MOVING TO WORK ANNUAL REPORT

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I. INTRODUCTION

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

This FY 2022 MTW Annual Report (October 1, 2021 to September 30, 2022) states ECC/HANH's MTW progress toward achieving goals and objectives outlined in the FY2022 MTW Annual Plan.

What Is Moving to Work?

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

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

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

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

ECC/HANH Participation in MTW

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

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

According to the MTW Agreement, ECC/HANH's MTW program does not include HUD grant funds committed to specific grant purposes, namely:

- ECC/HANH's HOPE VI grants for Monterey Place
- ECC/HANH's HOPE VI grants for Quinnipiac Terrace/Riverview

- Rental Assistance Demonstration (RAD) Grants
- Any future HOPE VI Revitalization grants
- Other competitive grant funds awarded for specific purposes

These grant funded programs committed to specific purposes require ECC/HANH to provide periodic reports to HUD. Although these grant funded programs are not included in ECC/HANH's MTW program, ECC/HANH has included information, where relevant, regarding these grant funded programs in this MTW Annual Report for FY2022.

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

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

ECC/HANH's MTW program is the product of an extensive planning process, conducted initially from 1998-2000, to establish long-term plans for improving our agency's operations and for transforming our public housing stock. During 2006-2007, ECC/HANH engaged in a planning process to update and reinvigorate our agency's plans. ECC/HANH developed a Three-Year Strategic Plan from FY07 to FY09. During 2009-2010, ECC/HANH again engaged in a planning process to re-evaluate and provide continuity to the original Three-Year Strategic plan. In 2015 ECC/HANH updated its strategic plan and issued the Strategic Plan for 2015-2018. Since FY2018, ECC/HANH has introduced the strategic planning process of developing agency playbooks and has continued to update its playbook regularly.

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

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-SUFFICIECNY

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.

SHORT TERM GOALS

DELIVER COST EFFECTIVE SOLUTIONS

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 ECC/HANH's public housing stock through revitalization/redevelopment or disposition of remaining poor-performing assets
2. Address housing crisis experienced by marginalized populations.
3. Promote housing opportunities in the public housing and HCV program for income-eligible work-able families
4. Use housing choice vouchers to promote development of mixed-income, mixed-finance housing opportunities in non-ECC/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
1.4 & 1.10	Defining Income Eligibility for the Project-Based Voucher Programs	✓	✓		2012	Ongoing
1.5	HCV Preference and Set-Aside for Victims of Foreclosures		✓		2009	Ongoing
1.6	Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Programs)		✓		2008	Ongoing
1.7	Tenant-Based Vouchers for Supportive Housing for the Homeless		✓	✓	2010	Ongoing
1.8	Farnam Court Transformation Plan		✓		2011	Ongoing
1.9	Increase the Allowed Percentage of Project Based Voucher (PBV) Units from 75 Percent to 100 Percent in a Mixed-Finance Development	✓	✓		2012	Moved[2]
1.11	Increase the Percentage of Housing Choice Voucher Budget Authority for the Agency that is Permitted to Project-Base from 20 Percent up to 25 Percent		✓		2013	Ongoing
1.12	Development of Replacement Public Housing Units with MTW Block Grant Funds		✓		2013	Ongoing
1.13	Creation of a Commercial Business Venture at 122 Wilmot Road	✓			2013	Closed[3]
1.14	Redevelopment of 99 Edgewood Avenue (Dwight Gardens)		✓		2013	Closed[4]
Label	**Description**	**Cost Effective**	**Expand Housing Choice**	**Increase Self-Sufficiency**	**FY Approved**	**Status**

[1] Project completed
[2] Moved to "MTW Initiatives Requiring Funding Flexibility Only"
[4] Project completed
[4] Project not being pursued

OVERVIEW OF MTW INITIATIVES

1.15-1.17	RAD Finance Development for Rockview Phase II Rental & Westville Manor Transformation Plan		✓		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	Approved
1.27	Cap on Project Based Units in a Project	✓	✓		2010	Closed
2.1	Family Self-Sufficiency Program			✓	2007	Ongoing
2.2	Incremental Earned Income Exclusion			✓	2008	Closed in 2022
2.3	CARES (Caring About Resident Economic Self-Sufficiency)			✓	2012	Ongoing
2.4	Teacher in Residence			✓	2015	Ongoing
2.5	REACH			✓	2019	Ongoing[5]
2.11	Community Health Network of CT (CHNCT)	✓			2022	Approved 2022/ Closed 2022
3.1	Rent Simplification	✓			2007	Ongoing
3.2	UPCS Inspections	✓			2008	Closed[6]
3.3	Revised HQS Inspection Protocol	✓			2011	Closed[7]

5 During FY2021 this initiative was implemented as a soft launch. Full implementation during FY2022 is planned.

6 Initiative no longer requires MTW flexibility

7 Initiative was revised and relaunched as item 3.5

OVERVIEW OF MTW INITIATIVES

3.4	Mandatory Direct Deposit for Housing Choice Voucher Landlords	✓			FY10	Closed[8]
3.5	HCV Rent Simplification/Cost Stabilization Measures	✓			FY14	Ongoing
3.9	LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families	✓			FY08	Closed

OVERVIEW OF MTW INITIATIVES REQUIRING FUNDING FLEXIBILITY ONLY[9]

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
1.20F	Fulton Park Modernization		✓		2011	Ongoing
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/Disable Residents			✓	2005	Ongoing
2.10F	Jumpstart Incentive Program			✓	2020	Ongoing

[8] Initiative does not require MTW flexibility

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

2.12F	ECC Believes		✓		2014	Ongoing
3.11F	Creation of New Instrumentality Entities to Support ECC/HANH Goals and Strategic Planning activities	✓			2019	Moved

II. GENERAL OPERATING INFORMATION

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ANNUAL MTW REPORT

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
McConaughy Terrace	201	0	Committed	Yes	RAD conversion of ACC units
Farnam Court Phase 2	88	88	Leased/ Issued	Yes	RAD conversion of ACC units
Christian Community Action	18	18	Leased/ Issued	No	PBV award for non-traditional supportive housing initiative
NHP Foundation (MLK)	8	0	Committed	No	9% LIHTC award
Hill Central Phase 1	32	0	Committed	No	9% LIHTC award
Dixwell Housing	20	0	Committed	No	9% LIHTC award
Beacon Communities - Branford	40	0	Committed	No	9% LIHTC award for expanded jurisdiction initiative
Valley Townhouses	40	0	Committed	No	RAD Conversion
2022 RFP for PBV	100	0	Committed	No	Competitive proposals for PBV developers/units
TOTAL: Planned new Project Based Units in Plan Year	**547**	**106**			

* Figures in the “Planned” column should match the corresponding Annual MTW Plan.

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

Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

Due to rising costs related to COVID, ECC/HANH had to re-bid for Valley Townhouses. Also, the rising interest rates and the rising costs of materials, caused the closing to be delayed. The closing is anticipated in FY2023. McConaughy Terrace - the construction and permanent interest rate increased which caused a funding shortfall in excess of $1.2MM dollars allocated. ECC and Glendower is now in the process of modeling methods to fill that shortfall and the closing of Phase 1 is anticipated for the 3rd quarter of FY 2023. An RFP was advertised for the PBVs. Responses were received, however the PBVs were not awarded due the respondents being unable to secure tax credits to finance their deals. Beacon Communities - 20 vouchers are allocated for existing residents and 20 vouchers for new applicants on a redeveloped site. Groundbreaking for that site occurred in FY2022 COVID related delays had a significant impact for construction materials, etc for all real estate developers. This contributed to delays at NHP Foundation, Hill Central Phase 1 and Dixwell Housing.

i. Actual Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Name	#		Status (below)	Yes/No	Description
PBV Fellowship I	18	18	Leased	No	New PBV units
PBV Fellowship II	5	5	Leased	No	100% Supportive Housing
PBV Also Cornerstone (Continuum of Care)	4	4	Leased	No	100% Supportive Housing
PBV Norton Court (Continuum of Care)	12	12	Leased	No	100% Supportive Housing
PBV Cedar Hill	4	4	Leased	No	100% Supportive Housing
PBV West Village	15	15	Leased	No	100% Supportive Housing
PBV QT Phase 1	23	23	Leased	No	LIHTC PBV units
PBV QT Phase 2	23	23	Leased	No	LIHTC PBV units
PBV QT Phase 3	16	16	Leased	No	LIHTC PBV units
PBV Eastview Phase I	49	49	Leased	No	LIHTC PBV units
PBV Brookside Phase I Rental	51	51	Leased	No	LIHTC PBV units
PBV Brookside Phase 2 Rental	51	51	Leased	No	LIHTC PBV units
PBV Rockview Phase I Rental	47	47	Leased	No	LIHTC PBV units
PBV New Rowe Building	32	32	Leased	No	LIHTC PBV units
PBV 122 Wilmot Road	13	13	Leased	No	LIHTC PBV units
PBV Park Ridge	60	60	Leased	No	LIHTC PBV units
PBV Frank Nasti Existing	11	11	Leased	No	PBV units
PBV CUHO Existing	24	23	Leased	No	Scattered Site PBV families
PBV CUHO New Construction	5	5	Leased	No	Scattered Sites PBV families
PBV Shartenburg	20	20	Leased	No	PBV units
Mutual Housing Association New Construction	20	20	Leased	No	PBV units
PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)	9	9	Leased	No	PBV Units
PBV Mutual Housing Existing	15	15	Leased	No	PBV units
PBV Casa Otonal	12	12	Leased	No	PBV units
New Haven Coliseum (previously Live Learn Play)	19	19	Committed	No	PBV units
RAD 122 Wilmot Road	34	34	Leased	Yes	RAD/PBV
RAD Eastview Phase I	53	53	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook)– 9%	44	44	Leased	Yes	RAD/PBV
Charles T. McQueeney	149	149	Leased	Yes	RAD/PBV

Winslow Celentano	64	64	Leased	Yes	RAD/PBV
Howe Street Single Room Occupancy	80	80	Leased	Yes	RAD/PBV
RAD Ribicoff (Twin Brook) -4%	51	51	Leased	Yes	RAD/PBV
RAD Fair Haven/ Farnam	55	55	Leased	Yes	PBV Units and 1 ACC unit
RAD Monterey Place-Edith B Johnson	95	95	Leased	Yes	RAD converted ACC units
RAD Monterey Place-William Griffin	4	4	Leased	Yes	RAD converted ACC units
RAD Monterey Place 1	42	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2	7	7	Leased	Yes	RAD converted ACC units
RAD Monterey Place 3	45	45	Leased	Yes	RAD converted ACC units
RAD Monterey Place 4	42	42	Leased	Yes	RAD converted ACC units
RAD Monterey Place 5	17	17	Leased	Yes	RAD converted ACC units
RAD Monterey Place 2R	28	28	Leased	Yes	RAD converted ACC units
RAD Prescott Bush	56	56	Leased	Yes	RAD Converted ACC units
RAD Waverly Townhouses	51	51	Leased	Yes	RAD converted ACC units
RAD CB Motley	45	45	Leased	Yes	RAD converted ACC units
RAD Newhall Gardens	26	26	Leased	Yes	RAD converted ACC units
RAD Katherine Harvey Terrace	17	17	Leased	Yes	RAD converted ACC units
RAD Fulton Park	12	12	Leased	Yes	RAD converted ACC units
RAD Chamberlain Court (Justice Landing)	7	7	Leased	Yes	RAD converted ACC units
RAD Farnam Onsite I	86	86	Leased	Yes	RAD converted ACC units
RAD 4 (Ruoppolo/Fairmont	201	201	Leased/Issued	Yes	RAD converted ACC units
Rockview Phase 2	62	62	Leased	Yes	RAD converted ACC units
Portsea Place	8	8	Leased	No	Supportive Housing for homeless young adults

Total: Planned Existing Project-Based Vouchers	**1939**	**1939**	

* Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

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

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

There were no changes in FY2022

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

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR
In preparation for the RAD conversion of an LIPH development. LIPH dwelling units were not re-occupied within 90 days of the RAD closing date. Those vacant units were used for swing units for relocation purposes during the construction phase of the RAD. 33 LIPH vacant units in non-RAD Project sites were used as swing units and/or master lease for RAD relocation purposes. 62 units at Westville Manor were removed from the LIPH portfolio in FY2022 as part of the Rockview Phase 2 redevelopment.

iii. General Description of All Actual Capital Expenditures During the Plan Year

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

MTW FY22 plan included receipt of CFP 2021 funds. CFP 2022 funds were awarded in the 3rd quarter (5/12/22), $2,718,137.00. $362,737.50 of CFP 2022 is obligated for a development project bond debt, leaving $2,355,399.50 for planned projects for the remaining portfolio.

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ECC/HANH's goal through its MTW status was to provide Housing of Choice in the most cost-effective method possible. Given the funding limitations, our plan was 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 FY22, ECC/HANH continued to execute projects that support these goals and improve the remaining portfolio. Properties planned for future redevelopment efforts were not prioritized for CFP projects; however, if there was a Life, Health and Safety challenge, we considered the needs across the entire portfolio. Several work items in the FY22 MTW Plan were continuations and implementations of MTW FY21 Plan projects that were not fully completed by the end of FY21. In FY22, work took place at Crawford Manor, Essex Townhouses, Wolfe, and Scattered Sites East and Scattered Sites West properties. Funds were also earmarked for Agency wide services and obligations including our Agencywide Physical Needs Assessments, critical for planning and redevelopment efforts.

1. Crawford Manor Upgrades-Fire Alarm System, Health-Safety, Interiors

- Continuation of projects initiated in prior MTW years to further ADA access by upgrading vestibule and common areas and provide COVID security. The entry did not provide adequate turnaround area or pull-side clearance. The challenge was to improve the accessibility of the entrance and conform to the requirements of SHPO (State Historic Preservation Organization) respecting the design by architect, Paul Rudolph. The building has been listed on the National Register of Historic Buildings since 2015. The Fire Alarm panel and Fire Pump were at the end of their useful life. The Fire Alarm system code now requires inclusion of addressable features for smoke alarms. This critical equipment needed to be replaced to ensure safety for residents in the 15-story apartment tower. Due to COVID concerns, the project was repackaged as Vestibule and Fire Pump Upgrades, Phase 1 since this work could be performed without entrance into resident apartments in pre-vaccine COVID times. Bids were solicited in December 2020 and a contract awarded in March 2021. Work was substantially complete during FY21. The fire alarm system upgrade along with other health and safety improvements identified through an Architectural and Engineering site assessment (work that involved entry into occupied apartments) went to bid in October 2021. Bids received were rejected as overbudget, another victim of volatile bid conditions affected by COVID and contractors' nervousness about supply-line and workforce availabilities. Scope was re-assessed and re-bid in February 2022 for implementation in FY22-FY23. Phase 2 interior health & safety improvements contract executed June 2022 with work extending into FY23. $197,881.28 spent on Phase 1 Vestibule-Fire Pump contract. $50,930.00 spent to date, on Phase 2. $1,422.01 spent on relocation costs.

2. Wolfe: Health and Safety Repairs

- ECC/HANH has had plans for major development upgrade at Robert T. Wolfe as a future RAD conversion project. In the interim, as other developments took priority for redevelopment, ECC/HANH identified more immediate health and safety needs to be addressed while waiting for full project redevelopment, including demolition of the full building in three to four years. COVID safety concerns impacted work scheduling and phasing. Solicitation documents were repackaged to address exterior and common area scopes of work, first, until it was deemed safer to work in occupied apartments. October 2020 bids were over budget and no award made, again evidence of the volatile bidders' market. Common areas scope, Phase 1, was re-bid in March 2021. Contract awarded June 2021. Construction in progress with anticipated completion Winter 2022. Interior health and safety scope of work solicited June 2021; contract awarded August 2021. Work commenced on Phase 2 and continued into FY22. Although in different times, Phase 1 and Phase 2 would have been one project for cost and time savings and efficiencies, these two years of pandemic have required another approach. $503,338.93 spent on Phase 1; $1,161,104.63 spent on Phase 2; $110,422.03 spent on temporary resident relocation

3. **Essex Interior/Building/Site Upgrades**
    - Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors, appliances; fences, sidewalks, lighting, building envelope and exterior repairs, etc. Backlog of unfunded needs. Due to COVID safety protocols, priority was placed on addressing basement asbestos abatement, fences, and exterior building envelope (roofs, siding, windows, gutters) until it was deemed safe to perform work in occupied apartments. The projects represent a major commitment to the residents of Essex Townhouses and to the 20-year sustainability of the community by addressing renovations to the exterior envelope and significant interior improvements. In March 2021, ECC/HANH solicited for rear patio separation fences and basement asbestos abatement. Bids received with no award--clarification needed in non-technical section of solicitation. Bids re-solicited in June 2021. Contract awarded August 2021. Also, in June 2021, bids solicited for exterior envelope, bathrooms, floors and other interior scope of work. Contract awarded September 2021. Work on both contracts being performed in FY22. Specifically, due to the prevalence of asbestos in the building materials at Essex, we have emphasized good and enduring products and design to provide long-term solutions and sustained life, health and safety conditions through the construction process. $325,753.57 spent on basement abatement-fence contract work; $375,075.73 spent on exterior envelope-dwelling unit contract; $4,731.00 spent on temporary resident relocation.

4. **McConaughy Interior/Building/Site Upgrades (RAD Conversion Development)**

   In FY 2021, Glendower Group was awarded 9% (and 4%) tax credits for major redevelopment at McConaughy. No CFP funds can be expended at McConaughy after the CHAP was received, including the grant funding for Lead Abatement. No funds for health-safety work, including lead interim control measures, that might be needed prior to RAD conversion were expended. Lead Interim Controls, spearheaded by Planning and Modernization were performed in conjunction with Operations Department staff, paid through Operations funding prior to the award. No Capital Funds were spent after the CHAP was awarded. $0 spent

5. **Scattered Sites Interior/Building/Site Upgrades**

   It is more costly per unit to maintain individual residences in scattered sites across New Haven, than it is to maintain one building with multiple units. For this reason, maintenance has been historically deferred, in favor of renovations which could impact more residents with fewer dollars. It is, however, essential that ECC/HANH support Housing of Choice which includes neighborhood choice. The less racially impacted Scattered Site neighborhoods enable residents' access to a variety of amenities, not otherwise afforded, and have greater school choice through proximity, and are one of Elm City Communities' (ECC) answers to racial and economic segregation in New Haven. *In America's Rental Housing, 2022*, published by the Joint Center for Housing Studies of Harvard University, it is presented how the current real estate market impacted by Covid and current preferred trends for rentals has produced a demand among higher-income households to move to rental properties, raising home prices, monthly rental costs and the availability of housing stock. *"According to Zillow, typical home values were climbing at an 18.9% annual rate in September 2021, up from 5.7% the year before. (pg.5)"* ECC takes this jump in cost very seriously and is dedicating our current efforts and funding to upgrade these single family homes, 2 and 3-family homes so that our LIPH residents will not only have safe and decent housing, but the significant right to Neighborhood Choice as a feature of our portfolio offerings. *"Rental housing units make up 20% of the housing stock in nearly a third of the* *nation's census tracts. Single-family-only zoning and other density restrictions block the development of multifamily housing in many communities, thereby excluding renter households from those neighborhoods. Given that people of color are more likely to have lower incomes and to rent rather than own their homes, the geographic concentration of rental housing…*perpetuates…*patterns of racial and socioeconomic segregation. (pg.6)* --- This is housing discrimination by zoning. Therefore, our initial concern regarding the purchase of properties difficult to maintain, spread out across the City, in unfamiliar census tracts, has become the bulwark against historic and repeated housing discrimination in our city. Together, with other development efforts to provide mixed-income communities throughout the city, the LIPH Scattered Sites AMPs boldly stand, as an answer to the rise in rental rates and exclusionary zoning, especially in the midst of the current rental crisis.

- **Scattered Sites West Interior Building/ Site Upgrades**
  Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors appliances; fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Backlog of unfunded needs. New needs assessments completed. Findings will assist ECC/HANH in decision-making regarding scattered site properties. Renovations occurring in conjunction with the Lead Grants 2017 and 2020 and Housing-Related Hazards Grant 2020. $0 spent
- **Scattered Sites East Interior/Building/Site Upgrades**
  Non-RAD conversion development. Units need kitchen and bathroom upgrade; interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Backlog of unfunded needs. New needs assessments completed. Findings will assist ECC/HANH in decision-making regarding scattered site properties. $0 spent

- **Scattered Sites Multifamily Interior/Building/Site Upgrades/Fire Unit**
  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. New needs assessments completed. ECC's Glendower Group applied to convert 88 of the scattered site multifamily portfolio units to RAD and received a CHAP. Glendower's tax credit application for these 88 multifamily units not awarded. Glendower intends to re-submit. Under a separate ECC solicitation, during FY22, fire damage repairs were completed on 1 unit at Scott Ridge II. Contract closed out. $116,411.55 (includes $40,245.00 fire insurance) spent

6. Lead Paint Abatement – McConaughy, Essex, SS West, SS East

Lead paint abatement where it was identified by inspection-risk assessment. ECC/HANH had difficulty attracting bidders. Repackaged in smaller groupings to facilitate response. With 2017 lead paint grant, one bid and three quotes were awarded in FY21; work implemented and completed. During FY21, HUD awarded ECC/HANH Lead Based Paint 2020 Grant that will enable lead paint removal instead of encapsulation as a more enduring alternative. Architect and environmental consultants working in tandem to prepare solicitation documents for bidding continuing into FY23. In FY22, $161,825.00 spent on SS West Groups 1, 2 and 3. ECC/HANH received a CHAP for redevelopment of McConaughy Terrace on December 16, 2020. As per requirements of the Lead-Based Paint Grant, no further grant funding could be spent in the AMP. Testing of the property and Interim controls were already performed. The development team is following up with the completion of the Lead abatement, required.

7. Housing-Related Hazards Abatement – McConaughy, Essex, SS West, SS East, Crawford Manor, Robert T Wolfe

- At the start of FY22, ECC received a $3,999,993 HUD Housing-Related Hazards Grant to address carbon monoxide, radon, mold, and pests in public housing. ECC is engaging consultants to plan comprehensive strategies. ECC/HANH performed mold testing, abatement and clearance in 2 SS East units and pest inspection-survey at Wolfe; performed pest inspection on 15th and 14th floors at Crawford; and performed radon testing (59 buildings) at non-RAD units that have not been issued a Commitment to Enter Into a Housing Assistance Payment Contract (CHAP). In August 2022, ECC/HANH awarded radon mitigation contract for 1 SS East unit and 6 SS West units. With CFP non-grant funds, contract also included radon mitigation in 9 SS multi units. Carbon monoxide-smoke detector evaluation in progress. $116,519.80 spent

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

- Completed and closed out gas conversion and heating-hot water heater replacement work initiated in earlier MTW years. Work started April 15,2021 and reached substantial completion August 20, 2021. Project included 17 units in 13 properties. Anticipated outcome: energy savings and improved resident comfort. An additional benefit is that the energy source does not require fuel deliveries allowing for a seamless transfer of accounts in the event of a vacancy, potentially preventing damage from frozen pipes. $12,933.97 spent this fiscal year to complete the contract.

The following are agency wide funding projects:

9. Agency Wide Vacancy Reduction

Funds were allocated for abatement costs and vacancy reduction efforts during FY22 to supplement work performed by Operations staff to help ECC/HANH improve its occupancy percentage. Completed 6 Westville units, 10 McConaughy units, 2 Essex units; 6 Wolfe units; 6 Crawford units; 4 SS Multi units and 4 SS East units; also abated 12 units. $136,213.10 spent

10. Agency Wide Physical Needs Assessments

Funds were allocated to conduct agencywide physical needs assessments of ECC/HANH properties. During FY21 solicitation issued and contract awarded. Site visits were completed. Draft reports received and reviewed. Final reports were prepared. $87,594.00 spent

a. McQueeney Front Plaza

Sidewalk repairs to correct tripping hazards and expand and unify the plaza at the front of the building. $25,112.00 spent

11. 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.

a. **Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services** $272,672.33 spent
b. **IQC Environmental Consulting Services** $319,852.61 spent

12. Administration Salaries & Benefits (CFP only)

Staff salaries and benefits in support of CFP FY22 activities. $350,379.45spent

13. 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. Payments were made in March and September. $355,362.50 spent

ECC/HANH's Reference to most Recent HUD-approved Five-Year Plan: Updated rolling five-year plan for FY 2022-2026 approved in EPIC 5-26-22. FY 2017-2021 Five-Year Plan Revision 6 for 2017 lead paint grant approved in EPIC 8-1-22. FY 2020-2024 Revision 2 for 2020 lead and Housing-Related Hazards grants approved in EPIC 10-1-21.

Long-term outcomes of the FY22 work 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. Capital fund projects support the MTW goals of Housing of Choice and Neighborhood of Choice.

Refer to Appendix 7 for Actual Capital Expenses and Portfolio Capital Needs Chart

B. LEASING INFORMATION

i. Actual Number of Households Served

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED		NUMBER OF HOUSEHOLDS SERVED	
	Planned	Actual	Planned	Actual
MTW Public Housing Units Leased	8808	11,196	734	933
MTW Housing Choice Vouchers (HCV) Utilized	67,584	63,552	5632	5296
Local, Non-Traditional: Tenant-Based^	48	0	4	0
Local, Non-Traditional: Property-Based^	0	180	0	15
Local, Non-Traditional: Homeownership^	0	0	0	0
Planned/Actual Totals	76,440	74,928	6370	6244

* "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.

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

ECC/HANH had higher than anticipated (and correspondingly lower than anticipated HCV utilization) due to delays in the RAD conversions of Valley Townhouses and McConaughy Terrace. Both developments were anticipated to be closed in FY2022, however, due to closing delays, will not close until 1st quarter of FY2023.

ECC/HANH anticipated utilizing four (4) LNT Tenant based vouchers for the proposed Community Health Network of CT Health/Housing Initiative (CHNCT) in March 2022. However, the initiative was closed out due to the partner agency, CHNCT, being unable to commit to the initiative.

Fifteen (15) of nineteen (19) units at Christian Action Agency (CCA), a LNT initiative approved in FY19, were leased in FY22. The planned utilization was inadvertently left out of the FY2022 Plan.

Lease up at CCA did not begin until the 4th quarter of FY2022. 15 participants were leased. ECC/HANH is working with CCA to lease up the remaining units with a goal of 100% lease up in FY2023.

For the Local Non-Traditional units, ECC began lease up of CCA during the 4th quarter. ECC is working with CCA to obtain referrals for the final applicants.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY (NAME and NUMBER)	MONTHS OCCUPIED or LEASED Planned^^	OF UNIT MONTHS OCCUPIED or LEASED Actual	OF HOUSE-HOLDS SERVED Planned^^	OF HOUSE-HOLDS SERVED Actual
Tenant-Based	Community Health Network of CT Health/Housing Initiative (CHNCT) - #2.11	48	0	4	0
Property-Based	Non-Traditional Supportive Housing Program -Christian Community Action Agency (CCA)-#1.22	0	180	0	15
Homeownership	N/A	0	0	0	0
Planned and Actual Totals		48	180	4	15

* 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.

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	ECC/HANH held 33 LIPH units offline to be used as swing units for RAD resident relocations during redevelopment. The swing units were used multiple times for the phases of the relocation. 40 units were held at Valley Townhouses in anticipation of a Spring 22 RAD conversion. However, the RAD conversion did not occur. The conversion is anticipated for FY2023. There weren't any other leasing issues in Public Housing.
MTW Housing Choice Voucher	HCV addressed leasing issues the HCV waitlist, which had applicant information that may have been no longer valid and opening the HCV in order to accept current applicants. The HCV waitlist remains open. Any delays in leasing were due to HCV applicants experiencing difficulty in finding available units. This was due partly to rent inflation vs the allowed payment standard. HCV is conducting a rent study to determine the current market trends in New Haven.
Local, Non-Traditional	ECC/HANH anticipated utilizing four (4) LNT Tenant based vouchers for the proposed Community Health Network of CT Health/Housing Initiative (CHNCT) in March 2022. However, the initiative was closed out due to the partner agency, CHNCT, being unable to commit to the initiative, so leasing did not occur. Fifteen (15) of nineteen (19) units at Christian Action Agency (CCA), a LNT initiative approved in FY19, were leased in FY22. The planned utilization was inadvertently left out of the FY2022 Plan. Lease up at CCA did not begin until the 4th quarter of FY2022. 15 participants were leased. ECC/HANH is working with CCA to lease up the remaining units with a goal of 100% lease up in FY2023.

C. WAITING LIST INFORMATION

i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Public Housing	Site Based	19,129	Open	Yes
MTW Housing Choice Voucher	Program Specific	25,659	Open	Yes

Please describe any duplication of applicants across waiting lists:

Applicants can apply for more than one program within ECC/HANH. Numbers provided for each waitlist are not duplicated, these are the actual number of applicants for each program.

ii. Actual Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Housing Choice Voucher (Tenant Based)	The HCV Waiting List (Tenant Based) was opened in February 2021 and remained open.
Low-Income Public Housing	The LIPH waitlist remains open

D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. 75% of Families Assisted Are Very Low Income

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

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	0
49%-30% Area Median Income	2
Below 30% Area Median Income	13
Total Local, Non-Traditional Households Admitted	**15**

ii. Maintain Comparable Mix

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

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

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

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

N/A

MIX OF FAMILY SIZES SERVED 2022				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	32%	2634	42%	10%
2 Person	24%	1453	23%	-1%
3 Person	20%	1056	17%	-3%

4 Person	13%	609	10%	-3%
5 Person	6%	322	5%	1%
6+ Person	5%	170	3%	-2%
TOTAL	**100%**	**6244**	**100%**	

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

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

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

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

ECC/HANH saw an increase of 10% in 1 person families over baseline

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

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

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
CARES	24	Number of Households to receive zero subsidy at the end of year 6.
Prison Community Reentry	0	Live Independently and be lease compliant[10]
Family Self Sufficiency Program	1	1 new homeowner also enrolled and reflected in CARES program count as well
	0	**(*Households Duplicated Across MTW Activities*)**
Total Households Transitioned to Self-Sufficiency	**25**	

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

[10] Includes graduates from reentry programs in HCV

Who We Serve

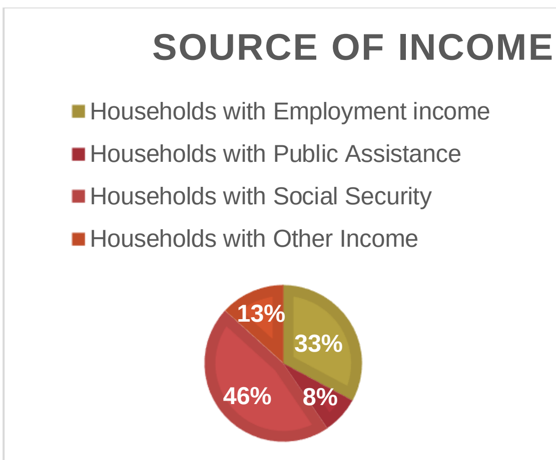
ECC/HANH served 6,244 families through its Low-Income Public Housing (LIPH) and Housing Choice Voucher (HCV) programs during FY 2022. 933 families were served through LIPH and 5,311 families through HCV program, of which 15 were families in local non-traditional units.

