MOVING TO WORK ANNUAL PLAN 2022

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I. INTRODUCTION

In 2001, the Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH) was awarded Moving to Work (MTW) status as part of the federal MTW Demonstration Program. ECC/HANH is one of thirty-nine housing authorities nationwide selected for participation in the MTW Demonstration Program. During ECC/HANH's MTW term, in lieu of the standard PHA Annual Plan and Five-Year Plan documents, ECC/HANH is required to develop and submit to HUD MTW annual plans 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.

What Is Moving to Work?

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

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

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

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

ECC/HANH Participation In MTW

ECC/HANH's MTW program and flexibility includes, and is limited to, the following HUD programs:

- 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 FY22.

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.

On June 16, 2020, ECC/HANH's Board of Commissioners authorized the Fourth Amendment to Attachment C of the Moving to Work Agreement clarifying updates to sections D.1.f, D.5. D.7.A and D.7.D.

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. ECC/HANH developed its updated strategic playbook in 2018 and updates it regularly.

The ECC/HANH Moving to Work Annual Plan follows, emphasizing our focus on the following short- and long-term goals. The Agency, in all its departments functions as One Team Meeting Expectations.

SHORT TERM GOALS

DELIVER COST EFFECTIVE SOLUTIONS

1. Continue to expand streamlined process such as self-certification for HQS inspections and rent simplification models
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

EXPAND HOUSING CHOICE

1. Complete revitalization of West Rock community through McConaughy Terrace, Valley Townhouses and Westville Manor and 34 Level St. redevelopments
2. Increase market-rate homeownership opportunities
3. Partner with local government and non-profit entities to increase the supply of affordable housing
4. Complete redevelopment of Farnam Court/Mill River
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

LONG TERM GOALS

1. Explore regional provision of housing authority services on a fee-for-service basis
2. Complete disposition and/or conversion of remaining non-performing assets
3. Continue investment in technology to reduce administrative burden and create model wired and wireless communities
4. Continue investment in energy efficiency initiatives

EXPAND HOUSING CHOICE

1. Complete final revitalization effort of 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 FAMLIES 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

4. Expand supportive services program – especially critical for effective management of Elderly/Disabled developments – to support families as they move toward self-sufficiency
5. Expand partnerships with local school system to support student academic progress and educational 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[2]
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	Closed[3]
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
1.9	Increase the Allowed Percentage of Project Based Voucher (PBV) Units from 75 Percent to 100 Percent in a Mixed-Finance Development	✓	✓		2012	Moved
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

Label	Description	Cost Effective	Expand Housing Choice	Increase Self-Sufficiency	FY Approved	Status
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]
1.15-1.17	RAD Finance Development for Rockview Phase II Rental & Westville Manor Transformation Plan (Revised in 2021 to add McConaughy Terrace and Valley Townhouses)		✓		2014 Revised in 2021	Ongoing
1.16	Crawford Manor Transformation Plan	✓	✓		2014	Ongoing
1.21	Expanded Jurisdiction		✓		2019	Ongoing
1.22	Non-traditional Supportive Housing Program		✓		2019	Ongoing
1.23	St. Luke's Redevelopment	✓	✓		2022	Propose d

[1] Project completed
[2] Fungibility no longer required to be reported as an initiative
[3] Initiative completed in 2019
[4] Project completed
[5] Project not being pursued

1.27	Cap on Project-Based Units in a Project	✓	✓		2010	Closed

Label	Description	Cost Effective	Expand Housing Choice	Increase Self-Sufficiency	FY Approved	Status
2.1	Family Self-Sufficiency			✓	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
2.11	Community Health Network of CT (CHNCT)	✓			2022	Proposed

Label	Description	Cost Effective	Expand Housing Choice	Increase Self-Sufficiency	FY Approved	Status
3.1	Rent Simplification	✓			2007	Ongoing

3.2	UPCS Inspections	✓			2008	Closed[6]
3.3	Revised HQS Inspection Protocol	✓			2011	Closed[7]
3.4	Mandatory Direct Deposit for Housing Choice Voucher Landlords	✓			2010	Closed[8]
3.5	HCV Rent Simplification/Cost Stabilization Measures	✓			2014	Ongoing
3.9	LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families	✓			2008	Closed
Requires Funding Flexibility Only						
Label	**Description**	**Cost Effective**	**Expand Housing Choice**	**Increase Self-Sufficiency**	**FY Approved**	**Status**
1.8F	Farnam Court Transformation		✓		2011	Ongoing
1.24F	Fulton Park Modernization		✓		2011	Closed[9]
1.20F	Redevelopment of West Rock		✓		FY11	Ongoing

[6] Initiative no longer requires MTW flexibility
[7] Initiative was revised and relaunched as item 3.5
[8] Initiative does not require MTW flexibility
[9] Redevelopment completed

1.25F	Vacancy Reduction – Various Projects		✓		2008	Ongoing
1.28F	Project Modernization – Various Projects		✓			Ongoing
2.6F	Resident-Owned Business Development			✓	2009	Ongoing
2.7F	SEHOP Capital Improvement Fund			✓	2010	Ongoing
2.8F	Prison/Community Re-entry	✓		✓	2009	Ongoing
2.9F	Resident Services for Elderly/Disabled Residents			✓	2005	Ongoing
2.10F	Jumpstart Incentive Program			✓	2020	Ongoing
2.12F	ECC Believes		✓		2014	Ongoing
3.11F	Creation of New Instrumentality Entities to Support ECC/HANH Goals and Strategic Planning activities	✓			2019	Moved[10]

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

II. GENERAL OPERATING INFORMATION

(I) GENERAL OPERATING INFORMATION

ANNUAL MTW PLAN

A. Housing Stock Information

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year 0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
McConaughy Terrace CT004000004	201	Conversion to RAD
Valley Townhomes (Waverly Townhomes CT004000005)	40	Conversion to RAD

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Westville Manor CT004000001	62	Conversion to RAD
Scattered Site Multi Family	87	Conversion to RAD
TOTAL: Public Housing Units to be Removed in the Plan Year	390	

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
McConaughy Terrace	201	Yes	RAD conversion
Farnam Court Phase 2	88	Yes	RAD Conversion
Christian Community Action	18	No	PBV award for non-traditional supportive housing initiative
NHP Foundation	8	No	9% LIHTC award
Hill Central Phase 1	32	No	9% LIHTC award
Dixwell Housing	20	No	9% LIHTC award
Beacon Communities-Branford	40	No	9% LIHTC award for expanded jurisdiction initiative
Valley Townhouses	40	Yes	RAD conversion
2022 RFP for PBV	100	No	Competitive proposals anticipated
TOTAL: Planned new Project Based Units in Plan Year	547		

iv. Existing Project Based Vouchers

Housing Choice Vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD. Select “Planned Status at the End of Plan Year” from: Committed, Leased/Issued

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Name	#	Status (below)	Yes/No	Description
PBV Fellowship I	18	Leased	No	New PBV units
PBV Fellowship II	5	Leased	No	100% Supportive Housing
PBV Also Cornerstone (Continuum of Care)	4	Leased	No	100% Supportive Housing units
PBV Norton Court (Continuum of Care)	12	Leased	No	100% Supportive Housing
PBV Cedar Hill	4	Leased	No	100% Supportive Housing
PBV West Village	15	Leased	No	100% Supportive Housing
PBV QT Phase 1	23	Leased	No	LIHTC PBV units
PBV QT Phase 2	23	Leased	No	LIHTC PBV units
PBV QT Phase 3	16	Leased	No	LIHTC PBV units
PBV Eastview Phase I	49	Leased	No	LIHTC PBV units
PBV Brookside Phase I Rental	51	Leased	No	RAD/PBV units
PBV Brookside Phase 2 Rental	51	Leased	No	LIHTC PBV units
PBV Rockview Phase I Rental	47	Leased	No	LIHTC PBV units
PBV New Rowe Building	32	Leased	No	LIHTC PBV units
PBV 122 Wilmot Road	13	Leased	No	LIHTC PBV units
PBV Park Ridge	60	Leased	No	LIHTC PBV units
PBV Frank Nasti Existing	11	Leased	No	PBV units
PBV CUHO Existing	24	Leased	No	Scattered Site PBV families
PBV CUHO New Construction	5	Leased	No	Scattered Sites PBV families
PBV Shartenburg	20	Leased	No	Scattered Sites PBV units Families
Mutual Housing Association New Construction	20	Leased	No	PBV units
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)	9	Leased	No	PBV Units
PBV Mutual Housing Existing	15	Leased	No	PBV units
PBV Casa Otonal	12	Leased	No	PBV units
New Haven Coliseum (previously Live Learn Play)	19	Committed	No	PBV units
RAD 122 Wilmot Road	34	Leased	Yes	RAD/PBV

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
RAD Eastview Phase I	53	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook)– 9%	44	Leased	Yes	RAD/PBV
Charles T. McQueeney	149	Leased	Yes	RAD/PBV
Winslow Celentano	64	Leased	Yes	RAD/PBV
Howe Street Single Room Occupancy	80	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook) -4%	51	Leased	Yes	RAD/PBV
RAD Fair Haven/ Farnam	55	Leased	Yes	PBV Units and 1 ACC unit
RAD Monterey Place- Edith B Johnson	95	Leased	Yes	RAD converted ACC units
RAD Monterey Place- William Griffin	4	Leased	Yes	RAD converted ACC units
RAD Monterey Place 1	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2	7	Leased	Yes	RAD converted ACC units
RAD Monterey Place 3	45	Leased	Yes	RAD converted ACC units
RAD Monterey Place 4	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 5	17	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2R	28	Leased	Yes	RAD converted ACC units
RAD Prescott Bush	56	Leased	Yes	RAD Converted ACC units
RAD Waverly Townhouses	51	Leased	Yes	RAD converted ACC units
RAD CB Motley	45	Leased	Yes	RAD converted ACC units
RAD Newhall Gardens	26	Leased	Yes	RAD converted ACC units
RAD Katherine Harvey Terrace	17	Leased	Yes	RAD converted ACC units
RAD Fulton Park	12	Leased	Yes	RAD converted ACC units
RAD Chamberlain Court (Justice Landing)	7	Leased	Yes	RAD converted ACC units
RAD Farnam Onsite I	86	Leased	Yes	RAD converted ACC units
RAD 4 (Ruoppolo/Fairmont	201	Partial Occupancy/Under Construction	Yes	RAD converted ACC units
Rockview Phase 2	62	Leased	Yes	RAD converted ACC units
Portsea Place	8	Leased	No	Supportive Housing for homeless young adults
Total: Planned Existing Project-Based Vouchers	**1,939**			

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
The Authority is repositioning its assets and as such will utilize LIPH units for temporary relocation. We anticipate the use of approximately 33 units which will be used as swing units as we make capital improvements.

vi. General Description of Planned Capital Expenditures

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

The following plan for MTW FY 22 includes receipt of CFP 2021 funds.
ECC/HANH's goal through its MTW status is to provide Housing of Choice in the most cost-effective method possible. Given the funding limitations, our plan is to address the most urgent operational needs within the LIPH portfolio remaining post-RAD conversion. Our ongoing objectives remain:

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

During FY 22, ECC/HANH will continue to execute projects that support these goals and improve the remaining portfolio. Properties that are planned for future redevelopment efforts are not prioritized for CFP projects; however, if there is a Life, Health and Safety challenge, we have considered the needs across the entire portfolio. Several work items in the FY22 MTW Plan are continuation/implementation of MTW FY21 Plan projects that will not be fully completed by the end of FY 21. In the past year, COVID safety concerns impacted work scheduling. In FY 22, work is planned at Crawford Manor, Essex Townhouses, Robert T. Wolfe, Scattered Sites–Multifamily, West, and East. Funds have also been earmarked for Agency wide services and obligations. During FY 21, ECC/HANH solicited proposals to perform Physical Needs Assessments Agency wide. Reports generated through these assessments will assist in planning for future capital activities.

1. **Crawford Manor Upgrades-Fire Alarm System, Health-Safety, Interiors**
   - In FY 21, ECC/HANH performed work to bring the vestibule-entryway into ADA compliance and replaced the fire pump. The existing fire alarm system is also at the end of its useful life. The codes for the fire alarm system now require inclusion of accessible features for smoke alarms. This equipment needs to be replaced to ensure safety for residents in the 15-story apartment tower. ECC/HANH is proceeding with fire alarm replacement and interior repairs that had been deferred until it was deemed safe for contractors to enter occupied units. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings; appliances; windows, lighting, etc. Renovations will proceed based on targeted priorities and continue in FY 22.

2. **Wolfe: Health and Safety Repairs**
   - ECC/HANH identified life, health and safety needs at Robert T. Wolfe to be addressed pending development of future major redevelopment plans for this property. COVID safety concerns impacted work scheduling. Phase 1 initiated in FY 21 includes renovations to the building entrance and common areas that do not require entry into occupied residential units. This includes an ADA compliant entry, Community Room, Community Kitchen Laundry room and corridor upgrades. Phase 2 includes interior repairs-- asbestos flooring replacement, asbestos wall and ceiling repairs, electrical, plumbing and some domestic hot water heater replacements, and will continue into FY 22.

3. **Essex Interior/Building/Site Upgrades**
   - Non-RAD conversion development. Due to COVID, ECC/HANH began with rear patio fence separations and basement asbestos pipe insulation abatement and replacement, in FY 21, activities that did not require entrance into occupied apartments. Moving forward ECC/HANH is addressing the exterior building envelope to replace roofs, gutters, siding, windows and AC sleeves. The units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors, plumbing, electrical repairs, etc. Work will continue into FY 22. This work represents a major commitment to the property to preserve and upgrade the units.

4. **McConaughy Interior/Building/Site Upgrades (RAD Conversion Development)**
   - In FY 21, ECC/HANH's Glendower Development Group applied for and received 9% and 4% LIHTCs to undertake the conversion of McConaughy Terrace to RAD PBVs. This 201-unit family housing development is now converting to RAD and will undergo major revitalization through a combination of renovation of existing structures and new construction. Interim health safety work to be addressed when needed prior to RAD conversion, including HUD Lead Interim Control Measures

5. **Scattered Sites Interior/Building/Site Upgrades**
   - **Scattered Sites West Interior Building/ Site Upgrades**
     i. 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, etc. Backlog of unfunded needs.
   - **Scattered Sites East Interior/Building/Site Upgrades**
     i. 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, etc. Backlog of unfunded needs.
   - **Scattered Sites Multifamily Interior/Building/Site Upgrades**
     ii. 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, etc. Backlog of unfunded needs.

6. **Lead Paint Abatement—McConaughy, Essex, SS West, SS East**
   - ECC/HANH received a HUD Lead Based Paint grant for McConaughy, Essex, Scattered Sites West and Scattered Sites East. Inspections-risk assessments initiated in FY19 and abatement plans developed in FY20. COVID safety concerns impacted work scheduling. ECC performed interim controls on building exteriors that did not necessitate entry into occupied apartments and solicited contractors in nine groupings for abatement work that required access to unit interiors. Prior to Covid-19 shut down, interim control measures were also completed on a few 2 and 3 family homes. Abatement contract work began in FY 21 and is expected to continue into FY 22. Lead paint grant funds insufficient to complete all abatement, supplementing with non-lead grant CFP funds. New HUD Lead Based Paint abatement grant, 2020 of $3.7 million awarded in May 2021 will allow for targeted removal of lead-based paint in the Scattered Site properties, instead of encapsulation.

7. **Housing Related Hazard Abatement—McConaughy, Essex, SS West, SS East, Crawford Manor, Robert T Wolfe**
   - On September 15, 2021, ECC/HANH received a 2020 HUD Housing Related Hazards grant in the amount of $3,999,993. for the abatement of mold, asbestos, radon, carbon monoxide and vermin in our remaining LIPH portfolio. Having had the experience with the Lead Based Paint grant which pays for only one hazard, lead, we had faced the challenge of having only the lead paid for. The funding for the related asbestos, mold and other reconstruction costs had to be taken from our annual CFP allotments. This grant addresses a whole grouping of hazards commonly found together, to facilitate full abatement with the result of a creating a healthy home environment. We look forward to tackling hazards. We are in the process of laying out our plan of attack and procuring environmental consultants. Although this project will not produce shiny new housing, it constitutes the

hard work of maintenance and doing things right for our community, making it safer, and healthier in a comprehensive effort.

The following are agency wide funding projects:

8. **Agency Wide Vacancy Reduction**
   - Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 22.

9. **Agency Wide Physical Needs Assessments**
   - In FY 21**,** ECC/HANH contracted for services to perform physical needs assessments, reports and e-tools. Work is expected to continue into FY 22.

10. 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.
    - **Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services**
    - **IQC Environmental Consulting Services**

11. **Administration Salaries & Benefits (CFP only)**
    - Staff salaries and benefits in support of CFP FY 22 activities.

12. **CFFP Bond Debt**
    - 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.

ECC/HANH's Reference to most Recent HUD-approved Five-Year Plan: Form 50075.2, FY2020-2024 HUD-approved in HUD EPIC portal 3-11-20. Updated rolling five-year plan for FY2021-2025 submitted in EPIC 3-25-21 and approved 5-12-21. Five-Year Plan Revision 1 for lead paint grant approved in EPIC 4-23-19. Five-Year Plan Revision 1 for 2020 lead-based paint grant approved in EPIC 6-9-21.

Long-term outcomes of the planned FY 22 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.

Description	MTW Goal or Initiative	Capital Expenditures Planned FY 2022	CFP Total	MTW Total	Other Total (CARES)	Total Estimated Project Cost	Comments
Crawford Interior & Exterior Upgrade, including Health & Safety Work Items	Continue modernization and capital investment in current housing portfolio	$828,442	$150,000	$0	$678,442	$2,216,674	Continuation of projects initiated in prior MTW years to further ADA access by upgrading vestibule and common areas; replace fire pump at end of useful life. Fire alarm system requires including addressing features for smoke alarms--expected to start in FY 2021. In FY 2021, ECC undertaking building assessment to set health & safety priorities for implementation in FY 2022. COVID safety protocol impacted implementation of repairs inside resident units.
Wolfe Health-Safety Work: Interior-Exterior Upgrade	Continue modernization and capital investment in current housing portfolio	$480,000	$400,000	$0	$80,095	$2,310,283	Began with health & safety work and common areas upgrade only in FY 2021 due to COVID. Moving forward with interior building repairs as Phase 2 continuing into FY 2022.
Essex Health-Safety Work: Interior/Exterior Upgrade	Continue modernization and capital investment in current housing portfolio	$879,500	$200,000	$0	$679,500	$3,056,025	Due to COVID, began with rear patio fence separations & basement asbestos abatement in FY 2021. Moving forward with exterior envelope (roof, gutters, siding, windows, AC sleeves) & interior building repairs. Work to continue into FY 2022.

McConaughy Health-Safety Interior/Exterior Building Upgrades	Maintain health and safety until forthcoming RAD conversion upgrade	$100,000	$100,000	$0	$0	$100,000	In FY 2021, Glendower Group awarded 9% (& 4%) tax credits for major redevelopment at McConaughy. Funding for health-safety work, including Lead Interim Control Measures that may be needed prior to RAD conversion.
Scattered Sites West Interior/Building/Site Upgrades	Vacancy Reduction- Expand housing choice; Continue modernization and capital investment in current housing portfolio	$75,000	$75,000	$0	$0	$2,000,000	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.
Scattered Sites East Interior/Building/Site Upgrades	Vacancy Reduction- Expand housing choice; Continue modernization and capital investment in current housing portfolio	$75,000	$75,000	$0	$0	$3,000,000	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.
Scattered Sites Multifamily Interior/Building/Site Upgrades	Vacancy Reduction- Expand housing choice; Continue modernization and capital investment in current housing portfolio	$75,000	$75,000	$0	$0	$5,000,000	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.
Continuation of Lead-Based Paint Abatement at McConaughy, Essex, SS West, SS East (CFP & LBP Grant)	Expand housing choice; Continue modernization and capital investment in current housing portfolio	$1,500,000	$1,500,000	$0	$0	$$4,700,000	Continue lead paint abatement and related repairs where identified by inspection-risk assessments. Work initiated in FY 2021 & expected to continue into FY 2022. Abatement costs anticipated to exceed lead paint grant award and be funded through non-lead CFP.

Agency Wide Vacancy Reduction/Unit Abatement	Vacancy Reduction- Expand housing choice; Continue modernization and capital investment in current housing portfolio	$100,000	$100,000	$0	$0	$200,000	Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 2022.
Physical Needs Assessment	Continue modernization and capital investment in current housing portfolio	$100,000	$100,000	$0	$0	$300,000	Continue agency wide physical needs assessments initiated in FY 2021.
IQC A&E	Continue modernization and capital investment in current housing portfolio	$200,000	$200,000	$0	$0	$500,000	A&E consultant firms assist with design & construction management needs agency wide.
IQC Environmental	Continue modernization and capital investment in current housing portfolio	$200,000	$200,000	$0	$0	$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)	Continue modernization and capital investment in current housing portfolio	$328,165	$328,165	$0	$0	$328,165	Covers portion of 3 staff salaries & benefits to support CFP activities.
CFFP Bond Debt	Expand housing choice	$355,362.50	$355,362.50	$0	$0	$355,362.50	Post defeasance bond debt FY 2022 in accordance with HUD repayment schedule. Payments are made in March and September.
Total		$5,296,470	$3,858,528	$0	$1,437,942	$4,566,5102	

B. LEASING INFORMATION

i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	8808	734
MTW Housing Choice Vouchers (HCV) Utilized	67,584	5,632
Local, Non-Traditional: Tenant-Based^	48	4
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served:	76,440	6370

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED *	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Community Health Network of CT Health/Housing Initiative (CHNCT)	48	4
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

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

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

The planned number of LNT units is based upon the anticipated utilization in the CHNCT proposed initiative with lease up beginning in March 2022.

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

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	ECC/HANH is holding 33 LIPIH units offline under an approved Master Lease agreement to facilitate relocations related to RAD conversions. These units are used as swing units during redevelopment activities. ECC/HANH is holding 40 units offline at Valley Townhouses anticipating a Spring 2022 RAD conversion. ECC/HANH has a robust waitlist and turnover management strategy that will minimize other leasing issues.
MTW Housing Choice Voucher	ECC/HANH reopened the HCV waitlists during FY21. ECC/HANH has recently purged its HCV waitlists and has transitioned to an online portal. As the applicants being contacted are those with more current applications and due to the improved process of online applications, we expect delays in lease up to be minimized.
Local, Non-Traditional	The planned number of LNT units is based upon the anticipated utilization in the CHNCT proposed initiative with lease up beginning in March 2022.

