.
When the family would be evicted because it is unable to pay the minimum rent.
When the income of the family has decreased because of changed circumstances, including loss of employment.
When a death in the family has occurred; or
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 an 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 an 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:

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

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,

that there can be no eviction for non-payment of rent during the suspension period.

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

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.

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.

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.

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:

If the hardship exemption is determined to be temporary:

That a temporary hardship exemption was granted;

the effective dates of the exemption;

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

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.

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

that a long-term hardship exemption was granted;

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

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

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.

If the hardship is determined to be non-existent:

that a hardship exemption was denied;

the reason for such determination; and

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.

PUBLIC HOUSING RENT SIMPLIFICATION SUMMARY
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)(x 11	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 over 18. 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

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing 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 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	The Federal EID benefit is embedded into the Rent Simplification rule so the provision of EID by definition of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit, however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. 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. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/tri annual certification comes up. Families who do already receive the benefit of no increase in rent with higher wages under the Rent Simplification rule will be tracked in Elite under EID at time of Bi-Tri annual certifications.
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	Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		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.	
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)
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	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.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		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.	
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; 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 When the family would be evicted because it is unable to pay the minimum rent 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.
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.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing 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, McConaughey 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 that affect the determination of adjusted income.	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. Asset exclusion is raised to $50,000.00 and only self-certification will be required.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
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 VASH, RAD, and Enhanced Vouchers are not covered by this policy.

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 EID 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 FY15 (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 first- and second-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 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. This rule does not apply to Hardships. See language related to hardships

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 their total expenses exceed $2,000.00

Minimum 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.

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 of the following criteria:

- When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
- When the family would be evicted because it is unable to pay the minimum rent;
- When the income of the family has decreased because of changed circumstances, including loss of employment;
- When a death in the family has occurred; or
- 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. At the end of the 90 days, the family will undergo an interim increase.

A long term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days. At the end of the long term hardship, an interim is conducted to adjust the family's income.

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. At the end of the hardship, an interim will be conducted to bring family up to speed on current household income.
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 an ECC/HANH employee if the family experiences any one of the Criteria for Minimum Rent Exemption.

When a participant submits an application or an 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:

- that ECC/HANH has received an Application for Exemption from Minimum Rent,
- 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,
- that there can be no termination of assistance for non-payment of rent during the suspension period;
- 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
- 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.

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.

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.

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:
If the hardship exemption is determined to be short term:

- that a short-term hardship exemption was granted;
- the effective dates of the exemption;
- 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
- 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.

If the hardship exemption is determined to be long term:

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

- 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.

If the hardship is determined to be non-existent:

- that a hardship exemption was denied;
- the reason for such determination; and
- 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 $50,000 in 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 of the following criteria:
- When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
- When the family would be evicted because it is unable to pay the minimum rent;
- When the income of the family has decreased because of changed circumstances, including loss of employment;
- When a death in the family has occurred; or

- 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. At the end of the 90 period, an interim will be completed to set the family to rent based on the new current income.

A long tern hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days. At the end of the long-term hardship, an interim will be completed to set the family to rent based on the new current income.

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 an 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.
Significant Change to MTW FY20 Plan Amendment #1

Rent Simplification Interims HCV & LIPH:
Rent Simplification in both LIPH and HCV will include a request to adjust rent during COVID19 and any similar pandemic or National, State or Local emergency affecting a large number of families in the community. In order to prevent staff having to reprocess files when families go back to work during a time like this, ECC/HANH will create a letter which advises the families of decrease to their rent for 120 days (4 months), as a result of loss or decrease in income. At the end of the 4 months, the rent will be adjusted back to what it was before the decrease. Staff would process

2 actions, the decrease, and a second action (effective on the 1st day of the 4th month) which would be an increase back to previous amount.   This way, families will not need to report the increase and staff can give 30 day notice of the potential increase change at the same time they are giving the decrease notice.

If families are not yet back to work or the change is permanent, they must report the change to ECC/HANH as soon as they are aware so that the second interim may be cancelled or adjusted.