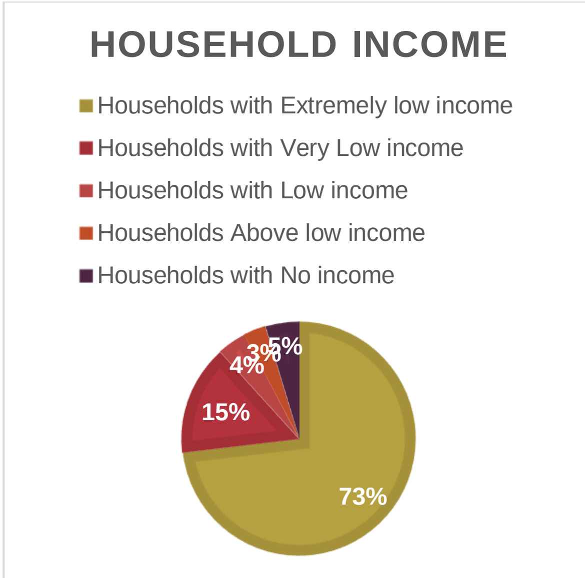
ECC/HANH served 2% fewer families (6400) than anticipated during FY2022.

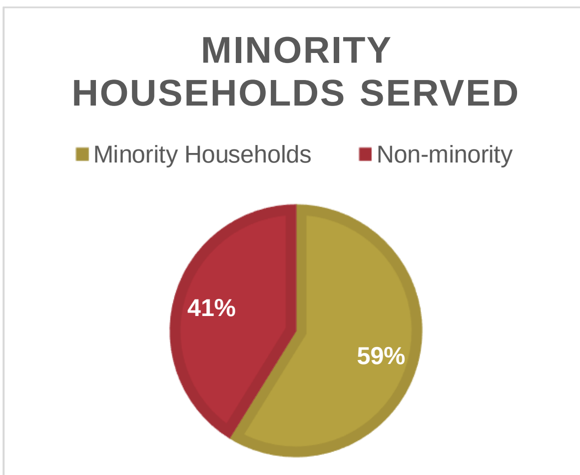
During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current numbers reflect an increase of approximately 29% % (1,417 families), indicating that MTW status has allowed ECC/HANH to increase the number of families served.

The vast majority of the families served by ECC/HANH can be categorized as Extremely Low Income (ELI). ELI households make up 77% of LIPH and 77% of HCV families. Households are predominantly composed of 1 to 3 persons, with 80% of LIPH and 91% of HCV households ranging from 1-person to 3-person families. 39% percent of LIPH families and 33% of HCV families earn wages. Only a small percentage of families report no income, accounting for 9%of LIPH and 4% of HCV households. Despite the challenges of the COVID-19 pandemic, we saw an increase in the number of LIPH families earning wage income.

A table on the following page summarizes the population demographics.







29%

more low-income families served by ECC/HANH since 2001.

ECC/HANH Population Demographics					
	LIPH		HCV		Total
Total Households*	933	15%	5311	85%	6244
Total Individuals*	2265	16%	11,614	84%	13,844
Average Income	$18,309		$17,673		
Average TTP	$426		$413		
Households with Extremely low income	715	77%	4060	77%	4775
Households with Very Low income	132	14%	859	16%	992
Households with Low income	38	4%	226	4%	265
Households Above low income	48	5%	151	3%	199
Households with No income	82	9%	217	4%	299
Households with Employment income	368	39%	1755	33%	2123
Households with Public Assistance	306	33%	188	4%	494
Households with Social Security	414	44%	2568	48%	2982
Households with Other Income	245	26%	609	11%	854
Minority Households	611	65%	3053	58%	3664
Non-minority	322	35%	2243	42%	2565

Elderly families	186	20%	1531	29%	1717
Disabled families	391	42%	2297	43%	2815
1 member	303	33%	2331	44%	2634
2 members	257	28%	1191	22%	1448
3 members	186	20%	865	16%	1051
4 members	94	10%	512	10%	607
5 members	63	7%	257	5%	320
6 members	16	2%	83	2%	99
7 members	10	1%	34	1%	44
8+ members	4	0.4%	23	0.4%	27

Low-Income Public Housing (LIPH)

At the end of FY2022, ECC/HANH had a total 1,062 public housing units. This total included:

- 689 site-based family units (65% of LIPH stock)
- 202 elderly/disabled units (19% of LIPH stock)
- 171 scattered site units (16% of LIPH stock)

ECC/HANH started the year with 1124 units. During FY22, ECC/HANH planned to remove 390 units from the LIPH portfolio and convert them to RAD PBV. However, due to delays in the RAD conversions and delays in the disposition of 6 scattered site units, ECC/HANH was only able to remove the 62 units at Westville Manor after receiving approval. This was a 6% reduction in units, opposed to the 35% reduction that was planned.

Although ECC/HANH is decreasing the LIPH stock, it is important to note that the RAD stock has increased. The increase in RAD units means that residents are not losing housing opportunities, and as noted previously, 29% more families are now served through ECC/HANH's affordable housing programs than before ECC/HANH was granted MTW status.

Of the total LIPH units, post RAD-conversion, 12 units will remain approved as vacancies for units offline. These will be held for the following uses: Officers in Residence, Teachers in Residence, Asset Management offices, Tenant Resident Council offices/food banks.

The following table details the LIPH portfolio at the end of FY22.

Development Name	Development Type	Units beginning FY22	Planned Units to Add	Planned Units to Remove	Actual Units Added	Actual Units Removed	Total units at the end of FY22
Val Macri	Elderly/Disabled	17	0	0	0	0	17
Crawford Manor	Elderly /Disabled	109	0	0	0	0	109
RT Wolfe	Elderly /Disabled	93	0	0	0	0	93
Valley Townhouses	Family	40	0	40	0	0	40
Westville Manor	Family	151	0	62	0	62	89
McConaughy Terrace	Family	201	0	201	0	0	201
Quinnipiac Terrace I	Family	58	0	0	0	0	58
Quinnipiac Terrace 2	Family	56	0	0	0	0	56
Quinnipiac Terrace 3	Family	17	0	0	0	0	17
Essex Townhouses	Family	35	0	0	0	0	35
New Rowe	Family	46	0	0	0	0	46
Brookside Phase 1	Family	50	0	0	0	0	50
Brookside Phase II	Family	50	0	0	0	0	50
Rockview Phase 1 Rental	Family	30	0	0	0	0	30
Scattered Site - Multi Family	Scattered Sites	96	0	87	0	0	96
Scattered Site – West	Scattered Sites	23	0	0	0	0	23
Scattered Site – East	Scattered Sites	52	0	0	0	0	52
Total		**1124**	**0**	**390**	**0**	**62**	**1062**

Housing Choice Voucher

In FY2022, ECC/HANH planned 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.

At the end of FY2022, the HUD allocation was 6236 vouchers and the total voucher count of 5637 was allocated to HCV purposes. This is consistent with ECC/HANH's plans to allocate at least 90% of HCV budget authority toward direct housing services through HCV programs.

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

[11] (17%) This represents 776 PBV units out of a total budgeted authorization of 4,643 non-RAD vouchers.
The Plan stated 4,643 non-RAD vouchers, this in fact should have stated **4934** non-RAD vouchers.

ECC/HANH added 88 RAD/PBV units and 18 non-RAD PBVs with a total count of 1461 RAD/PBVs and 584 Non-RAD/PBVs. The non-RAD/PBV allocation was 12%.

During FY2022, ECC/HANH planned to allocate 4,053 vouchers for tenant-based uses. ECC/HANH added 3 units for a total of 4,056 of the total number of vouchers for tenant based uses. (uses described in table below)

Description	2022 Baseline	Planned units to be removed	Actual units removed	Planned units to be added	Actual units added	Actual units at the end of FY 2022
MTW Vouchers						
DMHAS Supportive - Housing First	10	0	0	0	0	10
DMHAS MHT Grant - FUSE	10	0	0	0	0	10
Family Options - Homeless	15	0	0	0	0	15
Permanent Enrichment	10	0	0	0	0	10
Foreclosure Protection	17	0	0	0	0	17
Family Unification Supportive Housing	20	0	0	0	0	20
Homelessness/Imminent Danger of Homelessness	40	0	0	0	0	40
Supportive Housing/Homelessness Prevention I	51	0	0	0	0	51
Project Longevity	25	0	0	0	0	25
Re-entry Fresh Start	15	0	0	0	3	18
CARES	5	0	0	0	0	5
Section Eight Home Ownership Program (SEHOP)	60	0	0	0	0	60
West Rock Homeownership Phase I	2	0	0	0	0	2
Farnum Relocation	52	0	0	0	0	52
RAD IIA Relocation	7	0	0	0	0	7

Valley Relocation	32	0	0	0	0	32
Westville Relocation Vouchers	50	0	0	0	0	50
MTW Tenant Based Voucher	3,258	0	0	0	0	3,258
Subtotal	**3,679**	**0**	**0**	**0**	**3**	**3,682**
Non-MTW Vouchers						
Emergency Housing Vouchers (EHV)	37	0	0	0	0	37
Church Street South (Tenant Protection Voucher)	179	0	0	0	0	179
Church Street South 2	15	0	0	0	0	15
Church Street South 3	47	0	0	0	0	47
Enhanced Vouchers	11	0	0	0	0	11
VASH Vouchers	85	0	0	0	0	85
Subtotal	**374**	**0**	**0**	**0**	**0**	**374**
TBV Totals	**4053**	**0**	**0**	**0**	**3**	**4056**
RAD/PBV Vouchers	**1,381**	**0**	**0**	**634**	**88**	**1,473**
Grand Total	**5434**	**0**	**0**	**634**	**91**	**5529**

Emergency Housing Vouchers

The American Rescue Plan (ARP) of 2021, section 3202 created the Emergency Housing Vouchers (EHV) 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.

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).

ECC/HANH has received approval to implement the following rent simplification flexibilities to the Emergency Housing Vouchers, which will reduce the staff time to process the recertification and reduce the burden of participants having to report their income annually and have an annual inspection.

- 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

In FY2022, ECC/HANH leased 75% of the vouchers, 28 leased. ECC/HANH anticipates 100% lease up in FY2023.

III. Proposed MTW Activities

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

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IV. Approved MTW Activities: HUD Approval previously granted

A. IMPLEMENTED ACTIVITIES

Initiative 1.2 – Local Total Development Cost (TDC) Limits

Cost Effective

Housing Choice

i. Plan Year Approved, Implemented and Amended

Approved in FY08 and implemented in FY09.
Amended in FY12 and FY17

ii. Description/Impact/Update

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

ECC/HANH's Alternative TDC results in:

OVER 1000 REDEVELOPED UNITS
REAC SCORES EXCEED 90
22-85% REDUCTION IN UTILITY COSTS

ECC/HANH prepared a TDC and HCC schedule, which reflects construction and development costs in New Haven. ECC/HANH first submitted its revised alternate TDC and HCC schedule as part of the Appendix to the FY09 Annual MTW Report. The alternate HCC and TDC uses historical data from recent ECC/HANH mixed-income developments by building type and bedroom size, in addition to current RS Means Building Cost Data by building type, gross square footage, and applicable hard costs. The data further confirmed that New Haven MSA construction costs are on par with those of Fairfield County (in Connecticut), like that of the New York City market. Given these costs, the data showed that it is necessary to use an alternate HCC and TDC.

During FY12, ECC/HANH submitted revised TDC and HCC limits. The TDC limits were again revised in 2017 to reflect increased development costs.

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

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

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

During FY2022, Local TDCs were not required for redevelopment projects undertaken during this year.

Impact

ECC/HANH's MTW flexibility has allowed for an extensive redevelopment approach that has utilized the alternative TDC initiative to support the design and development of quality, energy efficient housing of choice that meets market demand and local standards. This is bolstered by the critical flexibility provided by the initiative, including the ability to leverage non-MTW funds through applications for competitive funding rounds. Of the past 14 redevelopments, 8 of 14 required use of the local TDC. TDCs ranges from $198k to $380k per unit. Those that exceed HUD TDC limits exceeded by between $4700 and $78k. At no time did we exceed the HUD approved alternate TDC limits.

Since implementing this initiative, ECC/HANH has redeveloped thousands of units, leveraged significant non-federal dollars and created quality, cost and energy efficient housing opportunities. The alternate TDC has allowed for an increase of almost 300 hard units, improved occupancy rates and significant reductions in utility costs.

There has also been an 85% reduction in the average per unit/per month electric utility expenses from the baseline in 2012, $900 to $135.30 and a 22% reduction in the average per unit/per month gas utility expense from $60.83 to $47.05. This savings is even greater taking inflation into account.

ECC/HANH had the following developments in the 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. The exception is the Farnam Court Phase II 4% and Farnam Court Phase II 9% projects, are completed and Valley Townhomes and McConaughy Terrace which are in financial closing were anticipated closing in the first and 3rd quarter of FY 2023.

Farnam Court Phase II 4% and Farnam Court Phase II 9% projects were completed in FY2022 and are now fully occupied and comply with the TDC. Valley Townhomes did not have a financial closing as anticipated and the closing is anticipated for FY2023. McConaughy Terrace and Crawford Manor will not trigger TDC and Westville Manor, 34 Level St and Robert T Wolfe will more than likely be TDC developments. ECC/HANH 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 anticipated reduced crime rates in redeveloped sites and improved REAC scores.
ECC/HANH has resumed regular unit inspections and routine maintenance work that was deferred during the height of the COVID-19 pandemic. REAC inspections resumed in FY2022 for the developments with remaining LIPH units.

The average REAC scores for Brookside I and II, Rockview Terrace, Quinnipiac Terrace I, II and II and William T Rowe was 91% compared to 51% which is the current ECC/HANH LIPH units. 91% which is 11% above the baseline REAC score of 80%

ECC/HANH contracted for our own independent inspections. The average REAC-like inspection score across all redeveloped sites was 85% which is a 5.4% increase from the FY2021 score of 79.6%

HC #2: Units of Housing Preserved				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 occupied units (baseline 2001)	Decrease of not more than 5% from previous year (limited to de minimus reduction)	2022: 2,246 units[12] 2021: 2,246 units	Yes

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

Internal Metric #6: Utility Expense Per Unit ****				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Reduction of utility expenses per unit, pre and post redevelopment – Electric	Valley/Waverly: $900 per unit/ per month in 2012	5% reduction; Electric utility expenses would reach approximately $855 per unit	Refer to Appendix 10, Electricity Utility Costs Per Unit Per Month. 2022: Average cost per unit; $135.30	Yes – 85% reduction
Reduction of utility expenses per unit, pre and post redevelopment – Gas	Valley/Waverly: $60.83 per unit/ per month in 2012	5% reduction; Gas utility expenses would reach approximately $58 per unit	Refer to Appendix 10, Gas Utility Costs Per Unit Per Month. 2022: Average cost per unit: $47.50	Yes – 22% reduction

[12] 1,124 LIPH units and 1,122 PBV and RAD redeveloped replacement units

TOTAL DEVELOPMENT COST BY DEVELOPMENT AND UNIT										
Development Name	Year Converted	LIPH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units	HUD TDC (2013) ~	ECC HANH TDC ~	TDC	TDC Per Unit
Eastview Terrace Phase 1	2009	53	49	102	0	102	$259,210	$351,621	$32,289,891	$316,567.56
Quinnipiac Terrace 3	2010	17	16	33	0	33	$259,210	$351,621	$9,384,480	$284,378.18
William T. Rowe	2010	46	32	78	26	104	$313,133	$428,328	$24,987,375	$240,263.22
Brookside Phase I	2011	50	50	100	0	100	$259,210	$351,621	$30,198,639	$301,986.39
Brookside Phase II	2012	50	51	101	0	101	$259,210	$351,621	$20,014,054	$198,158.95
Wilmot Crossing	2012	0	47	47	0	47	$313,133	$428,328	$13,109,292	$278,921.11
Rockview Phase I	2013	30	47	77	0	77	$259,210	$351,621	$21,790,445	$282,992.79
Ribicoff 9%	2014	0	44	44	11	55	$313,133	$428,328	$14,517,329	$263,951.44
Ribicoff 4%	2014	0	51	51	0	51	$259,210	$351,621	$13,457,150	$263,865.69
Farnam Courts-Fair Haven	2015	0	57	57	0	57	$259,210	$351,621	$19,203,991	$336,912.12
Farnam Court Phase I onsite	2016	0	86	86	8	94	$313,133	$428,328	$27,436,148	$291,873.91
Rockview Phase 2	2019	0	62	62	16	78	$298,901	$405,464	$22,736,473	$291,493.24
Farnam Courts-Phase 2	2020	0	88	88	23	111	$259,210	$351,621	$33,394,964	$300,855.53
Total		**246**	**680**	**926**	**84**	**1010**	$3,625,113	$4,931,744	$282,520,231	$3,652,220.13

*- In closing,**Proposed

Redevelopment Metrics				
Internal Metric #2: REAC Scores				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
REAC scores	REAC score of 80 for ECC/HANH's developments (those reflecting alternate TDCs)	At least a10% increase. REAC scores would reach 88.	Refer to Appendix 8: ECC/HANH Development REAC Scores for specific data points.	Yes
Internal Metric #3: Average work order				
Work orders per property	N/A	Brookside Phase I: 1,000 (10 work/year) Brookside Phase II: 1,000 QT1: 560 QT2: 580 QT3: 170 Eastview: 1,020	Refer to Appendix 9: Work Orders, FY09 to FY22 for specific data points.	Yes

During FY2022, we did not have a financial closing utilizing our alternative TDCs.

Overall, the average REAC scores for Brookside I and II, Rockview Terrace, Quinnipiac Terrace I, II and II and William T Rowe significantly exceeded baseline (11% above the baseline REAC score of 80%).

Redeveloped units that utilized the alternative TDC had an 85% reduction of utility expenses per unit, pre and post redevelopment for electric and 22% reduction for gas.

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

In reviewing the Internal Metric #2, the non LIPH redevelopments are no longer subject to REAC inspections, however we contract for independent UPCS inspections and utilize those scores to track progress.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

There were no challenges for FY22 as the costs for projects nearing closing fell within the TDC limits. Inflation due to supply chain disruptions may cause a need to review the TDC limits under future Plans.

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

Approved in FY12 and implemented in FY13.

Cost Effective

Housing Choice

Description/Impact/Update

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

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

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

1. No less than 40 percent of the project-based vouchers awarded in any year to be awarded to families with incomes at or below 30 percent of the Area Median Income (AMI), adjusted for family size.
2. ECC/HANH will award up to 15 percent of the PBV's allocated for any mixed finance project to families with incomes between 50 and 80 percent of AMI for Brookside Phase 1 Rental.
3. 45 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 Rental mixed finance development.

This initiative includes the developments listed in the following chart.

Income Eligibility for Project Based Voucher Program in Mixed-Finance Developments							
Development	Units at or below 30% of AMI	Percent	Units at 31-49% of AMI	Percent	Units at 50-80% of AMI	Percent	Total Units
BROOKSIDE PHASE I	33	69%	8	17%	7	14%	48
BROOKSIDE PHASE II	45	96%	2	4%	0	0%	50
CONSTANCE B MOTLEY	36	90%	4	10%	0	0%	40
EASTVIEW TERRACE PHASE I	38	78%	10	20%	1	0%	49
EASTVIEW TERRACE PHASE II	32	65%	13	27%	4	8%	49

FAIRHAVEN CHATHAM	26	81%	5	16%	1	3%	32
FAIR HAVEN EASTVIEW II	14	58%	9	38%	1	4%	24
FULTON PARK	11	92%	1	8%	0	0%	12
KATHERINE HARVEY TERRACE	15	100%	0	0%	0	0%	15
MCQUEENEY	131	89%	14	10%	1	1%	146
NEWHALL GARDENS	20	83%	4	17%	0	0%	24
PRESCOTT BUSH	44	90%	3	6%	2	4%	49
QUINNIPIAC TERRACE PHASE I	13	56%	6	26%	4	17%	23
QUINNIPIAC TERRACE PHASE II	14	60%	8	34%	1	4%	23
QUINNIPIAC TERRACE PHASE III	8	67%	4	33%	0	0%	12
RIBICOFF	35	80%	5	11%	4	9%	44
RIBICOFF 4	41	82%	7	14%	2	4%	50
ROCKVIEW PHASE I	22	76%	7	24%	0	0%	29
STANLEY JUSTICE	5	71%	2	29%	0	0%	7
VALENTINA MACRI	16	100%	0	0%	0	0%	16
WAVERLY TOWNHOMES	38	78%	8	16%	3	6%	49
WILLIAM T ROWE	22	69%	7	22%	3	9%	32
WILMOT CROSSING	13	97%	1	7%	1	0%	15
WILMOT CROSSING	31	97%	1	3%	0	0%	32
WINSLOW	55	90%	5	8%	1	2%	61
Total	**758**	**81%**	**134**	**16%**	**36**	**4%**	**928**

Impact

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

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 occupied units (baseline 2001)	Decrease of not more than 5% from previous year (limited to de minimus reduction);	2022: 2,246 units 2021: 2,246 units[13]	Yes

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

Internal Metrics

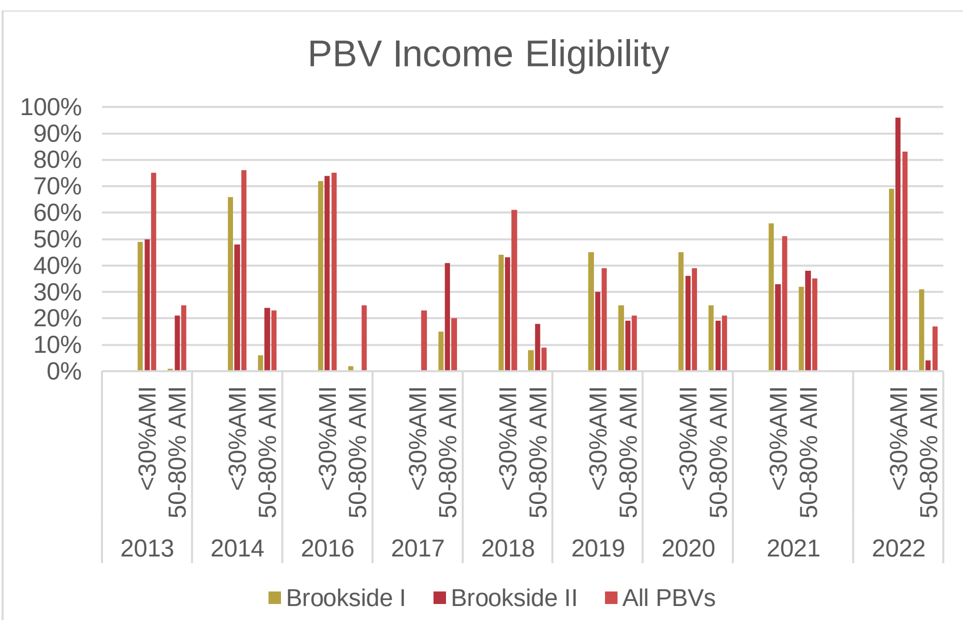
Internal Metric #9: Income eligibility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households at below 30% Area Median Income (AMI)	N/A	No less than 40% of the PBVs awarded in any year will be awarded to families with incomes at or below 30% of the area median income, adjusted for family size.	2022 • 64% of families in applicable developments have incomes below 30% AMI (see above Income Eligibility table for more information) • 2% of new PBV households at Brookside Phase I families were at or below the 30% AMI. • 60% of all households at Brookside Phase I are at or below 30% AMI. • 2% of new PBV households at Brookside Phase II were at or below 30% AMI. • 52% of all households at Brookside Phase II are at or below 30% AMI.	Yes

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

			2021 • 45% of families in applicable developments have incomes below 30% AMI (see above Income Eligibility table for more information) • 6% of new PBV households at Brookside Phase I families were at or below the 30% AMI. • 56% of all households at Brookside Phase I are at or below 30% AMI. • 13% of new PBV households at Brookside Phase II were at or below 30% AMI. • 33% of all households at Brookside Phase II are at or below 30% AMI. 2020: • 39% of families in applicable developments have incomes below 30% AMI (see above Income Eligibility table for more information) • 0% of new PBV households at Brookside Phase I families were at or below the 30% AMI. • 45% of all households Brookside Phase I are at or below 30% AMI. • 0% of new PBV households at Brookside Phase II were at or below 30% AMI. • 36% of all households are at or below 30% AMI.	

Redevelopment Metrics (continued)				
Internal Metric #9: Income eligibility (continued)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households between 50% AMI and 80% Area Median Income (AMI)	N/A	15% of the PBVs may be allocated to families with incomes between 50 and 80% of AMI at Brookside Phase I rental 45% of PBV may be allocated to families with incomes between 50 and 80% AMI at Brookside Phase II rental	2022 • 3% of new PBV households at Brookside Phase I families were between 50% & 80% AMI. • 52% of TOTAL households at Brookside Phase I were between the 50% to 80% AMI. • 4% of new PBV households at Brookside Phase II were between 50% & 80% AMI. • 16% of total households at Brookside Phase II were between the 50% & 80% AMI. • 5% of families in applicable developments have incomes between 50% & 80% AMI. 2021 • 4% of new PBV households at Brookside Phase I families were between 50% & 80% AMI. • 32% of total households at Brookside Phase I were between the 50% to 80% AMI. • 10% of new PBV households at Brookside Phase II were between 50% & 80% AMI. • 38% of total households at Brookside Phase II were between the 50% & 80% AMI. • 35% of families in applicable developments have incomes between 50% & 80% AMI.	Partial

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



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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks or Possible Strategies

There were no challenges or changes for FY2022

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

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

Housing Choice

Description /Impact/Update

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

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

1. Wheelchair accessible units.
2. Large bedroom-size units, (4 bedrooms or larger).
3. Expanded housing opportunities in neighborhoods with low concentrations of poverty.
4. Housing opportunities in new development projects that include significant public investment to promote revitalization of neighborhoods; and
5. Mixed-income housing opportunities that promote expanded housing opportunities and de-concentration of poverty.
6. ECC/HANH approved budget-based rent increases for landlords who make major capital improvements in their property, including accessibility modifications.

Requests for MTW rent standards are reviewed on a case-by-case basis. Under no circumstances may ECC/HANH approve an MTW rent standard above 150% of Fair Market Rent without prior HUD approval. ECC/HANH reexamines its MTW rent standards monthly to ensure that ECC/HANH does not exceed 120% of the fair market rents (FMR) in the mean rent standard, which includes HAP payments to landlords, HAP RAD Payments, tenant rent payments to landlords, and any utility allowance amounts.

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

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

All planned updates were not implemented during FY2022. ECC/HANH began the mobility counseling program and will implement fully during FY2023. In conjunction with working with the mobility counseling offered through the Glendower, ECC/HANH has issued a solicitation to build and expand our mobility counseling with an emphasis on outreach and education of available programs to our applicants, participants and landlords.

Impact

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

At the start of FY2022, 229 HCV participants resided in non-impacted neighborhoods. This represented 5% of all HCV participants. At the close of FY2022, although families received mobility support, 0 families moved with assistance. However, eight (8) families were able to find homes on their own and moved to deconcentrated areas.

ECC/HANH will evaluate what, if any additional mobility supports will be helpful. However, at the close of FY2022 237 HCV participants have leased up in non-impacted neighborhoods in New Haven, representing 4% percent of the 5,311 TBV/PBV in New Haven.

ECC/HANH measures increase in HCV moves to deconcentration areas seeking to improve by more than 2% over the prior year.
FY 2022 data follows:

Sample Percent Increase Tracker	Previous FY Percentage (2021)	Current FY Percentage (2022)	Goal - Percentage Increase	2% of Previous Year (2021)	Is Current Percent Equal to or Greater than 2% of Previous Year?
FY2021	5%	4%	2%	7%	No

With an average household income of $17,487, families who live in non-impacted areas have income which is one percent lower as compared to the entire ECC/HANH HCV-assisted population, at $17,723. This represents a non-significant income difference.

Outcomes

HUD-Required Metrics

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Annual number of incremental households leased-up in low poverty areas* because of the activity	0 (2008)	Greater than 2% increase over prior year	2022-8 2021-11 2020- 13	No

** Low poverty areas include the following U.S. Census Tracts: 1401, 1410, 1411, and 1428*
*** This benchmark was new as of FY17 and was reevaluated in FY19. No changes to the benchmark*

Internal Metric: Exception Rents Granted					
Unit of Measurement		Baseline	Benchmark	Outcome	Benchmark Achieved?
Annual number of incremental households with exception rents approved due to bedroom size issue because of the activity	0 (2008)	1**	Greater than 2% increase over prior year	2022-0 2021 –0 2020-0	No
Annual number of incremental households with exception rents approved due to an accessibility issue because of the activity	0 (2008)	10***	Greater than 2% increase over prior year	2022-0 2021 – 0 2020-0	No

Actual Non-significant changes

None

Actual Changes to Metrics/Data Collection

None

In the 2019 Plan, ECC/HANH noted that HC#5 would be reviewed to determine continued use during FY19. ECC/HANH reviewed the benchmark and no changes have been made. ECC/HANH will continue to review the metrics and will update accordingly if needed.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

ECC/HANH's in house mobility counseling team received 216 referrals from the Housing Choice Voucher team. Families elected to not move to a deconcentrated area for the following reasons.

1. Keep their children in the same schools.
2. Remain close to their jobs.
3. Be near their family.
4. Lack of public transportation
5. Desire to live in familiar neighborhoods.

Staff will work to address the concerns of families, by providing information that will address employment opportunities, transportation, schools, etc. The questionnaire will be updated to be more specific in inquiring about their needs and desires in choosing a new home. The incentives offered will be more clearly communicated so families will take advantage of what is being offered.

Also, due to the tight rental market, the availability of rental units with vacancies, in the deconcentrated areas also impacted the participants ability to move to those neighborhoods. Staff will also conduct landlord outreach and workshops, so landlords are aware of the initiative and incentives and can advertise their vacant units with ECC/HANH.