C. *WAITING LIST INFORMATION*

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
LIPH	Site based. Not population specific.	9,466	Open	Yes
HCV	Program specific. Not population 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. ECC/HANH waitlists remain open.

ii. **Planned Changes to Waiting List in the Plan Year**
Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

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

ECC/HANH anticipates serving approximately 6,400 families during FY 2022. During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current projected numbers reflect an increase of approximately 1,500 families or 30% indicating that MTW status has continuously allowed ECC/HANH to increase the number of families being served.

The vast majority of families fall in the Extremely Low-Income category with 77% of LIPH and 77% of HCV families in this income category. 38% percent of LIPH families and 34% of HCV families earn wages. The percentage of families reporting no income are 8% of LIPH and 4% of HCV families.

80% of households in LIPH range from 1 person to 3 person families and 82% of households in HCV, range from 1 person to 3 person families. The following table summarizes the population demographics.

ECC/HANH Population Demographics -FY21[1]

	LIPH		HCV		Total
	2021		2021		2021
Total Households	978	17%	4,945	83%	5,923
Total Individuals	2,404	18%	10,973	82%	13,377
Average Income	$17,564.00		$17,060.00		
Average TTP	$398.00		$396.00		
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%	1,694	34%	2069
Households with Public Assistance	360	37%	189	4%	549
Households with Social Security	421	43%	2,371	48%	2792
Households with Other Income	292	30%	670	14%	962
Minority Households	647	66%	2,875	58%	3522
Non-minority	331	34%	2,070	42%	2401
Elderly families	186	19%	1,433	29%	1619
Disabled families	402	41%	2,067	42%	2469

1 member	311	32%	2,131	43%	2442
2 members	263	27%	1,098	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

ECC/HANH is starting FY22 with a housing stock of 1124 units and plans to end with 734 public housing units. This includes 431 site-based family unit, 219 Elderly/Disabled units, and 84 Scattered Site units. This reduction in LIPH units is offset by the conversion of 390 units to RAD. At the start of ECC/HANH's MTW status, ECC/HANH's LIPH housing stock included 2,965 total units. Since then, several LIPH units have converted to RAD/PBV and PBV units.

Development Name	Development Type	Units beginning FY22	Planned Units to Add	Planned Units to Remove	Planned units at the end of FY22
Val Macri	Elderly/Disabled	17	0	0	17
Crawford Manor	Elderly /Disabled	109	0	0	109
RT Wolfe	Elderly /Disabled	93	0	0	93
Valley Townhouses	Family	40	0	40	0
Westville Manor	Family	151	0	62	89
McConaughy Terrace	Family	201	0	201	0
Quinnipiac Terrace I	Family	58	0	0	58
Quinnipiac Terrace 2	Family	56	0	0	56
Quinnipiac Terrace 3	Family	17	0	0	17
Essex Townhouses	Family	35	0	0	35
New Rowe	Family	46	0	0	46
Brookside Phase 1	Family	50	0	0	50
Brookside Phase II	Family	50	0	0	50
Rockview Phase 1 Rental	Family	30	0	0	30
Scattered Site - Multi Family	Scattered Sites	96	0	87	9
Scattered Site – West	Scattered Sites	23	0	0	23
Scattered Site – East	Scattered Sites	52	0	0	52
Total		**1124**	**0**	**390**	**734**

Housing Choice Voucher Program

During FY 2022, ECC/HANH plans to allocate at least 90% of its HCV funding to HCV program and administrative costs with an estimated 5,900 vouchers utilized out of a HUD allocation of approximately 6,353 vouchers.

ECC/HANH's project based vouchering allocation includes the following: At the start of the year, ECC/HANH has allocated 558 non-RAD PBVs, 1,381 RAD PBVs for a total of 1,939 project-based vouchers. During FY2022, ECC/HANH anticipates allocating an additional 218 non-RAD PBVs and 416 RAD PBVs. ECC/HANH will have project-based 17% of its non-RAD HCV allocation.[11]

[11] This represents 776 PBV units out of a total budgeted authorization of 4,643 non-RAD vouchers.

ECC/HANH will allocate 4,053 vouchers for tenant-based uses (uses described in table below).

Description	2022 Baseline	Planned units to be removed	Planned units to be added	Planned units at the end of FT 2022
MTW Vouchers				
DMHAS Supportive - Housing First	10	0	0	10
DMHAS MHT Grant - FUSE	10	0	0	10
Family Options - Homeless	15	0	0	15
Permanent Enrichment	10	0	0	10
Foreclosure Protection	17	0	0	17
Family Unification Supportive Housing	20	0	0	20
Homelessness/Imminent Danger of Homelessness	40	0	0	40
Supportive Housing/Homelessness Prevention I	51	0	0	51
Project Longevity	25	0	0	25
Re-entry Fresh Start	15	0	0	15
CARES	5	0	0	5
Section Eight Home Ownership Program (SEHOP)	60	0	0	60
West Rock Homeownership Phase I	2	0	0	2
Farnum Relocation	52	0	0	52
RAD IIA Relocation	7	0	0	7
Valley Relocation	32	0	0	32
Westville Relocation Vouchers	50	0	0	50
MTW Tenant Based Voucher	3,258	0	0	3,258
Subtotal	**3,679**	**0**	**0**	**3,679**
Non-MTW Vouchers				
Emergency Housing Vouchers (EHV)	37	0	0	37
Church Street South (Tenant Protection Voucher)	179	0	0	179
Church Street South 2	15	0	0	15
Church Street South 3	47	0	0	47
Enhanced Vouchers	11	0	0	11
VASH Vouchers	85	0	0	85
Subtotal	**374**	**0**	**0**	**374**
TBV Totals	**4053**	**0**	**0**	**4053**
RAD/PBV Vouchers	**1,392**	**0**	**634**	**2026**
Grand Total	**5445**	**0**	**634**	**6079**

Emergency Housing Vouchers

The American Rescue Plan (ARP) of 2021, section 3202 created the Emergency Housing Vouchers for individuals and families who are experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing stability. ECC was allocated 37 EHV effective July 1, 2021. After September 30, 2023 a PHA may not reissue any previously leased EHV, regardless of when the assistance for the formerly assisted family ends or ended.

All referrals must come through the CoC Coordinated Entry system or from a Victims Services Provider. ECC/HANH has entered into an MOU with the CoC (CAN Alliance) who agrees to fulfill its responsibilities of prioritizing individuals and families for EHV assistance, determining the homelessness eligibility, referring individuals and families through the CoC's coordinated entry system, supporting individuals and families in processing voucher applications, supporting the housing search process, and planning for and coordinating the delivery of supportive services to support the housing stability of EHV participants.

ECC/HANH has received approval to implement the following rent simplification flexibilities to the Emergency Housing Vouchers.

- Rent simplification activities, consisting of:
    - Multi-year recertification cycles (triennial for elderly or disabled households and biennial for work-able households)
    - Simplified rent tiers with elimination of standard deductions, and $1,000 income bands beginning at $2,500
    - Exceptional expense tiers, allowing households with exceptional medical, disability, or childcare expenses to request a rent reduction
    - $50 minimum rent, with a hardship exemption for households unable to pay minimum rent
    - Transition period of one year from current income-based rent to the tiered-rent structure and minimum rent to avoid hardships
- Rent simplification/cost stabilization measures, consisting of:
    - HQS inspections on a biennial and triennial schedule, matching recertification schedule and allowing participants and landlords to request a special inspection at any point if deficiencies are suspected
    - Self-certification for curing failed inspections if failed items are unrelated to health and safety issues
    - Limiting landlord rent increases to only the time of the household's recertification

III: Proposed MTW Activities

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

Increase Housing Choice	*Summary Description*
St. Luke’s Whalley Ave Development	The Authority’s development instrumentality, The Glendower Group, will co-develop new construction with up to 55 project-based vouchers to create supportive quality affordable housing units thereby increasing housing choice.
Community Health Network of CT (CHNCT)	This pilot program, in partnership with the Community Health Network of CT (CHNCT), will examine the stabilization of housing and the correlation to health outcomes. This program with further examine how to mitigate health disparities to increase stabilization and to leverage the collective investments.

Initiative 1.23 - St Luke's Whalley Avenue Development

HOUSING CHOICE

A. **Activity Description**—

ECC/HANH through its instrumentality The Glendower Group, seeks to partner with a community based developer, St. Luke's Development Corporation to redevelop multiple adjacent commercial parcels along Whalley Avenue just walking distance from downtown New Haven and Yale University into a premier mixed-use development including commercial/retail space and market and affordable units. Currently under design, the project plans will provide for a comprehensive transformation of the corner of Whalley Avenue and Sperry Streets in the city of New Haven.

The project's parcels are in a newly designated "opportunity zone," where certain investments will be eligible for preferential federal tax treatment. The Project shall consist of approximately fifty-five residential units and appurtenant commercial or retail space. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

i. **Describe the proposed initiative**

St. Luke's Development Corporation (SLDC) has acquired parcels located at 117-125 & 129 Whalley, 10-12 Dickerman, and 34-36 Sperry. SLDC requires certain predevelopment and development services in connection with the development of the Project, has determined a need for a co-developer to assist with the development of the Project, and desires to work with Glendower as co-developer to undertake the Project. The St Luke's Whalley Avenue Development Project will redevelop multiple adjacent commercial parcels along Whalley Avenue just walking distance from downtown New Haven and Yale University into a premier mixed-use development including commercial/retail space and market and affordable units. Currently under design, the project plans will provide for a comprehensive transformation of the corner of Whalley Avenue and Sperry Streets in the city of New Haven.

In 1997, congregants of St. Luke's Episcopal Church founded St. Luke's Development Corporation (SLDC), a not-for-profit corporation in order to provide neighborhood retail amenities, high-quality affordable housing, and affordable office space in New Haven's Dixwell neighborhood and on Whalley Avenue. SLDC's first project, Josephine Jarvis Gray Senior Housing, completed in 2007, provides eighteen affordable units for elderly residents in New Haven's Dixwell neighborhood. Additionally, and SLDC has developed an eighteen-unit, $3 million low-income senior housing facility located at 120 Goffe Street and has managed the $595,000 rehabilitation of a two-family home at 16 Dickerman Street.

The Glendower Group (Glendower) is a nonprofit 501(c)(3) corporation established in November 2001 is an instrumentality to the Elm City Communities / Housing Authority of the City of New Haven (ECC/HANH). Glendower has been engaged in the development of real property for the past 20 years and has successfully developed over $560 million worth of developments in New Haven, Connecticut: Glendower is at the forefront of those leading the private sector market in affordable housing. Glendower provides comprehensive and integrated real estate development services specializing in affordable housing. Glendower's vision has always been high-quality, innovative, and fiscally sound housing for families.

The project's parcels are in a newly designated "opportunity zone," where certain investments will be eligible for preferential federal tax treatment. The Project shall consist of approximately fifty-five residential units and appurtenant commercial or retail space. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program. The St Luke's Whalley Avenue Development Project will include the demolition of the commercial structures located at 117-125 and 129 Whalley Ave. and raze a multi-family building over ground floor commercial/retail space with a lower-level buildout for community access and use.

This mixed income project will contribute to promote healthy lives, a strong community and robust economy. Residents of the Whalley Avenue building will have easy access to area amenities providing them the opportunity to participate in social activities and services available in their community. The pedestrian-friendly layout of the project will offer increased traffic to new and existing businesses leasing the commercial space, and the new building will improve curb appeal as it becomes the gateway to one of New Haven's most active commercial districts.

To assist in the development of this affordable housing development, Elm City Communities will provide up to 62 project-based vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and management of the property.

ii. **Describe how it will achieve one of the three statutory objectives**

The development will meet two of the statutory objectives: a) improving housing choice and c) being more cost effective. This initiative will increase housing choice by proving additional affordable housing options in the Whalley Avenue Corridor that provides direct access to commercial, retail, and job opportunities. The inclusion of new affordable and market rate units where quality affordable housing doesn't currently exist will also improve housing choice by creating new affordable units.

iii. **Provide the anticipated schedule for implementation**

Due to costs related to the demolition of ancillary buildings and the new construction of a new approximate 62 unit residential building, the development of St Luke's Whalley Ave is only feasible through a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. ECC/HANH, through its development instrumentality, The Glendower Group will apply for 4% Low Income Housing Tax Credit in the second quarter of FY 2022. Architectural documents will be completed in the 3rd quarter of 2022 and the financial closings will be targeted for the fourth quarter of FY2022. It is anticipated that construction will take 18 months to assure that all required relocation activities will comply with the

Uniform Relocation Act. Under this scenario the redevelopment will be complete, and all units occupied by the first quarter of calendar year 2024.

B. Activity metrics information

i. Provide the metrics from the HUD Standard Metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box. Up to **62**	Housing units of this type prior to implementation of the activity (number). This number may be zero. **0**	Expected housing units of this type after implementation of the activity (number). Up to **62**	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase). **$800,000**	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero. **$0**	Expected amount leveraged after implementation of the activity (in dollars). **$29M**	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

ii. **Give the baseline performance level metric for each indicator (numerical value).**
Prior to the implementation of this development, affordable and market rate didn't exist. The number of units created will therefore be approximately 62.

iii. **Give the annual benchmark for each indicator (numerical value).**
This section is N/A considering this is a new construction development with an approximate eighteen-month construction cycle yielding units in the first quarter of 2023.

iv. **If applicable, give the overall or long-term benchmark for each metric.**
The long-term benchmark is to sustain quality, efficient affordable housing units over twenty (20) years.

v. **Give the data source from which the metric will be compiled**
The metrics is a function of units constructed.

C. Cost implications

i. **State whether the proposed activity will result in any cost implications (positive or negative for the PHA)**
This proposed activity will result in a positive for ECC/HANH and its redevelopment instrumentality, The Glendower Group, Inc. ECC/HANH and Glendower will leverage 3rd party capital to complete this development effort and shall receive a developer fee. The Glendower group will have a percentage of ownership. ECC/HANH and Glendower will provide predevelopment in an amount not to exceed of $800,000. ECC/HANH will also provide vouchers of up to 80% of the affordable units, anticipated to be approximately 50 project-based vouchers.

ii. **If so, discuss the amount and how the PHA will manage the surplus or deficit anticipated**
ECC/HANH and Glendower will realize a return of its initial investment in an amount not to exceed $800,000, a developer's fee of approximately $1.5m, and a percentage of ownership in an asset.

D. **Need/justification for MTW flexibility**

i. **Cite the authorizations provided in attachment C and/or D of the Standard MTW Agreement**

1. Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities
2. Attachment C. B. 1. b. vii. Single Fund Budget with Full Flexibility. If the agency chooses to establish single fund flexibility, the agency is authorized to use housing assistance payments for purposes other than payments to owners, so long as these purposes are consistent with other eligible uses of section 8 and section 9 funds.
3. Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.
4. Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued.

ii. **Explain why the authorization is needed**
The above authorization is needed for the purpose of providing MTW predevelopment capital to be reimbursed and the use of project-based vouchers.

E. **Rent reform/term limit – *__Not applicable.__***

i. **Impact analysis**
   1. **Description of how it will impact tenant rent share**
   2. **How we will implement and track impact and how that process will enable identification of unintended consequences**
   3. **Numerical analysis of the intended/possible impact on tenant rent, rent burden, households impacted, etc.**
   4. **A plan for weighing the consequences/benefits and how to determine if it should be expanded, modified, terminated, etc.**

ii. **Hardship criteria – include copy of the policy in the Appendix**

iii. **Description of annual re-evaluation**

iv. **Transition period**

Initiative 2.11 Community Health Network of CT (CHNCT)

HOUSING CHOICE

SELF SUFFICIENCY

A. **Activity Description**

Elm City Communities, The Housing Authority of New Haven (ECC/HANH) was approached by a local health care insurer who seeks to provide a small amount of funding to support housing needs for families enrolled in their service. ECC/HANH proposes an initiative in connection with the Community Health Network of CT (CHNCT) to provide layered rental subsidy to recipients of the HUSKY A or Husky D medical insurance program. The program seeks to pilot a combined subsidy model that merges funding from healthcare and housing providers that demonstrates the importance of investing in social determinants of health and to potentially open up new sources of funding and partnership to address housing need in this community. By demonstrating the power of housing stability to support medical stabilization, we hope to learn lessons that may lead to program expansion and additional partnerships.

Per Notice PIH-2011-45 (HA). this initiative is a Local Non-traditional use of HCV funding. The activity will be implemented under the category, Service Provision as it will provide supportive services subsidies for low-income families and will be compliant with the general and service provision parameters, as listed.

B. **Describe the proposed initiative**

ECC/HANH and CHNCT will provide a combined subsidy for up to four families for a period of no more than 24 months per family. The program size is small as determined by the funding level of the funder (CHNCT). While the pilot is small, the lessons learned may help to generate a larger investment by CHNCT and perhaps other insurers. Families in this program will be required to participate in a person-centered program provided by the Community Health Network of CT, developed to help members manage the social, medical, financial, and behavioral health issues associated with complex conditions.

All Program Participants will agree to a maximum period of housing subsidy support of 24 months. At the end of the program period, unless otherwise authorized, it is the expectation that families will continue to rent market rate units in the community without subsidy or will have identified subsidized housing options inside or outside of the City of New Haven.

Program participants will be screened and referred by CHNCT and placed on a program specific waitlist. The team at CHNCT will be referring families who qualify under their criteria and will then send the names to ECC/HANH. Once ECC/HANH receives the names, the family will be added to a special waitlist for this program.

Upon referral, ECC/HANH will screen for HUD program eligibility. Participants not deemed eligible will be notified and provided information about how to apply for ECC/HANH's other housing programs. Program participants must meet the income eligibility criteria for CHNCT's Medicaid program. Program participants will not be placed on any of the regular ECC/HANH waitlists unless the family has applied via an open waitlist process. The participant will not be issued a voucher and participation in the program does not provide any housing assistance beyond the 24-month program period.

Rental assistance will be treated as a layered subsidy in the following order:

1. The family will be responsible for paying their portion of the rent in a market rate unit based on ECC/HANH's Rent Simplification rent calculation.
2. The Community Health Network of CT will provide $500.00 toward the families rent on a monthly basis for a period of up to 2 years (24 months).

3. ECC/HANH will assist each participating family with the remaining rent balance for up to 2 years (24 months).

Families can receive up to two years of assistance under this program, however the term can be shorter if the funds available do not cover two full years. This would be the case if a family leaves the program after a period of less than two years, and a new family comes in, to access to the remaining subsidy period, based on the agreed upon amount per month ($500). It may be possible to arrange the spreading of the subsidy during a longer period of coverage for the new family as long as the total amount does not exceed the agreed upon program total.

ECC/HANH will provide participants with housing search assistance services through its Relocation Department. All units will be inspected for HQS compliance through ECC/HANH's HCV unit inspection process. All housing subsidized under this initiative must meet HQS compliance.

CHNCT Program & Services
CHNCT's Care Management program, Intensive Care Management, is a system of collaborative processes which assesses, plans, implements, coordinates, monitors, and evaluates options and services to meet an individual's health needs. The correlation between receipt of the rental subsidies and the services provided by CHNCT creates an opportunity and consistency for members to receive appropriate care management services. Knowing the member's permanent address at least for the 2 years, allows the care management team the ability to readily locate members and maintain contact to offer ongoing services to manage their medical and behavioral health conditions. Additional benefits include 1:1 engagement with a CHNCT nurse care manager, registered dietitian and/or community health worker to provide coaching in lifelong skills targeting improvement in overall self-management and elimination of barriers associated with social determinants of health.

- Intensive Care Management (ICM) is comprised of a multidisciplinary staff of nurses, Social Worker, Behavioral Health Coordinator, Community Health Workers, Dietitians, and non-clinical support staff.
- Promotes quality, cost-effective improved health outcomes for members who have complex or specific healthcare needs.
- Assists members who are affected by the underlying factors relating to the social determinants of health.
- Is a voluntary, person-centered program developed to help members manage the social, medical, financial, and behavioral health issues associated with complex conditions.
- Provides coaching and resource coordination to support and empower HUSKY members to help them take control of managing their healthcare needs.
- Focus includes high-risk, high-need members which includes those with frequent hospitalizations or emergency department (ED) visits.
- ICM Engagement Process:
    - Completes the assessment and develops a care plan for both member and family members. Working with members at home, CHNCT nurses will assess health conditions, health perception, cultural values, coping mechanisms, self-care practices, and social determinants of health to support the member's ability to prioritize important areas and goals.
    - Assists members who are affected by the underlying factors relating to the social determinants of health.
- CHNCT will complete a person-centered plan of care to assess barriers.
- Arrange transportation to medical appointments
- Rental assistance for no more than two years paid to ECC/HANH to administer.
- Identify PCP and specialists that would support the members complex health needs.
- Coordinate services with the Connecticut Behavioral Health Partnership for behavioral health needs and link to community resources

i. **Describe how it will achieve one of the three statutory objectives**

This initiative is designed to increase Housing Choice for low income families: During the two-year period, families will have the opportunity to live in a community of choice in a market rate unit; and to give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient. Families will receive supportive services provided by CHNCT which will prepare the families to move toward financial self-sufficiency during the two-year period. Care management's wrap around services will include an assessment of each member's current financial status, developing a plan for supporting housing independence; and assist members to explore employment and educational opportunities to get job training.

ii. **Provide the anticipated schedule for implementation**

1. July 2021 Obtain ECC/HANH Board approval.
2. December 2021- Obtain HUD Approval for New MTW Activity
3. January-March 2022- Send program information to families on the ECC/HANH waitlist
4. April 2022 – Program Enrollment Begins
5. May 2022 – Begin the lease-up process

C. Activity metrics information

i. **Provide the metrics from the HUD Standard Metrics**
ii. **Give the baseline performance level metric for each indicator (numerical value)**
iii. **Give the annual benchmark for each indicator (numerical value)**
iv. **If applicable, give the overall or long-term benchmark for each metric**

SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households participating.	To be determined upon enrollment	Increase average family earning by 20%	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.