This interim option does not cancel or supersede the current interim change rule where families are not required to report a new income or increase in income if the previous decrease was associated with an annual certification. In other words, 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. With that said, COVID19, or similar pandemic or national, state or local emergency related interim decreases will remain in effect for the full 120 days. Any increases after this time period must be reported to ECC/HANH within 10 days of the change.

During these moments, the start and end date of interim decrease requests will made clear to families of ECC/HANH via current forms of communication with families.

Minimum Rent Hardship LIPH & HCV:
The three month hardship time-frame will be increased to four months during COVID19 and any similar pandemic or national, state or local emergency affecting a large number of families in the community. Additionally, families who fall under the hardship repayment requirement will not be required to repay hardship.

Housing Choice Voucher HQS Inspections
HQS Inspections may be conducted via video conference on a case by case basis with the Owner or his/her designee present at the inspection site. Inspection appointments will be scheduled as usual and will be attended in person by the landlord or designee. All HQS inspections forms will be mailed to the owner or designee in advance of the scheduled appointment. A certified HQS inspector must participate on the video conference and will guide the homeowner or designee through the inspections process. This process will be allowed for initial inspections of previously inspected units, meaning if a unit was previously occupied by a family receiving HCV subsidy, the unit may qualify for a video inspection for initial inspection for new voucher holder, as well as special inspections and bi/triennial inspections. Failed initial inspections will follow the current inspections protocol and timeline with the added option of proceeding via video conference. A 2nd failed inspection will require that an inspector go out to the site and inspect the corrected deficiencies in person.

The landlord or designee will bring the provided forms to the inspections appt and will sign the landlord portions of all forms while on video conference. The Inspector will serve as the witness to the landlord or designee signature and will sign as such. The inspector must include any notes regarding the process, including any information or areas that were not inspected or discussed during this time.

With the exception of HVAC & other home systems, special inspections may be conducted via video conference. In the same way as the Initial and bi/triennial inspections, a 2nd fail will trigger an in-person inspection by the HQS inspector.

Exceptional Expenses
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.

ATTACHMENT C-1
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.

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
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; (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.	Eliminated from HCV program
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.

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
Additional (Exception) Expenses Deductions	24 CFR 5.611	None	Families with verifiable deductions at 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 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.	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 re

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
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	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

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
		portion of those payments which is so designated; or (4) The minimum rent	Simplification Policy shall not $75 a month. The increase in TTP during the fifth year shall not exceed $100 a month above the monthly TTP in the year immediately preceding the 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

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			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 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. 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

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			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.	

Waiver of Requirement to give 12 month notice to family about Payment Standard decrease	24 CFR 982.505 (3)(iii)	(iii) The PHA must provide the family with at least 12 months' notice that the payment standard is being reduced during the term of the HAP contract before the effective date of the change.	The PHA will notify families at the time of biennial or triennial recertification that the payment standard may increase or decrease at the next reexamination based on the approve FMR at that time.
Waiver to allow a decrease in payment standard the effective date of the family's second regular reexamination following the effective date of the decrease in payment standard.		The initial reduction in payment standard cannot take place before the effective date of the family's second regular reexamination following the effective date of the decrease in payment standard.	The PHA will use the payment standard in effect on the date of reexamination whether it is a decrease or an increase.

Appendix 7: Actual Capital Expenses and Portfolio Capital Needs

Table of General Description of All Actual Capital Expenses During the Plan Year

Description	FY2021	Capital Expenditures Actual as of 9-30-21	FUNDING SOURCES CFP	MTW Total	HUD CARES Act-Other	Total Estimated Project Cost/Need	Comments
Crawford ADA Vestibule and Fire Pump Upgrades	$606,000	$240,721.88	$0	$233,195.18	$7,526.70	$1,145,000	Project supports MTW goal to further ADA access to our properties by upgrading common areas in existing buildings. Building fire alarm panel & fire pump at end of useful life. Alarm systems now require addressing features for smoke alarms. Due to COVID, project repackaged as vestibule and fire pump as first phase. IFB issued December 2020; contract awarded March 2021; fire alarm phase being solicited with other health & safety improvements involving entry into occupied apartments as described below.
McConaughy Storm-Sanitary Sewer Replacement	$600,000	$906,214.88	$906,214.88	$0	$0	$908,450	Major Repairs & replacement coordinated with Greater New Haven Water Pollution Control Authority. Repair and Replacement of 73-year-old infrastructure--Sanitary and Storm Sewers. Project awarded and started during FY 2020; substantially complete May 2021. Expected outcome: improved site drainage and fewer plumbing backups.