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

Approved in FY10 and implemented in FY11.

Housing Choice

Self-Sufficiency

Description/Impact/Update

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

At the beginning of FY22, ECC/HANH had 196 tenant-based vouchers allocated to serve individuals that meet one or more of the following criteria.

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

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

TBV Supportive Housing Efforts	Description	2022 Voucher Baseline	Planned Units to be Removed	Actual Units Removed	Planned Units to be Added	Actual Units Added	Actual Units at end of	Actual Number of Vouchers Utilized	Percentage of Vouchers Utiliz
Tenant Based DHMAS Supportive – Housing First	Supportive Housing	10	0	0	0	0	10	9	90%
DMHAS Mental Health Transformation Grant – FUSE	Supportive Housing	10	0	0	0	0	10	5	50%
Family Options – Homeless	Supportive Housing	15	0	0	0	0	15	9	60%
Permanent Enrichment	Supportive Housing	10	0	0	0	0	10	7	70%
Family Unification Supportive Housing	DCF Family	20	0	0	0	0	20	11	55%
Homelessness/Imminent Danger of Homelessness	(Formerly Foreclosure PBV)	40	0	0	0	0	40	34	85%
Supportive Housing/Homelessness Prevention	Supportive Housing/Homelessness Prevention	51	0	0	0	0	51	38	75%
Project Longevity	25 vouchers for city initiative targeting homeless former	25	0	0	0	0	**25**	17	68%
Re-entry Fresh Start	15 vouchers for city initiative targeting homeless	15	0	0	3	3	**18**	14	78%
Supportive Housing Efforts Subtotal		**196**	**0**	**8**	**0**	**3**	**199**	144	**72%**

Please note that the number of vouchers allocated to this initiative is 196. The 2022 MTW Plan had 171 vouchers allocated. Inadvertently the vouchers for Project Longevity and Re-Entry Fresh Start were not included in the chart in the 2022 MTW Plan.

ECC/HANH added 3 vouchers to the Re-Entry Fresh Start to support homeless former offenders who are engaged with Fresh Start.

ECC/HANH will continue to work with the Supportive Service on receiving referrals to increase utilization and assist a homeless family or individual.

Impact

Due to the homelessness crisis in our city and our nation, this initiative is critical and a necessity. This initiative is a small but mighty step that ECC/HANH has taken to eradicate this epidemic. ECC/HANH's initiative to engage area Agencies that provide supportive services to individuals and families who are near homelessness or chronologically homeless on a path to stability and self-sufficiency is making an important and impactful. Studies show that the one of the major obstacles to self-sufficiency is access to decent and affordable homes for families. As ECC/HANH continues to assist these individuals and families, our secondary focus will be assisting them in obtaining self-sufficiency so they can move on, and the voucher can be available for others who are in need.

These families are now stably housed and focus on increasing their average household income which is in the Extremely Low category at $11,565.00. ECC/HANH has grown this program since inception and has recently transitioned to an admission preference system granting a percentage of all new admissions to providing housing for the homeless and re-entry populations. To date, significant increase in family income have not been noted partly due to the impact of COVID on employment and the high percentage of families living with disabilities. In FY2023, Staff will also work with the FSS team and offer assistance with the FSS program so families can participate in FSS activities that assist them in obtaining job opportunities to increase their incomes.

However, one of the families who became an HCV participant through this initiative in 2011 had wages of less than $8,000 upon lease up and their family income increase to $16,000 in 2019, through employment opportunities. Currently the families' wage income has increased to over $31,000.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average total household income for households affected by this policy in dollars	$12,643 (2013)	Steady increase in average household income over prior year	2022: $11,565 2021: $11,264 2020: $10,136	No
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Percentage of homeless households enrolled in program receiving supportive services	0 (2010)	100% receiving supportive services	2022:100%	Yes

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Additional permanent housing made available to homeless families	0 (2010)	At least 10 new families housed per year	2022: 3 2021: 11 2020: 1	No

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

ECC/HANH increased the number of vouchers in the Re-Entry Fresh start program from 15 to 18. The agency making the referrals has demonstrated there is an adequate pool of applicants to support the increase in vouchers.

Challenges in Achieving Benchmarks and Possible Strategies

ECC/HANH experienced challenges with lease up related to outreach, engagement and scarcity of units. In the upcoming year, ECC/HANH will increase the interaction with the Supportive Housing providers who are making the referrals. ECC/HANH will have more consistent meetings with the agencies to ensure that referrals are made consistently.

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

Housing Choice

Approved in FY12 and implemented in FY13.

Description/Impact/Update

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

ECC/HANH analyzed the feasibility of converting Annual Contribution Contract ("ACC") units to Project-Based Units using criteria like those set forth under Section 22. ECC/HANH will increase its flexibility to allocate the number of units in a project from 75% (as previously approved by HUD) to 100%, which will allow for the conversion of ACC units to PBV units. This will provide the cash flow necessary to enable ECC/HANH to borrow private funds to rehabilitate aging developments in the portfolio. ECC/HANH also seeks to waive the requirement of one-year tenancy to allow participants greater flexibility.

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

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

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

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

Under the prior MTW Demonstration Agreement, ECC/HANH was specifically authorized to aid up to 50 percent of the units in a project. This authorization has been essential in helping to promote increased housing opportunities, as well as in leveraging private funds. HUD's development of the Rental Assistance

Demonstration (RAD) Program has made this initiative unnecessary for projects approved for RAD conversion, however, it is maintained for capital investment in non-RAD properties. During FY2022, no actions were taken pursuant to this initiative.

Impact

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

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

Outcomes

HUD-Required Metrics

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

CE #4: Increase in Resources Leveraged (MTW Leverage Ratios)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Brookside I	1.7	2.0	2016: 2.3 2015: 2.3	Yes
Brookside II	1.7	2.0	2016: 7.5 2015: 7.5	Yes
Rockview I	1.7	2.0	2016: 4.6 2015: 4.6	Yes
122 Wilmot Road	1.7	2.0	2016: 3.2 2015: 3.2	Yes
Brookside Homeownership	1.7	2.0	2016: 1.7 2015: 1.6	Yes
Ribicoff I	1.7	2.0	2016: 6.1 2015: 6.1	Yes
Ribicoff II	1.7	2.0	2016: 1.2 2015: 1.2	No
Quinnipiac Terrace I	1.7	2.0	2016: 5.5 2015: 5.5	Yes
Quinnipiac Terrace II	1.7	2.0	2016: 8.6 2015: 8.6	Yes
Quinnipiac Terrace III	1.7	2.0	2016: 4.2 2015: 4.2	Yes
Eastview I	1.7	2.0	2016: 0.6 2015: 0.6	No

Rowe	1.7	2.0	2016: 4.5 2015: 4.5	Yes
Farnam Phase 1	1.7	2.0	2016: 3.1	Yes
Rockview Phase 2	1.7	2.0	2019:12.1	Yes

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

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

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

Internal Metrics

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

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

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

Approved in FY13 and implemented in FY14.

Housing Choice

Description/Impact/Update

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

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

ECC/HANH's current percentage of non-RAD project based MTW vouchers is 12%, equivalent to a total of 584 vouchers.[14]

Impact

ECC/HANH uses its ability to project-base vouchers in order to increase the availability of quality affordable housing options. During FY2022, ECC/HANH awarded PBVs to 1 provider for 18 units of affordable housing. ECC/HANH has increased the percent of PBV to 12% currently continuing to maximize the choice feature of the HCV program. ECC/HANH anticipates continued ability to invest in worthwhile development opportunities making use of PBV ability given funding availability.

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 units (frozen 2001 base)	Decrease of not more than 5% from previous year	2022; 2,246 2021: 2,246 units	Yes
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (non ECC/HANH projects)		Annual PBV awards consistent with ECC/HANH MTW Annual Plan	2022: 0 units awarded 2021: 100 units awarded 2020: 100 units awarded	No
CE #4: Increase in Resources Leveraged				
Brookside I	1.7	2.0	2016: 2.3 2015: 2.3	Yes
Brookside II	1.7	2.0	2016: 7.5 2015: 7.5	Yes

[14] *FY22 HANH divided the total number of Project Based Vouchers into the Total Voucher Authorization to come up with the percentage of Non-RAD PBV units, 584/4934).*

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

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

Internal Metrics

Redevelopment Metrics				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Internal Metric #12: HCV Budget Authority for the Agency that is Permitted to Project-Base				
Overall ECC/HANH percentage of PBV/HCV**	11% (FY13)	Up to 25%	2022: 12% 2021: 11%	Yes

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

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

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

No changes.

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

Housing Choice

Description/Impact/Update

ECC/HANH has been very active in redeveloping and repositioning its aging public housing stock by leveraging private investment through the mixed-finance process and replacing units with a variety of affordable housing types, including public housing, project-based vouchers and tax credit units. ECC/HANH has also been at the forefront of using its MTW authority creatively to complement and enhance these efforts. With the absence of HOPE VI, Choice Neighborhoods, or other similar funding authority, MTW flexibility has proven an invaluable tool in the ongoing replacement of obsolete public housing units. MTW flexibility has allowed ECC/HANH to undertake the large-scale redevelopments identified below by providing capital funding as well as RAD PBV overhang funding. This infusion of MTW funds allows us to structure funding proposals that maximize non-MTW funds to the greatest extent possible. ECC/HANH is committed to maximizing all non-MTW funding sources for every development activity. ECC/HANH's three most recent redevelopment projects, Rockview Phase 2, Farnam Phase 2, and Valley Street all include highly competitive 9% Low Income Housing Tax Credits made possible by the infusion of MTW funds.

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

Development Name	Year Converted	LIPH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units	Overall Development Costs	MTW Share	MTW Per Unit	MTW Leverage
Eastview Terrace Phase 1	2009	53	49	102	0	102	$43,110,362	$3,591,481	$35,210.60	12
Quinnipiac Terrace 3	2010	17	16	33	0	33	$15,013,613	$836,120	$25,336.97	18
William T. Rowe	2010	46	32	78	26	104	$40,710,905	$7,907,927	$76,037.76	5
Brookside Phase I	2011	50	50	100	0	100	$40,618,730	$6,625,828	$66,258.28	6
Brook. Phase II	2012	50	51	101	0	101	$29,798,133	$1,633,849	$16,176.72	18
Wilmot Crossing	2012	0	47	47	0	47	$18,806,305	$1,626,517	$34,606.74	12
Rockview Phase I	2013	30	47	77	0	77	$33,407,238	$5,791,932	$75,219.90	6
Ribicoff 9%	2014	0	44	44	11	55	$22,469,185	$4,075,502	$74,100.04	6
Ribicoff 4%	2014	0	51	51	0	51	$21,551,269	$10,101,565	$198,069.90	2
Total		**246**	**387**	**633**	**37**	**670**	**$265,485,740**	**$75,695,058**	**$41,354,601**	**85**

In FY13, ECC/HANH proposed to begin a new initiative to develop public housing replacement units with MTW block grant funds, while making use of MTW authority to waive or substitute certain program rules. ECC/HANH pursued this initiative at certain sites in FY13, including Farnam Courts and Abraham Ribicoff Cottage and Extension, but intended to use this same model at other sites to be identified in the future.

During recent years ECC/HANH has not used this initiative but has rather transitioned to RAD conversions using a Project Based Voucher and mixed-finance model. The units that have been completed continue to 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 used its MTW authority to design and fund a local program to develop replacement public housing units under a local housing assistance payments contract with the owner entity, with operating assistance being utilized in a manner like the project-based voucher program. Among other things, this approach allows ECC/HANH to pay debt service on private loans taken out to support redevelopment projects. To the extent necessary, under its MTW authority ECC/HANH revised required forms to provide for this mix of applicable rules and sought the necessary HUD approvals.

Subsequent to the approval of this initiative, HUD developed, and ECC/HANH has successfully competed for RAD awards. The RAD program has served the intended purpose of this initiative. During FY2022 flexibility was not required, so this initiative has been put on hold. ECC/HANH maintains the need for this initiative for potential development to be undertaken separate from RAD.

Development Name	PH Units[15]	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units
Eastview Terrace	**0**	**102**	**102**	**0**	**102**
Quinnipiac Terrace I	**58**	**23**	**81**	**0**	**81**
Quinnipiac Terrace 2	**56**	**23**	**79**	**0**	**79**
Quinnipiac Terrace 3	**17**	**16**	**33**	**0**	**33**
Brookside Phase I	**50**	**50**	**100**	**0**	**100**
Brookside Phase II	**50**	**51**	**101**	**0**	**101**
Rockview Phase I	**30**	**47**	**77**	**0**	**77**
William T. Rowe	**46**	**32**	**78**	**26**	**104**
Wilmot Crossing	**0**	**47**	**47**	**0**	**47**
Monterey Place	**0**	**42**	**42**	**0**	**42**
Monterey Place 2	**0**	**7**	**7**	**0**	**7**
Monterey Place 3	**0**	**45**	**45**	**0**	**45**
Monterey 4	**0**	**42**	**42**	**0**	**42**
Monterey 5	**0**	**17**	**17**	**0**	**17**
Monterey Phase 2R	**0**	**28**	**28**	**0**	**28**
William Griffin	**0**	**4**	**4**	**0**	**4**
Edith Johnson Towers	**0**	**95**	**95**	**0**	**95**
Ribicoff 9%	**0**	**44**	**44**	**11**	**55**
Ribicoff 4%	**0**	**51**	**51**	**0**	**51**
Total	307	**672**	**1073**	**37**	**1110**

ECC/HANH does not plan on creating additional LIPH units. The redevelopment efforts will reposition LIPH units to either a RAD or mixed finance platform.

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

Impact

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

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None

Initiative 1.15-1.17 – West Rock Transformation Plan/Major Redevelopment Efforts (Previously Initiative 1.13

RAD Finance Development for Rockview Phase II Rental and Westville Manor Transformation Plan)

Housing Choice

Approved in FY14 and implemented in FY17.
Revised in FY2021

Description/Impact/Update

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

Impact

West Rock Community: The West Rock community, which originally included Rockview Terrace, Brookside Manor, and Ribicoff Cottages, was developed as affordable housing in the 1950s and 1960s in what at that time was an outlying area with little access to public service or job opportunities. Westville Manor was constructed in the Westrock neighborhood in the 1980s. ECC/HANH's goal has been to redevelop these aged and poor performing assets with a viable, sustainable, and connected community known as the Westrock Redevelopment Plan. To date, Rockview Terrace, Brookside Manor, and Ribicoff Cottages have all been demolished and reconstructed through a series of development projects funded through mixed finance vehicles. In addition to these three redevelopments, ECC/HANH also developed Wilmot Crossing on a gateway location to the Westrock neighborhood. Wilmot Crossing includes senior and disabled housing, a community store, and a full-service medical clinic. These activities have transformed obsolete public housing into vibrant mixed-income communities that brought approximately 500 units of affordable and market rate rental housing, homeownership, associated community space and commercial space into the West Rock community. To assure connectivity, ECC/HANH worked successfully with the City of New Haven and the Town of Hamden to open a long-closed road creating an access way into the community from the Town of Hamden, providing access to retail and employment opportunities. The redevelopment of Valley Townhomes and the substantial redevelopment of McConaughy Terrace were added to the Westrock initiative in FY21, along with 34 Level Street

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

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

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

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

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

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

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

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

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

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

The Westrock initiative was revised in 2021 to include the redevelopment of Valley Street Townhomes, McConaughy Terrace, and 34 Level Street.

McConaughy Terrace

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. The conversion of this development to RAD is planned for FY 23. While originally slated for conversion in FY2022, delays have caused a shift to FY2023

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.

Valley Street

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. 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.

Valley Street townhomes has received 9% LIHTC funding and all other funding sources are in place. RAD conversion was planned for FY2022, however, it is anticipated that the Valley Street closing will occur in the first quarter of FY23. 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.

34 Level Street

ECC purchased 34 Level Street, New Haven, CT.   The property has been unoccupied since 2010. The property is located in the West Rock neighborhood directly adjacent to Westville Manor. The redevelopment plan is to demolish the existing unused commercial building and redevelop the subject property as a 51 unit HUD 202 development that will allow for the elderly to live independently even as residents may require more assistance with activities of daily living. Glendower unsuccessfully applied for 2021 HUD Section 202 Supportive Housing for the Elderly program. The score under the 2021 round was very competitive and a proposal will be resubmitted under the 2022 round.   A mixed-finance model will be used with funding sources including Low Income Housing Tax Credits, Section 202 funds, and MTW funding. An application will be resubmitted under the FY2023 HUD 202 NOFA

Outcomes

HUD-Required Metrics

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

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes
None

Challenges in Achieving Benchmarks and Possible Strategies
ECC/HANH submitted an application for LIHTC in the FY2022 round for Westville Manor, and Section 202 funding for 34 Level Street was unsuccessful. Redevelopment along the current plans is dependent upon successful award. Failure to receive funding will require a revision to the redevelopment timeline.

Initiative 1.16 – Crawford Manor Transformation Plan

Approved in FY13, implemented in FY16, and placed on hold in FY17.
Moved to Active in FY22

Housing Choice

Description/Impact/Update

ECC/HANH applied for the Choice Neighborhoods Initiative Planning Grant, but it was not awarded. Therefore, this initiative was placed on hold while an alternative plan and timeline was devised. The initiative was removed from on hold status in FY2022.

The redevelopment plan for Crawford Manor is to use 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 intention was to complete architectural plans and seek funding in the second quarter of FY2022, however that did not occur. Since Crawford Manor is listed on the National Registry of Historic Places, the State and Federal Historic Tax credit process is very specialized, and we have determined that an historic consultant is required to compete the process properly. The procurement process for this consultant began in FY2022 and a consultant is expected to be hired in FY2023. ECC/HANH also started the procurement process for an architect and construction manager and plans on completing 40% of the design documents and obtaining city planning approval.

Impact
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 ADA units. Under no circumstances will the diminimis reduction of 5% be exceeded and affordable square footage will remain the same.

The preservation of 109 affordable units in this non-impacted area will promote ECC/HANH's goal of assisting residents towards self-sufficiency as well as increase the economic development in this area. The residents will live in an area where they will access to supportive services, access to jobs, high quality early learning programs, public assets, public transportation, high-quality public schools and education programs and hospitals and health care facilities.

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	104 units	99 units	0 preserved to date	No

Actual Non-Significant Changes

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

The challenges centered around obtaining the necessary funding which included State and Federal Historic Tax Credits as well as Low Income Housing Tax Credits. ECC/HANH is in the process of procuring for an historic consultant to assist in the process.

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

Housing Choice

Proposed and Approved in FY2019

Description/Impact/Update

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

When looking at the availability of affordable housing resources, one will note that these resources fall disproportionately in communities of very low and low opportunity. New Haven has the region's largest percentage of government-assisted public housing. The City's Consolidated Plan notes the need for a more "balanced approach of market-rate and affordable units, spread more evenly across the entire South Central CT region". ECC/HANH and its instrumentality, The

Glendower Group, is a major developer and subsidizer of affordable housing in this region. This initiative proposes to allow ECC/HANH and Glendower to expand its reach into neighboring areas of opportunity.

Currently, achieving significant increases in mobility moves to areas of deconcentrated poverty has been difficult. Most ECC/HANH assisted families lease in the City of New Haven – a city of high rates of poverty (over 25% of families live in poverty). Affordable housing in the city is increasing with over 20 % of housing units subsidized. Most census tracts in the city are classified as concentrated poverty areas. This initiative seeks to allow ECC/HANH and its instrumentalities to develop housing opportunities that allow families from ECC/HANH waitlists to obtain housing opportunities that currently do not exist.

During FY 2021, ECC/HANH identified a partner agency through its competitive PBV RFP to develop housing in the neighboring town of Branford CT. ECC/HANH awarded 40 units of PBV to this developer for the redevelopment of a formerly elderly only development into family affordable housing of which 40 will be subsidized by ECC/HANH vouchers for families currently on the ECC/HANH waitlist. 20 vouchers will be allocated for current residents and 20 vouchers will be allocated for applicants when the property is developed.

During FY 2022, ECC/HANH entered into an MOU with Branford Housing Authority and completed the AHAP. The groundbreaking occurred in FY2022, and construction is expected to be completed in FY 2023.

Lease up for the 20 vouchers for current residents did not occur in FY2022 and is anticipated in FY2023.

In FY2022, ECC/HANH did not pursue other development opportunities in areas of opportunity but anticipates pursuing other areas in FY2023.

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

Impact

The “Opportunity areas” are areas identifies as “opportunity-rich” with greater access to educational outcomes, employment, lower poverty and reduced 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.

There are approximately four neighborhoods in New Haven which are considered deconcentrated or high opportunity and due to the tight rental market, it has been difficult for most families to find housing. 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 in all areas of the city of New Haven and gives families for housing choice opportunities.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Zero (0)	Not to exceed 5% of ECCHANH’s total non-RAD voucher authority 65	0	No

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None

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

Approved in FY19.

Housing Choice | Self-Sufficiency

Description/Impact/Update

ECC/HANH proposes to co-develop non-traditional housing supports for units of affordable housing for families transitioning from homelessness. This support is targeted toward families seeking economic self-sufficiency following shelter and transitional housing offered through a community provider. The first project developed under this proposed initiative would be a 19-unit development owned by Christian Community Action (CCA). Program participants would be identified from shelters owned and managed by CCA and from other family shelter providers in the greater New Haven area. Families will receive case management support to achieve work goals that support independent living in 24 to 36 months, with a maximum period of housing subsidy support for 36 months. This activity will be a 10-year PILOT program and at the conclusion of the pilot period, ECC/HANH will determine if it will make this Initiative a permanent activity.

Program participants would be identified from shelters owned and managed by CCA and from other family shelter providers in the greater New Haven area. Families will receive case management support to achieve work goals that support independent living in 24 to 36 months. Once families graduate from the program, they will receive an additional year of support and mentorship. These services will be provided by CCA's ARISE Center. The ARISE (Accessing Resources for Independence, Skill-Building and Employment) Center serves families that are residing within the CCA Hillside Family Shelter (HFS) and Stepping Stone Transitional Housing Program (SSTHP), as well as serving families for up to one year after they have moved from a CCA housing program and into permanent housing. The purposes of the ARISE Center services are to increase employability and promote family health, wellness, and stability through the work of the ARISE Employment Services and Child and Family Services.

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

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

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

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

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

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

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

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

Impact

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

To date ECC/HANH has leased 15 units to families who were formerly unhoused and transitioning from temporary housing. Upon admission, 42% of head of households were employed either full time or part time. 100% of the household had children with 64% of the households with 2 or more children. The children are all of school age. Having a stable place to live will give the families stability to be able to look for stable employment and provide food and essentials for the family. Stable housing will also benefit the children in their education and other areas of their lives.

ECC/HANH anticipates making families self-sufficient and successful with this initiative and will work with CCA to track their progress.

Outcomes

HUD-Required Metrics

SS#1: Increase household income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Family income	As families are enrolled baseline household income will be determined. At baseline, family income will be below levels required for	33% of families will experience an increase in family income 6	2022: 13 of the 15 families leased enrolled at under 30% AMI. 2 families fell within the 30% to 50% AMI.	ECC/HANH is unable to determine at this time if family's income increased as families just began lease up and enrolled in

	unassisted housing $17,305 (average gross income of initial families)		The average household gross income is $17,305	the program in July 2022.

SS#3: Increase positive outcomes in employment status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Enrollment in part- and full-time employment	At baseline, all families will be engaged in workforce training or educational program, part time employment or full-time employment	50% of families will be enrolled in a part time or fulltime employment by the end of year 1 of their admission to the program.	2022- 43%	No

SS#8: Households transitioned to self sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Transition to access housing without assistance	At baseline, no families will meet economic self-sufficiency measures as indicated by ability to lease unassisted in the market 0	About 33% of families are anticipated to reach self-sufficiency goals in year one	N/A	N/A

HC#1: Additional units of housing made available

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

Delays in program start occurred due to program design and staffing challenges therefore lease up did not occur until the end of FY2022. Currently 15 of the 18 units are leased. ECC/HANH anticipates the remining units to be leased up in FY2023.

Initiative 1.23 - St Luke's Whalley Avenue Development

Approved and Implemented in FY22

Housing Choice

Description/Impact/Update

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. 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.

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.

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 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.

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 55 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. Architectural plans are in the process of being completed and multiple applications have been submitted for financing have been submitted. It is anticipated that this development will use a 4% LIHTC mixed-finance model with a closing anticipated in FY23.

Impact

The creation of up to 62 units of affordable and mixed-income housing in a key location adjacent to downtown New Haven and Yale University. The site is walkable to a major grocery store, pharmacy, and other service and retail establishments. The site is also served by a 24/7 CT Transit bus service with links to downtown New Haven and the multi-modal Union Station.

In FY2022 the Glendower Group did not apply for the 4% Low Income tax credit as anticipated, however the Glendower Group applied for funding from the State Department of Housing, the Federal Home Loan Bank, and the Department of Economic and Community Development and is waiting for approval.
The architectural documents were not completed and the financial closings did not occur as anticipated.
Once this scenario is complete, construction will begin and it 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.

Outcomes

HUD-Required Metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI 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). 0	Whether the outcome meets or exceeds the benchmark. No

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). 0	Whether the outcome meets or exceeds the benchmark. No

Actual Non-Significant Changes
None

Actual Changes to Metrics/Data Collection
None

Actual Significant Changes
None

Challenges in Achieving Benchmarks and Possible Strategies
The challenges to implementing this initiative is securing the necessary third-party funds. Funding applications have been submitted to the State of Connecticut and Federal Home Loan Bank. A 4% LIHTC application will be submitted in FY23.

Initiative 2.1 – Family Self-Sufficiency (FSS) Program

Self-Sufficiency

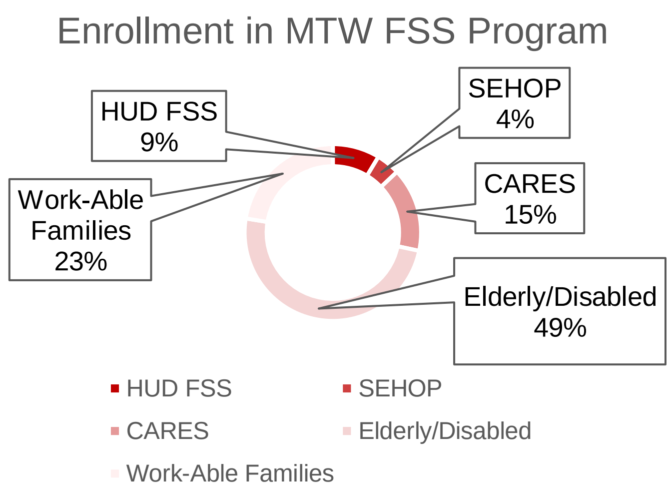
Approved and implemented in FY07.

Description/Impact/Update

ECC/HANH's FSS program provides intensive counseling and case management services to help participant families achieve their self-sufficiency goals, according to each family's needs. Adding new services has allowed ECC/HANH to provide much needed support to a larger number of LIPH and Section 8 residents. Service referrals focus on: education, literacy, GED preparation, vocational and job skills and financial management.

EARN ANNUAL INCOMES THAT EXCEED THE AMI FOR THE CITY OF NEW HAVEN
REDUCED THEIR DEBT BY OVER $129K
INCREASED CREDIT SCORE TO 650

The MTW FSS program serves up to 1,150 families. The following table details the number of enrollment slots for each program.



Program	Number of Slots	Number Served in 2022	Benefits from Escrow	Owner	Supports
HUD FSS Grant Funded Slots	150	96	Yes	FSS Coordinators	RSCs, CED Managers & Supervisors
CARES Program	Up to 178	129	Yes	CARES Coordinator	CED Managers & Supervisors
Work-able families	60 200	35 200	Yes Yes	Program Managers FSS Coordinators	FSS Coordinators, CED Managers & Supervisors, RSCs
Elderly/Disabled	570	570	No	RS Coordinators	CED Managers & Supervisors, FSS coordinators
TOTAL	**1158**	**1030**			

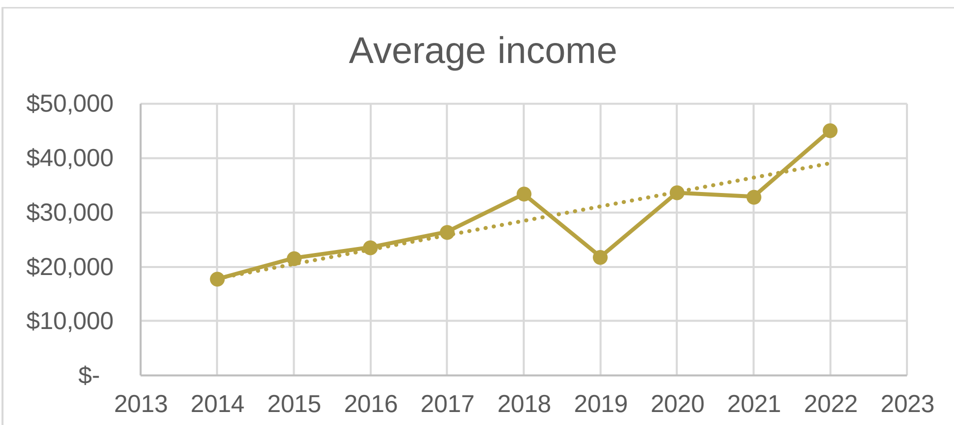
Impact

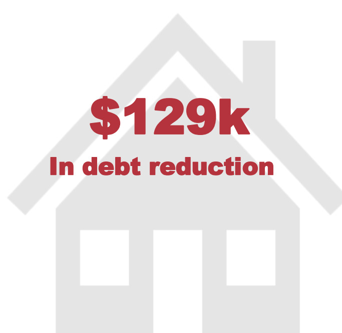
This initiative is expected to increase the self-sufficiency of residents through employment, specialized training, higher education and increased earnings and savings. Continuing to be impacted by the COVID pandemic, focus was on assisting residents in functioning in the virtual/hybrid world, maintenance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

In FY2022, ECC/HANH continued offering programming focusing on empowerment, childcare, financial literacy and mental health as well as continuing to promote class offerings to better serve residents' needs and to partner with other agencies that are a part of the Program Coordinating Committee (PCC). Throughout the year, 89% of the slots were filled. Two-hundred sixty (260) residents attended programming and attendance remained consistent. Over 50 programs and workshops were presented virtually and on-site including computer classes, job skills training and employment assistance. Looking forward, the FSS staff will conduct additional outreach to encourage more participation and fill up the remaining slots.