SS#3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program	(1) Employed Full-Time- 0 (2) Employed Part-Time-0 (3) Enrolled in an Educational Program-0		Actual head(s) of work-able households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

	(4) Enrolled in Job Training Program-0 (5) Unemployed-0 (6) Other-0			
(4) Enrolled in Job Training Program (5) Unemployed (6) Other	Actual status to be determined upon enrollment.	Goal is to move 100% of workable families into employment or education/training programs.	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

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).	zero	100% of the participants	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	zero.	Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number). It is expected that 4 families (100%) transition to self-sufficiency	Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	zero	4	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

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

ECC/HANH will utilize Emphasys Elite, tracking sheets and the agency case management software program in combination to track families and compile data.

D. **Cost implications**

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

This initiative will save ECC/HANH $48,000 as another provider is paying this cost. ECC/HANH expects to incur cost in the amount of, and not expected to exceed $41,172.00 for administrative costs and out of pocket subsidy associated with this program. MTW funding will be utilized.

ECC/HANH will fund a reduced HAP subsidy equal to the balance after tenant portion and the CHNCT subsidy in included. Additionally, ECC/HANH will fund the cost of administrative support and the cost of HQS inspections per family during the term of this program which is expected to run for a period of two years at an estimated amount of $1,623.00 per household. The following table shows the total expected costs of ECC/HANH's administrative expense based on four families accessing this program during a period of 2 years per family.

Process	Allocation of Resources			Cost
Allocation of 1 staff member to process each applicant from intake to lease-up 3Hours (One Time Cost)	HCV Administrative Tasks	4 Families	3 hours per family @ $27/hr.	$ 324.00
LCI Allocation of Inspection Resources	Up to 9 Inspections Per Unit		$78.00 per Inspection	$2,808
1 Initial				
1 Fail-Re-inspect				
1 Special				
Repeat for unassigned unit				
1 Initial				
1 Fail Re-inspect				
1 Special				
Allocation of Finance Dept. Resources	Initial & Monthly check processing		0.25 hours*/or $25.00 Plus 40% Fringe	
Initial Rental payment set-up				$ 2,400.00
Twelve payment periods				
one W-2 Preparation				$ 960.00
Total Expected Expense				$ 6,492.00

ECC/HANH will pay a maximum subsidy amount of $330.00 per month toward rent, as part of the subsidy layering, to cover any remaining balance after the participant portion and the CHNCT funds have been applied. This next table shows the potential out of pocket cost of the rental subsidy provided by ECC/HANH, by family size, for this program.

	Efficiency	1 bdrm	2 bdrm	3 bdrm	4 bdrm
FMR 2022	$1,048	$1,186	$1,447	$1,789	$1,995
Average Contract Rent (Elite VMS Report	$828	$900	$1,081	$1,271	$1,450
Average HAP Payment (Elite VMS Report)	$499	$507	$488	$496	$495
CHNCT Payment	$500	$500	$500	$500	$500
Average Income After Exclusions by Bdrm size for families with a HAP between $450-$550 (VMS Report)	$14,470	$18,781	$31,726	$38,978	$47,138
Average TTP (30% of Adjusted Income)	$361.75	$469.53	$793.15	$974.45	$1,178.45
ECC/HANH Portion of Rent Payment Based on FMR 2022	$186.25	$216.48	$153.85	$314.55	$316.55

The expected cost of ECC/HANH's out of pocket rental assistance averages $31,680.00 for the two-year program with an additional $3,000.00 included in the budget for purposes of covering two additional families if needed. The total program cost for ECC/HANH is not to exceed $41,172.00.

Administrative costs:	$ 6,492.00
Additional administrative costs for two more families:	$ 3,000.00
ECC/HANH (2 year) Out of Pocket Rental Assistance based on the largest bedroom size shown in the table:	$31,680.00
	$41,172.00
CHNCT Funds:	$48,000.00
Total Program Cost:	$89,172.00

i. **If so, discuss the amount and how the PHA will manage the surplus or deficit anticipated –**

ii. This initiative will save ECC/HANH $48,000 as another provider is paying this cost. ECC/HANH expects to incur costs not expected to exceed $41,172.00 for administrative costs and housing subsidy associated with this program. MTW funding will be utilized. ECC/HANH will conduct rent reasonable checks to determine tenant affordability on a quarterly basis. ECC will meet with CHNCT staff to review HAP register on a quarterly basis.

E. Need/justification for MTW flexibility

a. Cite the authorizations provided in attachment C and/or D of the Standard MTW Agreement

1. Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities
2. Attachment C. B. 1. b. vii. Single Fund Budget with Full Flexibility. If the agency chooses to establish single fund flexibility, the agency is authorized to use housing assistance payments for purposes other

than payments to owners, so long as these purposes are consistent with other eligible uses of section 8 and section 9 funds.

3. Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.
4. Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued.

b. Explain why the authorization is needed

The above cited authorizations are required for this initiative as it involves use of single fund flexibility to provide time limited subsidy to families, relocation services through an instrumentality of the agency, use of HCV funds for administrative costs, and modified tenancy rules.

F. Rent reform/term limit

i. Impact analysis

1. Description of how it will impact tenant rent share

Families will be responsible for paying the family share portion based on a rent simplification calculation. The Community Health Network of CT will provide $500.00 toward the families rent on a monthly basis for a period of up to 2 years (24 months). ECC/HANH will assist each participating family with the remaining rent balance for up to 2 years (24 months). The tenant portion will not differ from the amount that would be calculated under Rent Simplification. The benefit to the participant is that the amount received on their behalf from the insurer is not counted as family income.

2. How we will implement and track impact and how that process will enable identification of unintended consequences

This relatively small cohort of families will be tracked within agency MIS and through our case management system allowing for tracking of internal and external case management services, income changes and moves toward self sufficiency. Additionally, the insurer will be tracking health outcome data.

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

3. **Numerical analysis of the intended/possible impact on tenant rent, rent burden, households impacted, etc.** This initiative does not negatively impact the family share. The family receives a benefit in that the $500 time limited benefit is not counted as family income saving the family approximately $150 per month. This additional subsidy paid to the Authority allows ECC/HANH to subsidize other families that would have utilized the $48,000 being paid by the insurer. ECC/HANH and CHNCT will provide a combined subsidy for up to four families for a period of no more than 24 months per family.

4. **A plan for weighing the consequences/benefits and how to determine if it should be expanded, modified, terminated, etc.**
ECC/HANH and the insurer will be meeting monthly to review progress of this cohort regarding health outcomes and self sufficiency. These meetings will also include

transition planning for families at the end of the pilot period. Indicators of progress in terms of health outcomes and workable families' employment status will be an indication of success of this initiative. Should this housing support coupled with intensive case management not result in improved housing and self sufficiency outcomes for this cohort, the funding will likely not be renewed and the initiative will be terminated.

ii. **Hardship criteria – include copy of the policy in the Appendix**

Families receiving housing support under this initiative are identified by the insurer as in need of housing stability to support medical goals. Families are not currently receiving subsidy and would volunteer for this time limited support. Upon enrollment, families consent to the fact that support is for a maximum of 24 months. Families receive intensive case management support from the insurer care management team. This support includes identifying permanent housing options.

Rent portion will be calculated per ECC/HANH's Rent Simplification Policy. Consistent with that policy, prior to imposition of any change in rent, the household will be provided with advanced notice as required by their lease and/or governing documents. Households that are notified of a rent increase will also be informed, in writing, of their ability to seek a waiver based in financial hardship provided that the hardship is related to extraordinary deductions or extraordinary cost of living (rent, utilities, medical expenses, childcare expenses). Families meeting minimum rent criteria who seek adjustment of their rent shall be considered through the agency's Minimum Rent policy.

<u>Hardship Criteria</u>

The following criteria will trigger a review for consideration of a Hardship.

- <u>Extraordinary Cost of Living:</u>

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

- <u>Medical, Disabled Expenses of $6,000.00 or more:</u>

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

Rent adjustments will be made consistent with the Authority's Rent Simplification Policy. All requests for Hardship Review shall be referred to and reviewed by the Hardship Committee. Should a resident request hardship review but fail to attend the scheduled meeting, one opportunity to reschedule will be provided. If the resident fails to attend the second scheduled appointment no further attempts to reschedule will be made and ECC/HANH will determine that no hardship exists. Persons with disabilities always remain the right to request Reasonable Accommodations consistent with the Authority's Reasonable Accommodations Policy.

<u>Hardship Review</u>

All requests for Hardship Review shall be forwarded to the Hardship Review Committee. The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Senior VP of Operations or his/her designee and the 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.

Requests for exemption from Minimum Rent shall be reviewed consistent with the Authority's Minimum Rent Policy. 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 will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent. 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.

<u>Transition from CHNCT Program</u>

Families enrolling in this program do so with the understanding that it is a 24-month period of housing support. Case management services will assist the family to be prepared to transition to market rent/nonsubsidized, to access permanent subsidized housing and to ensure all applicable benefits are accessed. ECC/HANH waitlists are continually open and families will be encouraged to apply.

Families that move to the top of the ECC/HANH or any other subsidized waitlist shall be able to terminate participation in the CHNCT funded housing support and access housing offered. Family care management will continue through CHNCT.

Families will be supported by ECC/HANH Relocation Team in identifying affordable housing options upon transition from the program.

Families that are deemed unready to transition to unsubsidized housing can be afforded one (1) 6-month extension.

<u>Appeal Process</u>

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

iii. **Description of annual re-evaluation**

The program will be evaluated on an on-going basis by both the Authority and the insurer partner for housing and health related outcomes. An executed MOU will govern data sharing expectations and responsibilities. Results for this activity will be reviewed annually as part of the ECC/HANH MTW Report Submission to HUD. Changes to the program model will be made at that time. Changes to the program will be the result of performance or resource levels.

iv. **Transition period** –Transition Period- ECC/HANH expects to discontinue offering this incentive at the end of the two-year period. The families receiving services at the time of the end of program shall receive their benefit as stated in the agreement. Any families on the waitlist for the incentive will be notified. Given the small cohort size, should the funding lapse prior to the two year period for any of the four families in the cohort, ECC/HANH will continue to fund for as many months as required to complete the families' term. However, no new families will be added.

IV: Approved MTW Activities

A. IMPLEMENTED ACTIVITIES

Increase Housing Choice

Initiative 1.2 – Local Total Development Cost (TDC) Limits

This initiative was approved in FY08 and implemented in FY09. This activity establishes TDC and HCC limits for ECC/HANH separate from HUD's standard limits to better reflect local market conditions for development and redevelopment activities.

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

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

The Housing Authority has the following developments in its pipeline: Valley Townhomes; Farnam Phase II 4%, Farnam Phase II 9%; Crawford Manor, 34 Level Street, Westville Manor Phase I, McConaughy Terrace and Westville Manor Phase II. As it relates to our approved TDC, the developments shall not exceed the approved TDC. These developments are in the predevelopment stages. The exception is the Farnam Court Phase II 4% and Farnam Court Phase II 9% projects, which are under development; and Valley Townhomes and McConaughy Terrace financial closings are anticipated in the first quarter of 2022. The Authority continues to work diligently to find creative construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of the approved TDC.

ECC/HANH does not anticipate changes to the initiative or metrics. This initiative aims to increase housing choice and cost efficiency of redevelopment efforts.

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

This initiative was approved in FY12 and implemented in FY13. This activity defines the incomes to be eligible for Project Based Voucher Programs as follows:

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

ECC/HANH does not anticipate changes to the initiative or metrics. This initiative aims to increase housing choice and cost efficiency of redevelopment efforts. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

Initiative 1.4 and 1.10
Income Eligibility for Project Based Voucher Program
PBV in Mixed Finance Developments

Fiscal Year 2020

Name	30%	30%	50%	50%	60%	60%	Over 60%	Over 60%	Grand Total
Brookside Phase I	34	72%	9	19%	2	4%	2	4%	47
Brookside Phase II	49	98%	1	2%	0	0%	0	0%	50
Constance B Motley	39	87%	6	13%	0	0%	0	0%	45
Eastview Terrace Phase I	29	63%	13	28%	3	7%	1	2%	46
Eastview Terrace Phase I	25	56%	15	33%	2	4%	3	7%	45
Fair Haven Chatham	21	72%	5	17%	1	3%	2	7%	29
Fair Haven Eastview II	16	67%	5	21%	3	13%	0	0%	24
Fulton Park	8	67%	3	25%	1	8%	0	0%	12
Katherine Harvey Terrace	16	94%	1	6%	0	0%	0	0%	17
McQueeney	86	96%	4	4%	0	0%	0	0%	90
Nerwhall Gardens	21	84%	4	16%	0	0%	0	0%	25
Prescott Bush	49	94%	1	2%	1	2%	1	2%	52
Quinnipiac Terrace Phase I	32	56%	21	37%	4	7%	0	0%	57
Quinnipiac Terrace Phase II	32	59%	17	31%	1	2%	4	7%	54
Quinnipiac Terrace Phase III	13	76%	3	18%	0	0%	1	6%	17
Ribicoff	30	71%	10	24%	2	5%	0	0%	42
Ribicoff 4	43	86%	7	14%	0	0%	0	0%	50
Rockview Phase I	25	86%	4	14%	0	0%	0	0%	29
Stanley Justice	5	83%	1	17%	0	0%	0	0%	6
Valentina Macri	17	100%	0	0%	0	0%	0	0%	17
Waverly Townhomes	41	80%	10	20%	0	0%	0	0%	51
William T Rowe	37	84%	7	16%	0	0%	0	0%	44
Wilmot Crossing	12	80%	3	20%	0	0%	0	0%	15
Wilmot Crossing	29	97%	1	3%	0	0%	0	0%	30
Winslow	21	91%	1	4%	1	4%	0	0%	23
Total	**730**	**80%**	**152**	**17%**	**21**	**2%**	**14**	**2%**	**917**

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

Approved in FY08 and implemented in FY09 (Significant Change Proposed in FY20)

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

During FY08, ECC/HANH began to implement MTW Rent Standards that allow ECC/HANH to approve exception rents in the following cases: Wheelchair accessible units; Large bedroom-size units, (4 bedrooms or larger); Expanded housing opportunities in neighborhoods with low concentrations of poverty; Housing opportunities in new development projects that include significant public investment to promote revitalization of neighborhoods; and Mixed-income housing opportunities that promote expanded housing opportunities and deconcentration of poverty.

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

Significant Changes to the Initiative in FY2020

ECC/HANH made enhancements to the deconcentrating initiative and required different authorizations from what was initially proposed. Additionally, in an effort to model Indicator 15 of the Section 8 Management Assessment Program (SEMAP), ECC proposed to update HC#5 from the benchmark of 10 moves per year, to the SEMAP standard of:

- 2% higher of all Section 8 movers who moved to low poverty census tracts in the FY, compared to the total count of movers who moved to low poverty census tracts at the end of the last completed FY.
  Example: If In FY 2018 the percent of families who moved to low poverty areas is 2.75%, the percent of families in FY19 must be of at least 4.75%, which is 2% higher than the total percent of families who moved to an area of low poverty in FY18.

Sample Percent Increase Tracker	Previous FY Percentage (2017)	Current FY Percentage (2018)	Goal Percentage Increase	2% of Previous Year (2017)	Is Current Percent Equal to or Greater than 2% of Previous Year?
FY2018	2.75%	2.53%	2.00%	4.75%	No

Note that the SEMAP measurement is Section 8 families with children and the ECC MTW measurement is all families, with and without children who move to areas of low poverty or high/very high opportunity.

HC#7, 'Households assisted by services that increase housing choice' will be added to HUD metrics for this initiative starting in FY20.

Changes approved in the amendment in the FY2020 Plan include the following:

Security Deposit Assistance, Application fees and Landlord Incentive Payments
ECC/HANH provides mobility counseling services for voucher participants to assist their search for housing in non-impacted areas.

Subject to funding availability, families that agree to participate in mobility counseling and locate to census tracts in areas with low concentrations of poverty (Opportunity *areas include the most recent U.S. Census Tracts and may be adjusted as necessary*) will be given the opportunity for the following:

1- Application fees paid for up to 3 units (anticipating $30 per application or $90 per family)
2- Security deposit assistance (up to one month of contract rent) or
2- Assistance with repayment of past utility debts that would prevent a family from securing utilities in their own name (up to payment standard for family size)

Additionally, landlords in non-impacted areas may receive incentive payments upon their first lease up with ECC/HANH in the HCV program.

The decision whether to offer the above assistance is at the discretion of ECC/HANH and will be paid up to the payment standard that the family is eligible to receive.

Expected cost of new addition to this initiative is estimated at $35,000 per year and includes a new mobility-counseling contract.

During FY21, the updates to this initiative were implemented. While ECC/HANH is still in the process of implementing updates, the FY21 report will reflect updates to services as of October 1, 2020. As a result of COVID the roll out of updates were slow. During FY22 ECC/HANH will continue to work toward helping more families access housing in neighborhoods of choice.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22.

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

This initiative was approved in FY10 and implemented in FY11. Under ECC/HANH's MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods.

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

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

There continues to be a need for vouchers for the homeless population and we are forming additional partnerships with homeless advocates.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22. This initiative meets the statutory objectives of Increasing Housing Choice.

TBV Supportive Housing Efforts					

Tenant Based DHMAS Supportive – Housing First	Supportive Housing	10	0	0	**10**
DMHAS Mental Health Transformation Grant – FUSE	Supportive Housing	10	0	0	**10**
Family Options – Homeless	Supportive Housing	15	0	0	**15**
Permanent Enrichment	Supportive Housing	10	0	0	**10**
Foreclosure Protection	Foreclosure Protection	15	0	0	**15**
Family Unification Supportive Housing	DCF Family	20	0	0	**20**
Homelessness/Imminent Danger of Homelessness (TBV)	(Formerly Foreclosure PBV)	40	0	0	**40**
Supportive Housing/Homelessness Prevention I	Supportive Housing/Homelessness Prevention	51	0	0	**51**
***Supportive Housing Efforts Subtotal**		**171**	**0**	**0**	**171**

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

This initiative was approved in FY12 and implemented in FY13. ECC/HANH has completed a Project Needs Assessment ("PNA") of its entire portfolio. The PNA shows that over the next 20 years ECC/HANH's needs would exceed available funds by a ratio of more than 3:1. In order to address this funding gap and to help assure the long-term viability of its portfolio, the Agency used the PNA to determine an asset management strategy for each of its developments. Part of this strategy included converting existing public housing to Project Based Assistance under Section 8(o) (13). ECC/HANH would dispose of properties under Section 18 of the Housing Act of 1937 or Rental Assistance Demonstration (RAD) prior to conversion to Project Based Vouchers.

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

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

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

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

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

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

This initiative was approved in FY13 and implemented in FY14. This authorization will allow for the continued redevelopment efforts of the underperforming developments as well as increase housing choices for our residents. It allows the Authority to use its vouchers to pool monies together in order to leverage funds for redevelopment efforts.

This initiative was contemplated prior to the advent of the RAD program. The percentage of MTW project based did not include the full conversion of ACC sites to PBVs. The advent of RAD increases the proportion of the portfolio that will be project-based. ECC/HANH's current percentage of non-RAD project based MTW vouchers is 11% (522 vouchers).

RAD conversions are not included in the calculation re. percent project based.

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

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

This initiative was approved in FY13 and implemented in FY14. ECC/HANH has been very active in redeveloping and repositioning its aging public housing stock by leveraging private investment through the mixed-finance process and replacing demolished units with a variety of affordable housing types, including public housing, project-based vouchers and tax credit units. ECC/HANH has also been at the forefront of using its MTW authority creatively to complement and enhance these efforts.

In 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 intended to pursue this initiative at certain specific sites in FY 13, including Farnam Courts and Abraham Ribicoff Cottages and Extensions, but intended to use this same model at other sites to be identified in the future.

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

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

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

Initiative 1.15 and 1.17 – West Rock Transformation Plan/Major Redevelopment Efforts (Previously Included Initiative 1.13)

This initiative was initially approved in FY2014 and revised in FY 2021. ECC/HANH's MTW flexibility has facilitated the redevelopment of the West Rock community in several phases. The West Rock revitalization is a project to redevelop two obsolete Public Housing developments, Rockview Terrace and Brookside, and one additional parcel that previously contained a commercial building. The 491 Public Housing units and the retail building that have stood on the three sites will be replaced with a mix of Project-Based Section 8/LIHTC rental, Public Housing/LIHTC rental and affordable homeownership housing totaling 472 units, along with 8,987 square feet of retail space at the 122 Wilmot site. The rental units will consist of 392 units, 352 family townhouse units and 40 senior units in a mid-rise building. The homeownership component consists of 38 units. The cost of the revitalization of the phases bulleted directly below was $240 million.

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

Completed phases include:

- Brookside Phase I and II, Homeownership --ECC/HANH received HUD approval to dispose of the Brookside property in FY2010 and construction was started.
- Rockview Phase I (completed and leased in FY2014) and Phase II (completed and leased in FY2021) ECC/HANH requested approval of disposal of Rockview in FY12. Per HUD direction, Initiative 1.13 was folded into this Section V description since only single fund flexibility was required.
- Wilmot Crossing at 122 Wilmot Road
- Commercial development at Wilmot Road. (FY2013) In FY14, Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road had been combined into this initiative. The mixed-use facility will provide for the Glendower Group Inc., or an affiliate thereof, an opportunity to develop one or more cooperative ventures to facilitate economic growth and create wealth in the West Rock community.
- Ribicoff Cottages – Twin Brooks I and II. (FY 2015). TB 9% was completed in December 2015 and Twin Brooks 4% was completed in FY2016.

The next phase involves the redevelopment of McConaughy Terrace, Valley Townhouses, and Westville Manor/34 Level St.

In FY 2021 ECC/HANH began the process of undertaking the redevelopment of McConaughy Terrace to convert the property to a Project based Voucher model using the Rental Assistance Demonstration Program (RAD). McConaughy Terrace currently contains 201 units of townhouse style family rental units within two different building types. These building types include four-unit buildings referred to as 4-plexes and traditional horizontal townhouse units containing 6 units each. McConaughy Terrace was built in the 1940s and has been reduced in decades past from its original design which included 291 units, including units removed to create a central park for residents and families. McConaughy is the largest ECC/HANH family development on the west side of New Haven and its continued operation as affordable family housing is necessary to assure continued affordability in New Haven. McConaughy provides employment and shopping opportunities due to its proximity to the commercial and employment corridor of State Route 63/Whalley Avenue and the site is served by both local and regional transportation services.