Renovation work items associated with lead paint abatement at Essex, McConaughy, SS West & SS East	$300,000	$250	$250	$0	$0	$300,000	Renovations in units where lead paint abatement grant funds are being used to pay for related work items that are not eligible for payment with lead grant funds. An RFP for hazmat contractors bid in FY 2020. No awards. Repackaged for re-bid. Four contracts of nine groupings have been awarded. Minimal non-lead work performed; more forthcoming; McConaughy has been removed from the Lead Grant, as the development is slated for redevelopment and is now under a CHAP.
Scattered Sites EAST & WEST: Replacement of Heating & Domestic Hot Water systems	$500,000	$398,860.99	$398,860.99	$0	$0	$500,000	Replace 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; Replace antiquated gas systems with energy efficient new gas fired systems; Replace electric heat-hot water systems with energy efficient systems. Project designed during FY 2019. Bids rejected; Project re-bid and awarded during FY 2021. Work began April 2021. Substantial completion August 2021: 17 units in 13 properties. Includes separate gas co. cost to install gas service at 8-10 Terrace. Anticipated outcome: energy savings; improved resident comfort and environmental preservation with the removal of outdated oil tanks.
Wolfe Health-Safety Work: Elevator Controls etc.	$700,000	$184,213.50	$184,213.50	$0	$0	$1,409,000	Address life-health-safety issues pending future plans for major Wolfe redevelopment. Initiated during FY 2020, but due to COVID, solicitation repackaged to address exterior and common areas scope of work first. Received 2 bids October 2020--overbudget. Resolicited March 2021. Contract awarded June 2021. Interior health & safety scope of work solicited June 2021. Contract awarded August 2021. Work continuing into FY 2022.

Crawford Life Health & Safety Upgrades	$0	$0	$0	$0	$0	$5,000,000	Non-RAD conversion renovation project: Units need kitchen & bathroom upgrades; interior doors; walls, ceilings, appliances, window replacement, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs; This project will prioritize needs, and focus on life and health safety, including replacement of Fire Alarm System. Work based on A&E field assessment. Expect to solicit bids October 2021.
McConaughy Interior/Building Upgrades	$0	$0	$0	$0	$0	$550,000	Development needs kitchen & bathroom replacements; interior doors, walls, ceilings, finishes, appliances, fences, sidewalks, lighting; bldg. exterior repairs, etc. Backlog of unfunded needs. Upgrade likely would be phased due to large infusion of funds needed. Glendower Group evaluated options. In March 2021, 9% & 4% tax credits awarded. Redevelopment of McConaughy to proceed as RAD conversion.
Scattered Sites West Interior/Building /Site Upgrades	$250,000	$0	$0	$0	$0	$1,800,000	Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs. New needs assessment being performed.
Scattered Sites East Interior/Building /Site Upgrades	$200,000	$0	$0	$0	$0	$4,200,000	Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs. New needs assessment being performed.
Scattered Sites Multifamily Interior/Building /Site Upgrades	$200,000	$0	$0	$0	$0	$14,000,000	Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs. New needs assessments being performed.

Essex exteriors /Building/Site Upgrades/access system	$1,145,00 0	$0	$0	$0	$0	$2,762,024	Non-RAD conversion development in need of interior and exterior upgrade. Due to COVID, priority placed on addressing basement abatement, fences and exterior building envelope (roof, siding, windows, gutters) until deemed safer to work in resident apartments. Solicited bids for fence & basement abatement in March 2021. No award--clarification needed in non-technical section of solicitation. Re-solicited in June 2021. Contract awarded August 2021. Also, in June 2021 separate bid solicitation issued for exterior envelope, baths and other interior upgrades. Contract awarded September 2021. Work to be performed in FY 2022.
Covid-19 Cares Separation projects	$12,200	$5,086.67	$0	$5,086.6 7	$0	$12,200	Areas of Covid-19 Safety separation: Staff safety in Central office. Office partitions installed summer 2021.
Continuation of Lead-Based Paint Abatement at McConaughy, Essex, SS West, SS East (CFP LBP Grant)	$700,000	$373,517. 99	$373,517. 99	$0	$0	$986,260	Lead paint abatement where identified by inspection-risk assessment. Difficulty attracting bidders. Repackaged in smaller groupings to facilitate response. Three quotes & 1 bid awarded in FY 2021. Completed all 35 Essex units and 12 of the 17 SS West units awarded. More groupings pending solicitation-award. ECC awarded additional HUD 2020 lead paint grant that will enable lead removal instead of encapsulation.
Finance Office-Breakroom	$118,065	$137,478. 24	$0	$21,369. 23	$116,10 9.01	$146,000	Work began during FY 2020 and completed in December 2020. Contract closed out. Workstations procured separately.