Despite a challenging home buying market, 3 families became new homeowners in FY 22. FSS Staff has assisted families achieve homeownership by working with residents to set self-sufficiency goals that support employment, specialized training, higher education, and asset building. In addition to required one-on-one meetings with a Coordinator, FSS staff conducts outreach to engage all residents to effectively gain and maintain access to resources that can assist participants in pursuing opportunities in achieving self-sufficiency.

In FY22, residents enrolled in the FSS program had an average earned household income of $45,122 demonstrating a significant increase over baseline and in comparison, to ECC/HANH overall population. Further, participating families demonstrate growth in annual family income that exceeds the New Haven AMI of $44,507.





ECC/HANH's focus on financial literacy yielded marked improvements in credit scores and debt elimination. Over 201 residents received financial literacy services including over 315 one-to-one budgeting sessions. Eighty-seven percent (87%) of participants met their individual financial literacy goals resulting in over $129k in debt reduction (on average $3,500 per family) and an average credit score of 648.

One successful resident has met her employment goals, has business wages of $38,302, savings in excess of $2,000 and a credit score of 708. She is now working with a lender toward her homeownership goals.

One successful resident was recently given the green light to move forward with her lender and pursue her homeownership goal reaching annual wages of $46,935, savings of $17,781 and a credit score of 731.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earnings (wages) of households enrolled in FSS Program**	$4,082 (2013)	Steady increase in average household earnings. Long-term Goal: meet or exceed NH AMI $44,507	2022: $45,122 2021: $32,864 2020: $33,633 Prior years' average income: $24,072	Yes

SS #3: Increase in Positive Outcomes in Employment Status				
Employed full-time*** Employed part-time Enrolled in an educational program Enrolled in job training program Unemployed Other	2014 - Employed FT: 22 - Employed PT: 93 - Enrolled in education: 228 - Enrolled in job training: n/a - Unemployed: 113 - Other: N/A	Steady increase in full-time employment for FSS participants	2022: - Employed FT: 55 - Employed PT: 7 - Enrolled in Education: 94 - Enrolled in Job Training: 13 - Unemployed: 13 - Self Employed: 3 - E/D: 16 2021: - Employed FT: 55 - Employed PT: 14 - Enrolled in Education: 103 - Enrolled in Job Training: 10 - Unemployed: 585 2020: - Employed FT: 68 - Employed PT: 15 - Enrolled in Education: 107 - Enrolled in Job Training: 9 - Unemployed: 591	Partial

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of FSS households that have taken vocational and computer classes (excluding Specialized Training)	155 (2013)	200	2022: Total 260 117 Computer class 137 Educational 6 CDA Course 2021 -103 2020: 107 Prior years' average: 150	Yes

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

SS #8: Households Transitioned to Self-Sufficiency				
Number of households who achieve homeownership	10	Steady increase in new homeowners annually	2022: 3 2021: 19 2020: 18	No

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

At baseline ECC/HANH's FSS program was serving approximately 450 families and has grown to almost 800. Families participating in FSS have demonstrated growth in annual family income and have exceeded the New Haven AMI of $45,507. We continue to show growth in the employment status of our families with more families in full time, rather than part time employment. Enrollment in education and training programs remains strong.

Over time our focus has shifted to reach more of our families with no earned income. At baseline, of the workable families, half of the families were employed and half were unemployed. As the program has grown, we have specifically targeted unemployed families and with a goal of moving them to employment. The share of unemployed families has decreased significantly from baseline and from the past two years which represents some recovery from the surge in unemployment during the pandemic impacted years.

Actual Non-significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

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

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

Approved in FY12 and implemented in FY13.

Self-Sufficiency

Description/Impact/Update

Implemented in 2013, ECC/HANH implemented a new pilot program to promote HUD's mission to promote self-sufficiency throughout the agency. ECC/HANH developed a pilot self-sufficiency plan for the Brookside Phase II and Rockview Rental development that encompassed HUD's continued mission to increase self-sufficiency among residents and promote accountability. The C.A.R.E.S. Program (Caring About Resident Economic Self-Sufficiency) introduced the concept of term limits into the public housing and Section 8 programs administered by ECC/HANH. All residents, except those who are exempt under the program requirements, will be subject to a 72-month time limit on receiving rental assistance. The second component of the program requires certain individuals to participate in an extensive 24- month case management, supportive services program designed to overcome barriers to becoming self-sufficient. Residents returning to Brookside Phase I after redevelopment are exempt but can voluntarily participate in the program. ECC/HANH will use its MTW flexibility to fund the required social services component of this program.

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

ECC/HANH recognizes that there are individuals who due to no fault of their own will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an Individual Service Plan (ISP) and case manager and show progress towards the goals of the plan will continue to be able to receive rental assistance if they continue to make progress towards their goals. There are two levels of engagement in the program: Full CARES and Transition CARES. This engagement is outlined here:

Full CARES Participant

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

Transition CARES Participant

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

Residents and participants are incentivized to enroll in the CARES program because of the intensive supportive services offered, the escrow payment, and the increased control over the use of their escrow account funds (including subsidy dollars). In addition to the intensive supportive services for 24 months during the 72-month rental period, residents also receive a lump sum payment. The amount is deposited into an escrow account (REEF) and released upon graduation from CARES. The monthly subsidy payment will be pre-determined at an initial assessment conducted prior to lease up.

The funds in the REEF (accessible at or after year three) may be used to cover the following costs:

- a hardship (as defined under the Hardship Policy and Guidelines)
- purchase of a vehicle to attain or maintain employment (a one-time payment not to exceed $3,000 after all other options have been exhausted)
- costs to start a small business (a one-time payment not to exceed $2,500 after all other options have been exhausted)

- purchase of a computer
- enrollment in higher education, subject to the approval of ECC/HANH

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

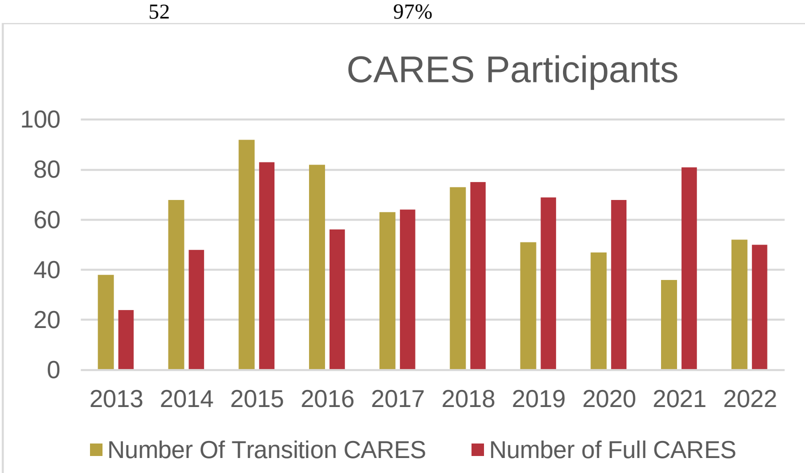
During FY2020, program changes were made in recognition of the global pandemic. This allowed for rent adjustments and withdrawals from REEF savings.

Impact

The CARES program continues to provide case management, resources and tools to support participants in reaching self-sufficiency. At the end of FY22, 102 participants were enrolled in the CARES program. Based on the total number of units at both Brookside II & Rockview, the program can hold up to 177 participants at any given time, however, the number can be higher if families who transfer from Brookside II or Rockview to Brookside I decide to continue to participate. Currently there is 1 participant at Brookside phase I who transferred to units from Brookside phase II and Rockview and opted to continue to participate in CARES. There are currently 53 units that have residents who are exempt from the program. Additionally, the total number of participants includes families who participated at any time throughout the year who either became exempt or moved out. The total count for FY 2022 included 129 participants of which 102 remained at the end of the FY.

Historical program participation is as follows:

	Number of Transition CARES	Number of Full CARES	% Program Compliant
2013	38	24	83%
2014	68	48	98%
2015	92	83	90%
2016	82	56	46%
2017	63	64	100%
2018	73	75	46%
2019	51	69	94%
2020	47	68	97%
2021	36	81	95%
2022	50	52	97%

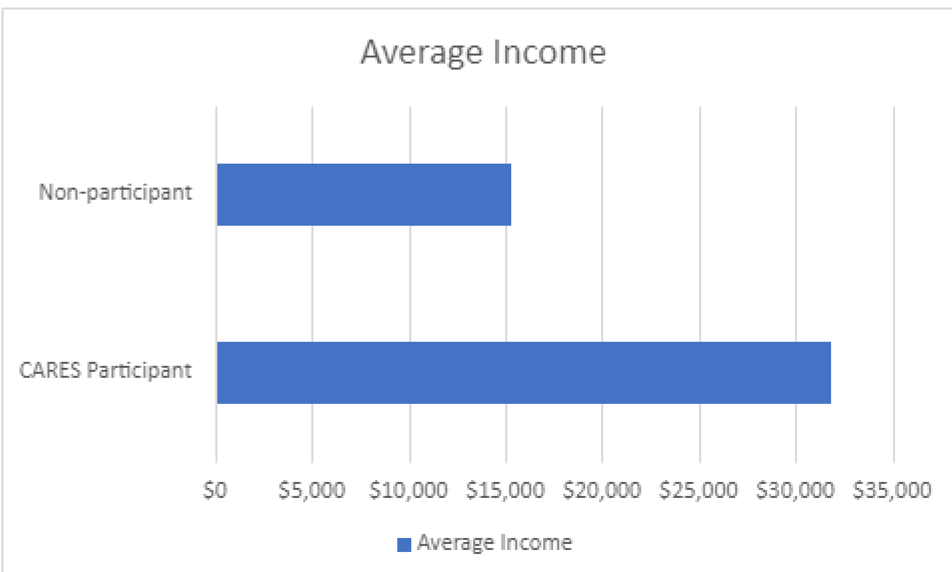


During the initial years of CARES, the majority of the families were in transition meaning they had not achieved full time employment. Since 2017, that has shifted that now the majority of the families qualify as Full CARES participants demonstrating that consistent improvement in employment outcomes. In FY2022, the percent of Transition and Full CARES families was almost evenly split. This is in part accounted for by the large number of families who graduated the program this year -- 18 families graduated, meaning they are no longer receiving housing subsidy and are self-sufficient.

The table below outlines the breakdown of families at these sites during FY2022.

CARES Participation End of FY22		
Program	Participants	Notes
Full CARES	52	1 out of 52 is BSI
Transition CARES	50	
Total at end of FY22	**102**	**101 BSII/ROCKVIEW**
Exemption	54	
Vacancy	4	
Graduate Market Rate/Flat Rent	18	

During FY22, the average income of all CARES participants was $31,828. Comparatively, in Brookside Phase I LIPH units, which is not under the CARES program, residents have an average earned income of $15,256. This represents a doubling of average earned incomes between CARES and a non-CARES group. When looking only at families in the Full CARES program, the income data is even more promising with an average annual income for the 52 Full CARES families at $48,363.



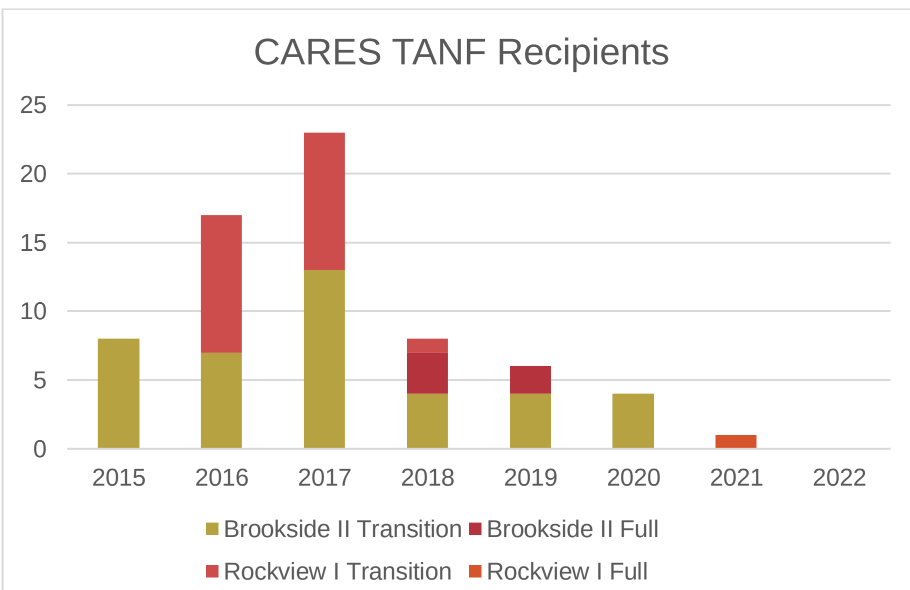
In FY22 the approximate amount of funds in each participant's REEF account was $11,036.01. Historically, the average amount requested by CARES participants to cover costs is $3,000, which suggests that residents utilize an average 27.5% of the REEF account if they tap into it prior to graduation and graduate with over 2/3 of the accumulated savings unspent. In FY22 there were no requests from CARES participants to access the REEF account prior to graduation.

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

Request to Cover Cost	Total Amount Requested	Total Amount Approved	Request to Cover Cost
Purchase of a vehicle (16)	$49,500.00	$49,500.00	Purchase of a vehicle (17)
Down payment on a home (1)	$10,448.11	$10,448.11	Down payment on a home (1)
Purchase of a Computer (1)	$500.00	$349.00	Purchase of a Computer (1)
Enrollment in Higher Education (6)	$14,449.00	$14,449.00	Enrollment in Higher Education (6)
Start a small business (1)	$1,000.00	$1,000.00	Start a small business (1)
A hardship (4)	$13,066.00	$12,491.47	A hardship (4)
Other (7)	$13,100.00	$11,184.51	Other (7)
Denied requests (3)	$8,000.00	$0.00	Denied requests (3)
Total Requests (39)	**$110,063.11**	**$99,422.09**	**Total Requests (40)**

Currently every participant in the CARES program is receiving on-going support and assistance through one of ECC/HANH's many partnerships including: Family Self Sufficiency programs, Resident Owned Business training, Connecticut Association Human Services financial literacy support, CONNCAT Training School and external Homeownership programs which includes HUD Homebuyer seminars as well as other resources in hopes of reaching self-sufficiency. Residents also participate in a number of Asset Building programs and initiatives offered through a grant offered by the Cities for Financial Empowerment Fund and serviced through CAHS and the New Haven Financial Empowerment Center.

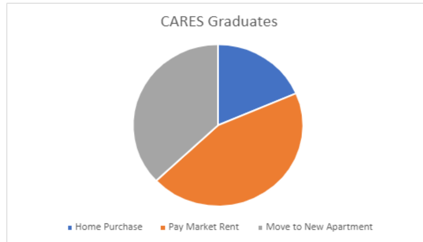
CARES is proving successful as we are seeing residents graduate with significant escrow savings, consistent and full time, well-paying employment. There is also a noted decrease in the number of families receiving TANF with zero (0) CARES Brookside II and Rockview residents currently requiring temporary cash assistance.



In FY22, there were 27 CARES participants who graduated from the program in FY2022. This included

- 5 participants who purchased homes,
- 12 participants who decided to stay and pay flat market rent and
- 10 who decided to move outside ECC/HANH.

Each resident successfully graduated before the 72-month CARES limit and the Average Earned Income of the 27 graduates is: $47,421.09. Since the start of the program there have been 61 CARES residents who have graduated the program with 24 having purchased homes. All graduated on or before contract expiration date.



FY 2022
CARES Graduates + Disbursements from REEF

Participant 1	$0.00	$8,184.70-after move out
Participant 2	$3,000 (car)	$8,507.20- after move out
Participant 3	$3,000 (car)	$19,894- after move out
Participant 4	$1,495 (training course)	$6,689.70- after move out
Participant 5	$3,000 (Car)	$3,942.14- after move out
Participant 6	$0.00	$14,438.00- after move out
Participant 7	$0.00	$ 8184.70-after move out
Participant 8	$0.00	$ 6,451- after move out
Participant 9	$0.00	$18,962- after move out
Participant 10	$975 (CNA Course)	$5,967.14-after move out
Participant 11	$0.00	$6,942.14-after move out
Participant 12	$2,299.25 (Delinquent Bill)	$5,885.45-after move out
Participant 13	$0.00	$4,848.69-after move out
Participant 14	$3,000 (Car)	$3,942.14-after move out
Participant 15	$ 0.00	$6,451-after move out
Participant 16	$ 2,000 (Tuition)	$6,184-after move out
Participant 17	$ 0.00	$22,055.47-after move out
Participant 18	$1,443 (Medical Hardship)	$9,956.15-after move out
Participant 19	$8,184 (Down payment)	$3,174.63-after move out
Participant 20	$0.00	$8,184.70-after move out
Participant 21	$0.00	$12,802.97-after move out
Participant 22	$879 (Hardship)	$8,197.10-after move out
Participant 24	$2,500 (College Class)	$6,184-after move out
Participant 25	$ 0.00	$8,189.76-after move out
Participant 26	$ 0.00	$8,200 after move out
Participant 27	$ 1,500 (Course)	$12,802.97-after move out

Total: $29,695 (average disbursement before graduation $1,155.37)
$236,092.79 (average disbursement at graduation $8,766.48)

Recent CARES participant closed on a home in East Haven, CT. Beginning as an unemployed resident, by year 2 she secured full time employment at Yale University and subsequently received 2 promotions. Upon CARES graduation, she had a credit score of 750 and personal savings in excess of $10,000.

Another CARES participant graduated from SCSU with a degree in Social Work while also working full time. She is planning to pursue her MSW. Upon graduation, she had $36,000 in personal savings.

CARES participant graduated with an MBA in Marketing and achieved full time employment working with an ECC/HANH partner agency assisting others with financial empowerment. She is currently working to increase her credit score and build savings with hopes of achieving homeownership.

Outcomes

HUD-Required Metrics

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average Income for Full Cares and Transition CARES participants*	Average income of population: $16,897 in Fiscal Year 2013 (Adjusted to 2022 dollars – baseline $22,046)	Average family income of $45,000 by program completion (Full CARES)	2022: BSII Transition: $16,678.00 BS II Full: $45,160 Rockview I Transition: $13,909 Rockview I Full: $51,566 2021: BSII Transition: $13,375.00 BS II Full: $39,729.00 Rockview I Transition: $14,963.08 Rockview I Full: $44,116.00 2020: BSII Transition: $17,586 BS II Full: $36,734 Rockview I Transition: $12,453	Yes

			Rockview I Full: $36,412 Prior years' average income BS II Transition $15,404 BS II Full: $32,046 Rockview I Transition: $18,166 Rockview I Full: $36,871	

SS #2: Increase in Household Savings				
Unit of Measurement	**Baseline**	**Benchmark****	**Outcome**	**Benchmark Achieved?**
Average amount of savings/escrow of participants affected by this policy in dollars (REEF accounts)	Zero	$8,000 per participant (Adjusted to 2022 dollars – baseline $10,438)	2022: Brookside: $10,709 Rockview: $11,712 2021: Brookside: $10,811 Rockview: $11,659.73 2020: Brookside: $10,483 Rockview: $10,920 Prior years' average savings: $9,308	Yes

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of participants enrolled in education /job development training	Zero	10% annual increase in enrollment of education/job development classes	2022 – 56 participants Higher Education: 8 College (4yr): 5 NHS Homebuyer: 5 Asset Building: 27 Financial Empowerment Center 1:1 Budget Counseling: 9 2021 – 117 total with 33 attending education and job training programs 4 ROB- Resident Owned Business 2 CNA - Certified Nursing Program 4 CDA child development associate 5 Adult Education 18 4-year college/trade school 2020- 108 participants total (may have attended more than one education job/training below) with 36 attending education and job training programs 19 in 4-year colleges/trade schools 7 in adult education 21 in homebuyer education course 10 in Healthy Start series 25 in Financial Empowerment Center 16 in ALICE Saves Initiative 10 in ROB entrepreneurship training	No (In FY22, many participants enrolled in these programs graduated and there are now new residents participating)

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Percentage of households receiving TANF assistance	2013: 4 (11% of Transition CARES)	Reduction by 20% of prior year households receiving TANF	2022 Total: Brookside Transition: 0 Brookside Full: 0 Rockview Full:0 Rockview Transition: 0 Reduction percent: 100% 2021 Total: Brookside Transition: 0 Brookside Full: 0 Rockview Full:0 Rockview Transition: 1 Reduction percent: 75% 2020 Total: Brookside Transition: 4 Brookside Full: 0 Rockview Full: 0 Rockview Transition: 0	Yes

SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark*****	**Outcome**	**Benchmark Achieved?**
Number of participants receiving services aimed to increase self-sufficiency (participants who have completed CARES action plans)	Zero	10% annual increase	2022: 102 2021: 120 2020: 130 Prior years' average: 130	No (In FY22,61 participants enrolled have graduated and stayed in their units which lowers the number of potential participants in CARES)
SS #8: Households Transitioned to Self-Sufficiency				
Number of households who receive zero subsidy at the end of year six	Zero	12 by the end of the program; Estimated length of the program is six years in total	2022: 27 (includes 3 homeowners) 2021: 11 (includes 5 homeowners) 2020: 13 2019: 8 2018: 0	Yes
SS #8: Households Transitioned to Self-Sufficiency*****				
Number of households transitioned to self-sufficiency*	Zero	20 transitioned households	2022: 129 2021: 144 2020: 211 2019: 96	Yes

** Weighted income figures across Brookside and Rockview participants*
*** Benchmark was created in FY17 and may be reevaluated in FY22.*
**** While this benchmark has been met, it may be reevaluated in FY22 to reflect the idea that there will always be a certain percentage of new participants on TANF and the goal of transitioning those participants off TANF after enrollment.*
***** This benchmark may be reevaluated in FY22 to reflect the fact that participation is capped by the number of residents in the two developments.*
****** Self-sufficiency in this context is referring to the number of households that completed their FY 22 specific goals.*

During FY2022, 27 families transitioned to self-sufficiency, graduating early. Three families became homeowners. An analysis of CARES income data shows that families entering the program at CARES Transition are entering at around $15,000 in annual income and this has remained consistent over the years. However, by the time families move to Full CARES, annual income has tripled. Looking at CARES savings data shows that our families are consistently earning between $10,000 and $12,000 in their REEF accounts and that they are saving the majority of the money allowing for use at graduation.

CARES participants have access to a full range of programming designed to support their self-sufficiency. Program enrollment for education and training programs totaled 56 participants in FY2022. Program attendance peaked in 2017 and then declined slightly as a result of a staffing change. Participation has remained steady since then. Notably during FY2020 and 2021, years impacted by the pandemic, participation remained steady for this programming.

Additionally, ECC/HANH CARES families are successfully transitioning from TANF. After reaching a peak in 2017 of 23 families receiving benefits, we have consistently seen these numbers drop. During FY2022, 0 CARES family received TANF benefits.

Internal Metrics

Enrollment				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of Full CARES participants	Zero	25% Increase in Full CARES	2022:52 2021: 81 2020: 68 Prior years' average: 59	No (In FY22, many participants enrolled graduated and stayed in their unit which lowers the number of potential participants in CARES)
Number of Transition CARES participants	Zero	25% Reduction in Transition CARES	2022:50 2021: 36 2020: 47 2019: 51 Prior years' average: 67	No (In FY22, many participants enrolled graduated and stayed in their unit which lowers the number of potential participants in CARES)
Compliant with program requirements				
Number of participants compliant with the program's requirements	Zero	60% of new participants will remain compliant	2022: 99 (97%) 2021: 111 (94.9%) 2020: 129 (97%) Prior years' average: 80%	Yes

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

Program Compliance: Although the number of new participants who are compliant with program requirements (97%) has exceeded the benchmark of 60% of participants, this nonetheless still represents a program challenge. Program staff are working toward ensuring 100% program compliance.

Initiative 2.4 Teacher-in-Residence

Approved in FY15 and implemented in FY15.

Self-Sufficiency

Description/Impact/Update

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

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

The initiative aims to serve both ECC/HANH youth and their families. First, the initiative focuses on necessary academic assistance. Second, having the Teacher-in-Residence onsite also aims to help bridge an historical divide between educators and our families, working to build community and shift traditional relationships between teachers and parents. In turn, the program creates space for experiential learning, living, and communication. By grounding support where families live, the initiative aims to build relational pathways from the home into the classroom.

Teachers in the pilot program, as part of an agreement between ECC/HANH and each teacher, are required to provide educational assistance to ECC/HANH's youth at two properties: McConaughy Terrace and Valley Townhouses. The teacher is currently housed at the McConaughy Terrace development.

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

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

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

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

D. Participate in the Tenant Resident Council.

Impact

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

In FY22, the Teacher in Residence who had been in place since the inception of the program resigned as a teacher and moved from her unit. This has resulted in a lack of progress in the program as we work to recruit a new teacher.

While working to recruit a new teacher we partnered with Southern Connecticut State University to have an intern support in a temporary program to serve the families. The Intern, who was assigned to work exclusively to support families and youth was an MS in Social Work Student was also a former New Haven Public School teachers with an MS Ed. During the placement, the Intern provided afterschool programming, case management to youth residents and developed program and workshop curriculum to support young children and families.

In the interim, while recruiting for a Teacher in Residence the following has taken place for families at the developments:

- Developed Young N Fun Reading Groups at McConaughy Terrace
  - 73% of families with children aged 0-8 participated in the onsite program at McConaughy Terrace.
  - Program encouraged reading, comprehension, social emotional learning, fine motor skills, etc.
  - Parents attended and also received case management and community resources

- Increase in residents access Community Resources offered by ECC/HANH
  - 21 of the families who worked with the intern were enrolled to receive diapers and formula through the Diaper Bank of CT.
  - This represented 51% of the families engaged and 91% of families with children formula/diaper age.
  - Met on-site monthly to pick up diapers and was on hand to answer questions, offer additional resources.
  - All families also received access to books from New Haven Reads monthly

- Hosted a Winter Holiday Event
  - 30 families attended and received gifts, books, craft activities, diapers, information about reading and math resources.

*Story about a family:
- Single mom living at McConaughy Terrace with two school-aged daughters (ages 10,7)
- Children received tutoring support from the TIR from 2019 to 2022, including summer sessions
- Program provided afterschool care for mom during working hours
- Mom and TIR met on an ongoing basis to discuss progress and strategies to support learning
- TIR communicated with the children's teacher on an ongoing basis regarding reading levels, goals, benchmarks to coordinate efforts to build reading fluency in between 3rd and 4th grades. During that time, she progressed from reading 68 words per minute (slightly below benchmark for 3rd grade) to 100 words per minute (above benchmark for 4th grade
- Quote from mom: "My kids have really enjoyed this program and look forward to going afterschool. I loved that I had someone in my neighborhood that was a teacher who could help me to better understand and support their progress."

Outcomes

HUD-Required Metrics

SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark*** **	**Outcome**	**Benchmark Achieved?**
Number of households receiving consultation and/or technical assistance	0	65% of school-aged children	2022: 10 2021:6 2020: 16	No

Internal Metrics

Enrollment				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of children at each session	10	10% Annual Increase	2022: 8 (average) 2021: 4 2020: 10	Yes
Minimum of 15 children enrolled over the course of the year	20	5% Annual increase	2022: 10 2021: 6 2020: 10	Yes
Increase student achievement in Literacy				
Improvement in individual reading levels	N/A	80% of students will increase one reading level (equivalent to one year's growth)	2022: 30% (3 children provided report cards) 2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A
Increase student achievement in Mathematics				
Improvement in individual mathematics levels	N/A	80% of the students will increase one math level (equivalent to one year's growth)	2022: 30% (3 children provided report cards) 2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

It has been a challenge to have 65% of the youth in the development participate. This goal was originally set when the TIR program was designed with a teacher at Waverly and a teacher at McConaughy. Our first lease up occurred at Waverly and the goal was to serve 65% of the 57 children living there (37 eligible youth). This seemed to be an achievable goal and average program enrollment in the first three years, as 24 youth would've achieved the 65% benchmark. Now that the teacher has been moved and two new developments are targeted with much higher number of children, the benchmark of serving 65% of the youth needs to be re-evaluated. The benchmark will be reevaluated in FY 23.

The department has been taking a number of actions to try to fill the TIR vacancy and to secure data from NHPS. In addition to working with the recruitment department at NHPS directly, we have hosted four information sessions for teachers, attended the NHPS teacher recruitment event, reached out to our network of community partners to assist with spreading the word about the vacancy. The department will also be reaching out to local colleges with education programs as well as other schools in the area as we work to secure a teacher. Additionally, ECC has been meeting with the new data team at NHPS to revisit the data sharing agreement and partnership to be able to secure the math and reading scores and useable grades.

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

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

Approved FY19 and Implemented in FY21

Description/Impact/Update

Activity Description

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

In FY2019 ECC/HANH proposed to phase out and replace the Earned Income Exclusion program with the REACH Grant Program. The REACH program will allow ECC/HANH residents that have elected to participate in the agency Non-HUD FSS Program, the ability to apply for and receive up to $500 per year, for up to 5-years, to support the achievement of goals that they have established for themselves as part of the Individuals Self Sufficiency Plan. These funds will be managed by FSS Case Managers.

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

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

REACH Grant Funds can be used by residents in the following ways:

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

Impact

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

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

In FY22, ECC/HANH the number of families who had interest and applied to participate in the program increased by 700% (1 in FY 21 to 2 in FY 22). During assessments, 1:1's, catalogs and mailings, staff have been utilizing this time to remind Residents of the REACH program. In FY22, residents request funds for books for school, transportation needs and small emergencies. Other needs have been addressed by other programs or free funding through partners. As a result, from this grant, families were able to purchase books for secondary school without any barriers, get transportation fixed; which resulted in the Resident getting 2 part time jobs, and small emergencies for various reasons which resulted in barriers being removed so families can move towards self-sufficiency.

In addition to receiving the grant funding, all Residents received wrap around services from the CED department. These supports are through case management and coordination of services that are beneficial to the self-sufficiency of the household.

In FY 23, ECC/HANH can expect to see an increase in participation and interest in the program. During assessments, staff will offer the REACH incentive program to assist Residents reach their goals towards self-sufficiency. ECC/HANH expects to have an 5% increase in the average income outcome totaling $14,200 in FY 23.

SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Income for REACH participants	Average income of population: $14,000 (for non-HUD FSS)	5% Increase in Household Income for Non-HUD FSS Participants in the REACH Grant Program	2022: $13,520 (8 participants) 2021: $4,160 (1 participant)	No

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

Unit of Measurement	Baseline	Benchmark***	Outcome	Benchmark Achieved?
Number of participants receiving services aimed to increase self-sufficiency	Households receiving self-sufficiency services prior to implementation of the activity (0) Zero	50% annual increase	<u>2022: 8</u> <u>2021: 1</u>	Yes No

SS #7 - Increase in Agency Rental Revenue

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase)	Household contributions prior to implementation of the activity (in dollars) $308	*5% Increase in expected household contributions after implementation of activity (in dollars)	2022: $494 2021: $398	Yes Yes

**Revised benchmark from 5% decrease in PHA MTW TBV subsidies to non-HUD FSS participants in the REACH Grant program to 5% increase in expected household contributions*

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges and Changes

Some challenges engaging residents were noted even if the engagement or follow through is to their benefit. During follow up, we learned that most of the hesitancy seemed to be due to lack of understanding the program. CED staff will continue to assist in providing clarity and removing any other household barrier.

In FY 23, ECC/HANH through surveys, interviews and 1:1 conversation will analyze the program to ensure our Residents have a greater understanding of the program.

Cost Effectiveness

Initiative 3.1 – Rent Simplification

Cost Effective

Approved in FY07 and implemented in FY08.

Description/Impact/Update

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

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

1) **Multi-year recertification cycles**. ECC/HANH utilizes the Enterprise Income Verification (EIV) system for all third-party verifications. In FY09, ECC/HANH implemented the multi-year recertification cycles that recertifies work-able families every two years and elderly/disabled families every three years. MTW families that do not meet the definition of elderly or disabled definition will be considered work-able families.

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

    b. Biennial cycle (every two years) for work-able households (those that do not meet the elderly/disabled definition)

        - **Rationale**: Very little change in income takes place with elderly/disabled families on fixed income on an annual basis. Given this consistency, there is little financial incentive for ECC/HANH to verify the income of elderly/disabled families annually. Work-able families will also benefit from two-year cycles as they will not pay incremental rent increases on any income increases for the two years between recertifications.

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

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

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

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

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

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

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

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

4) **Minimum Rent of $50.** ECC/HANH established a minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for a $0 rent payment. To qualify, individuals must meet with the ECC/HANH Hardship Committee to determine the nature and length of the hardship. Rent is then modified accordingly based on the information collected. To move these residents towards self-sufficiency, they are referred to the Family Self-Sufficiency program if the adult household member is neither elderly nor disabled.

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

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

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

   a. Year 1: No family will have an increase in TTP

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

   c. Year 3: No family shall be subject to an increase in TTP greater than $50/month

   d. Year 4: No family shall be subject to an increase in TTP greater than $75/month

   e. Subsequent years: No family shall be subject to an increase in TTP greater than $100/month

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

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

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

Impact

Multi-year recertification schedules.

In FY22 the total number of HCV families served in FY2022 was 5311. In FY22 58% (3092) of the total number of HCV families were recertified. Of those 3,092 HCV recertifications scheduled, 2517 (47%) were eligible for the multi-year recertification schedule.

Backing out the 340 new admissions or port ins, of the 5311 families served, 4,971 would have been due for a recertification had we not implemented this initiative. Instead, due to rent simplification, 3092 were recertified. This is a 38% reduction in staff time to process recertifications and 38% reduction in mailing and postage costs.

Compared to the baseline, in FY07, prior to Rent Simplification, in which 3628 recertifications were processed, there is a 14% decrease overall from baseline, when far fewer vouchers were issued.

In FY2022, 599 LIPH recertifications were completed, which is 64% of the 933 LIPH families served. Prior to rent simplification, there were 1267 recertifications, which is a 53% reduction in recertifications scheduled and processed.

In FY2022, out of the 933 LIPH families served, 49 were new admissions, (families new to ECC/HANH), for a total of 884 families that would have an annual recertification if not for rent simplification. 599 were recertified. This is a 32% reduction in staff time to process recertifications and 32% reduction in mailing and postage costs.

Overall, in FY2022, 3691 bi-ennial/tri-ennial recertifications were processed for HCV and LIPH, compared to the baseline of 4895, which is a 25% reduction in both programs combined.

ECC/HANH also tracks interim recertifications. Given the longer period between recertifications, it was hoped that a corresponding spike in interims would not result. In both programs, in FY2022 there were 2382 interims processed compared to 1280 in FY2007. At baseline this represented 27% of families seeking interims. At the close of FY2022, 35% of families sought interims. While this represents an increase it does not offset the savings that result from multi-year certifications and ECC/HANH will continue to assess over time.

There has also been a 25% reduction in printing costs of $26,923 since 2007 to $20,301 in FY2022, due to the reduction in the number of annual recertifications for families. Again, this finding holds despite the significant growth in the number of families served. ECC/HANH anticipates that cost decreasing further as we implement an online portal for the processing of recertifications for families. That will reduce the printing and postage cost for mailing packets.

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 and having to provide documentation for every dollar expense for deductions, and has allowed families to save money for any increase in wages in between recertification cycles.

Minimum rent.

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.

In FY22, 32 applications for a hardship exemption to $0 rent were received and all 32 (100%) were approved. There are 483 (9%) HCV families and 122 (13%) LIPH families on either a hardship exemption or minimum rent of $50. This equates to 10% of the families that ECC/HANH serves.

The FSS staff continues to work with the families in programs such as job readiness, computer skills, job interviewing and GED and higher education classes. There were 32 new referrals to FSS in FY22. At the end of the FY, 29 were active participants in FSS attending various webinars and other activities offered by the FSS staff.

Simplification of deductions. Even though the rent calculation was simplified with tiered rents and simplified deductions, most time savings have resulted from a decrease in the number of recertifications processed and a reduction in time required to process a recertification. There has been a 30% decrease in staff time since 2007.

Outcomes

HUD-Required Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Savings related to staff reduction due to implementation of multi-year recertification*	$0	($133,000)	2022: $201,171 2021: $195,312 2020: $189,624 2019: $184,101 2018: $178,739 2017: $173,533 2016: $168,479 2015: $163,572 2014: $158,808 2013: $154,182 2012: $149,691 2011: $145,332 2010: $141,099 2009: $136,990 2008: $133,000	Yes, in 2008 there was a LIPH Director and HCV Director; The LIPH Director position was eliminated. HCV director position (salary + benefits) in 2008 position was combined.
Total annual cost of printing and mailing documents related to annual recertification (excluding staff time; PH and HCV combined). *	$26,923 (2007)	$13,750	2022: $20,301 • HCV $17,006 • LIPH $3,295 2021 $13,242 2020: $17,282 2019: $11,964 2018: $16,123 2017: $14,344 2016: $17,391 2015: $12,705 2014: $14,927 2013: $13,338 2012: $16,924 2011: $14,597 2010: $23,639 2009: $26,340 2008: $26,175	No

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

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total annual staff time in hours to complete annual recertifications (PH and HCV combined) **	12,238 (2007)	5,000 annual staff hours	2022: 8,489 (HCV 7,112) (LIPH 1,378) 2021: 8,120 2020: 8,240 2019: 4,671[16] 2018: 15,138 2017: 5,998 2016: 7,273 2015: 5,313 2014: 6,133 2013: 4,850 2012: 6,154 2011: 5,308 2010: 8,596 2009: 9,578 2008: 9,518	No
CE #3: Decrease in Error Rate of Task Execution				
Average percentage error rate in calculating rents in annual recertifications (% files reviewed with errors)	11% of files (2011)	5% of files	2022: 6% (average of LIPH and HCV) • 6% of files (HCV) • 5% of files LIPH 2021: 5% of Files LIPH 2020: 0% of Files LIPH 2019: 10% of files (HCV) 2018: 0% of files (HCV) 2017: 1% of files (HCV) 2016: 1% of files (HCV) 2015: 24% of files (HCV) 2014: 24% of files (HCV) 2013: 15% of files (HCV) 2012: 10% of files (HCV)	Yes

** 4,895 PH+HCV recertifications (2007); 2,310 (2015); 3,162 (2016); 2,000 (benchmark); $5.50 total cost per recertification packet: $2.50 average cost of postage and $3.00 printing (60-page recertification packet at $.05 per page) per recertification pre- and post-new schedules.*

*** 4,895 PH+HCV recertifications (2007); 2,714 (2014); 3,162 (2016); 2,500 (benchmark); 2.5 hours average staff time (both PH and HCV) per recertification pre-rent reform per 2007-time study and 2.3 hours post-rent reform from 2014 HCV activity time study (average of work-able and elderly/disabled households recertification processing time)*

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

Internal Metrics

Rent Simplification Initiative Metrics				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome***	**Benchmark Achieved?**
Number of hardships approved and hardship applications	2012: 122 approved/ 243 applications No baseline data available prior to 2012	No significant increase in hardships	2022: 32 approved/32 received 2021: 18 approved /20 received 2019: 18 approved/18 received 2018: 35 approved/102 applications 2017: 67 approved /73 applications 2016: 55 approved/94 applications 2015: 42 approved/111 applications 2014: 40 approved/213 applications 2013: 54 approved/195 applications	Yes

Rent Simplification Initiative Metrics (continued)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome***	**Benchmark Achieved?**
Number of families on minimum rent	28 (HCV - 2010) 170 (PH - 2007)	Decrease in minimum rent households	2022 483 (HCV); 122 (LIPH) - 10% of total families served 2021: 397 (HCV); 101 (PH) 2020: 378 (HCV); 103 (PH) 2019: 246 (HCV); 246 (PH) 2018: 412 (HCV); 165 (PH) 2017: 380 (HCV); 171 (PH) 2016: 360 (HCV); 233 (PH) 2015: 348 (HCV); 213 (PH) 2014: 341 (HCV); 233 (PH) 2013: 314 (HCV); 212 (PH) 2012: 287 (HCV); 180 (PH) 2011: 227 (HCV); 183 (PH) 2010: 28 (HCV); 153 (PH) 2009: 33 (HCV); 147 (PH) 2008: 121 (HCV); 161 (PH)	No
Number of annual interims processed (PH and HCV combined)	1,280 (2007)	1,300	2022: 2382 2,139 (HCV); 242 (LIPH) 2021: 1491 1,351 (HCV); 140 (LIPH) 2020: 2305 2,075 (HCV); 230 (LIPH) 2019: 1746 1,522 (HCV) 194(LIPH) 2018: 1231 949 (HCV); 282 (LIPH) 2017: 2493 2016: 2497 2015: 1551 2014: 1539 2013: 1363	No

			2012: 1967 2011: 1598 2010: 1196 2009: 1364 2008: 1140	

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

The biennial and triennial recertifications have eased the burden for most LIPH residents and HCV participants, particularly the elderly/disabled residents/participants who have little change to income. The rent tiers and elimination of standard deductions have also reduced the administrative burden for staff and the participants with impacts on staffing levels and administrative costs. Families in need of relief under minimum rent policy are still able to access such and no increase in errors has been noted as a result of rent simplification.

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

This initiative was implemented prior to transition of LIPH units to RAD. Under RAD program rules, rent simplification does not apply and this has tempered the number of families that receive this relief. Yet and still, savings continue to be noted.

Initiative 3.5 – HCV Rent Simplification/Cost Stabilization Measures

Approved and implemented in FY08. Updated in FY14.

Cost Effective

Description/Impact/Update

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

This activity has three components:

Part 1. HQS Inspections on Biennial/Triennial Schedule
Unit inspections and rent increases are placed on a schedule consistent with recertifications to coincide. However, HCV participants and landlords can request a special inspection, if necessary, at any point that deficiencies are suspected.

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

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

Part 2. Self-Certification for Fails Not Related to Health/Safety
ECC/HANH will use a self-certification process to follow-up with non-life threatening HQS inspection violations. Landlords and participants will be able to self-certify and submit documentation of corrected deficiencies for regularly scheduled HQS inspections. All participants retain the right to request a special inspection at any time.

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

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

Part 3. Landlord Rent Increases on Biennial/Triennial Schedule
Landlord rent increases are only processed at the time the family is recertified. These recertifications take place biennially for work-able families and triennially for Elderly/Disabled families. HQS inspections are placed on the same schedule as HCV recertification. Since HCV caseload optimization will change recertification dates, HQS inspection dates have changed correspondingly. See Initiative 3.1 for definitions of Elderly/Disabled and work-able families.

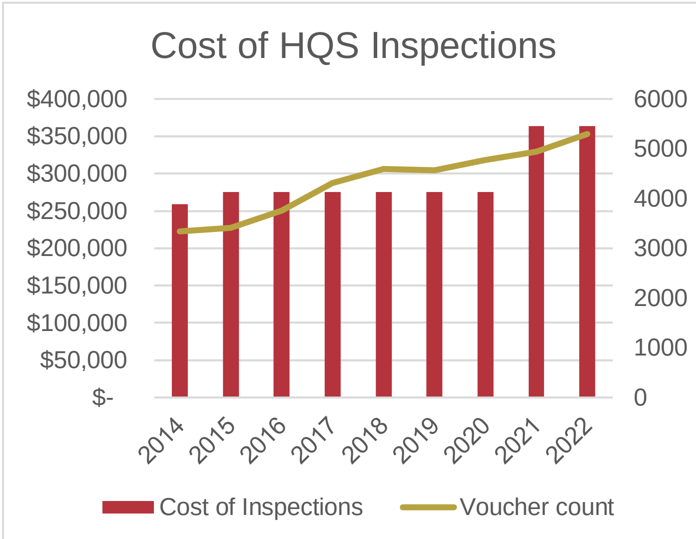
- **Rationale**: Requests for rent increases were allowed annually. Among the 3,500+ landlords, an average of 700 rent increases were requested and approved annually. This represents 20% of the assisted units, which suggests that most landlords are not requesting annual increases.

- **Expected impact**: Savings in HCV staff time is expected because of reduction in the number of requests related to landlord rent increases.

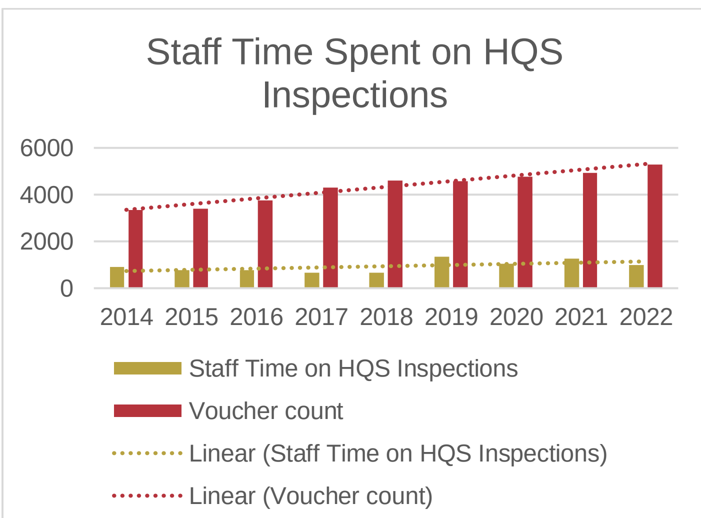
Impact

ECC/HANH has seen a significant increase in voucher utilization over time without associated increases in costs that would be expected were it not for these streamlining activities. ECC/HANH's HQS inspection was meant to create administrative savings while not sacrificing the quality of housing offered to families. By inspecting units every two or three years we anticipated reduced inspection costs. Since 2014, ECC/HANH has seen a 59% increase in voucher utilization and only a 40% increase in inspection costs from FY2019.

Cost per inspection has fallen from $77 to $68 from FY 2015 to FY2022. Additionally, accounting for inflation, the baseline inspection cost in today's dollars equals $98 per inspection, where we are only spending $68 per inspection, demonstrating significant cost avoidance.

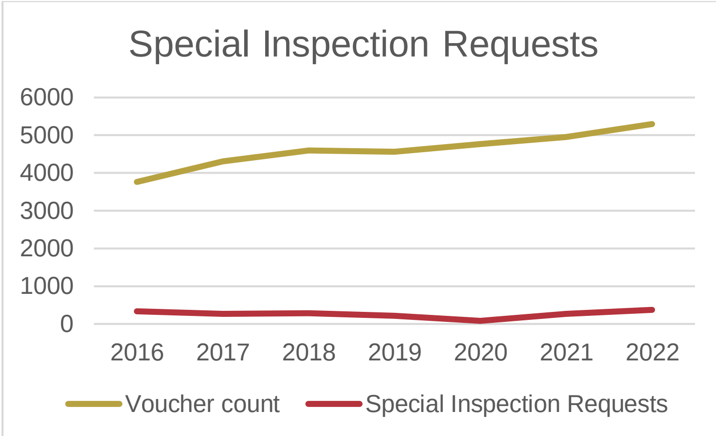


Staff time spent on HQS inspections has been reduced. Although vouchers increased significantly from FY2014 to FY2022, we saw staff time spent on HQS inspections drop steadily with almost 308 hours of staff time saved in FY2022. During FY2019 we saw an increase in staff time spent, however, this was corrected in FY2022 and since then has continued to show reductions despite the growing number of vouchers. It is important to note that ECC/HANH has seen a significant increase in RAD voucher utilization since FY2019 and these vouchers are not subject to the alternate year inspections. As more and more of ECC/HANH's portfolio becomes RAD (non-MTW) vouchers, the impact of this initiative will lessen.

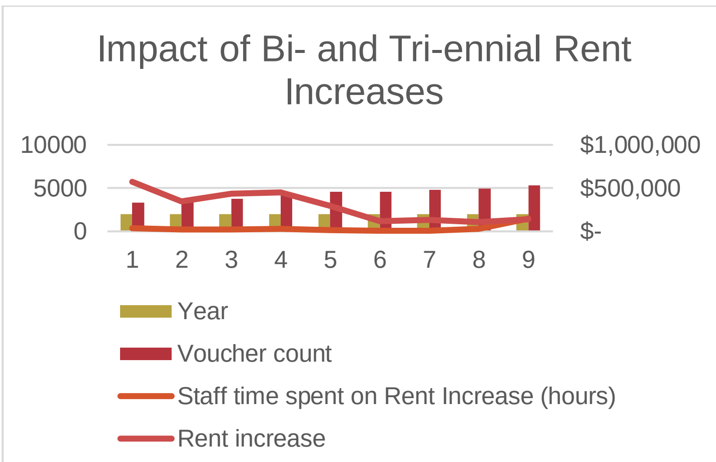


ECC/HANH wanted to ensure that the quality of housing did not diminish as we lessened our inspections. As such, we have tracked participant need for special inspections. At baseline, approximately 5% of units required a special inspection.

At the close of FY22, 7% of units required a special inspection. Since 2015 on average, 6% of units request special inspections. ECC/HANH is not seeing significant changes in this area.



ECC/HANH has tracked savings related to bi- and tri-ennial rent increases. Expense stabilization has been noted here as well. The amount of rent increase per voucher averaged $171 at baseline in 2014. Spreading rent increases over a two or three year period has resulted in reductions in the impact over time. In 2022, the per voucher average was approximately $27.



Outcomes

At baseline, the inspection the inspection contract resulted in a per inspection cost of $77. Escalated to today's dollars (at straight 3% escalation), the contract would be $98 per inspection. To reach a 25% reduction, 2022 per inspection rate must not exceed $73 per inspection. The current rate is $69 per inspection. Additionally, a stabilization in rent increases has been noted. This has not been at the expense of housing quality, as indicated by the stable level of requests for special inspections. An anomaly was experienced this year with a spike in staff time spent processing rent increases.

HUD-Required Metrics

Metrics Related to Inspections Components (1,2) of Activity				
CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Cost of inspection contract with City of New Haven (per voucher cost)	$259,000 (2014) * ($77.59)	25% reduction of inspection contract cost with City	2022: $363,550 ($68.65) 2021: $363,550 ($73.52) 2020: $326,866 ($57.73) 2019: $275,379 ($60.32) 2018: $275,379 ($59.98) 2017: $275,379 ($63.82) 2016: $275,379 ($73.20) 2015: $275,379 ($80.76)	Yes
Total HANH internal staff inspection scheduling time (annual hours) ** (minutes per inspection)	904 hours (2014) = 16 minutes per inspection	367 hours	2022: 999 hours (11 min/inspection) 2021: 1,274 hours (15 min/inspection) 2020: 1,039 hours (13 min/inspection) 2019: 1,352 hours (18 min/inspection) 2018: 674 hours (9 min/inspection) 2017: 670 hours (9 min/inspection) 2015: 778 hours (14 min/inspection)	Yes

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

Metrics Related to Biennial/Triennial Landlord Rent Increase Component (3) of Activity				
CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Cost (in annual HAP) of processing landlord rent increases	$573,000 (2014) *	$200,000 Proportionate reduction of 40%	2022: $140,585 2021: $107,240 2020: $136,428 2019: $115,140 2018: $296,520 2017: $453,324 2016: $437,580 2015: $343,932 2014: $573,000	Yes
CE #2: Staff Time Savings				
Annual staff time (hours) spent processing landlord rent increases	401 hours (2014) **	Reduce by 40%	2022: 1472 hours 2021: 264 hours 2020: 98 hours 2019: 70 hours 2018: 141 hours 2017: 278 hours 2016: 232 hours 2015: 210 hours	No

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

Internal Metrics

Special Inspections				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of HCV special inspections (percent of vouchers issued)	157 special inspections (2015) (5%)	No significant increase over baseline	2022: 373 (7%) 2021: 265 (5%) 2020: 82 (2%) 2019: 208 (5%) 2018: 277 (5%) 2017: 274 (6%) 2016: 338 (9%) 2015: 157 (5%)	Yes

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

Challenges in Achieving Benchmarks and Possible Strategies

An anomaly was experienced this year with a spike in staff time spent processing rent increases. This was due to delays in certifications related to the pandemic coupled with numerous RAD redevelopments occurring over the past few years. This is not anticipated to continue going forward.

B. NOT YET IMPLEMENTED

None

C. ACTIVITIES ON-HOLD

None

D. CLOSED OUT ACTIVITIES

Housing Choice

i. Initiative 2.11 Community Health Network of CT (CHNCT)

i. Approved in FY2022. Not implemented. Closed out in FY2022

ii. **Explain why activity was closed out**

The activity was closed out due to the partner, Community Health Network of CT (CHNCT), being unable to commit to the initiative at this time.

iii.. **Final Outcome and Lessons Learned**

Due to the fact the initiative was not implemented, there aren't any final outcomes. Due to significant delays in approval and implementation, the proposed funder no longer had the ability to move forward. There aren't any statutory exceptions outside the current MTW flexibilities that might have provided any additional benefit to the activity

Self-Sufficiency

Initiative 2.2 – Incremental Earned Income Exclusion

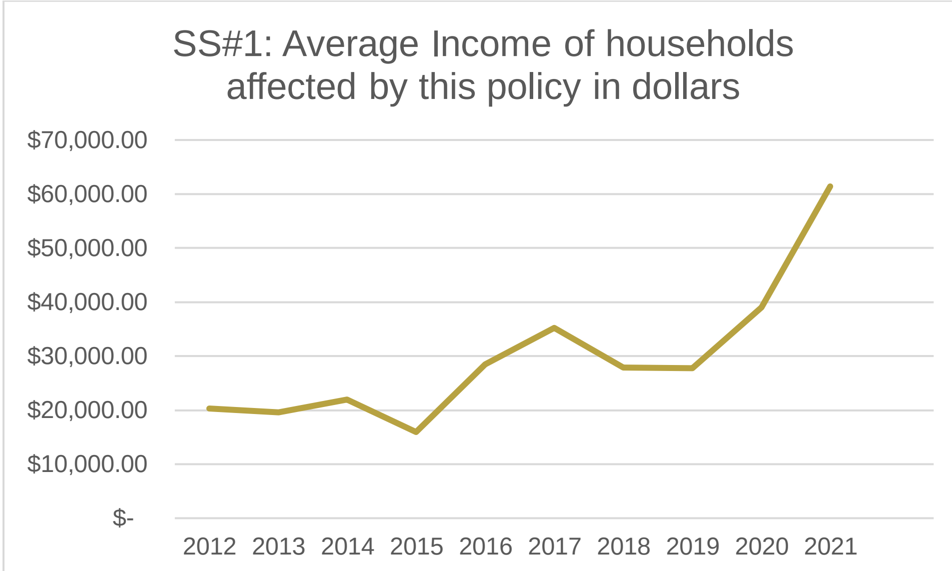
i. Approved and implemented in FY2008. Closed out in FY2022

ii. **Explain why activity was closed out**

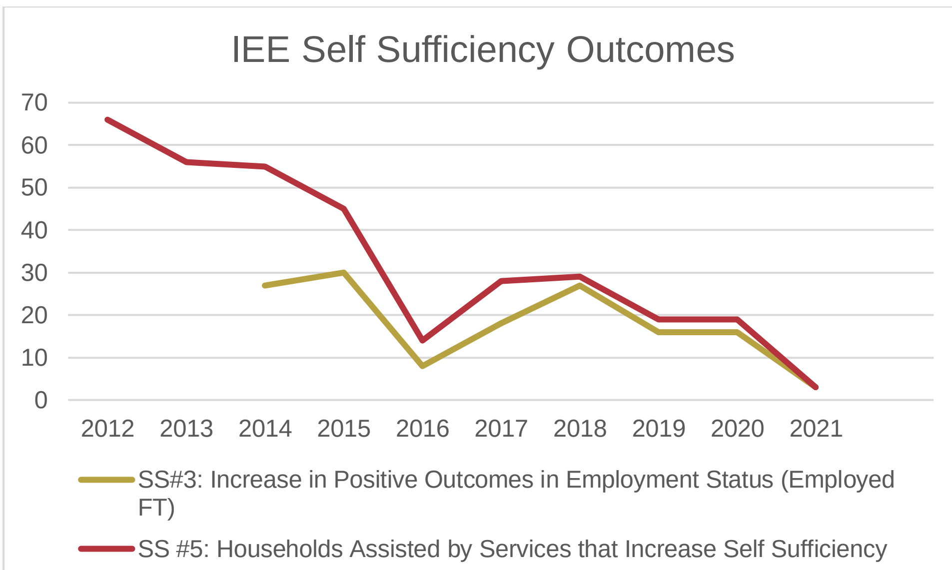
After almost 10 years of implementing this initiative, it was found to be confusing for residents and administratively difficult to manage. ECC/HANH proposed and was approved to transition out of this initiative, and this was replaced by the REACH grant program. As such, new families were not enrolled and existing families received their benefits through FY22. The number of individuals eligible for the Earned Income Exclusion in FY22 was 0 households and the initiative has been closed out.

iii. **Final Outcome and Lessons Learned**

It was determined that most participants enrolled in IEE were utilizing the monetary benefit up front since it is not an escrow but an income exclusion on their recertification. Historically, this did not result in any savings for participants. Data has shown that most participants have not saved the excluded earnings. Also, as a result of low participation and the inability to connect self-sufficiency outcomes to this initiative, ECC/HANH stopped adding new participants beginning in FY19.



SS#1: Average Income of households affected by this policy in dollars
$70,000.00
$60,000.00
$50,000.00
$40,000.00
$30,000.00
$20,000.00
$10,000.00
$-
2012 2013 2014 2015 2016 2017 2018 2019 2020 2021



IEE Self Sufficiency Outcomes
70
60
50
40
30
20
10
0
2012 2013 2014 2015 2016 2017 2018 2019 2020 2021
SS#3: Increase in Positive Outcomes in Employment Status (Employed FT)
SS #5: Households Assisted by Services that Increase Self Sufficiency

Previously Closed Initiatives

Activity	Plan Year Approved/ Implemented	Year Closed Out
Initiative 1.1 – Development of Mixed-Use Development at 122 Wilmot Road	Approved in FY09. Development was completed and occupied in September 2013.	FY14
Initiative 1.3 – Fungibility	Approved in FY12 and implemented in FY13. HUD provided guidance that this was no longer required to be listed as an MTW initiative.	FY13
Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road	Approved in FY13. MTW authorization no longer required.	FY14
Initiative 1.14 – Redevelopment of 99 Edgewood Avenue (Dwight Gardens). ECC/HANH will use MTW Block Grant Banks to develop housing through a mixed finance process.	Approved in FY13. Never implemented.	FY14
Initiative 3.2 – UPCS Inspections	Approved and implemented in FY08. MTW authorization no longer required.	FY13
Initiative 3.3 – Revised HQS Inspection Protocol	Approved and implemented in FY11. Replaced with Initiative 3.5.	FY15
Initiative 3.4 – Mandatory Direct Deposit for Housing Choice Voucher Landlords	Approved and implemented in FY10. MTW authorization no longer required.	FY14
LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families	Approved in FY08. Placed on hold in FY14 and closed out in FY16.	FY16
INITIATIVE 1.5—HCV Preference and Set-aside for Victims of Foreclosure	Approved in FY09. Implemented in FY10. Closed out in FY19.	FY19
Initiative 1.24F - Fulton Park Modernization	Approved in FY11 and Implemented in FY11	FY21
Initiative 2.11 Community Health Network of CT (CHNCT)	Approved in FY22. Implemented in FY22. Closed out in FY22	FY22
Initiative 2.2 Incremental Earned Income Exclusion	Approved and Implemented in FY2008	FY22

V. PLANNED APPLICATION OF MTW FUNDS

(V) PLANNED APPLICATION OF MTW FUNDS
ANNUAL MTW REPORT

A. FINANCIAL REPORTING

i. Available MTW Funds in the Plan Year

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

UNAUDITED/SINGLE AUDIT SUBMISSION TO FASS-PH, FY2022		
LINE ITEM #	DESCRIPTION	TOTAL
290	Total Assets and Deferred Outflow of Resources	$45,955,202
600	Total Liabilities, Deferred Inflows of Resources and Equity - Net Assets/Position	$45,955,202
70000	Total Revenue	$105,308,931
96900	Total Operating Expenses	$24,726.511
97000	Excess of Operating Revenue over Operating Expenses	$80,582,420
10000	Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	$6,249,806

** Line 10000 includes $1,761,462 of depreciation expense. Excluding depreciation expense Line 10000 would show an excess of revenues over expenses of $8,011,268

ii. Expenditures of MTW Funds in the Plan Year

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

N/A

iii. Describe Application of MTW Funding Flexibility

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding 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 (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

APPLICATION OF "MTW FUNDING" 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. For example, ECC/HANH spent approximately $600,000 for the 62 units at Westville Manor, $220,000 for the West Rock computer lab. The majority of the excess funds was spent on development costs.

Activities Requiring Funding Flexibility Only

Initiative 1.8F – Farnam Courts Transformation Plan

Approved in FY11 and implemented in FY12. - FY22

Description/Impact/Update

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

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

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

Farnam Courts Transformation replaced 240 units of housing originally built in the 1940s and most recently improved in the 1980s. The redevelopment occurred in phases resulting in 228 replacement units and additional market rate units. The redevelopment includes new roads, streets, infrastructure, and utilities funded through a $8 million capital investment from the City of New Haven.