The long-term sustainability of McConaughy Terrace is at risk without the substantial rehabilitation of the existing on-site units. The redevelopment plan is to substantially rehabilitate all existing units and to construct up to 40 additional units by constructing new buildings similar in size and scale to the existing 4-plexe units currently located within the development. The expansion of existing affordable units will help to address the overwhelming need for affordable housing in the New Haven area. The new proposed units will be constructed per ECC/HANH's sustainable 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 components. To the extent feasible, the rehabilitation goal of existing units will increase energy efficiency and incorporate other sustainability measures. These newly constructed units will also allow for the inclusion of accessible units at McConaughy Terrace. The existing development, dating from the 1940s, does not have any accessible units. Ten new accessible units are included in the design plans.

The development plan will also include the addition of market rate units within the newly constructed buildings, which is recognized as a successful method of economically integrating affordable developments and improving sustainability. The redevelopment will also include supportive services with a goal of improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

The financial closings will be targeted for the first quarter of calendar year 2022. It is anticipated that construction will take 18 months to assure that all required relocation activities will comply with the Uniform Relocation Act, applicable RAD notices, and family needs. Under this scenario the redevelopment will be complete, and all units re-occupied by the end of calendar year 2023.

In FY 2021 Valley Street Townhomes received an award from the U.S. Department of Housing and Urban Development (HUD) under its Rental Assistance Demonstration (RAD) portfolio award to convert public housing units to Section 8 project-based rental assistance contracts. Valley Street Townhomes is located at 210-290 Valley Street, New Haven. ECC is proposing to demolish and reconstruct this development as part of the conversion to RAD PBVs. The development will be completed by The Glendower Group, ECC's non-profit development arm. Valley Street currently contains 40 units of family housing constructed in a townhouse style and lacks accessible units. Valley Street is plagued by water infiltration and mold due to poor design and construction standards and has been determined to be more costly to rehabilitate than it would be to demolish and reconstruct on site. The proposed demolition and new construction of 40 units (32 RAD LIHTC and 8 unassisted market units) to replace the existing Valley Townhouses is included as part of HANH's RAD portfolio award. The multi-family property currently has a total of 39 rental apartments plus one apartment used as a community center on a site of approximately 3.21 acres. Construction of the property was completed in 1974, with capital work in 1995 and 2012. These more recent improvements have not been able to correct the moisture issues which has led to a recurring mold problem that will only be exacerbated by climate changes.

The new Valley Street development will occur on the same site and include 40 townhouse style units of which 10% will be accessible. All units will be visitable per Connecticut state statute. A. community center will be built as a separate structure on the same site for social service, development recreational activities, management services and will also include laundry facility for residents. The redevelopment of Valley Townhouses will continue the revitalization of the Housing Authority of New Haven's affordable public housing stock, provide residents with easy access to public transit, and promote economic diversity in the area. The site is served by 7-day per week bus service that links to the Whalley Avenue corridor and the downtown New Haven providing direct linkages to commercial, employment, and medical services Valley Street has received LIHTCs through the Connecticut 9% competitive process and all other funding source are in place.

Valley Street townhomes has received 9% LIHTC funding and all other funding sources are in place. It is anticipated that the Valley Street closing will occur in the first quarter of FY 2022. The construction period is estimated at 15 months with occupancy is anticipated for the second quarter of FY2023. All current residents will be provided full RAD and URA relocation rights including the right to return to the completed development.

Westville Manor/34 Level Street
Westville Manor originally contained 151 units of family housing. Westville Manor has outlived its economic useful life and is plagued by water infiltration, erosion and other moisture issues. The original design and building layout also does not provide areas of defensible space. Westville Manor consists of a series of linear buildings clustered around parking lots, on a terraced landscape due to steeply changing topography. As a result of a combination of topography and design, the current development has experienced extensive moisture issues. The cost of rehabilitation is similar to the cost of redevelopment with the result still being poorly designed units and likely future moisture problems. ECC/HANH is proposing a complete demolition and redevelopment of Westville Manor.

The redevelopment of Westville Manor represents the final piece in the transformation of ECC/HANH's West Rock Redevelopments into a new neighborhood that will become a community of choice. As can be seen from the following West Rock Master Plan map, Westville Manor lies adjacent to a series of newly redeveloped properties that were completed under the West Rock Revitalization Plan. This plan was completed in conjunction with the City of New Haven and undertaken through the City's Planned Development District regulations.

Westville Manor is located in an area of many opportunities. In addition to abutting West Rock State Park, the Westrock neighborhood features a number of other public assets, including Southern Connecticut State University, a health care center, and elementary and pre-schools. Just beyond the northern boundary of the neighborhood is the suburban Town of Hamden. Westville Manor will be redeveloped in three phases, 1 off-site and 2 onsite to replace the existing 151 units. The offsite phase, Rockview Phase 2, has been completed and is fully occupied. The original site will be completed in 2 phases due to the site and the number of units being developed. It is anticipated that on-site phase 1 will begin construction in early 2023 dependent on the obtaining of all funding.
ECC purchased 34 Level Street, New Haven, CT. The subject property is comprised of a 43,339 square foot skilled nursing facility, constructed on a 6.00-acre site. The improvements were built in 1958, and are in very poor condition. The property has been vacant since the nursing home was closed in 2010. The property is located in the West Rock neighborhood directly adjacent to Westville Manor. The redevelopment plan is to demolish the existing building(s) and redevelop the subject property as a 50 unit elderly development that will allow for the elderly to live independently even as residents may require more assistance with activities of daily living. Through this redevelopment Glendower is planning to construct a 50 unit HUD 202 Elderly Housing Development with the following characteristics:

- Housing that is physically designed to promote the long-term wellness of Elderly Persons and allow them to age in place;
- Can provide a robust package of services that support the health and social well-being of Elderly Persons; and

- Leverage Capital Advance funds with other financing sources to maximize the number of units created per dollar of HUD funding.

Glendower is planning to apply under the HUD Section 202 Supportive Housing for the Elderly program. A mixed-finance model will be used with funding sources including Low Income Housing Tax Credits, Section 202 funds, and MTW funding. We see this as a great opportunity to continue to create a mixed-age, multi-generational development in the West rock that will allow neighborhood residents to age in place.

ECC/HANH does not anticipate changes to the initiative or metrics. This initiative aims to increase housing choice and cost efficiency of redevelopment efforts.

Initiative 1.16 – Crawford Manor Transformation Plan

This initiative was approved in FY13, implemented in FY16, and placed on hold in FY17. This initiate is being moved from on hold to active in FY 22.

The Authority applied for the Choice Neighborhoods Initiative Planning Grant, but it was not awarded. This initiative was placed on hold while an alternative plan and timeline is being devised. Crawford Manor will be redeveloped using a combination of State and Federal Historic Tax Credits as well as Low Income Housing Tax Credits. Crawford Manor was designed by world-renowned architect Paul Rudolph in the 1960's brutalist style. Paul Rudolph was the Dean of the Yale School of Architecture at the time and this building is considered a local landmark and is listed on the national registry of Historic places. The listing on the National Register limits the type of rehabilitation that can be completed but also opens the redevelopment to non-MTW capital. The procurement process for an architect, historic consultant, and construction manager has already begun.

The intention is to complete architectural plans and seek funding in the second quarter of FY2022. The property currently contains 109 units in a mixture of studio and 1-bedroom units. If approved by the State Historic Preservation Office, a small number of units would be combined to allow for the inclusion of additional 1 bedroom or 2-bedroom units. Under no circumstances will the diminimis reduction of 5% be exceeded.

ECC/HANH does not anticipate any changes to the metrics and only requires MTW fungibility.

Initiative 1.21 – Initiative Expanded Jurisdiction: Creating Housing Opportunities Outside of the City of New Haven in Areas of Opportunity

This initiative was approved in FY 2019. 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.

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

ECC-HANH has identified its first potential project and awarded PBV support to a redevelopment effort in the neighboring suburb of Branford CT. During FY 2022, ECC/HANH anticipates entering into an MOU with Branford

Housing Authority, complete an AHAP and assist with subsidy of existing residents. Construction is expected to be completed in FY 2023.

ECC/HANH continues to pursue other development opportunities in areas of opportunity. ECC/HANH is not looking to apply its other MTW flexibility to jurisdictions outside of ECC/HANH.

ECC/HANH does not anticipate changes to this initiative or metrics.

Initiative 1.22 – Non-traditional Housing Support Time Limited Support for Families Transitioning from Homelessness

This initiative was approved in FY19. ECC/HANH proposes to co-develop Non-traditional housing supports for units of affordable housing for families transitioning from homelessness. This activity will be a 10-year PILOT program. This support is targeted toward families seeking economic self-sufficiency following shelter and transitional housing offered through a community provider. The City of New Haven has identified the need for supportive housing units to assist families, specifically working families as they attempt to make the transition from shelter and transitional housing to permanent non-assisted housing.

The first project developed under this proposed initiative is a 19-unit development owned by a community provider, Christian Community Action (CCA), and the Glendower Group, the real estate development entity of the Housing Authority.

CCA owns a 19-unit (18 rental units and 1 superintendent unit) transitional housing development that they seek to transition to 24 to 36 month supportive housing model. The authority will provide eighteen (18) project-based units. Participation in the program does not guarantee any housing assistance beyond the 36-month program period. ECC/HANH has entered into a partnership with CCA to develop new non-traditional housing models that assist in greater housing choice and self-sufficiency for high risk families transitioning out of homelessness. As part of the proposed activity, CCA and ECC/HANH may enter into a new partnership that will own the property where the program activities will take place. ECC/HANH will provide short-term, time limited housing assistance and the community provider will provide the supportive 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. Further this model is a non-traditional housing model involving short term assistance under a modified HAP agreement with modified payment standards for housing that is consistent with uses of Section 8 and 9 funds. Participants will be selected off a waitlist managed by the non-profit partner and will consist of families transitioning from shelter care.

During FY 2021, acquisition and renovation and program design was completed. During FY 2022, families will be leased.

ECC/HANH does not anticipate changes to this initiative or metrics during FY22.

Self Sufficiency Initiatives

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:

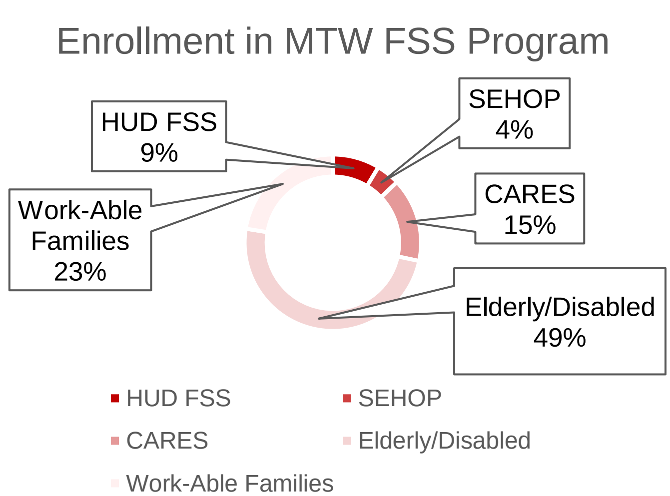
- remedial education
- literacy classes
- GED preparation
- vocational and job skills/employability
- financial management

Since its implementation in FY07, ECC/HANH has continued to add new services and programs for participants. For example, ECC/HANH has invested in computer Learning Labs that offer services to assist families move toward self-sufficiency. ECC/HANH also created a specialized training program that offers training in fields with employment opportunities in New Haven, such as healthcare or automobile repair. This program aims to provide residents the skills necessary to obtain employment or increase earnings. ECC/HANH continues to provide classes and trainings to residents that are experiencing barriers to employment. Classes include, but are not limited to:

- pre-GED
- GED
- literacy
- financial literacy
- basic, intermediate, and advanced computer training
- job skills and life skills classes prior to applying for jobs

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

- 570 Elderly/Disabled households
- 260 identified work-able families enrolled in MTW funded slots
- 178 families enrolled in the CARES Program
- 100 families enrolled in the HUD FSS grant-funded slots
- 60 Section Eight Homeownership Program (SEHOP) vouchers



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. Currently, every FSS participant can attend workshops and seminars offered by the CED Family Self Sufficiency and Resident Owned Business programs. ECC/HANH also coordinates programs through the Connecticut Association Human Services, CONNCAT Training School, and HUD Homebuyer seminars, among other resources.

FSS will continue to offer programming beneficial to all residents, including a focus on empowerment, childcare, financial literacy, and mental health. In FY22, ECC/HANH will continue to promote class offerings to better serve residents' needs and will continue to partner with other agencies that are a part of the Program Coordinating Committee (PCC). With the services provided by ECC/HANH to include computer classes, job skills training and assisting families in finding employment, ECC/HANH expects the average household earnings will increase and residents will continue to meet self-sufficiency goals.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22. This initiative meets the statutory objectives of Self Sufficiency, Housing Choice and Cost Savings.

Initiative 2.2 – Incremental Earned Income Exclusion

This initiative was approved and implemented in FY08. ECC/HANH believes promoting self-sufficiency is most effectively accomplished through helping residents to access services and supports, while also assisting residents to have greater choice in allocating their limited resources. Incremental Earnings Exclusion is phased increases of the determination of earned income over the five-year term of a family's participation in the FSS program. For example, ECC/HANH will exclude from the determination of annual income 100% of any incremental earnings from wages or salaries earned by any family member during the first year.

- Where the earned income increases (from the effective date of contract) of participants is excluded in increments according to the year of participation: 1st year of participation = 100%, 2nd year of participation = 75%, 3rd year of participation = 50%, 4th year of participation = 25%, 5th year of participation = 0%. During the 5th year, FSS staff will include all earned income in rent calculations.

- ➢ Note that during this period, if there is a contract, participants will not earn escrow benefits during the 1st year and may or may not during the following based on the rent increase and income exclusions.

This initiative is in the phase out mode since October 1 of FY19. As of said date, no new participants will be added to the IEE program.

This initiative meets the statutory objective of increasing family self-sufficiency and will be closed out once all current participants have cycled through. Phase out of this program continues during FY22 with the expectation that all residents will have transitioned by FY22.

ECC/HANH does not anticipate changes to the initiative or metrics. This initiative aims to increase housing choice and cost efficiency of redevelopment efforts.

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

This initiative was approved in FY12 and implemented in FY13. As an MTW Agency, ECC/HANH implemented a new pilot program to promote HUD's mission to promote self-sufficiency throughout the agency. ECC/HANH developed a pilot self-sufficiency plan for the Brookside Phase II Rental development and Rock View (not RAD sites) that encompassed HUD's continued mission to increase self-sufficiency among residents and promote accountability.

Key program components:

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

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

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

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

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

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

The CARES program description can be found in Appendix 3.

In 2015 the program was reviewed and updated to clarify that receipt of a PBV is not an option for families living at the CARES sites (Brookside II & Rockview I), regardless of participation in the CARES program or if they opted out; unless the family has an exemption. At time of graduation, for some residents, this means transitioning to Fair Market rent or Flat rent, and for others, this means moving into a fair market unit in the community or purchasing a home. Every participant in the CARES program is receiving on-going support and assistance through Family Self Sufficiency, homeownership, Resident-Owned Business, Connecticut Association Human Services-Financial Literacy, CONNCAT Training School, and other programs with ECC/HANH or in the community.

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

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

During this time, program participation increased by 17%. Families participated in briefings where they were reminded of the program rules and requirements and all families were again given the opportunity to opt into or out of the program. All current participants opted to stay in the program and a number of families who previously were not participating opted in. CARES is reaching its 1st 72-month mark, and residents who chose option 1 are aware of the program requirements and are preparing to graduate from the program.

Significant Change in Amendment #1 of the MTW 2020 Plan:
CARES Program Interim & Rent Hardship Rule During COVID19 and any pandemic or National, State or Local emergency affecting a large number of families in the community.

CARES program will include 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 order to prevent the reprocessing of files when families go back to work during a time like this, the CARES coordinator 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 5th month) which would be an increase back to the amount prior to the decrease. 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.

The decrease in rent will reflect 30% of the total household income but will allow for families with total household incomes below $2500 annually, to pay as little as the 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 rent payments between $0 to $50 accordingly.

These individuals meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent is then modified accordingly based on the information collected.
If a family is unable to pay the minimum rent because of a financial hardship the family may be eligible for a temporary waiver from paying Minimum Rent.

A family may be exempt from Minimum Rent for 120 days when the family experiences a hardship as a result of COVID19 and other similar pandemic or National, State or Local emergency affecting a large number of families in the community. There is no requirement to repay this rent during this type of circumstance, and no referral to FSS or community service will be required. Retroactive adjustments do not apply to families in the CARES program as they are required to pay rent based on the 3rd year rent calculation.

CARES Escrow
Families with an escrow balance may request funds for emergency services and needs associated with the current pandemic and other similar emergencies affecting families in the community. Families may request access to their escrow savings separate from the already embedded request for escrow outlined in CARES. This request will not count toward the number of requests allowed, per family. In addition to the current list of allowable uses, requests can include items such as, but no limited to:

- Food insecurities
- Home necessities
- Rent
- Related Medical Expenses
- Utility payments
- Transportation related expenses

Requests may be approved at the discretion of the housing authority only after all resources, such as access to foodbanks, diaper banks, and other community resources have been exhausted. All requests will need to be reviewed by the CARES committee under an expedited version of the current escrow request approval process and must be reviewed and signed by the Director of CED or designee.

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

Initiative 2.4 – Teacher in Residence

This initiative was approved in FY15 and implemented in FY15. As part of ECC/HANH Believes, an ECC/HANH youth initiative, Elm City Communities seeks to make academic supports readily available to the approximately 2,000 school age youth residing in our developments. Modeled on the Officer in Residence program already implemented through HUD approval, ECC/HANH offers housing to teachers in exchange for the delivery of homework help and tutorial services for our youth. Teachers housed through ECC/HANH Believes are called “Teachers in Residence” and the initiative provides ECC/HANH youth with the necessary academic assistance so many of our youth need, as well as help bridge a historical divide between educators and our families. Creating communities where teachers and parents reside and commune regularly shifts traditional relationships between teachers and parents. In turn, the program creates space for experiential learning, living, and communication. We are building relational pathways from the home into the classroom.

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

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

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

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

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

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

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

ECC/HANH has planned and implemented a non-significant change of moving the pilot site from Waverly Townhomes to McConaughy Terrace and does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed. Benchmark for metrics SS#5 may be reevaluated during FY19. This initiative meets the statutory objective of increasing family self-sufficiency.

In FY18, the special unit at Waverly was transitioned to a residential unit due to RAD conversion scheduled for the development during FY19. The afterschool program at Waverly concluded at the end of the 2018 school year to accommodate the teacher's move to McConaughy. In efforts to continue to provide the service to families from Waverly, ECC/HANH provides transportation for those who are interested in having their children continue to attend. Programming at McConaughy continues to be provided and includes children from other developments in the West Rock area allowing the program to reach a larger number of ECC/HANH youth across developments.

In 2019, it was determined that as a result of changes, and the move from one site to the other, reporting for FY19 would be treated as base reporting year. Staff continue working with students and their parents, and providing incentives to the new community in efforts to get more participation and bring new attention to the program.

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

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

Approved FY19

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

Activity Description

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

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

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

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

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

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

Statutory objectives.

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

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

2) Achieve Agency Cost Savings

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

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

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

ECC/HANH is in the process of phasing out the IEE program and will launch the REACH program during FY22.

The program was launched in FY21 and will continue to be monitored during FY22 and forward.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22. This initiative meets the statutory objectives of increasing self-sufficiency.

Cost Efficiency

Initiative 3.1 – Rent Simplification
Approved in FY07 and implemented in FY08

Description and Status
The full description of ECC/HANH's rent simplification program can be found in the appendix.

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[12] every three years. MTW families that don't meet the elderly/disabled definition will be considered work-able families.

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

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

- Triennial cycle (every three years) for elderly/disabled households (defined as head, co-head, or spouse is elderly and/or disabled)
- Biennial cycle (every two years) for work-able households (those that do not meet the elderly/disabled definition)
  - **Rationale**: Very little change in income takes place with elderly/disabled families on fixed income and there is little financial incentive for ECC/HANH to verify their income annually. Work-able families will benefit from two-year cycles as they will not pay incremental rent increases on any income increases for the two years between recertifications.
  - **Expected impact**: Administrative savings, increased participant satisfaction and reduced need for interim recertifications

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

- **Rationale**: Using a band-based tiered rent schedule allows families to move away from verifying every dollar earned and deducted
- **Expected impact**: Less intrusive recertification process and increased understanding of the rent calculation methodology

iii. **Exceptional expense tiers.** Households with exceptional expenses may request a rent reduction. This includes large families (with more than two children). It also includes families with excessive medical, disability assistance, or childcare expenses. Participants are not required to provide documentation of

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

every expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier. The amount of monthly rent reduction is established at the mid-range of the tier. Households with exceptional expenses will receive a direct reduction of the monthly rent. However, all participants must contribute a minimum of $50 towards their monthly rent.

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

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

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

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

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

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

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

- Year 2: No family shall be subject to an increase in TTP greater than $25/month
- Year 3: No family shall be subject to an increase in TTP greater than $50/month
- Year 4: No family shall be subject to an increase in TTP greater than $75/month
- Subsequent years: No family shall be subject to an increase in TTP greater than $100/month

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

- **Rationale:** Limit undue hardship to families due to minimum rents and streamlining of deductions.

- **Expected impact:** No sudden increase in hardship applications due to rent simplification activities.

Impact

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

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

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

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

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

In FY18, 102 applications were received and 35 (34%) were approved. In FY17, 73 applications were received and 67 (49%) were approved. There has been a 58% decrease in the number of applications received, and a 32% decrease in number applications approved in comparison to the 2012 baseline.

Due to staff reductions in LIPH during FY18, our time estimates are 1.5 hours per recertification without interviews (family). With interviews of family members (size) it can add an additional hour. In HCV staff used 3.5 hours on average to complete certifications; this included time associated with filing, answering calls & emails.