Agency Wide Vacancy Reduction	$100,000	$82,060.23	$82,060.23	$0.00	$0	$100,000	Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 2021. Completed 8 units at Crawford; 2 units at SS East; 14 units at McConaughy; 8 units at Wolfe; 3 units at Westville; 2 units at Essex; 1 unit at SS West; 1 unit at SS Multi. Abated 2 of the 14 units at McConaughy.
Agency Wide Abatement	$0	$5,867.80	$5,867.80	$0	$0	$0	Abated 1 occupied unit at Essex; Wolfe lobby
IQC A&E	$200,000	$378,943.52	$378,943.52	$0	$0	$500,000	A&E consultant firms assist with design, engineering & construction management needs agency wide; Contract for new needs assessments awarded June 2021.
IQC Environmental	$200,000	$145,393.05	$142,448.05	$0	$2,945	$500,000	Environmental consultant firms assist with potential hazardous materials testing, preparation of scopes and abatement monitoring needs agency wide.
Administration Salaries-Benefits (CFP only)	$375,000	$311,766.86	$311,766.86	$0	$0	$375,000	Covers portion of 3 staff salaries & benefits for a 5 staff department to support CFP activities.
CFFP Bond Debt	$363,150	$363,150	$363,150	$0	$0	$363,150	Post defeasance bond debt FY 2021 in accordance with HUD repayment schedule. Payments are made in March and September.
RAD Group 4 First Year Funding	$122,941	$245,882	$245,882	$0	$0	$368,823	As required by HUD, CFP formula funds were allocated for RAD Group 4 (Fairmont and Ruoppolo) for the anticipated 3 months of calendar year remaining from the Housing Assistance Payment (HAP) Contract effective date of 10-1-20. HAP date now 4-1-21. Initial year funding amount recalculated from $122,941 to $368,823.
Total	**$6,692,356**	**$3,779,408**	**$3,393,176**	**$259,651**	**$126,581**	**$35,925,907**	

Appendix 8: ECC/HANH Development REAC Scores, 2009 to Present

REAC Scores													
Development	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009
Brookside Phase I*	n/a	n/a	n/a		95		92						
Brookside Phase II*	n/a	n/a	n/a		91		95						
Constance Motley**	85	93	n/a				90						
Crawford Manor	* 66	n/a	n/a		78	69			88				
Edith D Johnson Towers**	n/a	n/a	n/a				95						
Eastview Terrace*/**		n/a	n/a							95			
Farnam Courts*/**		n/a	n/a	36		56							
Katherine Harvey Terrace**	71	73	n/a		86			95					
McConaughy Terrace	* 50	n/a	n/a							82	78	58	70
McQueeney**	70	76	n/a		63	70				64	59	85	54
Monterey 1**	n/a	n/a	n/a					96					
Monterey 2**	n/a	n/a	n/a					92					
Monterey 4**	n/a	n/a	n/a					92					
Monterey 5**	n/a	n/a	n/a					91					
Newhall Gardens**		93	n/a			96							
Prescott Bush Mall**	78	86	n/a				97						
Quinnipiac Terrace Phase I*	n/a	n/a	n/a		82		88		98	89			
Quinnipiac Terrace Phase II*	n/a	n/a	n/a		93		85						
Quinnipiac Terrace Phase III*	n/a	n/a	n/a			85							
Ribicoff Cottages - EXT**	81/79	77 (Ribi 9)/85(ribi 4)	n/a							82	82	68	91