This initiative involves multiple development sites and phases:

- Farnam offsite – Fair Haven consists of 57 units financed through 9% Low-Income Housing Tax Credits. The 57 units exist on two sites located in the Fair Haven neighborhood, an area undergoing significant reinvestment. The Chatham site includes 32 assisted units through the Rental Assistance Demonstration (RAD) program. The Eastview Terrace Phase II site includes 23 RAD assisted units and two Project Based Assisted units. This development is completed and fully occupied.
- Farnam Court Phase I – onsite involved the demolition of 148 units. These were replaced with two mid-rise 5 story buildings housing 94 units (86 PBV assisted and 8 market rate units) situated on 1.1 acres. These buildings house 7,400 square feet of commercial and community/program space. The community space support a comprehensive economic self-sufficiency program. This project is financed through LIHTC 4% Bonds, a $4 million Connecticut CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars, and private equity. This development is completed and fully occupied.
- Farnam Court Phase II- on site included the demolition of the remaining 92 units and construction of 111 units (87 RAD assisted and 24 market rate units) and a 3,600 square foot community center and park.

The following actions have been completed :

- Farnam Offsite Completed – Fair Haven consists of 57 units financed through 9% Low Income Housing Tax Credits. The 57 units exists on two sites located in the Fair Haven neighborhood, an area undergoing significant re-investment. The Chatham site includes 32 assisted units (Rental Assistance Demonstration Program). The Eastview Terrace Phase II site includes 23 RAD assisted units and two Project Based Assisted units. This development is completed and fully occupied.
- Farnam Court Phase I Completed – The first on-site phase included the demolition of 148 units. These where be replaced with 2 mid-rise 5 story buildings housing 94 units --86 assisted and 8 market rate units situated on 1.1 acres. Additionally, these buildings house 7,400 square feet of commercial and community/program space. The community space will support a vibrant comprehensive economic self-sufficiency program. This project was financed through LIHTC 4% Bonds, a $4 million State of CT CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars and private equity. This development is completed and fully occupied.
- Farnam Court Phase 2 Completed – -- During FY19, ECC/HANH received all necessary funding commitments to proceed to the completion of Phase 2. Phase 2 was bifurcated into a 4% LIHTC phase (45 total units, including 36 RAD units) and a 9% LIHTC Phase (66 total units, including 52 RAD units). ECC/HANH was successful in obtaining both 4% and 9% LIHTC through the Connecticut Department of Housing Competitive Housing Assistance for Multifamily Properties (CHAMP) funding round. Farnam 4% began construction during FY20 and Farnam 9% began construction during FY 21. The Phase 2 9% LIHTC phase included the construction of a community building and public park. Both phases were completed in FY22 and are now fully occupied. This initiative is now complete.
- Due to funding flexibility, ECC/HANH spent $43,203,819.00 on the transformation of Farnam Courts. The following amounts were spent on the various phases.
  - EVT - (1) $25,190,366; (2) $3,591,481
    Farnam I-$13,510,339; Farnam II(A) - $487,813.98 Farnam II(B) - $423,818.65

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

Outcomes

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline***	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	240 units	57 units at Fair Haven 94 units at Farnam Courts Phase I 111 units at Farnam Courts Phase II Total 262	57 Units completed (55 RAD and 2 PBV units completed at Fair Haven) 94 Units completed (86 RAD and 8 Market units completed at Farnam Courts I) 111 units completed including 88 RAD units Total 262 units	Yes,

Internal Metrics

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Internal Metric #6: Utility expenses per unit**				
Reduction of utility expenses per unit, pre and post redevelopment – Electric	Valley Waverly: $900 per unit/ per month in 2012	5% reduction Electric utility expenses would reach approximately $858.33 per unit	2022: $157.84 per unit/per month at Fair Haven $142.73 per unit/per month at Mill River 2021: $144.14 per unit/per month at Fair Haven $67.02 per unit/per month at Mill River	Yes

Reduction of utility expenses per unit, pre and post redevelopment – Gas	Valley Waverly: $60.83 per unit/ per month in 2012	5% reduction Gas utility expenses would reach approximately $65.83 per unit	2022: $29.30 per unit/ per month at Fair Haven $21.21 per unit/per month at Mill River 2021: $18.83 per unit/ per month at Fair Haven $23.94 per unit/per month at Mill River	Yes
Internal Metric #7: Crime Rate**				
Crime rate statistics, pre and post redevelopment	Farnam Courts FY19: 1	10% reduction in number of major crimes	2022: 1 major crime	Yes

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

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were achieved, and no changes were made to this activity. This initiative has been completed

Initiative 1.25F - Vacancy Reduction

Implemented in FY08.

Description/Impact/Update

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

Impact

During FY2022, a total of 179 LIPH unit vacancy turnovers were completed ending the year with an occupancy rate of 92%%.

Elm City Communities is undergoing redevelopment and modernization of significant numbers of units which requires a major scale resident relocation. In Fy2022, ECC/HANH continued to utilize the funding flexibility to effectuate its redevelopment efforts in which parts of the portfolio needed significant rehabilitation. As we will not house relocation residents in units that are substandard, some vacancy dollars were used to prepare the vacant unit for the relocated resident. 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. $420,228 in MTW funds were spent for Vacancy reduction.

Elm City Communities is committed to reducing its vacancies and increasing its occupancy percentage.

ECC/HANH LIPH portfolio continued to include some developments slated for redevelopment so although our vacancy turn work was helpful for overall building inspection scores, the inclusion in the portfolio of these developments in need of investment depressed the average scores.

Outcomes*

HUD-Required Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available	1,970 units (frozen 2001 base)	No more than a decrease of 5% from previous year	2022: 2,246 units and 179 units turned 2021: 2,246 units and 95 units turned	Yes

Internal Metrics

Internal Metric #2: REAC Scores				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
REAC scores	REAC score of 80 for ECC/HANH's developments (those not reflecting local or increased TDCs)	10% increase. REAC scores would reach 88.	Refer to Appendix 8: ECC/HANH Development REAC Scores for specific data points.	No. The average REAC score for the ECC/HANH portfolio in FY22 was 51.

Internal Metric #3: Average work order				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Work orders per property	Average portfolio wide: 671 work orders per property	reduce volume by 50% or more over baseline	Average portfolio wide: 275 work orders per property Refer to Appendix 9: Work Orders, FY09 to FY22 for specific data points.	Yes
Internal Metric #8: Occupancy				
Occupancy	FY02 93%	95%	Refer to Appendix 11: LIPH Occupancy for specific data points.	No. The overall occupancy for all ECC/HANH properties was 92% in FY22.

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

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

The developments in the LIPH portfolio are older stock and have a lot of deferred maintenance issues. Due to anticipated development activities, some of the capital needs in these developments are not repaired. Vacant units are turned over for occupancy and any emergency maintenance repairs are addressed. However, this leads to lower REAC scores. Once the properties are redeveloped, ECC/HANH anticipates that the scores will increase. Also, as we move aggressively through these redevelopment efforts there will be impacts on our occupancy/vacancy rates.

Initiative 2.6F - Resident-Owned Business Development Program

Implemented in FY11.

Description/Impact/Update

Implemented in FY11, ECC/HANH continues to strengthen the Resident-Owned Business (ROB) Development program by providing educational, financial management and other business growth training and technical services. Under this program, ECC/HANH serves residents that start their own businesses by providing technical assistance services. It was originally expected that ROBs will operate primarily in construction trades. However, over time this focus was broadened to include more business types. ECC/HANH continues to provide a revolving loan fund to which ROBs may apply for loans up to $25,000 by submitting a bona fide business plan and letter of intent for a pending contract award option. ECC/HANH anticipates an increase in the economic well-being of those residents who successfully start and sustain their own businesses.

Impact

The ROB program has increased the economic well-being of residents who have successfully started and sustained their own businesses. For FY22, the average income of ROB households is $34,232 compared to $22,892 in FY21, an increase of 49.5 percent.

At the start of the year, ECC/HANH supported 5 ROBs and had a goal of expanding, however ECC/HANH experienced difficulty in soliciting for the right business development contractor to work with the residents. During FY22, the Resident Owned Business (ROB) program served 5 participants, all of whom received individual assessments and entrepreneurship consultation and/or ongoing training. To date, the ROB program has launched 29 businesses. The businesses range in interests and include a cleaning services, livery service and relocation service. Of the 29 residents who have launched a business through the ROB program, five are actively operating at the end of FY22.

Sadie's Pro Cleaning showed a 33% increase in earned income. The business has reported significant growth as it has added clientele and various new projects to the business model. The business is also being promoted through Google and other online platforms. The resident was highlighted on a recent podcast, titled "Beating the Odds of Small Business Ownership and How Housing Programs Can Help" to talk about the business support she has received from ECC/HANH.

During FY22, ROB Sunny Dental Art Lab continued to receive consultation and/or technical assistance to secure the relevant materials needed to have her ECC/HANH loan request finalized and approved. The resident decided to rescind her request as she faced many personal hardships. Her request will be resubmitted when she advises. No new ROB loans were issued this year.

Resident Owned Business	**FY 22 Reported Earned Income**
(SM - Professional Cleaning Company)	$85,655
(ST - Dental Lab)	$23,400
(JG - Auto Repair)	$31,200
(QJ - Logistical Trucking)	$17,825
(JL - Hair Services)	$13,081
EARNED INCOME AVERAGE	**$34,232**

SS #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households or individuals affected by this policy in dollars	$38,785 (2014)	$24,850*	2022: $34,232 2021: $23,436 2020: $24,403 Prior years' average: $21,262	Yes

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

Number of households receiving consultation and/or technical assistance	7 (2012)	10	2022: 1 2021: 15 2020: 36 Prior years' average: 27	No
Number of households receiving training**	7 (2012)	10	2022: 5 2021: 27 2020: 31 Prior years' average: 13	No

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

Internal Metrics

	New loans issued	Dollar value of new loans	Amount outstanding	Amount under contract with ECC/HANH
2011		$ 33,093		]
2012		$ -		
2013	2	$ 74,423	$ 29,959	$ 800,000
2014	1	$ -	$ 10,541	
2015	1	$ -	$ 7,382	
2016	1	$ 7,382	$ 6,700	
2017	1	$ 22,000	$ 16,400	
2018	1	$ 12,000		
2019	1	$ -	$ 8,000	
2020	1	$ -	$ 5,222	
2021	0	$ -	$ -	$ 3,392
2022	0	$ -	$ -	$
Total	9	$ 148,898	$ 84,204	$ $803,392

In FY22, the CED Department presented a workshop titled, "How to Promote Your Business" with 60% of the ROB participants in attendance. In addition, the department hosted a 1:1 session with each business to learn more about their individual business needs. During the discussions, 100% of the participants reported needing motivational support as entrepreneurs.

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

Historically, residents with business have been reluctant to report business information to ECC/HANH for fear disclosing financial information that could impact their housing although the temporary exclusion is explained in detail when we explain the benefits of participating the Resident Owned Business Program. While working to identify a new strategy to make this initiative more effective, the department sought a consultant who specializes in motivational support for entrepreneurs. The goal is to offer a robust approach that includes a more hands-on, interactive, outreach and support.

Initiative 2.7F. SEHOP CAPITAL IMPROVEMENT PROGRAM (PREVIOUSLY INITIATIVE 4.2F)

SEHOP CAPITAL IMPROVEMENT PROGRAM

Implemented in FY10

Description/Impact/Update

Implemented in FY10, this program supports SEHOP homeowners with necessary capital improvements that arise after being in the home for a minimum of three years. The program was created to increase the livability and value of recently purchased homes. This program supports new homeowners with necessary capital improvements costing $500.00 or more that arise after being in the home for a minimum of three years. On a monthly basis, from the time of a SEHOP homeowner purchase, 1% of the purchase price of the home is deposited into the account to be available for capital improvements. Homeowners can access the funds after owning the home for three years.

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

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

Since the review of this initiative, the SEHOP contract has expired for four households and 20 household remain eligible. In FY22, of the 20 eligible households remaining, three homeowners requested and received a disbursement for capital improvements.

A total of 20 households are receiving the allowance and zero households received a disbursement in FY21 for capital improvements.

In FY22, the capital improvement allowance account balance was $226,171.96 and reflects disbursements to homeowners who utilized the benefit to cover structural repairs and emergency flooding in their homes

Since the inception of the program, ten households received disbursement for various capital improvements such as HVAC, plumbing, foundation, tree removal, demolition, ADA compliance, deck replacement with the total cost of improvements at $89,114.73.

FY22 SEHOP Capital Improvement

Number of Households	Amount Disbursed	Capital Improvement Balance
20	$27,527	$226,171.96

In FY22, the CED Department hosted an annual meeting to discuss the program and the ways homeowners can utilize the funds. As a result of this meeting, three SEHOP recipients inquired about funds, which were disbursed as follows:

- One household received a total of $7,950 for two different emergencies (mold removal & water sump pump installation).
- Another household received a total of $9,750 to make one of their bathrooms ADA compliant for a member of the household with a disability.
-
- A third household received a total of $9,827 to replace the HVAC system as she was without heat in her home.

Overall SEHOP Capital Improvement

Number of Households	Total Amount Disbursed Since Program Started to Date	Times Utilized
10	$89,114.73	6 households utilized once 2 households twice 1 household utilized three times 1 household utilized four times

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

The initiative requires a resident secure three quotes for any improvement requests. During this process, the department found vast differences between quotes received with varying recommendations and prices for services. During FY22 the department has introduced a SEHOP Capital Improvement Committee to review quotes received and assist in recommending the contractor selected.

Initiative 2.8F - Prison Community Reentry

Implemented in FY10.

Description/Impact/Update

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

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

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

As of September 30, 2022, there were 29 active participants utilizing HCV for rental subsidy. During the fiscal year 3 families transitioned from unemployment income or zero income to earned income. Of the 29 participants the total number of families with earned income increased to 13 throughout the fiscal year.

3 shopping vouchers were issued to families during FY 2022 who are still searching for units to lease as of September 30, 2022. 1 Family was EOP'd; 1 Family's voucher was expired during the fiscal year because they failed to lease a unit with subsidy.

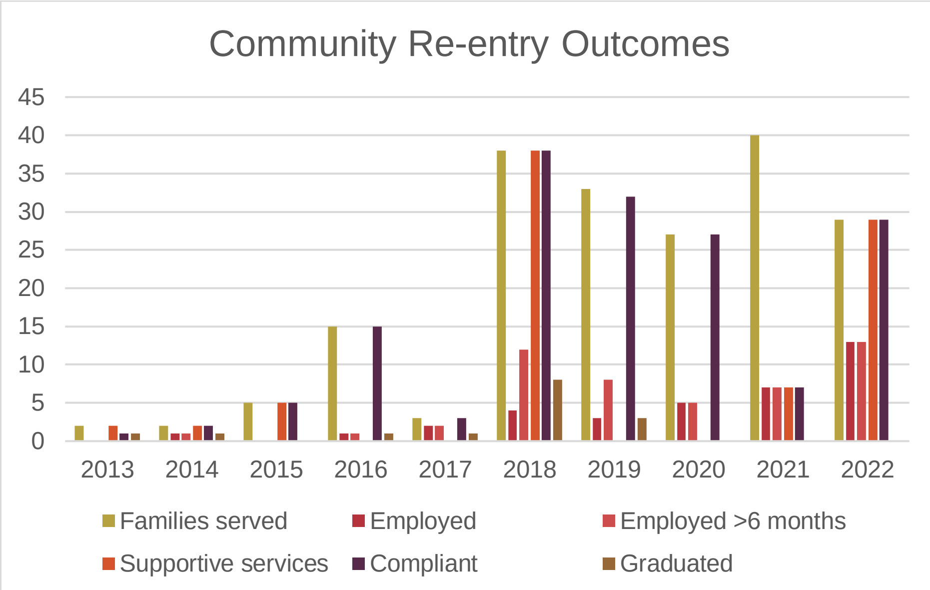
$359,397.96 was spent in MTW funding for this initiative in FY22.

Impact

During FY 2022, there were no new admissions in the LIPH segment and there were 7 new admissions in the HCV segment. Due to the need for LIPH units for relocations due to redevelopment efforts as well as the number of 1-person disabled families on the LIPH Re-entry wait list, it proved difficult to lease those families. During FY23, ECC/HANH anticipates fully implementing the new wait list management approach.

For the LIPH segment ECC/HANH has increased the number of families served over time. When we were able to lease families in this Re-entry segment, the vast majority of families housed were lease compliant and complied with their action plans. This year ECC/HANH saw a significant increase in the number of re-entry residents who obtained and sustained employment. 45% of families have employment income and have held a job for more than 6 months.

The HCV Re-entry segment had the highest number of families with employment income this fiscal year.



SS #3: Increase in Positive Outcomes in Employment Status*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of families with employment income as of 9/30/2021	0 (2010)	50% would be employed	2022 13/29 (45%) 2021: 7/40 (18%) 2020: 5/27 (19%)	No
Percentage of individuals remained employed for more than six months	0 (2010)	50% will be employed for more than six months	202213/29 (45%) 2021: 7/40 (18%) 2020: 5/27 (19%)	No

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

Percentage of individuals referred for services**	0 (2010)	All individuals will be enrolled in Family Support Service or FSS Program	2022 29/29 (100%) 2021: 07/40 (18%) 2020:0/27 (0%)	No

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

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of individuals compliant with plan	0 (2010)	50% will be compliant with Service Plan***	2022 29/29 (100%) 021: 7/40 (18%) 2020: 27/27 (100%)	No

SS #8: Households Transitioned to Self Sufficiency****				
Participant program graduation during fiscal year (LIPH segment)	0 (2010)	50% will Graduate the program	2022 0/29 (0%) 2021: 0/40 (0%) 2020: 0/27 (0%)	No

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

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

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges and Changes

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

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

Initiative 2.9F - Resident Services for Elderly/Disabled (Previously Initiative 4.4F)

Implemented in FY2003, Updated in FY2007

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

Description

The initiative began with the goal of supporting the quality of life for residents who are elderly, at age 62 and older, or living with a disability, and ensuring that residents can live independently and maintain self-sufficiency. Currently there are 392 Elderly and 187 Disabled families inclusive of 519 disabled individuals.
The initiative strives for this goal through:

- connecting elderly and disabled residents with the support needed to ensure a sense of community and companionship,
- decreasing isolation for those living alone,
- helping residents to access public benefits and supplemental income,
- making connections to medical and behavioral health services, and
- providing general support with access to basic needs, such as food, transportation, or housekeeping

Impact

The RSC role is funded in part through the Resident Opportunities and Self-sufficiency (ROSS) Grant, a HUD funded program that provides funding to hire and maintain service coordinators who work with residents living in public housing. Additional funding for RSCs and program services is through MTW flexible funding. Currently, there are two RSCs, that work with the elderly/disabled residents.

In FY2022, ECC/HANH spent $629,317 for Resident Services for the Elderly/Disabled.

- $25,000 for contracted service with the Senior Tech Club
- $80,653 for salaries from a ROSS grant
- $119,914 in Supportive Services contracts
- $403,750 for other services

The initiative began with the goal of supporting the quality of life for residents who are elderly, at age 62 and older, or living with a disability, and ensuring that residents can live independently and maintain self-sufficiency. The case management services received continues to help residents to live independently in ECC/HANH communities, avoid eviction, and delay or prevent a move to a higher level of care. To carry out Elderly/Disabled programming, the Resident Services Coordinators (RSCs) take on several responsibilities to ensure a high quality of life for Elderly/Disabled residents.

Support for residents typically falls into two categories: intensive support, for those with substance abuse disorders or those who require regular medical care, and minimal support, for those who have infrequent medical care such as occupational therapy or require a one-time service such as nutrition education. ECC/HANH has consistently seen growth in the number of individuals served through this initiative. In fiscal year 2021 the number of individuals enrolled was 579 residents. In FY2022 the residents enrolled increased to 726. There is a 25% increase.

The average number of outreach efforts has been stable over time totaling over 3000 outreach contacts this year. The average number of group meetings has increased by 26% in fiscal year 2022, however we have failed to achieve the benchmark because we were conducting the group meetings online and the elderly/disabled population did not attend due to barriers in using technology. The community rooms have been open since July and we have seen increases in attendance for groups.

The number of individuals compliant with action plan has increased to 26% this fiscal year as compared to last year. There is an increase of residents who have transitioned to self-sufficiency in the fiscal year 2022 as compared to last year. This can be attributed to the increase amount of intensive case management received from the third-party supportive services as well as referring residents to the self-sufficiency programs.

ECC/HANH hired a Senior Tech Consultant because we recognized that due to COVID our seniors were the most vulnerable population. The consultant was hired to assists with some of the barriers for isolation prevention.
The following topics were covered:

- Introduction to Tablets
- Navigating tablet/Android O/S
- On-line Banking
- Accessing On-line Health
- Accessing/Ordering On-line Prescriptions
- Paying Bills On-line
- Accessing the internet
- How to use Zoom
- On-line Shopping
- Accessing On-line Banking

Measurement

HUD-Required Metrics

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Number of individuals enrolled	102 (2012)	570*	2022: 726 2021: 579 2020: 608 2019: 640	Yes: 25.38% increase
Average number of outreach efforts conducted per month	62 (2013)	85	2022: 762 2021: 783 2020: 770 2019:530	Yes.

*ECC/HANH revised the goal to 570 which is the number of FSS slots allotted

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average number of group meetings held per month	128 (2013)	85	2022: 58 2021: 46 2020: 30 2019: 640	No.
SS #8: Households Transitioned to Self Sufficiency				
Number of households transitioned to self-sufficiency*	0 (2012)	20	2022: 47 2021: 41 2020: 52 2019: 96	Yes

** ECC/HANH defines self-sufficiency in the context of the Elderly/Disabled program as an individual's ability to live independently and be lease compliant without case management services.*

Internal Metrics

Compliant with Action Plan				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of individuals compliant with Action Plan*	83 (2013)	80	2022: 709 – 97% 2021: 564 2020: 589 2019: 546	Yes.
Non-compliant with Action Plan				
Number of individuals non-compliant with Action Plan	22 (2013)	< 25	2022:17 – 2% 2021:15 2020:19	Yes.

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

Actual non-significant changes

None.

Actual changes to metrics and data collection

None.

Actual significant changes

None.

Challenges in Achieving Benchmarks and Possible Strategies

COVID created challenges in engaging residents in person and the ability to return to in person services should address any challenges experienced this year.

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

Approved and Implemented in FY20

Description/Impact/Update

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

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

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

At baseline there are 51 LIPH and 130 HCV families reporting an income above the Low-Income Limit. This is the targeted universe for the Jumpstart initiative (181 families). By offering families a one-time incentive payment based upon the average amount needed to rent in the private market, we seek to accelerate the move out/end of participation of higher income families allowing us to house a family off the waitlist.
Payments will be made to families upon execution of the agreement along the following schedule and in amounts not to exceed the amounts below which are based upon currently Fair Market Rents[17]:

[17] FMRs will be adjusted annually.

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

Impact Analysis

During FY 22, we focused on LIPH families. 33 families were income eligible for Jumpstart and 9 families were noted to be over the 80% AMI and were served. All 33 families who qualified for this initiative were noted to have been impacted by COVID. Families referred were noted to have lost income. Families are being followed by supportive services and participating in the FSS program. The FSS program is closely monitoring the 9 families who were noted prior to COVID over the 80% AMI.
To date 9 families have been served, however 0 families have utilized the funds.

Activity Metrics Information

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self-sufficiency (increase). Total number of households receiving services under the jumpstart program per FY.	At baseline 0 of the 180 income eligible families	2021: 45 or 25% of the total number of families with income at or above the 80% AMI.	2022: 9:33 2021: 46	Yes 27% families served

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of Families who transitioned to self-sufficiency (graduated from the program). This includes families who transitioned to a market rate unit in the community or purchased a home without subsidized assistance.	At baseline 0 of the 180 income eligible families	2021: 45 or 25% of the total number of families with income at or above the 80% AMI.	2022:0 2021: 0	No

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). Number of units/vouchers made available as a result of families graduating to self-self-sufficiency under the Jumpstart Initiative.	2019: At Baseline we are ending participation for 250 families annually.	45 New Families housed annually as a result of housing made available when families in jumpstart transition to Self Sufficiency.	2022: 0 2021: 0	No

Actual non-significant changes

None

Actual changes to metrics and data collection

None

Actual signficant changes

None

Challenges in Achieving Benchmarks and Possible Strategies

Families that qualify for this program were impacted by COVID, ECC will continue to monitor family income, provide services and engage the families.

Initiative 2.12F - ECC Believes!

Proposed and implemented in FY2014

Description/Impact/Update

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

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

Parent's quote:

"The Student Employment Training Program (STEP) has been a wonderful experience. I originally desired for my son to get out of the house and socialize with other people, he did this and so much more. To witness my teenager mature right before my eyes has been profound. He has displayed his growth in time management, financial budgeting and establishing a work/life balance. He is so proud of himself with the work he performs and I am so delighted with his growth and work ethic. Without even trying, he has modeled for his younger brother the maturity needed in entering the workforce and eventually adulthood. I am so grateful to have my son working with the staff at STEP, he is challenged, respected and made to feel important. This allows for my son to want to perform his best. Thank you so much to the staff for making my son feel special, this has been an amazing experience."

Impact

In FY 22, ECC Believes! has expanded and provides a range of valuable services to student residents and their families. ECC Believes! is structured in a "cradle to career" pipeline model that starts with access to education supports in early childhood and continues throughout secondary school and into postsecondary education and employment preparation. The cradle to career pipeline includes five program focus areas that each include different partnerships and opportunities for residents: 1. Early childhood (Prenatal to 5 years old); 2. Family engagement (all ages); 3. Attendance and school engagement (Students K-12); 4. Academic supports and afterschool programming (Students K-12); and
5. Postsecondary preparation (Students 9-12).

During FY2022 ECC/HANH spent $366,227 on the ECC Believes! Initiative.

Youth engagement has increased over the last FY by 5.4% serving 1,424 of the 5,406 youth in the ECC portfolio. As the ECC Believes! initiative grows, ECC/HANH will continue to broaden community partnerships and identify new areas where they can support residents from cradle to career.

Early Childhood
In FY 22, ECC established a partnership with NH ChILD a local non-profit focused on early childhood system development. ECC/ HANH is focusing on early childhood outcomes through improving quality of care received. ECC/HANH received a grant to work with up to 20 residents who are employed in early childhood care settings to help them receive their Childhood Development Associate (CDA) credential at no cost. The goal of this program is to improve early childhood outcomes and provide workforce development support to resident families. Classes are provided by the local Gateway Community College (GCC) and held onsite at an ECC/HANH property. As a part of the program, all national certification costs are covered, and participants receive a stipend to assist with other associated costs including books and childcare. Also, as a part of the program, participants receive access to free mental health support services from Integrated Wellness throughout the 7-month certification process. The program will offer an intensive and culturally responsive learning opportunity.

Family Engagement
ECC has also established a partnership with the New Haven Early Childhood Council and United Way to increase family engagement and impact early childhood outcomes through resident training programs, on site workshops and quarterly Early Childhood Information Sessions. The Summer Circus and Childhood Resource Fair included over 81 families which represented 307 residents and 226 children.

Post-Secondary Preparation

In FY 22, youth employment has increased by 27.5% from FY 21. The Student Training Employment Program (STEP), the partnership with Youth@Work, and after-school job shadowing and apprenticeships at ECC/HANH. In FY 2022, ECC/HANH offered a number of Youth Employment programs with 88 youth participating.

ECC/HANH spent $22,782.71 to ensure that twenty (20) youth participated in the Youth @ Work summer employment program in collaboration with the City of New Haven. The youth were between 14 and 18 years old. Each participant was invited to participate in a work prep workshop where they participated in leadership, goal setting and critical thinking activities to attain skills to use while working. They attended Workshops on Leadership, Critical Thinking, Patience, Empathy, Workplace Behavior Conduct and Goal-Setting. Twenty-five percent (25%) of the students who participated in youth prep workshops through ECC/HANH CED stated that the prep workshops were extremely helpful in adjusting to their summer jobs.

The Student Training Employment Program is a program in which the students are placed in jobs in the various department at ECC/HANH. They are placed according to their career goals and aspirations or study concentration if they have one. If they do not have one, they will be placed in an area of interest. The students are high school or college students between the ages of 16 –22 years old. For FY2022, 56% (14) of the 25 slots were filled.

Eleven youth participated in the Resident Service Youth Volunteer Program. The total cost of this program was $18,483.

The eleven (11) youth in this program participated in the remodeling and updating of their local community center also known as “The Shack”. The Shack is a safe haven for local youth to gather, eat, and have access to resources. The Program Coordinator ensured that the youth were well trained and supported throughout the 5-week program.
They participated in the updating of the kitchen, computer lab, office area, lobby, lawn, parking lot, and bathrooms. The youth worked with local professional and were trained in areas such as gardening, home improvement and asphalt, landscaping,

They also participated in classroom training on money management, workplace conduct and time management. At the end of the program the youth expressed their excitement and eagerness to continue in finding employment and leadership opportunities. 88% of the participants stated that the training program prepared them to accomplish future goals.
50% stated if it wasn’t for the RSYVP program they would’ve been disengaged for the summer by simply just staying in the house.

While participating in the RSYVP program, 75% stated they were able to use the money they earned to buy items they needed and wanted. 25% of the participants opened a bank account for the first time and 75% of those participants saved more than $300. The maximum amount was $600. 50% of the students continued to maintain a G.PA. over 3.0 while engaged in this program.

“I learned confidence, communication and respect” – Z. S

“I would recommend this program to my friends so they can get out of the house.” -T.T.

“I would recommend this program because it is a safe environment to learn things.” -K.M.

"3 things I learned was landscaping, home improvement and how to re-tile a ceiling." T.Y

Also, in FY 22 ECC partnered with Connecticut Association of Human Services to offer asset building programming for young people via monthly workshops focusing on savings, credit, SMART goals, real world expenses, education after high school and employment benefits.

Academic Supports and Afterschool Programming

On site programming offerings for youth are varied and held at numerous developments across the portfolio. Programming such as:

- Academic Tutoring at Wintergreen Magnet & Common Ground Schools
- Bridges of Hope mentoring program
- LIVEGIRL Confidence Clubs
- Solar Youth afterschool program
- Teacher in Residence afterschool tutoring
- Urban Community Alliance mentoring program
- Youth Money School asset building program
- Youth Without Limits mentoring and employment program

These programs offer additional assistance to students with their schoolwork and provides mentoring for youth as well. Additional efforts have been made to increase youth engagement post COVID with several events that invite youth to recreational experiences with ECC/HANH off-site to connect them the community at large.