In this initiative was updated to include removal of requirement to follow up annually with Earned Income Disregard, Community Service & Flat Rent, and clarifying language to HCV Payment Standard increase or decrease at time of bi-tri ennial certifications.

Payment Standards

ECC/HANH 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 approved FMR at that time.
The PHA will use the payment standard in effect on the date of reexamination whether it is a decrease or an increase.

Expected Impact:

- Accurate and streamlined accounting for all HCV participants.
- Cost Savings to the agency derived from reduction in time spent revising and correcting miscalculations.

EID (LIPH)

This 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 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. 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 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.

Community Service Requirement (LIPH)

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.

LIPH Community Service Significant Change MTW FY20 Amendment #1:
Community Service requirements will not be required for families who experience a decrease in income due to loss of employment or decrease in hours as a result of COVID19 and any similar pandemic or national, state or local emergency that affects a significant number of families in the community. Residents will not be expected to make up these hours. The requirement will be reinstated when the stay at home and social distancing requirements are lifted.

The 96 community service hours per year will be calculated by 8 hours a month and families will not be required to make up hours during months affected. ECC/HANH will establish time period for hold on CSSR as needed.

Flat Rent

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.
Flat Rent

Significant Change as part of amendment #1 to the FY20 MTW Plan:
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 two 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 be 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 as a result of such pandemic or emergency, will not be required to repay hardship and will not be required to participate in family self-sufficiency services. Under this type of circumstances only, no referrals will need to be made by in house staff as a result of hardship.

ECC/HANH does not anticipate changes to the initiative or metrics. This initiative aims to increase housing choice and cost efficiency of redevelopment efforts.

Initiative 3.5 – HCV Rent Simplification/Cost Stabilization Measures

This initiative was approved and implemented FY08 and updated in FY14. The Authority enacted Rent Simplification measures consistent with the FY08 MTW Plan. This initiative expanded those streamlining measures. This initiative replaced previous Initiative 3.3 (closed-out).

This proposed activity has three components:

Part 1. HQS Inspections on Biennial/Triennial Schedule

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

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 or made accessible via email or other electronic format 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.

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

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

Part 3. Landlord Rent Increases on Biennial/Triennial Schedule

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

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

V: Approved Initiatives Requiring Funding Flexibility Only

Housing Choice

Initiative 1.8F- Farnam Court Transformation Plan

This initiative was approved in FY11 and was implemented in FY12.

The Authority has conducted a community planning process regarding the redevelopment of this obsolete 240-unit housing development constructed in the 1940s. This development's design lacks energy efficiency, positive urban design standards and has contributed to on-going crime issues in the area. It is surrounded by areas that are thriving or undergoing transformation and re-design of this property can better link it to its surroundings helping to create access and opportunity for residents. Farnam Court has been approved for conversion of the ACC units under the Rental Assistance Demonstration Program award.

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

Farnam Court will replace 240 units of housing originally built in the 1940s and most recently improved in the 1980s. The redevelopment will occur in phases resulting in 228 replacement units and introducing 31 market rate units as well. The redevelopment includes new roads, streets, infrastructure, and utilities funded through a City of New Haven $8 million capital investment. The project will reconnect the Farnam Court neighborhood with the Grand Ave corridor and the vital Downtown and Wooster Square neighborhoods. It also links to the Mill River neighborhood, a source of job opportunities.

Farnam offsite – 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. These developments were completed and occupied in 2015.

Farnam Court Phase I – on site will involve the demolition of 148 units. These will be replaced with 2 mid-rise 5 story buildings housing 94 units --86 assisted and 8 market rate units situated on 1.1 acres. Additionally, these buildings will house 7,400 sq. feet of commercial and community/program space. The community space will support a vibrant comprehensive economic self-sufficiency program. This project is being financed through LIHTC 4% Bonds, a $4 million State of CT CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars and private equity. This development is completed and fully occupied. Farnam Phase 1 was completed and occupied in 2018.

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 sq. feet community center and central park. Phase II has been bifurcated into two distinct LIHTC phases to allow for the maximization of federal, state, and private financing and the minimization of the use of MTW funding. Both Phase II developments completed the financial closings in FY20 and are under construction. All units under Phase II will be completed in FY2022

Under ECC/HANH's MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program. ECC/HANH will apply local TDC design standards, PBV income tiering and MTW Rent Standards that allow ECC/HANH to approve exception rents. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% without prior HUD approval. ECC/HANH will reexamine its MTW Rent Standards monthly to ensure that ECC/HANH does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, tenant rent payments to landlords, and any utility allowance amounts.

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

Initiative 1.25F Vacancy Reduction

This initiative was implemented in FY08.

ECC/HANH will continue to show improvement from the baseline FY2008 vacancy rate of 10%. Efforts will continue during FY 2022. ECC/HANH currently uses the funding flexibility to perform more unit turn over to reach an Occupancy percentage of 96%. The Agency has set a standard of unit turns by bedroom size. Typically, a 0- or 1-bedroom unit turn should occur within a 5-day period. A larger 3-5-bedroom unit may take several weeks particularly if hazardous materials (asbestos/lead) have been found in the unit. Funding allows the Agency to bulk, abate hazardous materials, renovate the unit, and manage all administrative functions supporting vacancy reduction. The Agency continues to identify resources and process to streamline vacancy reduction.

Elm City Communities is undergoing a major capital investment effort fueled in part by a RAD portfolio award. redevelopment and modernization of significant numbers of units requires major scale resident relocation. As such, the redevelopment efforts, detailed herein, will continue to utilize the funding flexibility to effectuate its redevelopment efforts. These awards also indicate that parts of the portfolio needed significant rehabilitation. As such, as we move aggressively through these redevelopment efforts there will be impacts on our occupancy/vacancy rates. We will not house residents in units that are substandard. Many units that are scheduled for RAD redevelopment are in substandard condition requiring an investment to turn the unit. Turning a unit that is scheduled for redevelopment is an inefficient use of limited federal dollars. As such, we are balancing our redevelopment plan with our agency-wide vacancy reduction efforts. Elm City Communities is committed to reducing its vacancies and increasing its occupancy percentage.

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

Self Sufficiency

Initiative 2.6F Resident Owned Business Development

This initiative was approved and implemented in FY09.

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

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

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

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

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

There are currently 8 Resident Owned Businesses. In 2022, ECC/HANH will be working to add more businesses to the ROB portfolio by completing additional outreach and providing more information to the residents of ECC/HANH.

For FY 22 ECC/HANH does not anticipate any changes to the initiative and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

Initiative 2.7F SEHOP Capital Improvement Program

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

This program supports new homeowners with necessary capital improvements costing $500.00 or more that arise after being in the home for a minimum of three years. In reviewing this initiative, ECC/HANH determined that the need for this service is low. Families are purchasing homes with newer systems, roofs, and windows; making it less likely for families to request assistance.

In FY19 ECC/HANH made the decision to close and phase out this initiative. Only those with a current contract will have access to the program until the contract expires, or program participation ends. This program will continue to be monitored and reported on during FY22

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

Initiative 2.8F Prison Community Reentry

This initiative was approved in FY09 and implemented in FY10.

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

Under this initiative ECC/HANH seeks to house individuals who have reentered society after completing a prison sentence. We currently have 3 segments of re-entry. 1 for our Low-Income Public Housing (LIPH) and another for our Housing Choice Voucher (HCV) programs for New Admissions. The 3rd is the addition of the Family Reunification program where individuals coming from incarceration may be able to be added to a current ECC/HANH household under both LIPH and HCV.

After one year of case management, progress is assessed. Participants who have successfully achieved their individual service plan goals complete the program and are eligible to remain in housing. Individuals who have not met their service plan goals by the one-year mark can remain in the program as they continue to work toward their goals. Individuals participating in the program are expected to participate in family self-sufficiency services, be lease compliant i.e. pay rent on time and will not be a nuisance to other residents.

All families will be required to engage with our Self Sufficiency unit. The FSS unit will refer the families to the community partners that offer specialized training for our families to increase their employability which in turn fosters movement toward increased income and self-sufficiency.

Programs that fall under the reentry initiative include, Project Longevity under the Housing Choice Voucher Program, Fresh Start under the Low-Income Public Housing Program, and Family Reunification under both HCV & LIPH.

In FY21 ECC/HANH updated the way families can access the program by expanding entry opportunities. In prior years, there were a set number of slots per subsidy program. Starting October of 2021, 1 out of every 10 New Admissions (10% per year) will be set aside in each subsidy program and the cap on number of vouchers will be lifted. In other words, as long as we meet the 1 out of every 10, we can take on as many new participants as allowed under this process. All other features of the program will remain the same, with the exception of Family reunification being added to the count.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22. This initiative meets the statutory objectives of providing Housing Choice and Family Self-Sufficiency.

Initiative 2.9F Resident Services for Elderly/Disabled

This initiative was approved and implemented in FY03. No amendments have been made.
Under this program ECC/HANH serves individuals who are elderly and/or disabled.

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

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

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY22. This initiative meets the statutory objectives of providing housing choice and family self-sufficiency.

Initiative 2.10F Jumpstart Initiative – incentivizing higher income families to exit subsidized program

Approved and Implemented in FY20

Description of Activity: 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 resource 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 were 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.

As a new program, we anticipate a conservative enrollment during year one of 25% of eligible families seeking to enroll. This represents a 15% increase in annual EOPs. Upon enrollment, families will enter into a Jumpstart initiative agreement that allows them to end their participation with ECC/HANH's LIPH or HCV program and provide to them the Jumpstart payment so long as:

1. The current unit passes housekeeping inspection with no damage beyond normal wear and tear.

2. The families is currently in good standing with regard to rental payments and other terms of the lease agreement.

3. The family is not under a repayment agreement.

4.The family can document an appropriate exit plan including having obtained new housing – rental or ownership.

5. The family understands that should they wish to return to subsidized housing they will need to go through the standard application process.

The family agrees to participate in follow up data collection and evaluation upon their exit to allow us to track the success of the initiative.

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[13]:

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

[13] FMRs will be adjusted annually.

Upon identification of a near over income family, the program will be explained to the family and a referral will be made to a Relocation Coordinator who will work directly with the family. The Relocation Coordinator will assist the family in identifying a unit in the private market.

Once landlord and resident have committed to the lease-up, ECC/HANH will provide the landlord with a promissory note detailing the payment amount and the requirements both the landlord and resident must fulfill in order to qualify. A check payment will be provided to the resident or landlord on the date of the EOP from ECC/HANH which is also the date of the new tenancy in the market rate unit. Upon move out of that unit, the security deposit, less any withholdings for damages, will be repaid to the resident for the resident's use.

This program is subject to budget availability. Initial year budget is based upon the projections above. Subsequent year allocations will be informed by the results of the program. Should interest exceed budget allocations, the program shall be offered on a first come, first served basis.

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

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

Impact Analyst

During FY20, a team of ECC/HANH staff met weekly to create program policies, procedures and forms associated with the jumpstart program. This program launched during the 2nd quarter of FY21.

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY21. This initiative meets the statutory objectives of increased housing choice, family self-sufficiency and cost effectiveness.

Initiative 2.12F – ECC Believes —

This initiative was approved and implemented in FY2014.

Elm City Believes is a new youth initiative that leverages smart housing policy and programs in order to advance academic outcomes for student residents so that we may see success among New Haven's young people through increased high-school graduation, postsecondary completion, and employment attainment. Launched as HANH Believes in April of 2014, Elm City Believes provides a cradle-to-career pipeline of learning resources for children and youth and sustains the notion that our children's success relies on supportive in-school and out-of-school experiences. Elm City Believes has the potential to stop the cycle of poverty among the families utilizing ECC/HANH and in so doing we have the opportunity to build a new, vibrant middle class in New Haven.

Elm City Believes is comprised of supports that expand upon the good work ECC/HANH has been doing as well as enhance what the nationally recognized New Haven Public Schools are doing. Programs are research-based and best practice supported as well as founded on feedback from our residents, ECC/HANH staff, and community stakeholders. As such, we focus our youth initiative on 1) academic supports and afterschool programming to reduce the achievement gap; 2) parent and family engagement in their children's education; and 3) increasing New Haven Promise admittance and other programs that support post-secondary opportunities. In addition to the array of HANH-wide programs, HANH has school-specific partnerships that cater to individual student needs (e.g. Tutoring and small group homework help, whole-family wraparound evaluations and mental health supports, student attendance and engagement assistance). See Appendix 5 for a full program description.

ECC Believes goals include improved school attendance, improved academic achievement and positive youth development.

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

Cost efficiency

Initiative 3.11F: Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities

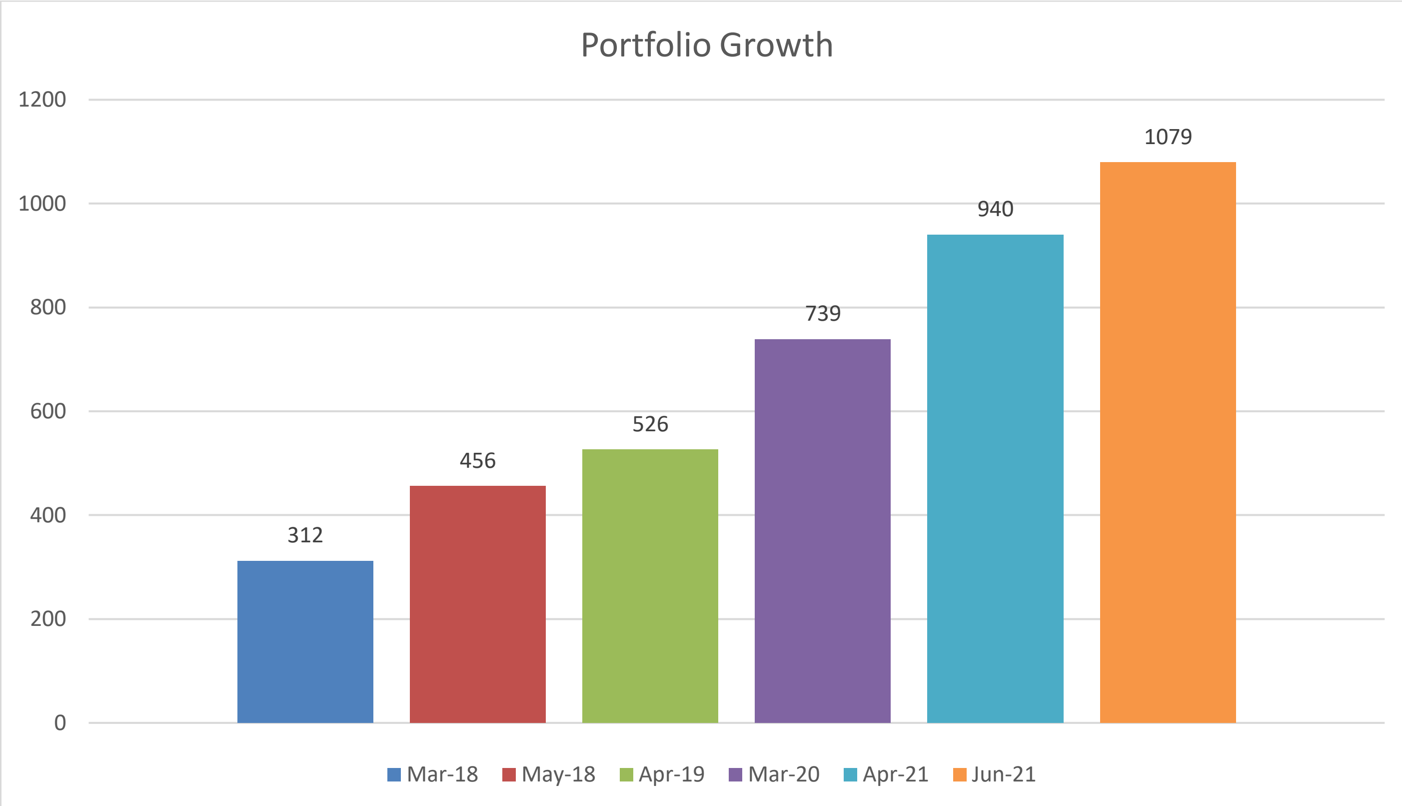
Approved and implemented in FY17

Description of Activity: In 2017, ECC/HANH 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: 1) Property management and consultant services 2) Development of mixed-use and mixed-income real estate projects, and 3) 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: 1) reduce costs and achieve greater cost effectiveness of federal expenditures, 2) 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, and 3) increase housing choices for low-income families.

The Formation of 360 Management Group Company

In 2017, ECC/HANH approved the formation of 360 Management Group Company and hired its first employee to serve as Senior Vice President. 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 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

The authority's redevelopment strategic goal was to achieve at least a 10% savings on total operating expenses by: 1) participating in HUD's Rental Assistance Demonstration program, which allows public housing agencies to leverage public, and private debt and equity; and 2) creating 360 Management Group, Co. (360) to serve as its managing agent and reducing operating expenses in comparison to the operating expenses incurred by LIPH. The formation of 360 Management Group Company, ECC/HANH's property management affiliate-instrumentality has contributed to the reduction of the agency's cost reduction and greater cost effectiveness goals since the formation of 360 Management Group, Co.

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 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**

During FY2022, ECC/HANH continues to explore the formation of a Resident Services Instrumentality.

The Formation of a Resident Services Instrumentality

ECC/HANH is committed to creating resident services programming which gives 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. Currently these services are coordinated by ECC/HANH's Community and Economic Development (CED) 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 2022 goal is to complete the due diligence and sustainability assessment of forming 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 anticipated 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.

During 2021, ECC/HANH, in collaboration with 360 Management Group, began to explore the feasibility of establishing a Resident Services instrumentality. The guiding questions were:

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

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.

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

B. Not Yet Implemented Activities

None

C. Activities on Hold

There aren't currently any activities on hold.

D. Closed-Out Activities

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

Initiative 1.24F Fulton Park Modernization

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

This initiative was approved in FY11, placed on hold in FY12, and was reactivated in FY2016. This development is included in the RAD conversion for FY2016. The Authority completed a RPCA and submitted a RAD application on 10.9.2015 for the rehabilitation of Fulton Park. The Authority received RAD approval in spring of 2016 and the RAD conversion was completed in 2020. This development was included in what is categorized as RAD 2 which also included Stanley Justice Landing and Waverly Townhomes. The rehabilitation project is complete and RAD units are fully leased. ECC/HANH does not anticipate any changes to the initiative or metrics and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing cost effectiveness and increasing housing choice.

2. Explain why the activity was closed out.
The activity was closed because the RAD conversion was completed in 2020. The redevelopment is complete, and the site is fully leased.

Initiative 4.9 LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This initiative was first approved in FY08. Implementation of the marketing initiatives for Higher Income Eligible families began during FY09 with the development of marketing materials. Due to ECC/HANH's focus on redevelopment activities, this initiative was placed on hold in FY12 and continued to be deferred in FY14.

2. Explain why the activity was closed out.
No actions were taken towards reactivating this activity as instead focus was on redevelopment into mixed income communities. Incentives have not been needed to attract higher income residents to these communities. ECC/HANH will no longer pursue this activity.

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

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This activity was Proposed and approved in 2009 MTW Annual Plan, it was implemented in FY14. The development was completed and occupied in September 2013.

2. Explain why the activities was closed out.
Completion of the Mixed-Use development occurred in 2013.

Initiative 1.3 – Fungibility

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
Approved in FY12 and implemented in FY13.

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

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

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This initiative was approved in FY09 and implemented in FY10. This activity was closed out in FY19.

2. Explain why the activities was closed out.

This initiative prevents displacement of families due to foreclosure. The demand for foreclosure vouchers decreased during FY2017 and FY18. In addition, many participants either ported out to another jurisdiction or left the HCV program, thereby reducing the need for the number of set aside vouchers even further. At the end of FY 18 there were 18 families leased and in the 1st quarter of 2018, there were 17 families leased.

ECC/HANH was able to assist families with the foreclosure vouchers at a time when homes were being foreclosed. Now that the market has stabilized and there are fewer foreclosures, there isn't as great of a need for the set aside of the foreclosure vouchers, and so the Foreclosure Waiting List is now closed. ECC/HANH allocated the remaining vouchers and closed out the initiative in FY19. During FY20, there were 15 vouchers in use. ECC/HANH is in the process of reallocating these vouchers as the families are absorbed via port out or end participation.

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

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
Approved in FY13. This activity was closed out in FY14.

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

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

ECC/HANH will use MTW Block Grant Banks to develop housing through a mixed finance process

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This activity was approved in FY2013 and was never implemented. This activity was closed out in FY14.

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

Initiative 3.2. UPCS Inspections

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
UPCS Inspections were approved and implemented in FY08. This activity was closed out in FY13.

2. Explain why the activities was closed out.
MTW authorization was no longer required. Since ECC/HANH implemented the initiative in FY08, HUD subsequently permitted all PHAs to inspect on a similar schedule. It is no longer being reported on as an MTW initiative.

Initiative 3.3 – Revised HQS Inspection Protocol

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
Revised HQS Inspections: Approved and implemented in FY11. This activity will be closed out in FY15.

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

Initiative 3.4. Mandatory Direct Deposit for Housing Choice Voucher Landlords

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
Mandatory direct deposit for Housing Choice Voucher landlords was approved and implemented in FY10. This activity was closed out in FY14.

2. Explain why the activities was closed out.
This activity was closed since it does not require MTW flexibility as it is covered by general operational flexibility provided to all PHAs. Although the activity continued in FY14 and will in the future, it will no longer be reported on as an MTW initiative.

V. Planned Application of MTW Funds

(II) SOURCES AND USES OF MTW FUNDS
ANNUAL MTW PLAN

ESTIMATED SOURCES AND USES OF MTW FUNDS

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	$1,289,808
70600	HUD PHA Operating Grants	$101,945,068
70610	Capital Grants	$3,518,749
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	$0
71600	Gain or Loss on Sale of Capital Assets	$0
71200+71300+71310+71400+71500	Other Income	$58,301
70000	Total Revenue	**$106,811,926**

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000(91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$4,272,623
91300+91310+92000	Management Fee Expense	$10,084,466
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	$175,719
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$1,699,833
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$2,934,763
95000 (95100+95200+95300+95500)	Total Protective Services	$147,005
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$662,575
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$1,858,953

96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$0
97100+97200	Total Extraordinary Maintenance	$396,419
97300+97350	HAP + HAP Portability-In	$76,013,404
97400	Depreciation Expense	$3,415,900
3397500+97600+97700+97800	All Other Expense	$0
90000	Total Expenses	$101,661,658

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:
Estimated Total Expenses include Line Item 97400 Depreciation Expense for $3,415,900, which is a non-cash item. After adjusting the depreciation expense, Estimated Total Revenues exceed Estimated Total Expenses by $8,566,168, which has been planned for development projects under the Non-MTW activities and other Capital Expenditures which will be recorded on the balance sheet.