Robert T Wolfe*	*** 44**	**n/a**	**n/a**		**71**		**85**			**82**	**49**	**80**	**51**
Rockview Phase I*	**n/a**	**n/a**	**n/a**		**97**		**96**						
Ruoppolo/Fairmont **	**NA**	**55/65**	**n/a**						**86**	**79**	**65**	**61**	**56**
St. Anthony II	*** 31**	**n/a**	**n/a**		**58**								
Val Macri	**n/a**	**n/a**	**n/a**				**94**						
Waverly Townhouses**	**73**	**n/a**	**n/a**		**65**								
Westville Manor	*** 49**	**n/a**	**n/a**		**58**					**47**	**51**	**35**	**90**
Wilmot Crossing*/**	**84**	**69**	**n/a**					**93**					
Winslow-Celentano**	**86**	**70**	**n/a**		**58**	**70**			**84**	**71**	**74**	**72**	**53**
WT Rowe*		**n/a**	**n/a**		**90**		**99**						
Scattered Sites II	*** 52**	**n/a**	**n/a**		**80**								
Scattered Sites III	*** 51**	**n/a**	**n/a**	**58**	**67**	**61**							

*Scores are based on USIG Inspections. There were no REAC Inspection in 2021 due to Covid-19.

Appendix 9: Work Orders, FY09 to Present

	Work Orders						
Development	**FY2021 Completed FY2021 Repairs Only**	**FY2020 - Completed FY 2020 - Repairs Only**	**FY 2019**	**FY 2018**	**FY 2017**	**FY 2016**	**Other Years**
Brookside Phase I	274	369	494	No data	No data	461	
Brookside Phase II	287	226	440	No data	No data	472	2013: 1,311
Rockview I	308	200	274		N/A	N/A	2014: 1,562
Charles T. McQueeney		938	1113	769	1,008	1,312	N/A
Constance B Motley		123	97	197	609	573	N/A
Crawford	412	372	768	907	1,461	No data	N/A
Eastview Terrace	137	169	62	951	1,323	625	N/A
Essex Townhouses	239	167	156		220	190	N/A
Fairhaven Chatham	97	71	25	238	92	No data	N/A
Fairhaven Eastview	46	28	14	176	129	No data	N/A
Fairmont Heights	134	385	770	588	756	1024	N/A
Farnam Courts		0	94	298	607	1002	N/A
Katherine Harvey Terrace	63	69	43	111	172	132	N/A
Mathew Ruoppolo	135	319	504	440	535	607	N/A
McConaughy Terrace	1092	1122	1369	1512	2,981	1,612	N/A
Newhall Gardens	69	128	81	106	312	360	N/A
Prescott Bush	152	235	165	165	734	464	N/A
Quinnipiac I			488		2,826	531	2013: 204
Quinnipiac II			481		2,815	608	2013: 273
Quinnipiac III			238		1,148	277	2013: 289
Ribicoff 4% & 9%	223	594	705	1222	404	122	N/A
Robert T. Wolfe		399	516	336	978	465	N/A
Scattered Sites (All)	956	926	541	1348	1,586	990	N/A
St Anthony			175		52	No data	N/A
Valley	112	126	534	775	1,339	1,470	N/A
Waverly		167					
Westville	381	745	563	710	961	1,206	N/A
Wilmot	226	444	1199	1346	338	175	N/A
William T. Rowe	451	500	485				
Winslow Celentano	175	403	341	649	933	765	N/A