Outcomes

Internal Metrics

Engagement				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Youth Engagement	1,263	Steady Annual Increase	2022: 1,424 – 5.4% increase (26% youth served within the ECC portfolio) 2021: 1,351 -7 % increase (25% youth served within ECC portfolio) 2020: 1263	Yes
Academics				
School Attendance	N/A	Steady annual increase	2022: Cannot report; schools did not provide data 2021: Cannot report; schools did not provide usable grades	N/A

			2020: Cannot report; schools did not provide usable grades	
Academic Achievement GPA/ D&F's	N/A	Students will increase GPA	2022: Cannot report; schools did not provide data 2021: Cannot report; schools did not provide usable grades 2020: Cannot report; schools did not provide usable grades	N/A
Employment				
Youth Employment	65	Steady Annual Increase	2022: 88 (27.5% increase) 2021: 69 (6% increase) 2020: 65	Yes

Actual non-significant changes
None.

Actual changes to metrics and data collection
None.

Actual significant changes
None.

Challenges and Changes
One of the main challenges within ECC Believes! is tracking student academic progress with quantitative metrics. This was especially difficult in FY22 when district schools have had a number of internal changes effecting data reporting. Even when a data sharing MOU is in place, it has been a challenge to acquire data. ECC/HANH continues to work with local schools and organizations to develop and manage data tools and resources, in a way that balances family preferences, student privacy, and useful data metrics.

Initiative 3.11F: Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities (Previously 4.6F)
Approved and implemented in FY17

Description/Impact/Update

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 were envisioned to 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 included:

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

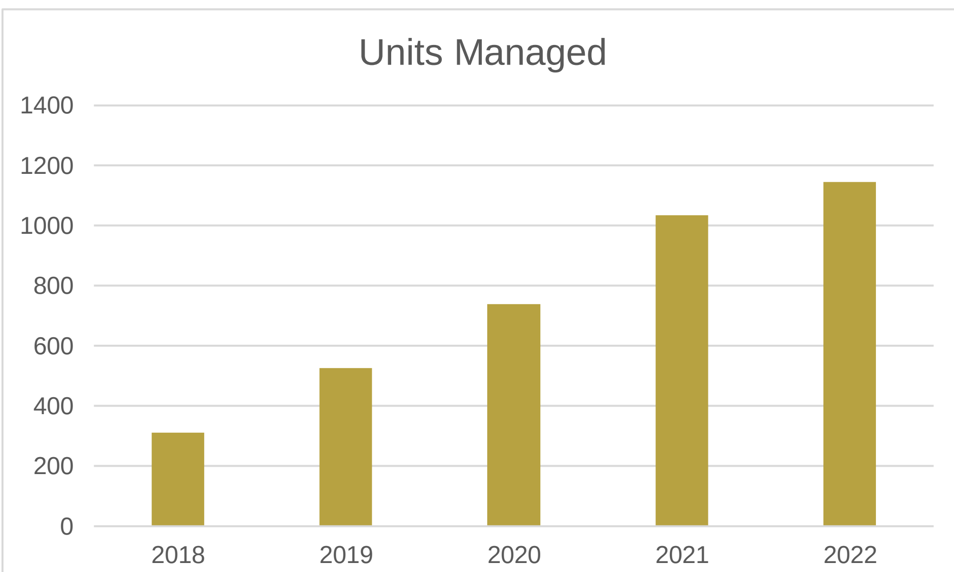
Through the establishment of the new affiliate entities, ECC/HANH sought to achieve the following:

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

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

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

The property management instrumentality received its 501 (c) (3) status in March 2018, and it assumed the property operations and compliance management of 312 units. Since then, 360 Management has increased its staff to 46 employees and expanded its reach to providing property management services to 1,145 units in 21 developments.



During FY2022, $2,683,614 in MTW funding was spent on this initiative.

Outcomes

During FY2022, 360 Management's redevelopment strategic goal was to achieve at least a 10% savings on total operating expenses. Overall, 360 Mgt. continued to achieve savings on total operating expenses. 360 Mgt continues to work on achieving the goal of 10% across all portfolios.

SITE	BASELINE OPERATING COST	BENCHMARK	ANNUAL COST UNDER 360 MGT	OUTCOME	BENCHMARK ACHIEVED
RAD GROUP I - (PRESCOTT BUSH; CB MOTLEY; KATHERINE HARVEY; NEWHALL GARDENS)	$1,286,696	10%	$1,184,307	9%	No
RAD GROUP II - (FULTON; STANLEY; WAVERLY)	$1,124,435	10%	$708,811	59%	Yes
RAD GROUP III - MCQUEENEY (RESIDENTIAL); CELENTANO	$3,074,395	10%	$1,690,535	80%	Yes
RAD GROUP IV - FAIMONT HEIGHTS; RUOPPOLO MANOR	$2,249,026	10%	$1,043,101	116%	yes

Internal Performance Metrics

360 Management Group Company continues to work 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.

In FY 2022 360 Management achieved the following performance metrics.

- Rent collection rate - 83%.
- Certification Rate – 84%
- Occupancy Rate – 97%

Actual Non-Significant Changes

None

Actual Changes to Metrics/Data Collection

None

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

360 Mgt. anticipated managing 1346 units in 22 developments by the close of FY2022 and 1386 units in 23 developments by FY23, according to the Glendower Group's pipeline schedule. However, delays in funding, resulted in fewer units managed in FY22.

COVID continues to challenge our residents financially with higher food prices, transportation costs, and other necessities. 360 Mgt. will continue to work with residents on rent collection and to enter into repayment agreements that will allow them to pay their arrears over time. 360 Mgt. will also continue to work closely with Elm City Communities' Community and Economic Development division to assist residents with financial counseling, budgeting and to link them to other community services.

The Formation of a Resident Services Instrumentality

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

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

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

Description/Impact/Update

The proposed needs assessment and the creation of a legal entity are postponed.

Actual Non-Significant Changes

The MTW 2022 goal was to complete a due diligence process, which would 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 of the due diligence process, it would inform ECC to proceed or reconsider the formation of a Resident Services instrumentality.

This process has not been started and is on-hold for the time begin.

Actual Changes to Metrics/Data Collection

None.

Actual Significant Changes

None

Challenges in Achieving Benchmarks and Possible Strategies

None

B. LOCAL ASSET MANAGEMENT PLAN

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

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

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

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

No changes were made in FY2022

VI. ADMINISTRATIVE

A. REVIEWS, AUDITS AND INSPECTIONS

ECC HANH has closed the books for FY2022 and the unaudited FDS was submitted on November 18. All prior CHRO and HUD VCA requirements have been met. During FY2022 REAC inspections were completed ECC/HANH has worked closely with HUD Field Office around issues of occupancy and TAR reduction.

B. EVALUATION RESULTS

None

HOTMA Reporting requirements

HOTMA 120%							
	FY19	FY20	FY21	FY22	FY23	FY24	FY25
Number of Families residing in Public Housing Administered by the agency who had incomes exceeding the applicable Income limitation (120% AMI)	3	3	3	1			
Number of Families on the LIPH waitlist as of the end of the FY	4461	4461	9466	19,129			

C. MTW STATUTORY REQUIREMENT CERTIFICATION

Certification that ECC/HANH has met the three Statutory Requirements

(1) 75% of families assisted must be below 50% of AMI at admission

In FY22, 92% of the families receiving ECC/HANH assistance are below 50% AMI at admission. Thus, ECC/HANH has met the requirement that 75% of families assisted be below 50% of AMI at admission. ECC/HANH has met this requirement every year since becoming an MTW organization.

New Admissions Only – FY07 through FY22												
	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18
Total number of newly admitted families assisted	344	329	344	425	433	447	238	402	560	676	947	673
Number of families with incomes below 50% AMI	332	310	322	387	394	410	229	372	522	606	872	650
Percentage of families with incomes below 50% AMI	96.5%	94.2%	93.6%	91.0%	90.9%	91.7%	96.2%	92.5%	93.2%	90.0%	92.1%	96.5%
	FY19	FY20	FY21	FY22	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30

Total number of newly admitted families assisted	347	609	498	706								
Number of families with incomes below 50% AMI	318	580	483	650								
Percentage of families with incomes below 50% AMI	91.6%	95.2%	96.9%	92.0%								

(2) Baseline for the Number of Eligible Low-Income Families to Be Served

ECC/HANH has served considerably more families since achieving MTW status, primarily through its modernization and redevelopment efforts made possible by MTW flexibility. During FY22, ECC/HANH served 29% more families than at baseline.

Families Served in FY2022 Compared to Baseline		
Baseline number of families to be served (total number of families)		4827
Total number of families to be served this fiscal year	HCV: 5,311	6244
	LIPH: 933	
Numerical difference above baseline		1417
Percentage difference above baseline		29.35%

ECC/HANH (CT004)								
	FY01	**FY02**	**FY03**	**FY04**	**FY05**	**FY06**	**FY07**	**FY08**
Families Served through MTW Public Housing	1,970	2,086	1,895	1,737	1,640	1,553	1,531	2,359
Families Served through MTW Vouchers	2,857	2,889	2,994	3,176	3,454	3,312	3,106	3,030
Other Families Served through MTW	0	0	0	0	0	0	0	0
NUMERATOR – Total Families Served	**4,827**	**4,975**	**4,889**	**4,913**	**5,094**	**4,865**	**4,637**	**5,389**
Number of Families (Public Housing)	1,970	1,970	1,852	1,852	1,575	1,432	1,490	1,365
Incremental Increase to Baseline	0	36	0	0	0	58	28	28
Incremental Decrease to Baseline	0	-154	0	-277	-143	0	-153	-90

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

ECC/HANH (CT004)								
	FY09	**FY10**	**FY11**	**FY12**	**FY13**	**FY14**	**FY15**	**FY16**
Families Served through MTW Public Housing	1,898	2,017	2,294	2,310	2,174	2,235	2,241	2,204
Families Served through MTW Vouchers	3,042	3,075	3,089	3,175	3,303	3,408	3,534	3,774
Other Families Served through MTW	0	0	0	0	0	0	0	0
NUMERATOR – Total Families Served	**4,940**	**5,092**	**5,383**	**5,485**	**5,477**	**5,643**	**5,775**	**5,978**
Number of Families (Public Housing)	1,303	1,061	1,061	1,060	1,110	1,194	1,031	911
Incremental Increase to Baseline	53	0	0	50	84	30	0	0
Incremental Decrease to Baseline	-295	0	-1	0	0	-193	-120	-55
Number of Families (Vouchers)	3,026	3,026	3,032	3,041	3,041	3,041	3,041	3,136
Incremental Increase to Baseline	0	6	9	0	0	0	95	321
Incremental Decrease to Baseline	0	0	0	0	0	0	0	0
TOTAL FAMILIES SERVED	**4,087**	**4,093**	**4,101**	**4,151**	**4,235**	**4,072**	**4,047**	**4,313**
% TOTAL	**121%**	**124%**	**131%**	**132%**	**129%**	**139%**	**143%**	**139%**

ECC/HANH (CT004)								
	FY17	**FY18**	FY19	FY20	FY21	FY22	FY23	FY24
Families Served through MTW Public Housing	1882	1,694	1,505	1,310	1106			
Families Served through MTW Vouchers	4,279	4,496	4,680	4,674	4914			
Other Families Served through MTW	0	0	0	0	0			
NUMERATOR – Total Families Served	**6,161**	**6,190**	**6,185**	**5,984**	**6,020**			
Number of Families (Public Housing)	856	274	92	21	-232	-562	-562	-562
Incremental Increase to Baseline	0	0	0	0	0	0	0	0
Incremental Decrease to Baseline	-582	-182	-71	-253	-330			
Number of Families (Vouchers)	3,457	3,824	4,055	4,125	4,374	4,689	4,689	4,689
Incremental Increase to Baseline	367	231	170	249	315			
Incremental Decrease to Baseline	0	0	0	0	0	0	0	0
TOTAL FAMILIES SERVED	**4,098**	**4,147**	**4,146**	**4,142**	**4,127**			
% TOTAL	**150%**	**149%**	**149%**	**144%**	**146%**	**0%**	**0%**	**0%**
Compliance Determination	**C**	**C**	**C**	**C**	**C**			

Incremental Increases/Decreases to Baseline			
Reason for Change	*Program*	*Year of Change*	*Change Amount*
Voucher Baseline - HANH gives "Section 8 Participant Demographics" on page 184 of their FY2002 Annual MTW Report. This number is given as of the beginning of FY2002 (which would be October of 2001). This is very close to when HANH signed their MTW Agreement. Best number available.	HCV	FY2001	2,857
Public Housing Baseline - HANH gives public housing households served as 1,146 (families) and 824 (elderly) at the beginning of FY2002 (which would be October of 2001). This is very close to when HANH signed their MTW Agreement. Best number found.	PH	FY2001	1,970
Public Housing - 154 actual units demo/dispo in 2002. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2002	-154
Public Housing - 36 HOPE VI public housing units added in 2002. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY2002	36
Vouchers - 77 Enhanced Vouchers became part of MTW program on 8/1/02.	HCV	FY2002	77
Public Housing - 277 actual units demo/dispo in 2004. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2004	-277
Vouchers - Housing Conversion for Ethan Gardens (28 in 01/05). Housing Conversion for Eastview Terrace (30 in 05/05).	HCV	FY2005	58
Public Housing - 143 actual units demo/dispo in 2005. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2005	-143
Vouchers - Housing Conversion for Canterbury Gardens (34 in 12/05).	HCV	FY2006	34
Public Housing - 58 HOPE VI public housing units added in 2006. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY2006	58
Public Housing - 153 actual units demo/dispo in 2007. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2007	-153
Public Housing - 28 HOPE VI public housing units added in 2007. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY2007	28
Public Housing - 90 actual units demo/dispo in 2008. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2008	-90
Public Housing - 28 HOPE VI public housing units added in 2008. Pulled according to "Production Year" in ACC unit construction spreadsheet.	PH	FY2008	28
Public Housing - 53 new units brought online at Eastview Terrace.	PH	FY2009	53

Public Housing - 295 actual units demo/dispo in 2009. Pulled from Demo/dispo report on PIC data page, pulled on 04.06.11.	PH	FY2009	-295
Vouchers - Housing Conversion for 77-79 Orchard Street Apartments (6 in 08/10).	HCV	FY2010	6
Vouchers - Willian T. Rowe Apartments (9 in 7/11).	HCV	FY2011	9
Public Housing - ADJUSTMENT - Demo/dispo report for FY2010 was updated to show one actual unit demolished.	PH	FY2011	-1
Public Housing - 50 new units brought online at Brookside Phase I.	PH	FY2012	50
Public Housing - 34 new units brought online at The Wilmont Crossing at West Rock and 50 new units at Brookside Phase II.	PH	FY2013	84
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY2014	-193
Public Housing - 30 units brought online at Rockview Phase 1 Rental (11/30/13 Actual DOFA Date)	PH	FY2014	30
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY2015	-120
Vouchers - 95 PH units converted to RAD PBV (44 units at Ribicoff Cottages 9%, 51 units at Ribicoff Cottages 4%).	HCV	FY2015	95
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.2.17	PH	FY2016	-55
Vouchers - Termination Opt Out (198 units in 4/16, 15 units in 6/16, 53 units in 8/16)	HCV	FY2016	266
Vouchers - 55 units converted to RAD PBV at Farnum - Fair Haven 9%	HCV	FY2016	55
Vouchers - PH Conv to PBV (86 units at Farnum 4%, 42 units at Monterey 4, 28 units at Monterey Place Phase 2R, 210 units at Monterey 1B)	HCV	FY2017	367
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 8.31.18	PH	FY2017	-582
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 10.1.19	PH	FY2018	-182
Vouchers - PH Conv to PBV (53 units at TH of Eastview Terrace, 34 units at Wilmont Crossing, 144 units at Harvey/Newhall/Motley)	HCV	FY2018	231
Public Housing - Pulled from Demo/Dispo Report on PIC data page, pulled on 5.27.20	PH	FY2019	-71
Vouchers - PH Conv to PBV (70 units at Waverly TH/Fulton Park)	HCV	FY2019	70
Vouchers - PH Conv to RAD (213 units at HANH RAD Group 3, 36 units at Farnam)	HCV	FY2020	249
Public Housing - Pulled from Demo/Dispo Report on PIC data page on 6.7.21	PH	FY2020	-253
Public Housing - Pulled from Demo/Dispo Report on PIC data page on 3.2.22	PH	FY2021	-330
Vouchers - PH Conv to RAD (52 units at Farnam, 201 unite at Matthew Ruoppolo Manor, 62 units at Westville Manor)	HCV	FY2021	315

Data Source Families Served		
Source	***Year***	***Amount***
September 2001 - Vouchers - Pulled from page 184 of HANH's FY2002 Annual MTW Report.	FY2001	2,857
September 2001 - Public Housing - Pulled from last page of HANH's FY2002 Annual MTW Report.	FY2001	1,970
FY2002 - Vouchers - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2002	2,889
FY2002 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2002	2,086
FY2003 - Vouchers - Pulled from September 2003 VMS Report that includes: 2,946 MTW and 48 All Other.	FY2003	2,994
FY2003 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2003	1,895
FY2004 - Vouchers - Pulled from September 2004 VMS Report that includes: 3,176 MTW.	FY2004	3,176
FY2004 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2004	1,737
FY2005 - Vouchers - Pulled from September 2005 VMS Report that includes: 3,333 MTW and 121 HOPE VI.	FY2005	3,454
FY2005 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2005	1,640
FY2006 - Vouchers - Pulled from September 2006 VMS Report that includes: 3,306 MTW, 1 All Other and 5 Tenant Protection.	FY2006	3,312
FY2006 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2006	1,553
FY2007 - Vouchers - Pulled from September 2007 VMS Report that includes: 3,106 MTW.	FY2007	3,106
FY2007 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2007	1,531
FY2008 - Vouchers - Pulled from September 2008 VMS Report that includes: 3,030 MTW.	FY2008	3,030
FY2008 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2008	2,356
FY2009 - Vouchers - Pulled from September 2009 VMS Report that includes: 3,042 MTW.	FY2009	3,042
FY2009 - Public Housing - Pulled from HANH FY2009 Annual MTW Report (page 22).	FY2009	1,898
FY2010 - Vouchers - Pulled from September 2010 VMS Report that includes: 19 Homeownership, 2,873 MTW, 168 Ports and 15 Tenant Protection.	FY2010	3,075
FY2010 - Public Housing - Pulled from HANH FY2010 Annual MTW Report (page 11).	FY2010	2,017
FY2011 - Vouchers - Unit month average pulled from VMS.	FY2011	3,089
FY2011 - Public Housing - Pulled from Development Detail Report for 09.27.11. Includes 178 units approved for demo/dispo. This is out of 2,542 (occupancy rate of 90%).	FY2011	2,294

FY2012 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2012	3,175
FY2012 - Public Housing - Pulled from Development Detail Reports. See third tab.	FY2012	2,310
FY2013 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2013	3,303
FY2013 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2013	2,174
FY2014 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2014	3,408
FY2014 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2014	2,235
FY2014 - Local, non-traditional - Reported in Annual MTW Report, Section II.	FY2014	0
FY2015 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2015	3,534
FY2015 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2015	2,241
FY2015 - Local, non-traditional - Reported in Annual MTW Report, Section II.	FY2015	0
FY2016 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2016	3,774
FY2016 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2016	2,204
FY2016 - Local, non-traditional - Reported in Annual MTW Report, Section II.	FY2016	0
FY2017 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2017	4,279
FY2017 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2017	1,882
FY2017 - Local, non-traditional - Reported in Annual MTW Report, Section II.	FY2017	0
FY2018 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2018	4,496
FY2018 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2018	1,694
FY2018 - Local, non-traditional - Reported in Annual MTW Report, Section II.	FY2018	0
FY2019 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2019	4,680
FY2019 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2019	1,505
FY2019 - Local, non-traditional - Pulled from Annual MTW Report, Section II.	FY2019	0
FY2020 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2020	4,674
FY2020 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2020	1,310
FY2020 - Local, non-traditional - Pulled from Annual MTW Report, Section II.	FY2020	0

FY2021 - Vouchers - Unit month average pulled from VMS. See third tab.	FY2021	4,914
FY2021 - Public Housing - Pulled from Unit Universe Reports. See third tab.	FY2021	1,106
FY2021 - Local, non-traditional - Pulled from Annual MTW Report, Section II.	FY2021	0

(3) Baseline for the Mix of Family Sizes to Be Served

Since baseline, ECC/HANH's portfolio has had several changes as a result of redevelopment efforts prior to RAD and more recently as a result of ongoing RAD conversion efforts. As can be seen, depending on the agency's development projects each year, the number of families served per member size can either increase or decrease. During FY22 ECC/HANH saw a 29% increase in the total number of households served.

Baseline Family Sizes Served by ECC/HANH							
Baseline	**1 person**	**2 people**	**3 people**	**4 people**	**5 people**	**6+ people**	**Total**
Ratio of family sizes to be maintained	32%	24%	20%	13%	6%	5%	100%
Number of families served by family size	2634	1453	1056	609	322	170	6244
Ratio of families served by family size	42%	23%	17%	10%	5%	3%	100%
Percentage Difference	10%	-1%	-3%	-3%	-1%	-2%	

D. MTW ENERGY PERFORMANCE CONTRACT FLEXIBILITY (EPC) DATA

N/A

VII. APPENDICES

Appendix 1: Documentation of Public Hearing and Public Comment Period

Board Resolution and Certificate of Compliance

Elm City Communities/Housing Authority of the City of New Haven
Public Hearing: Elm City Communities/Housing Authority of the City of New Haven
Moving to Work (MTW) Report FY2022
Monday, November 29, 2022 @ 3:00 p.m.
360 Orange Street, New Haven, CT 06511
(Via RingCentral teleconference

Those present included:

Evelise Ribeiro, ECC/HANH
Yesica Hernandez-Perez, 360 Mgt.
Catherine Hawthorne, ECC/HANH
Christina Musante, Glendower
Will Viederman, ECC/HANH
Calvin McGee, ECC/HANH
Jasmine Valdovinos, 360 Mgt
Jocelyne Barsczweski, Glendower
Agne Covil, 360 Mgt
Hannah Sokal-Holmes, ECC/HANH
Shenae Draughn, Glendower
Karen DuBois-Walton, ECC/HANH
Ed LaChance, Glendower
Monica Wolfork, ECC/HANH

The public hearing was called to order at 3:00 p.m. by Evelise Ribeiro, Director of Compliance and MTW Initiatives.
Ms. Ribeiro read the legal notice aloud which stated the reason the public hearing was being called. She noted that the notice was in English and Spanish and both versions would be submitted for the record.

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

Copies of the Moving To Work (MTW) FY2022 Report, will be made available on Tuesday, November 1, 2022 on the agency website www.elmcitycommunities.org or via Twitter, www.twitter.com/ECCommunities or via Facebook www.facebook.com/ElmCityCommunities.

You are invited to provide written comments addressed to: ECC/HANH, Moving to Work FY2022 Annual Report, Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 or via email to: eribeiro@elmcitycommunities.org.

Pursuant to said Section V (B), a public hearing where public comments will be accepted and recorded is scheduled for Tuesday, November 29, 2022 at 3:00pm via RingCentral:

https://v.ringcentral.com/join/975943490?pw=2e34ff6769797e68e96a95bb953d0d81
Meeting ID: 975943490
Password: yozWY5m3ib

Or dial:

+12679304000 United States (Philadelphia, PA)
Access Code / Meeting ID: 975943490
Dial-in password: 9699956342

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

A Seção V (B) do Contrato de Mudança para Trabalho da Autoridade {o "Contrato") exige que, antes que a Agência possa apresentar seu Plano Anual de Mudança para Trabalho e Relatório Aprovado para o Departamento de Habitação e Desenvolvimento Urbano dos EUA (o "HUD"), que deve conduzir uma audiência pública, considerar os comentários do público sobre as emendas propostas, obter a aprovação do Conselho de Comissários e submeter as emendas ao HUD.

Cópias do relatório Moving to Work (MTW) FY2022 serão disponibilizadas na terça-feira, 1º de novembro de 2022, no site da agência www.elmcitycommunities.org ou via Twitter, www.twitter.com/ECCommunities ou via Facebook www.facebook.com/ElmCityCommunities.

Você está convidado a fornecer comentários por escrito endereçados a: ECC/HANH, Moving to Work FY2022 Annual Report, Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 ou via e-mail para: eribeiro@elmcitycommunities.org.

De acordo com a referida Seção V (B), uma audiência pública onde os comentários públicos serão aceitos e registrados está agendada para terça-feira, 29 de novembro de 2022, às 15h, via RingCentral: https://v.ringcentral.com/join/975943490? pw=2e34ff6769797e68e96a95bb953d0d81

ID da reunião: 975943490
Senha: yozWY5m3ib

Ou disque:

+12679304000 Estados Unidos (Filadélfia, PA)
Código de acesso/ID da reunião: 975943490

Senha de discagem: 9699956342

Qualquer indivíduo que necessite de uma Acomodação Razoável para participar da audiência pode ligar para o Gerente de Acomodação Razoável (203) 498-8800, ramal. 1507 ou no TDD Número (203) 497-8434.

At 3:03 p.m., the meeting was opened to take public comments.
There was a second call for public comments at 3:06pm.
There was a third call for public comments 3:07pm.
There was a fourth call for public comments at 3:10pm.

There was a fifth and final call for public comments at 3:15pm.
There was a sixth call for public comments.

Public Comments:

No Public comments

Adjournment:

Ms. Ribeiro stated the attendees' names for the record.
She then thanked the participants, and the public hearing was adjourned at 3:16 p.m.

Board Resolution

MEMORANDUM

TO:	**Board of Commissioners**
DATE:	**December 20, 2022**
FROM:	**Karen DuBois-Walton, Ph.D., President**
RE:	**Resolution Authorizing Approval Of Moving To Work (MTW) Annual Report For FY 2022**

ACTION:	Recommend that the Board of Commissioners adopt Resolution #12-78/22-R
TIMING:	Immediately
DISCUSSION:	ECC/HANH is requesting authorization to submit the FY2022 Moving to Work Report to the U.S Department of Housing and Urban Development (HUD). The Report was made available for Public Review and Comment for a period of 30 days, starting on November 1, 2022, to November 30, 2022, and a public hearing was held on November 29, 2022, at ECC/HANH. No public comments were received. Attached is a copy of ECC/HANH's MTW FY2022 annual report. This resolution requests the Board's authorization to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Report for FY2022 with all required and related certifications and documents.
STAFF:	Evelise Ribeiro, Director of Compliance and Moving to Work Initiatives

MTW Report Resolution FY2022

ELM CITY COMMUNITIES
Housing Authority of the City of New Haven

RESOLUTION #12-78/22-R

Resolution Authorizing Approval Of Moving To Work (MTW) Annual Report For FY 2022

WHEREAS, ECC/HANH is requesting authorization to submit the FY2022 Moving to Work Report to the U.S Department of Housing and Urban Development (HUD); and

WHEREAS, The MTW report lists progress and challenges in achieving the objectives established in the FY2022 Annual Moving to Work Plan and is a combination of metrics, stories, hard work and commitment of the services provided by staff throughout the agency and the many successes of the residents and families who have participated in these programs; and

WHEREAS, The Report was made available for Public Review and Comment for a period of 30 days, starting on November 1, 2022, to November 30, 2022, and a public hearing was held on November 29, 2022, at ECC/HANH. no public comments were received. Attached is a copy of ECC/HANH's MTW FY22 annual report; and

WHEREAS, this resolution requests the Board's approval to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Report for FY2022, and all required and related certifications, documents and HUD forms.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN that the Board authorizes the President to take such actions and execute such documents as necessary to finalize and submit to the U.S. Department of Housing and Urban Development ECC/HANH's MTW Annual Report for Fiscal Year 2022, including all required certifications, documentation, and HUD forms, of which this Board Resolution is a part.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on December 20, 2022.

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

12/20/2022
Date

REVIEWED:
MCCARTER & ENGLISH, LLP
GENERAL COUNSEL

By: ______________________
Rolan Joni Young, Esq.
A Partner

MTW CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/01/2021), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

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

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

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

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

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

Housing Authority of the City 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).

William Kilpatrick
NAME OF AUTHORIZED OFFICIAL

Chairman
TITLE

William Kilpatrick
SIGNATURE

12/20/22
DATE

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

Appendix 2: Alternative TDC and HCC Limits

ECC/HANH's local total development cost (TDC) limits as approved by HUD.
The following pages detail ECC/HANH's Alternate TDCs.

HUD HCC 2013							
	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	$ 96,195	$ 122,916	$ 144,239	$ 170,801	$ 200,549	$ 219,593	$ 237,542
Row House	$ 78,165	$ 102,750	$ 121,542	$ 148,120	$ 176,091	$ 194,147	$ 211,074
Walk Up	$ 71,663	$ 97,219	$ 123,709	$ 161,949	$ 201,180	$ 226,579	$ 251,643
Elevator	$ 81,545	$ 114,163	$ 146,781	$ 195,708	$ 244,635	$ 277,253	$ 309,871

HUD HCC FACTORS							
	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	-33.31%	-14.78%	16.60%	18.42%	39.04%	52.24%	64.69%
Row House	-35.69%	-15.46%	-1.75%	21.87%	44.88%	59.74%	73.66%
Walk Up	-42.07%	-21.41%	0.00%	30.91%	62.62%	83.16%	103.42%
Elevator	-44.44%	-22.22%	0%	33.33%	66.67%	88.89%	111.11%

ECC/HANH HCC 2013							
	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	$ 145,318	$ 185,685	$ 217,896	$ 258,023	$ 302,962	$ 331,731	$ 358,846
Row House	$ 118,081	$ 155,221	$ 183,609	$ 223,759	$ 266,014	$ 293,290	$ 318,861
Walk Up	$ 108,259	$ 146,866	$ 186,882	$ 244,651	$ 303,915	$ 342,285	$ 380,149
Elevator	$ 109,828	$ 153,759	$ 197,690	$ 263,587	$ 329,483	$ 373,414	$ 417,346

HUD TDC 2013							
	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	$ 168,342	$ 215,103	$ 252,419	$ 298,901	$ 350,961	$ 384,288	$ 415,699
Row House	$ 136,788	$ 179,813	$ 212,699	$ 259,210	$ 308,159	$ 339,757	$ 369,380
Walk Up	$ 125,410	$ 170,134	$ 216,490	$ 283,411	$ 352,064	$ 396,513	$ 440,376
Elevator	$ 130,472	$ 182,661	$ 234,850	$ 313,133	$ 391,416	$ 443,605	$ 495,794

ECC/HANH TDC 2013							
	0	**1**	**2**	**3**	**4**	**5**	**6**

Detached	$228,357	$291,790	$342,408	$405,464	$476,083	$521,291	$563,900
Row House	$185,556	$243,918	$288,528	$351,622	$418,022	$460,885	$501,068
Walk Up	$170,121	$230,789	$293,673	$384,452	$477,581	$537,877	$597,377
Elevator	$178,470	$249,858	$321,246	$428,328	$535,410	$606,798	$678,186

PERCENT CHANGE ECC/HANH TDC 2008-2013

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

RECENT CHANGE COMPARISON HUD TO ECC/HANH TDC

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

ECC/HANH HCC 2022

	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	121,190	157,040	187,528	223,311	262,697	287,968	312,337
Row House	97,635	125,759	152,092	185,624	219,976	242,265	263,053
Walk Up	93,735,	126,547	160,381	211,534	262,255	295,587	328,536
Elevator	98,169	137,437	176,704	235,606	294,507	333,775	373,042

ECC/HANH TDC 2022

	0	**1**	**2**	**3**	**4**	**5**	**6**
Detached	212,082	274,821	328,175	390,793	459,720	503,944	546,589
Row House	168,330	220,078	266,161	324,843	384,958	423,964	460,344
Walk Up	162,165	221,457	280,667	370,185	458,945	517,278	574,938
Elevator	157,071	219,899	282,727	376,969	471,212	534,040	596,868

Appendix 3: Local Asset Based Management

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

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

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

Appendix 4: ECC/HANH MTW Evaluation

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

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

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

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

The evaluation provided the following recommendations:

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

ECC/HANH has been working toward these recommendations. In 2016, the agency contracted with Enterprise Community Partners to position the agency for future evaluation of its MTW program and each of its initiatives. Enterprise has completed its three-year contract to complete ECC/HANH's MTW Plans and Reports each year and has coordinated with ECC/HANH's data collection software provider for optimal data collection. Enterprise has provided data collection recommendations to ensure ECC/HANH is collecting data for metrics to support proper reporting and to support a future evaluation.