Estimated Total Expenses include Line Item 97400 Depreciation Expense for $4,927,935, which is a non-cash item. After adjusting the depreciation expense, Estimated Total Revenue exceed Estimated Total Expenses by $11,746,977, which has been planned for development projects under the Non-MTW activities and other Capital Expenditures which will be recorded on the balance sheet.

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

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

LOCAL ASSET MANAGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

No

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

Yes

iii. Has the MTW PHA provided a LAMP in the appendix?

Yes

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

No Proposed Changes in FY22

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. **Description of RAD Participation**

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
ECC/HANH has received approval to convert a significant proportion of its portfolio under the RAD conversion process. ECC/HANH completed the conversion of Ribicoff Cottages to Twin Brook under a RAD redevelopment resulting in 95 RAD units. ECC/HANH converted all formerly LIPH units at the Monterey Place development resulting in 280 RAD units. ECC/HANH converted 34 LIPH and 53 LIPH units to 87 RAD units at Wilmont Crossing and Eastview Terrace respectively. ECC/HANH is converting 244 LIPH units at Farnam Courts in a multi-phase redevelopment. The first phase resulted in 57 new RAD units at Fair Haven and through the second phase 86 new RAD units on site at Mill River Crossing. Through a portfolio award, HUD also approved the RAD conversion of 11 additional sites through 4 groupings. RAD 1 included 144 units of elderly only LIPH units were converted to RAD units at Prescott Bush, Katherine Harvey Terrace, Newhall Gardens and Constance Baker Motley. RAD 2 converted an additional 70 units at Stanley Justice, Fulton Park and Waverly. RAD 3 is currently under construction and has converted 213 units at McQueeney Towers and Celentano Towers. RAD 4, which closed in FY21, converted an additional 201 units at Fairmont Heights and Ruoppolo Manor. Rockview 2 was also completed in FY21 which will transfer 62 units from Westville Manor as an offsite component of the multi-phase Westville Manor redevelopment. The following developments are either in the planning or closing process that will

result in conversion: McConaughy Terrace, 201 Units LIHTC Approved), Valley Street Townhomes, 40 Units (LIHTC approved, Westville Manor, 88 units (planning), 34 Level Street approximately 55 units (planning), Crawford Manor 109 Units (planning).

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

No

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

There are no proposed changes to the RAD Significant Amendment.

VI. Administrative

Board Resolution – Approving ECC/HANH's MTW FY22 Annual Plan

To: Board of Commissioners

From: Shenae Draughn, Interim President

Date: July 20, 2021

RE: Approval of MTW Annual Plan for FY 2022

ACTION: Recommend that the Board of Commissioners adopt Resolution #07-54/21-R

TIMING: Immediately.

DISCUSSION: As an MTW agency, ECC/HANH is required, to provide an Annual MTW Plan and an Annual MTW Report. The MTW Annual Plan for FY 2022 was made available for public review; copies were made available on the Elm City

Communities Website and at the 360 Orange Street reception area. A RingCentral phone and video public hearing was held on Monday, June 14, 2021. No public comments were received.

ECC/HANH submits for Board approval the MTW Annual Plan for Fiscal Year 2022. We request the Board's authorization for submission to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Plan for FY 2022 and all related or required certifications and HUD forms, of which the attached document is a part, as well as all necessary documentation and submissions of the Plan.

FISCAL IMPACT: None

STAFF: Leasley Negron, Director of Moving to Work Initiatives
Office of Asset Management

Housing Authority of the City of New Haven

Resolution #07-54/21-R

APPROVING ECC/HANH'S MTW ANNUAL PLAN FOR FY 2022

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

WHEREAS, The MTW Annual Plan for FY 2022 was made available for public review on , and a public hearing was held on Monday, May June 14, 2021; and

WHEREAS, ECC/HANH received no public comments; and

NOW, THEREFORE, BE IT RESOLVED THAT THE BOARD OF COMMISSIONERS hereby authorizes the submission to the U.S. Department of Housing and Urban Development (HUD) the Moving to Work Annual Plan for FY 2022 and make the following certifications and agreements with HUD in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The 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.
4 The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives

to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.

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

9. The 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.

10. The 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 regulation2 at 24 CFR Part 135.

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

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

13. The 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.

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

15. The 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 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.

16. With respect to public housing the 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.

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

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

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

21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times

and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present on July 20, 2021.

Shenae Draughn
Interim President/Secretary

Date 7/30/21

REVIEWED:
MCCARTER & ENGLISH, LLP
GENERAL COUNSEL

By:________________
Rolan Joni Young, Esq.
A Partner

Certificate of Compliance

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning 10/01/2020, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

__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

Board Chair

NAME OF AUTHORIZED OFFICIAL TITLE

7/20/2021

SIGNATURE

DATE

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

NOTICE OF RE-SCHEDULED PUBLIC HEARING FOR THE ELM CITY COMMUNITIES, HOUSING AUTHORITY OF NEW HAVEN MOVING TO WORK 2022 ANNUAL PLAN

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 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.

Pursuant to said Section V (B), the Authority will conduct a public hearing on **June 14, 2021 at 11:00 AM, the ringcentral conference line** https://meetings.ringcentral.com/j/1467603184 or by phone at: 1(267)-930-4000 ID: 1467603184
to receive comments and recommendations. A copy of the Plan was made available for review starting **May 12, 2021** on the Authority's website at elmcitycommunities.org. The public is invited to provide written comments addressed to ECC/HANH MTW 2022 Plan, Attn: Maza Rey, P.O. Box 1912, New Haven, CT 06509-1912. Any individuals requiring a reasonable accommodation to participate in the hearing may call Teena Bordeaux, Reasonable Accommodations Manager for ECC/HANH at 498-8800 extension 1507 or at the TDD Number 497-8434.

AVISO DE FECHA NUEVA PARA AUDENCIA PUBLICA DEL PLAN DE MOVIMIENTO HACIA EL TRABAJO (MOVING TO WORK (MTW) DE ELM CITY COMMUNITIES, LA AUTORIDAD DE VIVIENDA DE NEW HAVEN.

La Sección V (B) para la enmienda del Plan de Movimiento Hacia el Trabajo de la Autoridad de Vivienda de New Haven requiere que antes de que la Agencia pueda presentar su Plan al Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (el "HUD"), debe llevar a cabo una audiencia pública, considerar comentarios del público, y obtener la aprobación de la Junta de Comisionados. Según Sección V (B), la Autoridad de Vivienda tendrá una audiencia publica **el día 14 de junio, 2021 a las 11:00 AM, por medio de la línea de conferencia de ringcentral** https://meetings.ringcentral.com/j/1467603184 o por teléfono 1(267)-930-4000 con numero de identificación de reunión 1467603184 para recibir comentarios y recomendaciones . Copias del Plan Serán disponibles para reviso el lunes **Dia 12 de Mayo**, **2021** en la página web de la agencia, elmcitycommunities.org
Comentarios escritos pueden ser enviados a: ECC/HANH MTW 2022 Plan, Attn: Maza Rey, P.O. Box 1912, New Haven, CT 06509-1912. Alguna persona requiriendo acomodación razonable para participar debe llamar a Teena Bordeaux, Reasonable Accommodations Manager de ECC/HANH a 498-8800 extensión 1507 o a el número de TDD 497-8434.

Housing Authority of the City of New Haven/Elm City Communities
Public Hearing: MTW FY2022
Monday, June 14, 2021
360 Orange Street, New Haven, CT 06511
(Via RingCentral teleconference)

Those present included:

Leasley Negrón, ECC/HANH
Other ECC team attendees via RingCentral (names unavailable)

The public hearing was called to order at 11:00 a.m. by Leasley Negrón.

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

NOTICE OF RE-SCHEDULED PUBLIC HEARING FOR THE ELM CITY COMMUNITIES, HOUSING AUTHORITY OF NEW HAVEN MOVING TO WORK 2022 ANNUAL PLAN

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 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.

Pursuant to said Section V (B), the Authority will conduct a public hearing on **June 14, 2021 at 11:00 AM, the ringcentral conference line** https://meetings.ringcentral.com/j/1467603184 or by phone at: 1(267)-930-4000 ID: 1467603184
to receive comments and recommendations. A copy of the Plan was made available for review starting **May 12, 2021** on the Authority's website at elmcitycommunities.org. The public is invited to provide written comments addressed to ECC/HANH MTW 2022 Plan, Attn: Maza Rey, P.O. Box 1912, New Haven, CT 06509-1912. Any individuals requiring a reasonable accommodation to participate in the hearing may call Teena Bordeaux, Reasonable Accommodations Manager for ECC/HANH at 498-8800 extension 1507 or at the TDD Number 497-8434.

At 11:02 a.m., the meeting was opened to take public comments.

Public Comments:

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

Adjournment:

Ms. Negrón thanked the participants and the public hearing was adjourned at 11:15 a.m.

Housing Authority of the City of New Haven/Elm City Communities

Results of Agency Directed Evaluations of Demonstration

ECC/HANH has contracted with Enterprise Community Partners to position the agency for a future case studies and evaluation of its MTW program and each of its initiatives. Enterprise is completing the 3rd year of a three-year contract to complete ECC/HANH's MTW Plans and Reports each year and has coordinated with ECC/HANH's data collection software provider for optimal data collection. Enterprise has provided data collection recommendations to ensure ECC/HANH is collecting data for metrics to support proper reporting and support a future evaluation.

Lobbying Disclosures

Disclosure of Lobbying Activities (SF-LLL)

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action:	2. Status of Federal Action:	3. Report Type:
na a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	na a. bid/offer/application b. initial award c. post-award	na a. initial filing b. material change **For Material Change Only:** year ________ quarter ________ date of last report ____________

4. Name and Address of Reporting Entity: ☐ Prime ☐ Subawardee Tier ______, *if known*: N/A **Congressional District**, *if known*: 4c	**5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:** N/A **Congressional District**, *if known*:
6. Federal Department/Agency: N/A	**7. Federal Program Name/Description:** N/A CFDA Number, *if applicable*: ____________
8. Federal Action Number, *if known*:	**9. Award Amount,** *if known*: $ N/A
10. a. Name and Address of Lobbying Registrant (*if individual, last name, first name, MI*): N/A	**b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*): N/A
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.	Signature: [signature] Print Name: Shenae Draughn Title: Interim President Telephone No.: 203-498-8800 x1001 Date: 7/30/2021
Federal Use Only:	Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

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AVISO DE FECHA NUEVA PARA AUDENCIA PUBLICA DEL PLAN DE MOVIMIENTO HACIA EL TRABAJO (MOVING TO WORK (MTW) DE ELM CITY COMMUNITIES, LA AUTORIDAD DE VIVIENDA DE NEW HAVEN.

La Sección V (B) para la enmienda del Plan de Movimiento Hacia el Trabajo de la Autoridad de Vivienda de New Haven requiere que antes de que la Agencia pueda presentar su Plan al Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (el "HUD"), debe llevar a cabo una audiencia pública, considerar comentarios del público, y obtener la aprobación de la Junta de Comisionados.
Según Sección V (B), la Autoridad de Vivienda tendrá una audiencia publica **el día 14 de junio, 2021 a las 11:00 AM, por medio de la línea de conferencia de ringcentral**
https://meetings.ringcentral.com/j/1467603184 o por teléfono 1(267)-930-4000 con numero de identificación de reunión 1467603184 para recibir comentarios y recomendaciones . Copias del Plan Serán disponibles para reviso el lunes **Dia 12 de Mayo**, **2021** en la página web de la agencia, elmcitycommunities.org
Comentarios escritos pueden ser enviados a: ECC/HANH MTW 2022 Plan, Attn: Maza Rey, P.O. Box 1912, New Haven, CT 06509-1912. Alguna persona requiriendo acomodación razonable para participar debe llamar a Teena Bordeaux, Reasonable Accommodations Manager de ECC/HANH a 498-8800 extensión 1507 o a el número de TDD 497-8434.

Appendix 1

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 70	$ 195,708	$ 244,635	$ 277,253	$ 309,871
HUD HCC FACTORS								
		0	1	2	3	4	5	6
Detached		-33.31%	-14.78%	16.60%	18.42%	39.04%	52.24%	64.69%
Row House		-35.69%	-15.46%	-1.75%	21.87%	44.88%	59.74%	73.66%
Walk Up		-42.07%	-21.41%	0.00%	30.91%	62.62%	83.16%	103.42%
Elevator		-44.44%	-22.22%	0%	33.33%	66.67%	88.89%	111.11%
ECC/HANH HCC 2013								
		0	1	2	3	4	5	6
Detached		$ 145,318	$ 185,685	$ 217,896	$ 258,023	$ 302,962	$ 331,731	$ 358,846
Row House		$ 118,081	$ 155,221	$ 183,609	$ 223,759	$ 266,014	$ 293,290	$ 318,861
Walk Up		$ 108,259	$ 146,866	$ 186,882	$ 244,651	$ 303,915	$ 342,285	$ 380,149
Elevator		$ 109,828	$ 153,759	$ 197,690	$ 263,587	$ 329,483	$ 373,414	$ 417,346
HUD TDC 2013								
		0	1	2	3	4	5	6
Detached		$ 168,342	$ 215,103	$ 252,419	$ 298,901	$ 350,961	$ 384,288	$ 415,699
Row House		$ 136,788	$ 179,813	$ 212,699	$ 259,210	$ 308,159	$ 339,757	$ 369,380
Walk Up		$ 125,410	$ 170,134	$ 216,490	$ 283,411	$ 352,064	$ 396,513	$ 440,376
Elevator		$ 130,472	$ 182,661	$ 234,850	$ 313,133	$ 391,416	$ 443,605	$ 495,794

ECC/HANH TDC 2013								
		0	1	2	3	4	5	6
Detached		$ 228,356.69	$ 291,789.97	$ 342,408.21	$ 405,464.41	$ 476,082.62	$ 521,291.12	$ 563,900.08
Row House		$ 185,556.06	$ 243,917.71	$ 288,527.99	$ 351,621.68	$ 418,022.08	$ 460,885.17	$ 501,067.76
Walk Up		$ 170,120.98	$ 230,789.37	$ 293,672.84	$ 384,451.85	$ 477,581.46	$ 537,876.94	$ 597,377.37
Elevator		$ 178,470.14	$ 249,858.09	$ 321,246.04	$ 428,328.23	$ 535,410.42	$ 606,798.37	$ 678,186.32

PERCENT CHANGE ECC/HANH TDC 2008-2013								
		0	1	2	3	4	5	6
Detached		15.00%	13.00%	10.73%	9.54%	9.11%	9.20%	8.94%
Row House		1.50%	2.94%	2.73%	5.14%	6.20%	6.94%	7.49%
Walk Up		16.75%	16.65%	17.70%	18.47%	20.73%	21.86%	23.14%
Elevator		10.45%	10.45%	10.45%	10.45%	10.44%	10.45%	10.45%

PERCENT CHANGE COMPARISON HUD TO ECC/HANH TDC								
		0	1	2	3	4	5	6
Detached		0.76%	0.74%	0.73%	0.64%	0.72%	0.72%	0.71%
Row House		0.66%	0.67%	0.67%	0.73%	0.69%	0.70%	0.70%
Walk Up		0.76%	0.76%	0.77%	0.79%	0.79%	0.80%	0.80%
Elevator		-0.20%	-0.20%	-0.20%	-0.20%	-0.20%	-0.20%	-0.20%

ECC/ HANH TDC 2017							
		0	1	2	3	4	5
Detached		$ 258,686.46	$346,915.00	$420,699.00	$514,164.00	$604,941.00	$660,932.00
Row House		$ 237,989.56	$326,544.00	$397,097.00	$488,020.00	$579,524.00	$638,384.00
Walk Up		$ 237,989.56	$286,276.00	$363,110.00	$474,222.00	$590,780.00	$665,145.00
Elevator		$ 210,661.90	$294,926.29	$379,191.42	$505,589.28	$631,956.64	$716,250.81

Appendix 2

Local Asset Management Plan:

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

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

Proceeds from the energy performance contracts and other non-federal sources to support project operations are not reflected in the operating statements for each project. The COCC operates on the allowable fees as described above. ECC/HANH systematically reviews information regarding the financial, physical and management performance of each project and identifies non-performing assets. All non-performing assets will have a management plan that includes a set of measurable goals to address. During FY09, ECC/HANH conducted an updated Physical Needs Assessment for each project. The work was completed in FY2010 and was fully reported in the FY10 report. Finally, ECC/HANH has implemented a Risk Management Program in accordance with §990.270.

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

The Housing Authority has the following developments in its pipeline: McConaughy Terrace 9%, McConaughy Terrace 4%, Valley Street Townhomes, Westville Manor Phase I, Westville Manor Phase II, and Crawford Manor. As it relates to our approved TDC, the developments shall not exceed the approved TDC. McConaughy Terrace ad Valley Street have been awarded 9% and 4% LIHTCs and are in the closing phase. Westville Manor, 34 Level Street, and

Crawford Manor are in the predevelopment. The Authority continues to work diligently to find creative construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of

the approved TDC.   The Authority also continues to seek alternative funding sources to reduce the need for MTW fungibility by seeking funding under the FHLB AHP program, State funding through the State of Connecticut Department of Housing and Department of Economic and Community Development

Appendix 3

CARING ABOUT RESIDENT ECONOMIC SELF-SUFFICIENCY (CARES)

PILOT PROGRAM FOR WEST ROCK REVITALIZATION INITIATIVES

Goals and Objectives of the Program

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

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

Eligibility/Threshold Requirements

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

- All adult members of the household 18 year of age or over must execute a CARES Addendum to the Standard PHA or HCV Lease Agreement;
- Be current in all lease obligations to ECC/HANH ;
- Be a resident in “good standing” as defined in the ACOP;
- Have been employed at least 12 months out of the prior 36 months before applying for the CARES program;
- Have a GED or High School diploma or be capable of obtaining such GED or High School diploma within 24-months of applying for program. Applicants for the program that do not have a GED or High School diploma must show progress towards meeting this goal;
- Enroll in the Authority’s FSS Program; and
- Open an IDA account

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

Program Overview

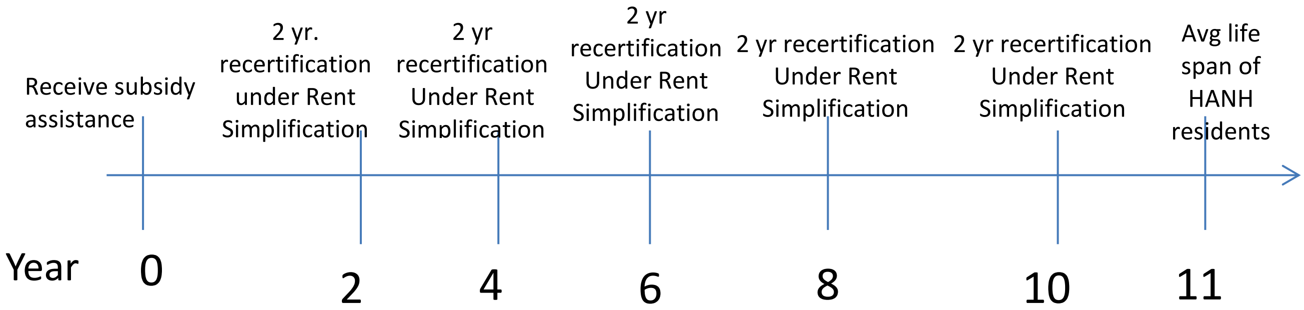
Brookside and Rockview families will be given the options, at lease up, to stay in a public housing program or reside in a Project Based Voucher (PBV) unit or to accept a Tenant Based CARES Program Voucher (CPV) as part of the CARES Program. Residents that opt to stay in public housing or a PBV unit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

Residents who elect to take the CPV option will be given up to two years to transition in to the CARES Program and a total of six years (72 months) to reach self-sufficiency based upon their income and job readiness at the signing of their lease. The first two years will enable residents the time to meet the basic requirements of the program. At the end of the six-year (72 month) program, participating residents will no longer receive rental assistance. ECC/HANH will determine the amount of assistance the family is eligible to receive over the term of the CPV assistance, and assistance will be adjusted annually for inflation (Exhibit A). In the third year of the program, an amount equal to the sum of the rental assistance that the family would have otherwise received in the final year will be deposited into a Resident Enrolled Escrow Fund (REEF). For the duration of the program the funds in the REEF may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted), purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of ECC/HANH . If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance. A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the Executive Director's office, the Director of Operations or designee, the Service Center Director or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

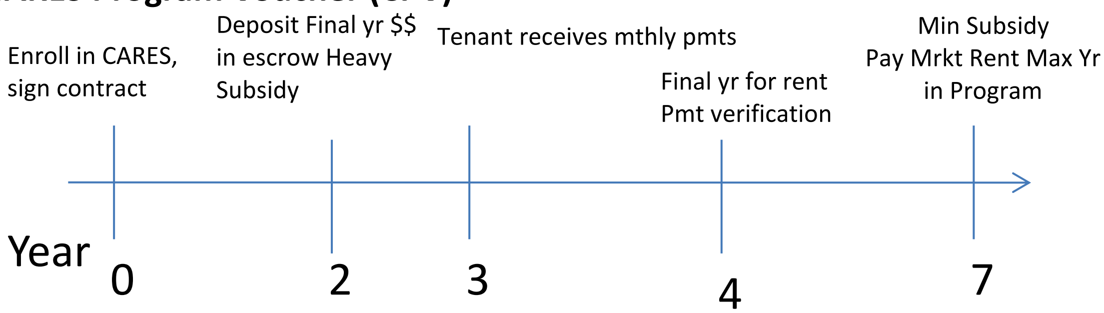
The first step to self-sufficiency is encouraging families to seek affordable housing and manage their household expenses on a fixed income which will empower them to make their own choices. At the time of enrollment into the program, each family will sign a CARES Addendum and go through an assessment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