Appendix 10: Utility Consumption, FY16 to Present

Electricity Consumption: Electricity Utility Costs Per Unit Per Month

Electricity

DEVELOPMENT	FY 2021	FY2020	FY2019	FY 2017	FY 2016
EASTVIEW I	$ 31.53	$ 56.02	$ 25.71	$ 68.97	$ 75.07
FAIR HAVEN	$144.14	$ 263.92	$ 111.83	$ 124.57	No data
QUINNIPIAC	$ 232.04	$43.95	$80.00	No data	No data
RIBICOFF 4%	$208.62	$ 180.70	$ 137.43	$ 159.52	No data
RIBICOFF 9%	$219.42	$ 207.59	$ 154.61	$ 183.81	No data
WILMOT	$168.25	$ 178.58	$ 133.07	$ 143.41	No data
WT ROWE	$ 30.76	$ 23.54	$ 22.51	$ 22.25	$ 21.48
RAD II	$115.82	$ 135.38	No data	No data	No data
MCQUEENEY	$163.87	$ 168.65	$ 133.97	No data	No data
MILL RIVER	$ 67.02	$ 58.99	No data	No data	No data
Average	$ 138.15	$ 161.43	$ 99.89	$ 117.09	$ 48.28

Gas Consumption: Gas Utility Costs Per Unit Per Month

Development	FY2021	FY 2020	FY2019	FY 2017	FY 2016
Eastview I	$ 11.42	$ 11.26	$ 11.03	$ 11.99	$ 7.00
Fair Haven	$ 18.83	$ 25.70	$ 14.84	$ 31.17	No data
Quinnipiac II	$28.44	$ $28.42	$36.47	No data	No data
Ribicoff 4%	$ 24.59	$ 23.46	$ 15.55	$ 13.28	No data
Ribicoff 9%	$ 29.43	$ 25.91	$ 21.21	$ 22.21	No data
Wilmot	$ 20.15	$ 26.09	$ 15.14	$ 9.88	No data
WT Rowe	$ 10.98	$ 8.46	$ 7.37	$ 6.98	$ 6.02
RAD II	$ 36.61	$ 85.28	No data	No data	No data
Mill River	$ 23.94	$ 28.02	No data	No data	No data
McQueeney	$ 34.26	$ 6.79	$ 6.79	$ 7.26	No data
Average	$ 19.72	$ 26.94	$ 16.05	$ 14.70	$ 6.51

Appendix 11: LIPH Occupancy

Dev #	Site	Occupancy Rate FY19	Occupancy Rate FY20	Occupancy Rate 2021
CT004000001	Westville M	98%	97%	87%
CT004000004	McConaughy	92%	97%	98%
CT004000005	Valley 2s	87%	80%	80%
CT004000010	Crawford	94%	94%	84%
CT004000011	McQueeney	83%		n/a
CT004000012	Winslow	91%		n/a
CT004000013	Wolfe	92%	98%	87%
CT004000014	Farnam	1%	0%	
CT004000015	Ruoppolo 2s	84%	81%	n/a
	Fairmont 4s	84%	82%	n/a
CT004000016	QT I	97%	97%	98%
CT004000017	QT II	100%	100%	98%
CT004000018	QT III	100%	100%	100%
CT004000020	Essex	91%	97%	97%
CT004000021	St. Anthony II	96%	98%	98%
CT004000022	Scattered Site II - West	95%	100%	100%
CT004000023	Scattered Site III - East	87%	82%	85%
CT004000075	Rowe	98%	100%	96%
CT004000076	Brookside I	94%	94%	98%
CT004000077	Brookside II	96%	90%	90%

CT004000081	Rockview	97%	94%	93%
CT004000082	Val Macri	100%	99%	94%
Average		89%	89%	93%

Appendix 12: Number of Major Crimes, FY12 to Present

Development	2021	2020	2019	2018	2017	2016	2014	2012
Eastview I	4	6		9	7	1	0	0
Ribicoff 4%	0	0	0		1	0	N/A	N/A
Ribicoff 9%	0	0	0		1	0	N/A	N/A
Quinnipiac Terrace	1		0	7	0	2	4	3
West Rock (122 Wilmot, Brookside I and II)	0	0	0	2	N/A	N/A	7	25
Westville	3	4	3	8	1	0	0	0
Robert T Wolfe	7	1	1	0				
Winslow Celentano	0	0	0	0	0	0	1	
Crawford Manor	2	0	0	1				
William T Rowe	0	0	0	4	0	1	0	0
McConaughy	12	4	3					
Farnam Phase I (Mill River Crossing)	1	0	1	1				
Fair Haven	1	0	1	3				
Wilmot	0	0	0	2	1	0	0	N/A
Average	2.2	1.2	0.7	3.5	1.4	0.5	1.7	5.6