HCV 7 Year Cash Payment Schedule

Public Housing/HCV Program



CARES Program Voucher (CPV)



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

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

Exhibit A - Housing Choice Voucher - HAP 7 Year Schedule

<table>
<tr><td colspan="2">Family Size</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr>
<tr><td colspan="2">Median Household HAP to Owner (9/10)</td><td>795</td><td>895</td><td>1000</td><td>1090</td><td>1147</td><td>1214</td></tr>
<tr><td colspan="2">Median Utility Allowance</td><td>122</td><td>292</td><td>357</td><td>362</td><td>425</td><td>430</td></tr>
<tr><td colspan="2">Median Monthly Cash Payment Assistance</td><td>917</td><td>1187</td><td>1357</td><td>1452</td><td>1572</td><td>1644</td></tr>
<tr><td>Years in Program</td><td>Cost of Living Increase</td><td colspan="6">Subsidy Value</td></tr>
</table>

1 Supportive Component Monthly	Lease up Year	917.00	1,187.00	1,357.00	1,452.00	1,572.00	1,644.00
Annually		11,004.00	14,244.00	16,284.00	17,424.00	18,864.00	19,728.00
2 Supportive Component **Monthly**	3%	944.51	1,222.61	1,397.71	1,495.56	1,619.16	1,693.32
Annually		11,334.12	14,671.32	16,772.52	17,946.72	19,429.92	20,319.84
3 Tenant Based Component **Monthly**	3%	972.85	1,259.29	1,439.64	1,540.43	1,667.73	1,744.12
Annually		11,674.14	15,111.46	17,275.70	18,485.12	20,012.82	20,929.44
4 Tenant Based Component **Monthly**	3%	1,002.03	1,297.07	1,482.83	1,586.64	1,717.77	1,796.44
Annually		12,024.37	15,564.80	17,793.97	19,039.68	20,613.20	21,557.32
5 Tenant Based Component **Monthly**	3%	1,032.09	1,335.98	1,527.32	1,634.24	1,769.30	1,850.34
Annually		12,385.10	16,031.75	18,327.79	19,610.87	21,231.60	22,204.04
6 Tenant Based Component **Monthly**	3%	1,063.05	1,376.06	1,573.13	1,683.27	1,822.38	1,905.85
Annually		12,756.65	16,512.70	18,877.62	20,199.19	21,868.55	22,870.16
7 Tenant Based Component **Monthly**	3% (Amount deposited into Escrow)	1,094.95	1,417.34	1,620.33	1,733.76	1,877.05	1,963.02
Annually		13,139.35	17,008.08	19,443.95	20,805.17	22,524.60	23,556.26
Total Cash Assistance		84,317.73	109,144.11	124,775.53	133,510.74	144,544.69	151,165.05

Program Steps

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

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

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

Individual Services Plan (ISP)
Once the assessment has been completed, the case manager and the family will develop an ISP that is designed to help the family meet the work requirement of this program within a 72-month timeframe. The plan must be completed within 90-days of moving into the new unit in the West Rock Community. The ISP will include the identified needs and agreed upon goals established during the needs assessment and be completed within 60-days after moving into the new rental unit. Families who are enrolled in the program will have to participate in the HUD mandatory income disallowance program and to enroll in the optional CARES REEF disallowance program. If it is determined that the family cannot obtain or sustain earnings over a 72-month period at or above self-sufficient income levels to obtain a market rate unit or other affordable unit on their own, the case manager may determine that the person cannot meet the goals of the program and that person may be exempted from the CARES program. If deemed exempt, that person will be required to enroll and to remain enrolled in the Authority’s Family Self Sufficiency (FSS) Program. The ISP shall address the following areas of concern.

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

Exemptions for residents remaining in Public Housing or Project Based Voucher Units
There are exemptions to the program for not having to pay the Flat Rent/Market Rent but who elect to remain in Public Housing or PBV units in the West Rock development. Persons disabled or deemed unemployable, and returning residents that have a right to return under the MOA between the former residents of Brookside and Rockview and ECC/HANH which will grandfather them in to return to the property and not be subject to the CARES program unless they voluntarily choose to.
Families that meet one or more of the following criteria are exempt from having to pay flat rent at the end of the 72 months:
The adult is precluded from obtaining or maintaining employment due to domestic violence or other circumstance beyond his or her control; or
The adult is employed and unable to pay their pro-rata share of the flat rent due to (1) a documented medical impairment that limits his/her work hours, or (2) the need to care for a disabled or elderly member of the household; or
The adult has a documented and substantive barrier to employment such as severe mental or physical health problems, one or more severe learning disabilities, domestic violence, or child who has serious physical or behavioral health problems; or
Enrolled in a bona-fide employment or adult educational or literacy training program for a minimum of 16 hours per week or two full time classes.

If any adult in the family meets one of the following exemption criteria, the family is not subject to the CARES Program. A person is exempt if:
He/she is incapacitated (as recognized by the Social Security Administration); or
Age 50 or older; or

Responsible for the care of an incapacitated family member; or
A non-parent caretaker relative; or
Caring for a child under the age of 2.9 (subject to include children at the time of initial move-in); or
Pregnant, if a physician has certified that she is unable to work; or
Unemployable (defined as "not able to hold or find a job")

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

Hardship Policy and Guidelines

i. **Hardship Policy:**

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

ii. **Hardship Criteria:**

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

Extraordinary Cost of Living:

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

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

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

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

CARES Program Interim & Rent Hardship Rule During COVID19 and any similar pandemic or emergency affecting a significant number of families in the community:

CARES program will include 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 order to prevent the reprocessing of files when families go back to work during a time like this, the CARES coordinator will create a letter which advises the families of 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 the amount prior to the decrease. 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.

The interim will allow for families to pay as little as the minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for $0 rent.

These individuals meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent is then modified accordingly based on the information collected.

If a family is unable to pay the minimum rent because of a financial hardship the family may be eligible for a temporary waiver from paying Minimum Rent.
A family may be exempt from Minimum Rent for 120 days when the family experiences a hardship as a result of COVID19 and other similar pandemic or national, state or local emergencies that affect a large number of families in the community.

There is no requirement to repay this rent during this type of circumstance, and no referral to FSS or community service will be required.

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

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

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

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

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

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

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

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

Program participants must establish an Individual Development Account. The amount that the family must contribute toward this account will be determined by mutual agreement between the case manager and the individual. ECC/HANH's contribution will be the resident's income disallowance portion as a contribution to the IDA based upon the initial Individual Service Plan and income verification process that is established by the families and a case manager at the time of lease up to move to West Rock. If a family's income increases, they can voluntarily deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that can experience an increase in earned income will be allowed to exclude the increase from Annual Income for four years at 100 percent. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

REEF Cash Deposit

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

CARES Income Disregard

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

Case Management

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

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

Progress Meetings

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

Early Graduation from CARES Program

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

Coordination of Supportive Services Initiatives

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

- Programs that help eliminate barriers to self-sufficiency.
- Educational activities that promote learning and serve as the foundation for young people from infancy through high school graduation, helping them to succeed in academia and the professional world. Such activities, which include

early childhood education, after-school programs, mentoring, youth leadership development and tutoring, must be created with strong partnerships with public and private educational institutions.

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

Violations of the CARES Program

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

Misappropriation of funds;

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

Non-compliance of CARES Program per the CARES Contract

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

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

Appeal Process

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

Moves

As outlined in the FY15 MTW Plan (Initiative 2.3), ECC/HANH will be initiating a policy to limit moves for CARES participants (those who elected to take the CPV option) unless an extraordinary situation exists. Limiting CARES moves to only extraordinary situations will allow participants to follow-through on the commitment they made at program entry and will give ECC/HANH data to evaluate the program as it was intended. Extraordinary situations could include moves to be closer to work, medical care, or full-time school, or to care for sick or disabled family member and will be evaluated by an ECC/HANH-appointed committee.

Appendix 4

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE PUBLIC HOUSING PROGRAM

Public Housing Program Rent Simplification

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

Rent Simplification: Equity & Efficiency

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

Everyone Should Contribute

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

Fiscal Equity for ECC/HANH

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

Approvable Method

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

Measurable Reduction in Administrative Time

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

Transition to Avoid Hardships

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

Asset Exclusion

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

Earned Income Disallowance (EID)

This 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. 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 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 year for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. ECC/HANH must perform more than 3,200 LIPH reexaminations every year. This is inordinately time consuming and an exceedingly complex process. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all 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 child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second- and first-party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

Households with exceptional expenses may request a rent reduction. This includes large families (with more than two (2) 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 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 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, 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. 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.

5. Hardship Review Committee

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

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

The Application for Exemption from Minimum Rent shall originate from the family or from 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 a large number of 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 as a result 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 more fully explain the reasons for the pattern of income loss. ECC/HANH will set the rent after the Conference Panel review.
Households with two or more instances of job loss or income drop within ninety (90) days of a scheduled certification do not have access to the Hardship Review Committee.
Rent Simplification Implementation - Public Housing
Residents will receive notice of the new policy on July 1, 2007 and the policy will take effect on January 1, 2008 for all reexaminations with an anniversary effective date on or after January 1, 2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.
A staggered approach is used to integrate the two-year and three-year reexamination cycles.
Initially in fiscal year 2008, all families will be re-examined during the first year.
In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.
Rent Simplification is expected to be fully implemented by December 31, 2010.

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

Rent Tier						
Income Range						
$0	$2,499	$50		$36,500	$37,499	$867
$2,500	$3,499	$59		$37,500	$38,499	$891
$3,500	$4,499	$83		$38,500	$39,499	$914
$4,500	$5,499	$107		$39,500	$40,499	$938
$5,500	$6,499	$131		$40,500	$41,499	$962
$6,500	$7,499	$154		$41,500	$42,499	$986
$7,500	$8,499	$178		$42,500	$43,499	$1,009
$8,500	$9,499	$202		$43,500	$44,499	$1,033
$9,500	$10,499	$226		$44,500	$45,499	$1,057
$10,500	$11,499	$249		$45,500	$46,499	$1,081
$11,500	$12,499	$273		$46,500	$47,499	$1,104
$12,500	$13,499	$297		$47,500	$48,499	$1,128
$13,500	$14,499	$321		$48,500	$49,449	$1,152
$14,500	$15,499	$344		$49,500	Above	$1,176
$15,500	$16,499	$368				
$16,500	$17,499	$392				

$17,500	$18,499	$416				
$18,500	$19,499	$439				
$19,500	$20,499	$463				
$20,500	$21,499	$487				
$21,500	$22,499	$511				
$22,500	$23,499	$534				
$23,500	$24,499	$558				
$24,500	$25,499	$582				
$25,500	$26,499	$606				
$26,500	$27,499	$629				
$27,500	$28,499	$653				
$28,500	$29,499	$677				
$29,500	$30,499	$701				
$30,500	$31,499	$724				
$31,500	$32,499	$748				
$32,500	$33,499	$772				
$33,500	$34,499	$796				
$34,500	$35,499	$819				
$35,500	$36,499	$843				

Hardship Waiver Policy and Guidelines

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

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

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.
All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.
All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency.
ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirements and in accordance with the provisions set forth herein. Residents will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to tenants at lease-up and at each recertification appointment and mailed to residents at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in tenant rent change notifications, the form lease agreement and all form documents related to the exemption process.

1. Criteria for Hardship Exemption from Minimum Rent Requirement

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

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

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
			member is enrolled in the FSS program
Business Income for Resident Owned Businesses	24 CFR Part 5.609(b)(2)	The net income from the operation of a business or profession is included in determining annual income.	Exclude 100 Percent of any net income derived from the operation of a businesses; provided the business qualifies as **a resident owned business** under 24 CFR Part 963.5. During the first year of enrollment in FSS program 100 percent; 75 percent in the second year; 50 percent in the third year; 25 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

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
			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 medical expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.	Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions
Additional (Exception) Expenses Deductions	24 CFR 5.611	A PHA may adopt additional deductions from annual income. ECC/HANH had none	Families with verifiable deductions in excess of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must exceed $2,000 and shall be the sum of (1) Mandatory Deductions determined in accordance with Section 5.611 (2), plus non-reimbursed utility expenses (except telephone and cable)
Total Tenant Payment	24 CFR 5.628	(a) Determining total tenant payment (TTP). Total tenant payment is	The Total Tenant Payment (TTP) will be based upon (1) income-tiered TTP structure or the

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent, as determined in accordance with Sec. 5.630.	minimum TTP $50 for a family with income of up to $2,500 annually.
Hardship Provision for Exceptional Expenses	24 CFR 5.611(2))	A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.	A family may be exempt from minimum rent as follows; 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.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Minimum Rent	24 CFR 5.630	A family may be exempt from minimum rent of $50.00 as follows: (i) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances; (iv) a death has occurred in the family's household; (v) any other circumstances to be considered by the PHA to be reason to waive the minimum rent requirement.	A family may only receive one hardship exemption from the minimum rent requirement during a twelve-month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve-month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No. Change. ECC/HANH will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughy Terrace and all Scattered Site properties.
Annual Reexamination of Income and Family Composition	24 CFR 960 Part 257	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of income will occur every three years for Elderly and Disabled families and every two years for all other families. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually. Additionally, the Community Service requirement will be reviewed annually for all household members who are not disabled, working less than 20 hours per week or enrolled in classes under the FSS program.
Interim Reexamination	24 CFR 960 Part 257	A family may request an interim reexamination of family income because of any changes since the last examination. The owner must make the interim reexamination within a reasonable time after the family request. Currently, family must report any change in income that	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

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		amounts to $200 or more a month.	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.
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 second and first party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

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

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

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

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

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

Changes in Family Composition
Residents are still required to get permission from the Housing 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 $50,000in the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required.

Section 985.3(j) **Annual reexaminations.**

This indicator shows whether the PHA completes a reexamination for each participating family at least every

12 months (24 CFR 5.617). A waiver of this indicator is required since ECC/HANH will no longer reexamine every family each year.

Section 985.3(m) **Annual HQS Inspections.**
This indicator shows whether the PHA inspects each unit under contract at least annually. (24 CFR 982.405(a). ECC/HANH will no longer inspect every unit every year, but will instead inspect units according to the families' biennial or triennial recertification schedule.
Section 985.507(m) **Rent to Owner: Reasonable Rent**

Section 985.3(n) **Lease-Up.**
This indicator shows whether the PHA enters HAP contracts for the number of units reserved under ACC for at least one year. Due to the funding fungibility under MTW, Section 8 funds are used according to the priorities set forth in the MTW Annual Plan.
Alternative Inspection Schedule
ECC/HANH will no longer inspect each unit every year, but will instead inspect units according to the families' biennial or triennial recertification schedule, unless:
The participant or landlord requests a special inspection due to violations noticed by either party.

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

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

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

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

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency.
ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirement and in accordance with the provisions set forth herein. Participants will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to participants at lease-up and at each recertification appointment and mailed to participants at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in participant rent change notifications, Application for Exemption from Minimum Rent and all form documents related to the exemption process.

Criteria for Hardship Exemption from Minimum Rent Requirement.

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family's circumstances fall into any one 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 that or exceed of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must equal or exceed $2,000 and shall be the sum of: Mandatory Deductions determined in accordance with Section 5.611 (a), plus non-reimbursed utility expenses (except telephone).
Total Tenant Payment	24 CFR 5.628	Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (a) 30 percent of the family's monthly adjusted income; (b) 10 percent of the family's monthly income; (c) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically 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

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.

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	The increase in TTP during the fourth year of the Rent Simplification Policy shall not $75 a month. The increase in TTP during the fifth 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

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			years prior to the implementation of the Rent Simplification Policy. A unit must have three consecutive years without a failed inspection to qualify for the bi-annual inspection. Units for which landlords are requesting increases in HAP payment will also be inspected prior to ECC/HANH granting any such increase.
Waiver of SEMAP Indicator	24 CFR Part 985.3(c).		Determination of Adjusted Income. Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000 is the determination 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

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			inspection as set forth above.
Waiver of SEMAP Indicator	24 CFR Part 985.3 (n)		Lease-Up. This indicator shows whether or not ECC/HANH enters HAP contracts for the number of units reserved under ACC for at least one year. ECC/HANH currently has a waiver of this provision and request that it be extended until September 30, 2008
Portability procedures	24 CFR Part 983.355 (c) (1)	ECC/HANH would like to have the ability to re-determine the eligibility of adult household members by performing a background check to ensure that family members do not have a criminal background.	

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.

Housing Choice Voucher (HCV) Program
Rent Simplification Rent Tier Schedule

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

Appendix 5

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

ECC/HANH BELIEVES: YOUTH INITIATIVE!

Housing Authority of the City of New Haven Background

From the Housing Authority of the City of New Haven to Elm City Communities

The Housing Authority of the City of New Haven (ECC/HANH) was established in 1938 by the City of New Haven in response to the United States Housing Act of 1937. Elm Haven, ECC/HANH's first housing development, planned in 1939, was one of the earliest public housing projects in the nation, a forward-thinking trend that still exists within ECC/HANH's philosophy today.

Quinnipiac Terrace and Farnam Courts were subsequently completed in 1941. As wartime labor flooded into New Haven, these family developments were noted for their effective use of space in a city facing a housing crisis. Again, ECC/HANH had prepared for the future.

The post-World War II population increased the housing shortage and the Housing Authority was the leading builder of new units in the city, which included moderate-income housing at McConaughy Terrace, Brookside and Rockview developments. In the 1950s and '60s, ECC/HANH completed expansion construction at Elm Haven and Farnam Courts.

In 1989, Elm Haven was rebuilt as the Monterey Place neighborhood, and in 2001, ECC/HANH received HUD status as a Moving to Work (MTW) agency, one of fewer than 36 MTW agencies in the nation at that time. In 2003, ECC/HANH received a grant for the reconstruction of Quinnipiac Terrace, and has since completed significant work at West Rock and Eastview Terrace.

MTW has enabled ECC/HANH to renovate senior housing, increase its number of accessible units to accommodate the needs of New Haven residents with disabilities, and has transformed its public housing stock into housing of choice. MTW has enabled ECC/HANH to provide a robust self-sufficiency program.

In 2009, the Housing Authority changed its name to "Elm City Communities" (ECC) to better capture the essence of that to which the Housing Authority of New Haven aspires: creating affordable, safe, decent neighborhoods with stability and positive opportunities for all our residents.

Today, Elm City Communities' developments and scattered sites provide affordable community living and quality of life services for more than 1,900 families comprising low- and middle-income households, families with children, seniors, disabled, young couples starting out, people in career transition and those saving to buy a home of their own. Since its inception, the Housing Authority of New Haven has continuously demonstrated its commitment to the people of New Haven with foresight, dedication and sensitivity.

ECC/HANH Believes

Placing a premium on youth

Elm City Communities/Housing Authority of the City of New Haven's (ECC/HANH) mission is to provide, now and in the future, affordable communities of choice and opportunities for greater self-sufficiency for residents of the City of New Haven. In the spirit of its original creation, Elm City Communities continues to find new ways to serve the ever-changing needs of an ever-growing population.

As a MTW agency, we not only have the flexibility to pilot programs that support families ability to gain self-sufficiency, it is our responsibility as a MTW agency to demonstrate innovative policies and programs that support our mission as well as model in this effort for public housing authorities around the country.

We, at Elm City Communities, are proud of our accomplishments to date but know we must do more if we are to truly help the majority of our families become self-sufficient; it is not enough to simply help the adults within our households. We must support our youth and by placing a premium on our young people's success, we achieve the results public housing authorities across the nation seek—higher turnovers and a shrinking waitlist.

A youth initiative focused on academic achievement
Elm City Believes is a new youth initiative that leverages smart housing policy and programs in order to advance academic outcomes for student residents so that we may see success among New Haven's young people through increased high-school graduation, postsecondary completion, and employment attainment. Launched as ECC/HANH Believes in April of 2014, Elm City Believes provides a cradle-to-career pipeline of learning resources for children and youth and sustains the notion that our children's success relies on supportive in-school and out-of-school experiences. Elm City Believes has the potential to stop the cycle of poverty among the families utilizing ECC/HANH and in so doing we have the opportunity to build a new, vibrant middle class in New Haven.

Elm City Believes is comprised of supports that expand upon the good work ECC/HANH has been doing as well as enhance what the nationally recognized New Haven Public Schools are doing. Programs are research-based and best practice supported as well as founded on feedback from ECC/HANH residents, ECC/HANH staff, and community stakeholders. As such, we focus our youth initiative on 1) academic supports and afterschool programming to reduce the achievement gap; 2) parent and family engagement in their children's education; and 3) increasing New Haven Promise[14] admittance and other programs that support post-secondary opportunities. In addition to the array of ECC/HANH-wide programs, ECC/HANH has school-specific partnerships that cater to individual student needs (e.g. Tutoring and small group homework help, whole-family wraparound evaluations and mental health supports, student attendance and engagement assistance).

Why now?
Although some young people are able to rise above the circumstances of birth and family structure in order to advance academically, personally, and professionally, most do not without intensive supports from an array of service providers and caring, community based organizations.

Students are not hopeful: 46% students surveyed[15] lack hope for the future, reporting they feel stuck in their lives (32%) or discouraged about the future (14%).

Students are not success-ready: Only 33% of U.S. students surveyed[16] in grades 5 through 12 are success-ready, meaning students have hope[17], are engaged[18], and their well-being[19] is thriving—things that significantly relate to student performance and influence outcomes such as grades, credits earned, achievement scores, likelihood to stay in school, and future employment. The fact of the

The average earnings for a high school dropout is $22,165

The average earnings for a high school graduate is $33,137

The average earnings for a college graduate is $55,722

42.2% of residents aged 25 years and over have a high school diploma / equivalent or less

The average earnings for a ECC/HANH family is $14,091

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[14] New Haven Promise is a scholarship and support program for New Haven Public School students that reside in New Haven, which provides full tuition to any in-state public university or college: http://newhavenpromise.org/
[15] 2013 Gallup poll of more than 600,000 students in grades 5 through 12 from school districts across the country
[16] Ibid.
[17] Student *hope* is defined by how students view their future. It's their belief that they can, and will, succeed at school and beyond.
[18] Student *engagement* is defined by the non-cognitive engagement—paying attention in class, how students feel, overall behavior, etc.
[19] Student *well-being* is defined by how students evaluate their lives and the extent to which they report positive daily experiences.

matter is that students in the U.S. become less engaged every year and we are in essence creating psychological dropout factories.

Students are not workforce-ready: Less than 30% of Americans (3 in 10)[20] feel high school graduates are prepared for college, and less than 20% (2 in 10)[21] of Americans feel graduates are ready to enter the labor force. Employers now rank reading and writing as top deficiencies in new hires—one in five U.S. workers reads at a lower skill level than their job requires;[22] written communications tops the list of applied skills found lacking in high school and college graduates alike.[23]

Poverty rate in New Haven is too high (population ≥ 25 years)[24]

25.0% of residents that have less than a high school degree
10.8% of residents that have high school graduates
3.8% of residents that have bachelor's degree or higher

Connecticut saw a 50% increase in child poverty since 1990[25]

[20] 2013 Phi delta Kappa/Gallup poll
[21] 2013 Phi delta Kappa/Gallup poll
[22] http://arts.gov/sites/default/files/ToRead.pdf
[23] http://arts.gov/sites/default/files/ToRead.pdf
[24] http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_S1701.
[25] http://datacenter.kidscount.org/data#CT

ECC/HANH Believes School Partnerships	Leverage opportunities for ECC/HANH to Address Mutual Challenges and Concerns as Part of ECC/HANH Believes	ECC/HANH Interventions and Strategies
Common Ground High School	• Coordinate with school to identify child-level needs • Individualized case management for students and families	• Homework help and tutoring • Attendance assistance • Technology assistance • Whole-family evaluations • Mental health support for students and families
Wintergreen Interdistrict Magnet School (WIMS), an ACES K-8 school	• Coordinate with school to identify child-level needs • Individualized case management for students and families	• Homework help and tutoring • Attendance assistance • Whole-family evaluations • Mental health support for students and families
Lincoln Bassett preK-6 School (Partnership w/ ConnCAT in discussion for SY 2015-16)	• Coordinate with school to identify child-level needs • Increased supports for students and families	• Homework help and tutoring • After school enrichment, Coding program for grades 5-6 • Parent engagement • Parent supports
New Haven Public Schools	• Coordinate with school to identify child-level needs • Increased enrollment in schools of choice	• Youth Stat • TBD
Adult Education (In partnership w/ existing work and Project MORE in discussion for SY 2015-16)	• Coordinate with school to identify student-level needs • Coordinate with school to identify family-level needs	• Attendance assistance • Whole-family evaluations • Mental health support for students and families • Parent engagement • Parent supports • Family supports
ECC/HANH Believes Programs	**Leverage Opportunities that Addresses Challenges and Concerns as Part of ECC/HANH Believes**	**ECC/HANH interventions and Strategies**

Academic Supports and Afterschool Programming to Reduce Achievement Gap	• Partner or administer out-of-school enrichment programs to support achievement in identified academic areas of need • Use housing authority developments to support high quality out of school enrichment programs • Raise awareness among parents about out-of-school academic programs • Leverage role as Housing Authority to drive quality programs	• Dinner Pilot during standardized testing window ***AGR** • After school program w/ ConnCAT: for 40 kids in Grades 5-8 ***AGR** • After school program w/ Solar Youth: for 86 kids in Grades k-12 ***AGR** • After school program w/ BGCNH: for 125 kids in Grades k-8 ***AGR** • After school program w/ Leap for Kids: for 20 kids in Grades k-12 ***AGR** • Nonprofit Evaluations ***AGR** • Homework Clubs @ every site ***AGR** • Computer Labs @ every site ***AGR** • Middle College for remediation: Wilbur Cross, Coop, and NHA ***AGR** • Technology for blended learning and flipped classrooms ***AGR**	
Access to High-Quality Early Learning and High-Quality Childcare ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Karen DuBois-Walton**	• Leverage role as Housing Authority to encourage more youth to read, especially at an early age with parents • Leverage role as Housing Authority to advocate for the importance of high-quality early learning • Leverage role as Housing Authority to advocate for the importance of high-quality early childcare • Leverage role as Housing Authority to advocate and change policies that support parents and families w/ OEC • Leverage role as Housing Authority to advocate and change policies that support parents and families w/ DOT	• Summer Read Program ***AGR, PFE** • Early learning and literacy campaign ***AGR, PFE** • Regulation and/or legislation changes to Care 4 Kids ***AGR** • Regulation and/or legislation changes to public transportation ***AGR**	

Parent and Family Engagement in Children's Education	• Organize formal and informal platforms for engaging families around the importance of education and academic opportunities for their children and parental engagement with the school system. • Demonstrate cultural competency and offer translation services to parents and families with limited English-speaking abilities • Educate parents on the importance of school and classroom stability	• Parent Support Network ***PFE** • Summer BBQs ***PFE** • Sports League ***PFE** • Parent workshops and trainings ***PFE, AGR** • Parent Ambassadors ***PFE** • Facts for Families ***PFE** • Text 4 Education *** PFE, AGR**
Student Attendance, Truancy, and Discipline ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Sheila Allen-Bell**	• Leverage role as Housing Authority to improve student attendance • Leverage role as Housing Authority to improve student truancy • Leverage role as Housing Authority to reduce student discipline	• Direct case management work w/ NHPS students through Youth Stat ***AGR, PFE** • Direct case management work w/ identified ECC/HANH students attending NHPS ***AGR, PFE** • Homework help ***AGR** • Whole-family evaluations ***AGR, PFE** • Mental health support for students and families ***AGR, PFE**
New Haven Promise Informational Sessions and other Programs to Support Postsecondary Opportunities	• Offer support during academic transitions: middle to high; high to postsecondary; postsecondary to employment and self-sufficiency • Leverage role as Housing Authority to create postsecondary avenues • Leverage role as Housing Authority to provide adult relationships through youth employment • Leverage role as Housing Authority to celebrate youth • Provide supports for completion of a postsecondary degree or credential	• NHP informational sessions for parents ***PSO, AGR, PFE** • NHP informational sessions for students ***PSO, AGR** • NHP applications for 8th graders ***PSO, AGR, PFE** • PSAT and SAT supports ***PSO, AGR** • ECC/HANH apprenticeship program ***PSO, AGR** • Afterschool job shadow program ***PSO, AGR** • Student Training and Employment Program (STEP) ***PSO, AGR** • Graduation gift ***PSO, AGR, PFE** • Youth Leadership Council (YLC) and STEP alumni group ***PSO, AGR**

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College Week ***ECC/HANH Believes Flagship Program*** **<u>POINT</u>: Emily Byrne**	• Leverage role as Housing Authority to avail students of the fact that postsecondary is a viable option for after high school graduation • Offer support during academic transitions: middle to high; high to post-secondary; post-secondary to employment and self-sufficiency • Offer support during the winter break when school is not in session	• 5 days of intensive supports during winter break for grades 9-12 that is geared toward postsecondary ***PSO, AGR, PFE** • Early years will be large groups; if there is more interest it will be separated into grade cohorts ***PSO, AGR, PFE** • Student Ambassadors ***PSO, AGR**	

System issues that need to be addressed
• **MOUS, Data Sharing Agreements, Consent Forms, and FERPA**
• **Culture of high expectations and excellence at ECC/HANH** • **Moving to Work status**
• **Start-up funds** • **Financial sustainability**
• **Culture change among academic, community and stakeholder partners** • **Sustainable social capital between schools and families**

Appendix 6

POLICIES FOR MIXED FINANCE DEVELOPMENT

NON-MTW ACTIVITY
Policy is entered in the plan to inform the public of Policies of Mixed Finance Developments.

ECC/HANH's public housing portfolio presently includes fifteen mixed finance developments: Monterey Place Phase 1, 2, 3, 4, 5 and 2R, Eastview Terrace Phase 1, William T. Rowe, Brookside Phase 1, Brookside Phase II, Rockview Phase 1 Rental, 122 Wilmot Road and Quinnipiac Terrace Phase 1, 2 and 3. The housing in all developments is owned and managed by private companies, according to management agreements, which have established their own policies for admissions and occupancy, according to the following guidelines:

The management agent of the mixed finance development must establish written policies for admissions and occupancy. The admissions and occupancy policies for the mixed finance development must be submitted to and approved by ECC/HANH.

The admissions and occupancy policies for the mixed finance developments must comply with HUD regulations and federal fair housing and civil rights requirements. The aforementioned mixed-finance developments have had their admissions and occupancy plans and policies set forth in previous MTW plans.

The West Rock Redevelopment consists of the Brookside Phase 1 Rental, Brookside Phase 2 Rental and Rockview developments. As such, pursuant to the MOA these units are subject to the Preferences indicated below, however, notwithstanding the method of selection for new admissions, the Owner is permitted to transfer families among and in between Brookside Phase 1, Brookside Phase 2 and Rockview Rental Phase 1; provided that such transfers are in accordance with the Transfer Procedures set forth in Priorities 1-6 below:

1. Relocation due to modernization

Where modernization activities will make units uninhabitable during construction, the Owner will require residents to relocate, either temporarily or permanently, and relocation options may include transfer to another PHA Assisted unit owned and managed by the Owner.

The relocation options of resident families will be specified in a Relocation Plan, and all Owner relocation activities will be conducted according to the requirements of the Uniform Relocation Act and implementing regulations. Resident families are entitled to all the rights specified in the URA and implementing regulations, including proper notice, offers of comparable units, and payment of certain relocation costs.

If a resident family refuses or has failed to relocate after 2 appropriate unit offers, provided that the Owner has complied with the requirements of the URA(and its implementing regulations, including requirements for proper notice, the Owner will begin lease termination proceedings against the family.

2. Families occupying units with accessibility or other special features that are not needed by the occupant family

The Owner has a limited number of accessible units with special features suited to persons with mobility-related disabilities. According to this ACOP, accessible units will be assigned first to current resident families or applicants in need of accessibility features. If there are no current residents nor applicants in need of the unit's accessibility features, the unit may be offered to another family that does not need that unit's accessibility features. However, as a condition of admission, the occupant family is required to consent to transfer to another appropriately-sized unit when/if the Owner has a resident or applicant in need of the unit's accessibility features. Families who are admitted to an accessible unit, but who do not require the unit's accessibility features, are required to sign a lease addendum to this effect. The Owner will maintain a list of households residing in accessible units but not needing their apartments' accessibility features, who will be required to transfer when the Owner has a resident or applicant in need of the apartment's accessibility features.

If an accessible unit (or unit with other special features) is occupied by a family that doesn't require the unit's accessibility features, when the Owner identifies that there is a need for the unit's accessibility features, the Owner will require the unit's occupant family to transfer to another, appropriately sized unit. The Owner will provide at least 30 days written notice that, when a unit of the proper size becomes available, the family will be expected to consent to a transfer.

Families required to transfer under this policy will be offered 1 comparable unit of the appropriate size for the household. If a family has rejected the unit offer, the Owner may begin lease termination proceedings against the family.

3. Emergency transfers due to un-inhabitability of unit

The Owner will prioritize, and may require, transfers in cases where the resident's unit has been damaged by fire, flood, or other causes to such a degree that the unit is not habitable, provided the damage was not the result of an intentional act, carelessness, or negligence on the part of the resident or a member or guest of the resident's household.

The Owner may, at its discretion, permit continued occupancy and permit and prioritize a transfer in cases where the damages that resulted in the unit's un-inhabitability were a result of carelessness or negligence of the resident or a member or guest of the resident's household, provided that the resident has, in writing, accepted the responsibility for such damage and has agreed to make restitution to the Owner for the expense of repairing such damage.

4. Protection of victims and witnesses

The Owner will authorize emergency transfers in cases where the Owner has received sufficient documented evidence of an emergency situation in which the family is subject to risk of violence and that a transfer to a different HANH public housing development will be effective in reducing the family's risk of threatened violence. Emergency transfers due to risk of violence may be provided in the following circumstances:

- Residents who are participants in a government-sponsored witness protection program.
- Residents who have been subjected to domestic violence.

  Households who have provided documentation that indicates a reasonable probability of threatened violence due to fear of retaliation for witnessing an incident, or providing testimony in an eviction or criminal proceeding.
- Residents who are victims of hate crimes.

Before considering an administrative transfer based on threats of violence, the Owner will require documentation that (1) there is a reasonable probability of violence, (2) the risk of violence is not due to the lease violations or other actions of family members, and (3) the family has taken any available actions to reduce its vulnerability to threats of violence (such as police involvement with documented reports, restraining orders, criminal trespass, etc.). In addition, the family must demonstrate that a transfer to another unit at the Brookside Phase 1 Community or HANH public housing unit or development will effectively reduce the family's risk of violence.

In cases in which the Owner determines that the risk of violence is valid (and sufficiently documented and that transfer to another public housing development will effectively end the threatened violence), and after approval by Owner the application will be forwarded to HANH for approval. ECC/HANH will prioritize this transfer to the next available unit of the appropriate size. ECC/HANH will also consider issuing a voucher on a case-by-case basis. The family is permitted to reject this unit and maintain its priority emergency transfer status only if:

- The resident provides evidence that the threatened violence would continue in this new site, or

- The offered unit does not have accessibility or other special features to accommodate a disability, which features were present in the resident's current apartment and/or were requested and approved through HANH's reasonable accommodations procedures.

Otherwise, if a family has requested an emergency transfer due to threats of violence but has rejected a unit offer that would address their emergency needs, the family will be removed from consideration as an emergency transfer and will be offered the opportunity to request a transfer based on good cause.

In cases in which HANH determines that there is a reasonable probability of violence that is sufficiently documented and that transfer to another public housing unit would not at all be effective in reducing the threat of violence, HANH may, at its discretion, refuse to transfer a family and, instead, may offer the family a Section 8 voucher so that they could relocate in the private market. This is an exceptional measure, and HANH will grant a Section 8 voucher to families under these circumstances only when (a) it is clear that transfer to another public housing development would not reduce the family's vulnerability to documented threats of violence, (b) relocation into the private apartment market with a voucher may effectively reduce the family's vulnerability to documented threats of violence, and (c) the family has taken steps necessary to reduce the family's vulnerability to threatened violence, including police reports, restraining orders, criminal trespass procedures, etc.

5. Under-housed or over-housed.

The Owner may initiate or require transfers of households who are under-housed by a degree of 2 bedrooms, or who are over-housed, according to the Owner's occupancy standards.

At the Brookside Phase 1 Community, the household is over or under-housed by a degree of two bedrooms. Over and under housed transfers by a degree of one bedroom shall also be considered on a case by case basis for reasons of good cause. Transfers to larger units may be approved only when the family size has increased through birth, marriage, legal adoption, award of custody (permanent or temporary custody greater than six (6) months), reconciliation of separated co-heads, return of a minor to legal custody of the household, or for approved medical or disability purposes.

If the Owner determines a resident family is over or under housed, the Owner will inform the resident in writing that when a unit of proper size becomes available, the Resident will have to move. The resident will receive at least 30 days' notice of the date by which the transfer must be complete.

6. Emergency Transfers

HANH may permit or require a transfer in emergencies, such as severe medical needs, upon approval of the Executive Director or her designee.

CARES – Brookside Phase II and Rockview Phase 1 Rental – the following preferences was approved by the ECC/HANH Board of Commissioners via Resolution # 11-225/11-R and Resolution # 01-02/13-S respectively: The following modifications will be made to the ECC/HANH ACOP specific to the Brookside Phase 2 and Rockview Phase 1 Rental Mixed Finance Development:

- An admission preference for "working families" for all PBV units;
- An admission preference for former and current West Rock residents for all ACC units will apply pursuant to the agreement between the Tenant Resident Council ("TRC") for West Rock and the Developer and is as follows:
    - **First preference** –all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development,

- **Second preference**—all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH,

- **Third preference**—all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH,

- **Fourth preference**—applicants in accordance with all other preference set forth in the ACOP.

- In accordance with the MOA, all relocated residents that are in "good standing" as defined in the ACOP will be permitted to exercise their right to return.
- Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to families on the Authority's transfer waiting list, then to families on the Authority's accessible waiting list.
- Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.
- In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment any deal-specific management documents and this ACOP those documents shall control. Provided however that in all events notwithstanding anything in this addendum to the contrary the applicable public housing requirements shall control.
- Income tiering in accordance with the ACOP such that 100 percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income.
- Rent determination for returning families will continue to be done in accordance with ECC/HANH's Rent Simplification Policies under ECC/HANH's Alternative Rent Determination Policy.
- Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.
- Flat Rent determination for new families shall be done annually.
- CARES (Caring About Resident Economic Self-Sufficiency) as further defined in Exhibit C attached hereto.
- Definition of "Tenant in Good Standing" for "returning residents" who have preference are as follows (i) ECC/HANH deems a household not to be in good standing if ECC/HANH has taken legal action against the household and has obtained an execution for possession, allowing it to evict the household. At this stage of the legal process, all rights to cure the lease violation have been exhausted, and so have the appeals processes through both the Housing Court and the Housing Authority's internal grievance procedure; (ii) Households which have reached court-stipulated agreements with the Housing Authority to cure lease violations (such as nonpayment of rent) are considered to be in good standing as long as they abide by the terms of the stipulated agreement; (iii) Households which have received a pre-termination notice or notice to quit or are at any subsequent stage of eviction process are still considered to be in "good standing" for the purposes of the MOA until they have "exhausted all rights to cure and appeals", this means that households under eviction remain in good standing until ECC/HANH obtains an execution for eviction.

In addition, the policies governing the 122 Wilmot Road development were approved via Resolution 12-243/11-R and included the following: Thirteen (13) PBV units will be designated for the elderly with preference for former West Rock residents pursuant to the agreement between the Tenant Resident Council ("TRC") for West Rock and the Developer and is as follows:

THE PREFERENCE SYSTEM

a) An Admission preference does not guarantee admission.
b) Preferences establish the order of applicants on the waiting list.
c) Every applicant must still meet the Wilmot Crossing at West Rock's Selection Criteria as set forth in the ACOP before being offered an apartment.
d) Verification must be submitted in order to be given a preference.

e) Preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer (prior to execution of a lease), have the oldest application date on the waiting list for the size and type of unit sought.

f) An admission preference for the thirteen (13) Project Based Section 8 (PBV) units are set forth below:

    a. The thirteen (13) PBV units are designed Elderly Only.
        i. Preference for these 13 PBV units are as follows:
            1. First preference – all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development;
            2. Second preference - all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
            3. Third preference - all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
            4. Fourth preference - applicants in accordance with all other preference set forth in the ACOP.

g) Within the aforementioned preferences, the following preferences will prevail:
    a. Displaced Persons as defined under Section II Housing Glossary Terms of the ACOP.
    b. Documented victims of domestic violence, dating violence or stalking.
    c. Local preference based on Income Targeting 24 CFR 960.202. The Owner and ECC/HANH have agreed pursuant to the Regulatory and Operating Agreement.

h) Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to a family on the Authority's transfer waiting list, then to the Authority's accessible waiting list.

i) Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.

j) In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment, any deal-specific management documents and this ACOP, those documents shall control. Provided however, that in all events notwithstanding anything in this addendum to the contrary, the applicable public housing requirements shall control.

k) Income tiering in accordance with the ACOP such that 100% percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income and that public housing units shall be leased to families with income above 30 percent of the area median income if households below 30% area median income are not available and eligible for occupancy so that vacant units are not unoccupied.

l) Rent determination for returning families will continue to be done in accordance with ECC/HANH's Rent Simplification Policies under ECC/HANH's Alternative Rent Determination Policy.

m) Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.

n) Flat rent determination for new families shall be done annually.

Appendix 7

CHNCT Hardship Policy

Community Health Network of CT (CNHCT)
Hardship Policy
Families receiving housing support under this initiative are identified by the insurer as in need of housing stability to support medical goals. Families are not currently receiving subsidy and would volunteer for this time limited support. Upon enrollment, families consent to the fact that support is for a maximum of 24 months. Families receive intensive case management support from the insurer care management team. This support includes identifying permanent housing options.
Rent portion will be calculated per ECC/HANH's Rent Simplification Policy. Consistent with that policy, prior to imposition of any change in rent, the household will be provided with advanced notice as required by their lease and/or governing documents. Households that are notified of a rent increase will also be informed, in writing, of their ability to seek a waiver based in financial hardship provided that the hardship is related to extraordinary deductions or extraordinary cost of living (rent, utilities, medical expenses, childcare expenses). Families meeting minimum rent criteria who seek adjustment of their rent shall be considered through the agency's Minimum Rent policy.
<u>Hardship Criteria</u>
The following criteria will trigger a review for consideration of a Hardship.

- <u>Extraordinary Cost of Living:</u>

  In the CNHCT program, a hardship review will be conducted if the monthly total shelter cost (rent plus utilities), when combined with un-reimbursed monthly medical, disability, and dependent costs, exceeds forty percent (40%) of a household's monthly income (monthly income is defined as annual income divided by twelve).
- <u>Medical, Disabled Expenses of $6,000.00 or more:</u>

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

Rent adjustments will be made consistent with the Authority's Rent Simplification Policy. All requests for Hardship Review shall be referred to and reviewed by the Hardship Committee. Should a resident request hardship review but fail to attend the scheduled meeting, one opportunity to reschedule will be provided. If the resident fails to attend the second scheduled appointment no further attempts to reschedule will be made and ECC/HANH will determine that no hardship exists.
Persons with disabilities always remain the right to request Reasonable Accommodations consistent with the Authority's Reasonable Accommodations Policy.
<u>Hardship Review</u>
All requests for Hardship Review shall be forwarded to the Hardship Review Committee. The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Senior VP of Operations or his/her designee and the 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.
Requests for exemption from Minimum Rent shall be reviewed consistent with the Authority's Minimum Rent Policy. 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 will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent. 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.
<u>Transition from CHNCT Program</u>
Families enrolling in this program do so with the understanding that it is a 24-month period of housing support. Case management services will assist the family to be prepared to transition to market rent/nonsubsidized, to access permanent

subsidized housing and to ensure all applicable benefits are accessed. ECC/HANH waitlists are continually open and families will be encouraged to apply.

Families that move to the top of the ECC/HANH or any other subsidized waitlist shall be able to terminate participation in the CHNCT funded housing support and access housing offered. Family care management will continue through CHNCT.

Families will be supported by ECC/HANH Relocation Team in identifying affordable housing options upon transition from the program.

Families that are deemed unready to transition to unsubsidized housing can be afforded one (1) 6-month extension.

Appeal Process

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