Enterprise Community Partners found the following:

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

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

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

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

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

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

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

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

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

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE PUBLIC HOUSING PROGRAM

Public Housing Program Rent Simplification

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

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

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

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

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

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

Transition to Avoid Hardships
ECC/HANH has devised a system that is not only revenue neutral for the organization but will not result in any undue hardship to our families. There will be a transition period of one year from the current income-based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy.

Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification

Asset Exclusion

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

Earned Income Disallowance (EID)

This benefit is embedded into the Rent Simplification rule so the provision of EID, of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit; however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. The maximum amount of time a family can be enrolled in the Federal EID is 24 months with a start/stop clock of 48 months. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/triennial certification comes up. In many cases the 48-month window will not be used as most families will receive the Rent Simplification benefit throughout the life of the EID; for the most part eliminating the need to stop or re-start the EID clock.

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

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

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

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

Other Exclusions

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

Annualized Income Calculation

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

Annual Reexaminations

Reexaminations are currently conducted every year for non-elderly households and every two years for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. ECC/HANH must perform more than 3,200 LIPH reexaminations every year. This is inordinately time consuming and an exceedingly complex process. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all their increased earnings between annual reexaminations. CSSR requirements will be reviewed at time of bi-tri certification for families and individuals who are not exempt and required to complete the required 96 hours per year. Household members exempt from having to meet the CSSR will be required to certify exemption at time of bi-tri certification. This change relieves staff of the additional burden of annual tracking and allowing families to benefit from the full extent of Rent Simplification as written. Tracking in Elite will only occur at time of bi/tri certifications

Effective FY15 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn't meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).

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

Deductions for Exceptional Expenses

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

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

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

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

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

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

Changes in Family Composition

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

Mandatory Interim Reexaminations Policy

- Residents must request an interim reexamination if any of the following conditions occur:
- Change in family composition that affects the voucher size or bedroom size.
- The addition of a family member 18 years of age or older

- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.
- Addition of a live-in aid
- Income increase following an interim rent reduction

If ECC/HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to ECC/HANH.

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

Decrease in family income that is expected to last 90 days or more if it will result in a change in the family's income tier (exclude seasonal workers; see below)

Increase in Exceptional Expenses of at least $2,000.00

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

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

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

If families are not yet back to work or the change is permanent, they must report the change to ECC/HANH as soon as they are aware so that the second interim may be cancelled or adjusted. This change does not cancel or supersede the current interim change rule where families are not required to report a new income or increase in income if the previous decrease was associated with an annual certification. In other words, Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed.

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

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

Verification of Annual Income from Wages and Salaries and Assets
To reduce the administrative burden associated with the verification of income ECC/HANH has amended its Admission and Continued Occupancy (ACOP) to specify that:

For earnings from wages and salaries where Annual Income for the prior period of up to and including $5,000.00, self-certification from family is all that shall be required as verification of income.

For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third-party source of Upfront Income Verification.

Self-certification of all sources of Annual Income shall be required in all cases.

For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands
Rents are based on $1,000.00 income bands starting at $2,500.00. Using a band-based rent schedule allows the ECC/HANH and residents to move away from verifying every dollar earned and deducted. (See Exhibit A)

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

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

Families with annual income below $2,500.00 will pay a minimum rent of $50.00. In no event shall any family pay less than 25 percent of its Annual Income for TTP.
All residents at a rent of $50.00, except for the elderly and persons with disabilities, are referred to the Family Self Sufficiency (FSS) Program for job or benefit counseling. Families may still choose the existing Flat Rent option for public housing. The Flat Rent option certification form will only be signed at time of bi-tri certification; however, families will have the opportunity to switch to the Flat rent once a year. Annual notice will go out to families, but signature will not be required except for at time of scheduled bi/tri certification. This change is in line with efforts to streamline the certification process; relieving staff of the additional burden and allowing families to benefit from the full extent of Rent Simplification as written.
Zero Income Households

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

All families placed on minimum rent except for elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.
All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.
All families who apply for such hardship exemption, apart from elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency.

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

Criteria for Hardship Exemption from Minimum Rent Requirement

- A family is automatically exempt from the minimum rent requirements for a 90-day period when the family's circumstances fall into any one of the following criteria:
- When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program.
- When the family would be evicted because it is unable to pay the minimum rent.
- When the income of the family has decreased because of changed circumstances, including loss of employment.
- When a death in the family has occurred; or
- Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

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

- A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.
- A long-term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

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

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

Hardship Review Committee

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

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

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

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

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

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

- that ECC/HANH has received an Application for Exemption from Minimum Rent,
- that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90-day suspension,
- that there can be no eviction for non-payment of rent during the suspension period.
- the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and
- that, except for elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

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

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

If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days),*** the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.
ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation about this requirement.
Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one-year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

If the ***hardship is determined to be non-existent,*** the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.
Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

If the hardship exemption is determined to be temporary:

- that a temporary hardship exemption was granted.
- the effective dates of the exemption.
- the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and
- that the resident has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

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

- that a long-term hardship exemption was granted.
- whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place.
- that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and
- that the resident must notify ECC/HANH within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.

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

If the hardship is determined to be non-existent:

- that a hardship exemption was denied.
- the reason for such determination; and
- the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

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

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

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

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

Rent Simplification Implementation - Public Housing

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

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

Initially in fiscal year 2008, all families will be re-examined during the first year.

In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.

In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.

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

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

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

$27,500	$28,499	$653				
$28,500	$29,499	$677				
$29,500	$30,499	$701				
$30,500	$31,499	$724				
$31,500	$32,499	$748				
$32,500	$33,499	$772				
$33,500	$34,499	$796				
$34,500	$35,499	$819				
$35,500	$36,499	$843				

Hardship Waiver Policy and Guidelines

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

All families placed on minimum rent except for elderly and disabled families will be referred to the Family Self Sufficiency Program.

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

1. Criteria for Hardship Exemption from Minimum Rent Requirement

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

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

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

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

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

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

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

2. Initiation of Hardship Exemption Review

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

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

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

3. Notification of the Right to a Hardship Exemption

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

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

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

4. Hardship Review Committee

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

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

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

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

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

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

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

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

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

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

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

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

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

If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days),*** the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.
ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement, if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation with regard to this requirement. Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one-year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

If the ***hardship is determined to be non-existent,*** the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.
Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

If the hardship exemption is determined to be temporary:

That a temporary hardship exemption was granted;

the effective dates of the exemption;

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

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

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

that a long-term hardship exemption was granted;

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

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

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

If the hardship is determined to be non-existent:

that a hardship exemption was denied;

the reason for such determination; and

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

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

7. Termination of Long-Term Exemptions

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

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

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

PUBLIC HOUSING RENT SIMPLIFICATION SUMMARY
EXCEPTIONS TO LIPH REGULATIONS

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Annual Income	24 CFR Part 5.609(a)(4) 5.609(c)(8)(x 11	Any income derived from an asset to which any member of the family has access Adoption assistance payments for any child in excess of $480.00 received.	Excludes asset from the determination of annual income to the extent the amount does not exceed $50,000. All income earned by fulltime student will be excluded who is over18. Students who are HOH or spouse are not excluded. All income earned by a family from adoption assistance will be excluded.
Income Exclusion for Person Enrolled in FSS Program	24 CFR Part 5.609(b)(1)	Incremental earnings and benefits resulting in any family member from participation in a qualifying **State or local employment training** programs (including training programs not affiliated with a local government) and training of a family member as resident management staff.	Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member during the first year of FSS program participation, 75% in 2nd year, 50% in 3rd year, 25% in 4th year and 0% in 5th year, as long as the household is enrolled in the FSS Program. This will not exceed 5 years. A family's eligibility to receive this optional income disallowance is limited to a total of 48 months. In addition, for families that qualify and receive the federal EID, the total number of months that a family may receive the optional income disallowance provided for under this subparagraph and under the Federal Earned Income Disregard (EID) may not exceed 48 months. In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving the federal EID as set forth in 24 CFR Part 5.617. Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying **federal** program, whether or not the member is enrolled in the FSS program

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Business Income for Resident Owned Businesses	24 CFR Part 5.609(b)(2)	The net income from the operation of a business or profession is included in determining annual income.	Exclude 100 Percent of any net income derived from the operation of a businesses; provided the business qualifies as **a resident owned business** under 24 CFR Part 963.5. During the first year of enrollment in FSS program 100 percent; 75 percent in the second year; 50 percent in the third year; 25 percent in the fourth year; 0 percent exclusion thereafter.
Earned Income Disallowance	24 CFR Part 960.255	Incremental income earned by a family member, provided the increase in income is the result (1) of employment of a family member was previously unemployed for one or more years prior to employment; (2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families	The Federal EID benefit is embedded into the Rent Simplification rule so the provision of EID by definition of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit, however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. The maximum amount of time a family can be enrolled in the Federal EID is 24 months with a start/stop clock of 48 months. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/tri annual certification comes up. Families who do already receive the benefit of no increase in rent with higher wages under the Rent Simplification rule will be tracked in Elite under EID at time of Bi-Tri annual certifications.
Mandatory Deductions	24 CFR Part 5.611	(1) $480 for each dependent; (2) $400 for any elderly family or disabled family; (3) The sum of the following to the extent the sum exceeds three percent of annual income: (I) Un-reimbursed medical	Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.	
Additional (Exception) Expenses Deductions	24 CFR 5.611	A PHA may adopt additional deductions from annual income. ECC/HANH had none	Families with verifiable deductions in excess of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must exceed $2,000 and shall be the sum of (1) Mandatory Deductions determined in accordance with Section 5.611 (2), plus non-reimbursed utility expenses (except telephone and cable)
Total Tenant Payment	24 CFR 5.628	(a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by	The Total Tenant Payment (TTP) will be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
		such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent, as determined in accordance with Sec. 5.630.	
Hardship Provision for Exceptional Expenses	24 CFR 5.611(2))	A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.	A family may be exempt from minimum rent as follows; When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program, including a family that includes a member who is a non-citizen When the family would be evicted because it is unable to pay the minimum rent When the income of the family has decreased because of changed circumstances, including loss of employment. Family whose shelter expenses, plus un-reimbursed medical, childcare and disability expenses exceed 40 percent of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek a deduction in rent for exceptional expenses.
Minimum Rent	24 CFR 5.630	A family may be exempt from minimum rent of $50.00 as follows: (I) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances; (iv) a death has occurred in the family's household; (v) any other circumstances to be considered by the PHA to be reason to waive the minimum rent requirement.	A family may only receive one hardship exemption from the minimum rent requirement during a twelve-month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve-month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy for Public Housing Program
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No. Change. ECC/HANH will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughey Terrace and all Scattered Site properties.
Annual Reexamination of Income and Family Composition	24 CFR 960 Part 257	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of income will occur every three years for Elderly and Disabled families and every two years for all other families. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually. Additionally, the Community Service requirement will be reviewed annually for all household members who are not disabled, working less than 20 hours per week or enrolled in classes under the FSS program.
Interim Reexamination	24 CFR 960 Part 257	A family may request an interim reexamination of family income because of any changes since the last examination. The owner must make the interim reexamination within a reasonable time after the family request. Currently, family must report any change in income that amounts to $200 or more a month.	A family can request only three interim re-examinations each 12 months with the exceptions of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled or a family enrolled in FSS may make **one** request for an **interim** for a hardship exemption each 12 months.
Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000	24 CFR 5.659	The owner must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available :(1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.	Only a self-certification will be required for income up to and including $5,000.00. For income above $5,000.00 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV. Asset exclusion is raised to $50,000.00 and only self-certification will be required.

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

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE SECTION 8 MTW VOUCHER PROGRAM

Housing Choice Voucher Program Rent Simplification

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

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

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

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

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

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

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

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

Asset Exclusion

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

Earned Income Disallowance

The Earned Income Disallowance (EID) under Sec. 5.617 for all HCV participants EID is eliminated.

Other Exclusions

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

Annualized Income Calculation

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

Annual Reexaminations

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

Effective FY15 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn't meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).
ECC/HANH believes this new definition more closely matches the spirit of a "work-able" family since all work-able families would have at least one work-able adult. Under the prior definition, an elderly/disabled family only needed a head, co-head, or spouse to be elderly or disabled which led to some families with work-able adults being categories as elderly/disabled. This change will also give ECC/HANH the ability to better track earnings and employment for work-able families; and the better population division will give ECC/HANH the flexibility to implement work-able specific rent policy changes in the future if it so chooses.

Deductions for Exceptional Expenses

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

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

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

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

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

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

Changes in Family Composition

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

Mandatory Interim Reexaminations Policy

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

Change in family composition that affects the voucher size or bedroom size.

The addition of a family member 18 years of age or older

Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.

Addition of a live-in aid

Income increase following an interim rent reduction

If ECC/HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to ECC/HANH.

Optional Interim Reexaminations Policy

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

Decrease in family income that is expected to last 90 days or more if it will result in a change in the family's income tier (exclude seasonal workers; see below)

Increase in Exceptional Expenses of at least $2,000.00

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

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

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

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

Verification of Annual Income from Wages and Salaries and Assets

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

For earnings from wages and salaries where Annual Income for the prior period of up to and including $5,000.00, self-certification from family is all that shall be required as verification of income.

For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third-party source of Upfront Income Verification.

Self-certification of all sources of Annual Income shall be required in all cases.

For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands

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

On 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 at or exceed of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must equal or exceed $2,000 and shall be the sum of: Mandatory Deductions determined in accordance with Section 5.611 (a), plus non-reimbursed utility expenses (except telephone).
Total Tenant Payment	24 CFR 5.628	Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (a) 30 percent of the family's monthly adjusted income; (b) 10 percent of the family's monthly income; (c) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (d) The minimum rent, as determined in accordance with Sec. 5.630.	TTP to be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually re

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
Hardship Provision	24 CFR 5.630(b)	A family may be exempt from minimum rent as follows: (i) When the family has lost eligibility or is waiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances, including loss of employment.	A family whose shelter expenses, plus un-reimbursed medical, childcare and disability expenses exceed 40 % of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek hardship.
Minimum Rent	24 CFR 5.630	$25.00 for HCV. $50.00 for LIPH	HCV increased from $25.00 a month to $50.00 a month so that LIPH and HCV have same minimum rent amount.
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No change. Tenant paid utilities to be deducted from TTP to determine tenant rent.
Medical Deductions	24 CFR 5.611(c)		No longer applicable unless they exceed applicable threshold.
Annual Reexamination of Income and Family Composition	24 CFR 982.516	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of family income will occur every three years for Elderly or Disabled families and every two years for all other families, instead of every year. Reexamination of family composition will only occur if a family notifies ECC/HANH of a change in family composition since this will affect the determination of appropriate size unit. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually.

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
Interim Reexamination	24 CFR 982.516	A family may request an interim reexamination of family income for any changes since the last annual reexamination. ECC/HANH must conduct the interim reexamination within a reasonable time period after the family request. Currently, family must report any change in income that exceeds $200 or more a month.	A family may request a maximum of three interim re-examinations within a 12-month period, with the exception of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled, may only make one request for an interim for a hardship exemption each 12 months, unless one (1) household member is enrolled in the FSS program.
Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000	24 CFR 5.659	ECC/HANH must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available: (1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.	Only a self-certification will be required for income up to and including $5,000. For income above $5,000 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV.
Determination of Tenant Total Payment (TTP)	24 CFR 5.628	Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) if the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the	TTP based upon income-tiered approach. No family shall be subject to an increase in TTP greater than $25.00 a month during the second year family is of the Rent Simplification Policy. The increase in TTP during the third year of the Rent Simplification Policy shall not exceed $50 a month. The increase in TTP during the fourth year of the Rent

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
		portion of those payments which is so designated; or (4) The minimum rent	Simplification Policy shall not $75 a month. The increase in TTP during the fifth year shall not exceed $100 a month above the monthly TTP in the year immediately preceding the implementation of Rent Simplification Policy. These limitations on rent increase shall only apply to increases in TTP that result from the implementation of the Rent Simplification Policy and not rent increases that result from changes in family composition or changes in family income.
Annual Inspections	24 CFR Part 982.405(a)	ECC/HANH must inspect each unit annually during Section 8 assisted occupancy. 24 CFRP Part 982.405 (a) states that : The PHA must inspect the unit leased to a family prior to the initial term of the lease, at least annually during assisted occupancy, and at other times as needed, to determine if the unit meets the HQS. (See §982.305(b)(2) concerning timing of initial inspection by the PHA.)	ECC/HANH will no longer inspect every unit every year, but will instead inspect units every two years, unless the first unit inspection conducted after the implementation of the Rent Simplification Policy shows that the unit; (1) failed an inspection, or (2) the unit had a failed inspection in the three
			years prior to the implementation of the Rent Simplification Policy. A unit must have three consecutive years without a failed inspection to qualify for the bi-annual inspection. Units for which landlords are requesting increases in HAP payment will also be inspected prior to

Topic	Exceptions to HCV Program Regulations	Current Policy	Alternative MTW Policy for Housing Choice Voucher Program
			ECC/HANH granting any such increase.
Waiver of SEMAP Indicator	24 CFR Part 985.3(c).		Determination of Adjusted Income. Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000 is the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required by HUD.
Waiver of SEMAP Indicator	24 CFR Part 985.3(m)		Annual HQS Inspections. This indicator shows whether the PHA inspects each unit under contract at least annually. CFR 982.405(a). ECC/HANH will no longer inspect every unit every year, but will instead inspect a unit every two years unless the unit's inspection history indicates a need for an annual inspection as set forth above.
Waiver of SEMAP Indicator	24 CFR Part 985.3 (n)		Lease-Up. This indicator shows

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

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

Appendix 7: Actual Capital Expenses and Portfolio Capital Needs

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

Description	Capital Expenditures Planned FY 2022	Capital Expenditures 09-30-22	CFP Total	MTW Total	Other Total (Insurance)	Total Estimated Project Cost	Comments
Crawford Health & Safety: Accessible Vestibule & Fire Pump; Fire Alarm, Interior & Exterior Health & Safety Work Items	$828,442	$250,233.29	$50,930.00	$199,303.29	$0	$2,216,674	In FY 2021, ECC undertook building assessment to set health & safety priorities. Accessible entrance & fire pump project initiated as 1st phase since it did not require entrance into resident units during COVID. Contract continued into FY 2022. Phase 2 including fire alarm system upgrade and work requiring apartment access bid fall 2021. Responses over budget; no award. Re-bid issued Feb. 2022. Contract awarded for implementation in FY 2022-23. Relocation costs included.
Scattered Sites EAST & WEST: Replacement of Heating & Domestic Hot Water systems	$0	$12,933.97	$12,933.97	$0	$0	$500,000	Replace antiquated inefficient oil-fired furnaces & boilers with gas-fired systems in 1-2 family homes saving utility cost, operations time and inconvenience of running out of fuel; Replace antiquated gas systems with energy efficient new gas fired systems; Replace electric heat-hot water systems with energy efficient systems. Project designed during FY 2019. Bids rejected; Project re-bid and awarded during FY 2021. Work began April 2021. Substantial completion August 2021: 17 units in 13 properties. Final payment made in FY 2022. Includes separate gas co. cost to install gas service at 8-10 Terrace. Anticipated outcome: energy savings; improved resident comfort.
Wolfe Health-Safety Work: Interior-Exterior Upgrade	$480,000	$1,774,865.59	$1,485,639.64	$289,225.95	$0	$2,310,283	Began with health & safety work and common areas upgrade only in FY 2021 due to COVID. In FY 2022, moved forward with interior building repairs in resident units as Phase 2 and completion of Phase 1 common areas. Includes associated temporary resident relocation costs. Phase 2 to be completed in FY 2023.

Essex Health-Safety Work: Interior/Exterior Upgrade	$879,500	$705,560.30	$375,075.73	$330,484.57	$0	$3,056,025	Due to COVID, began with rear patio fence separations & basement asbestos abatement in FY 2021. In FY 2022, moved forward with exterior envelope (roof, gutters, siding, windows, AC sleeves) & interior building repairs. Work to continue into FY 2023.
McConaughy Health-Safety Interior/Exterior Building Upgrades	$100,000	$0	$0	$0	$0	$100,000	In FY 2021, Glendower Group awarded 9% (& 4%) tax credits for major redevelopment at McConaughy. No funds for health-safety work, including lead interim control measures, that might be needed prior to RAD conversion were expended.
Scattered Sites West Interior/Building/Site Upgrades	$75,000	$0	$0	$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. No funds expended in FY 2022.
Scattered Sites East Interior/Building/Site Upgrades	$75,000	$0	$0	$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. No funds expended in FY 2022.
Scattered Sites Multifamily Interior/Building/Site Upgrades	$75,000	$116,411.55	$76,166.55	$0	$40,245	$5,000,000	Was non-RAD conversion development. CHAP issued Dec. 2021. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs. Pre-CHAP contract included 425B Eastern St. fire damaged unit repairs.
Continuation of Lead-Based Paint Abatement at SS West, SS East (CFP & LBP Grant)	$1,500,000	$161,825	$161,825	$0	$0	$4,700,000	Continue lead paint abatement & related repairs were identified by inspection-risk assessments. Work initiated in FY 2021 & continuing into FY 2022 & 2023. in FY 2022, completed final 5 of 17 SS West units. Further unit abatement costs anticipated to exceed lead paint grant award & be funded through non-lead CFP; new lead abatement grant awarded May 2021. Bid documents organized into 4 groupings. Solicitations awarded July 2022 for 2 groups for implementation in FY 2023. Third solicitation bids received under review. Fourth solicitation to be advertised in FY 2023.

Housing-Related Hazards	$0	$116,519.80	$116,519.80	$0.00	$0	$3,999,993	Housing-related hazards grant awarded Sept. 2021. Completed mold testing & abatement in 2 SS East units. Surveyed 93 Wolfe units for pests. Surveyed 15th & 14th floors at Crawford for pests. Tested 59 properties (Crawford, Wolfe, Essex, Chmb Ct, SSWest, SSEast) for radon. Aug. 2022, awarded radon mitigation contract for 1 SS East unit and 6 SS West units (under CFP non-grant radon mitigation for 3 units at Kingswood & 6 units at Fulton Turnkey). Carbon monoxide-smoke detector evaluation in progress.
Agency Wide Vacancy Reduction/Unit Abatement	$100,000	$136,213.10	$136,213.10	$0	$0	$200,000	Funds were allocated for abatement costs and vacancy reduction efforts that might occur during FY 2022. Completed vacancies 6 units at Westville; 10 units at McConaughy; 2 units at Essex; 6 units at Wolfe; 6 units at Crawford; 4 units at SS Multi; 4 units at SS East; abated 3 units at SS East; 1 unit at SS Multi; 1 unit at McConaughy; 2 units at Westville; 3 units at Essex; 1 unit at Valley; 1 unit at Crawford;
Physical Needs Assessment	$100,000	$87,594.00	$87,594.00	$0	$0	$300,000	Continued & completed agency wide physical needs assessments initiated in FY 2021.
McQueeney Front Plaza Repairs	$0	$25,112.00	$0.00	$25,112	$0	$25,112	Corrected tripping hazards and in so doing, provided an expanded unified look to the building plaza
IQC A&E	$200,000	$272,672.33	$272,672.33	$0	$0	$500,000	A&E consultant firms assist with design & construction management needs agency wide.
IQC Environmental	$200,000	$319,852.61	$319,852.61	$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)	$328,165	$350,379.45	$350,379.45	$0	$0	$328,165	Covers portion of 3 staff salaries & benefits to support CFP activities.
CFFP Bond Debt	$355,362.50	$355,362.50	$355,362.50	$0	$0	$355,362.50	Post defeasance bond debt FY 2022 in accordance with HUD repayment schedule. Payments were made in March and September.
Total	**$5,296,469.50**	**$4,685,535.49**	**$3,801,164.68**	**$844,126**	**$40,245**	**$29,091,615**	

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

Development	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009
Brookside Phase I*	99	n/a	n/a	n/a	n/a	95	n/a	92	n/a	n/a	n/a	n/a	n/a	n/a
Brookside Phase II*	99	n/a	n/a	n/a	n/a	91	n/a	95	n/a	n/a	n/a	n/a	n/a	n/a
Constance Motley**	72	85	n/a	93	n/a	n/a	n/a	90	n/a	n/a	n/a	n/a	n/a	n/a
Crawford Manor*	60	n/a	n/a	n/a	n/a	78	69	n/a	n/a	88	n/a	n/a	n/a	n/a
Edith D Johnson Towers**	n/a	n/a	n/a	n/a	n/a	n/a	n/a	95	n/a	n/a	n/a	n/a	n/a	n/a
Eastview Terrace**	86	46	n/a	n/a	59	57	n/a	n/a	n/a	n/a	95	n/a	n/a	n/a
Farnam Courts***	n/a	n/a	n/a	n/a	36	n/a	56	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Katherine Harvey Terrace**	96	71	n/a	73	n/a	86	n/a	n/a	95	n/a	n/a	n/a	n/a	n/a
McConaughy Terrace*	38	n/a	n/a	n/a	n/a	n/a	85	n/a	n/a	n/a	82	78	58	70
McQueeney**	62	69	n/a	n/a	n/a	63	70	n/a	n/a	n/a	64	59	85	54
Monterey 1***	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	96	n/a	n/a	n/a	n/a	n/a
Monterey 2***	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	92	n/a	n/a	n/a	n/a	n/a
Monterey 4***	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	92	n/a	n/a	n/a	n/a	n/a
Monterey 5***	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	91	n/a	n/a	n/a	n/a	n/a
Newhall Gardens**	83	n/a	93	n/a	n/a	n/a	96	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Prescott Bush Mall**	98	78	86	n/a	n/a	n/a	n/a	97	n/a	n/a	n/a	n/a	n/a	n/a
Quinnipiac Terrace Phase I*	84	n/a	n/a	n/a	n/a	82	n/a	88	n/a	98	89	n/a	n/a	n/a
Quinnipiac Terrace Phase II*	82	n/a	n/a	n/a	n/a	93	n/a	85	n/a	n/a	n/a	n/a	n/a	n/a

Quinnipiac Terrace Phase III*	**83**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**85**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**
Ribicoff Cottages - EXT (Twin Brook)**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**82**	**82**	**68**	**91**
Robert T Wolfe*	**47**	**n/a**	**n/a**	**n/a**	**n/a**	**71**	**n/a**	**85**			**82**	**49**	**80**	**51**
Rockview Phase I*	**98**	**n/a**	**n/a**	**n/a**	**n/a**	**97**	**n/a**	**96**						
Ruoppolo/Fairmont**	n/a	**n/a**	**61**	**n/a**	**n/a**	**n/a**	**87**	**n/a**	**n/a**	**86**	**79**	**65**	**61**	**56**
St. Anthony II*	**34**	**n/a**	**n/a**	**n/a**	**n/a**	**58**	**n/a**							
Val Macri*	**73**	**n/a**	**n/a**	**n/a**	**n/a**		**n/a**	**94**						
Waverly Townhouses**	**89**	**73**	**n/a**	**n/a**	**n/a**	**65**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**
Westville Manor*	**44**	**n/a**	**n/a**	**n/a**	**n/a**	**58**	**n/a**				**47**	**51**	**35**	**90**
Wilmot Crossing**	**87**	**84**	**69**	**n/a**	**70**	**70**	**n/a**	**n/a**	**93**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**
Winslow-Celentano**	**92**	**86**	**70**	**n/a**	**n/a**	**58**	**70**	**n/a**	**n/a**	**84**	**71**	**74**	**72**	**53**
WT Rowe*	**86**		**n/a**	**n/a**	**n/a**	**90**	**n/a**	**99**						
Scattered Sites II*	**64**	**n/a**	**n/a**	**n/a**	**n/a**	**80**	**n/a**							
Scattered Sites III*	**46**	**n/a**	**n/a**	**n/a**	**58**	**67**	**61**							

*Scores are based on REAC Inspections.

** Scores are based on USIG inspections

*** N/A

Appendix 9: Work Orders, FY09 to Present

Development	FY2022 Completed Work Orders	FY2021 Completed FY2021 Repairs Only	FY2020 - Completed FY 2020 - Repairs Only	FY 2019	FY 2018	FY 2017	FY 2016	Other Years
Brookside Phase I	368	274	369	494	No data	No data	461	
Brookside Phase II	379	287	226	440	No data	No data	472	2013: 1,311
Rockview I	265	308	200	274	No data	N/A	N/A	2014: 1,562
Charles T. McQueeney	757	527	938	1113	769	1,008	1,312	N/A
Constance B Motley	233	63	123	97	197	609	573	N/A
Crawford	1172	412	372	768	907	1,461	No data	N/A
Eastview Terrace	240	137	169	62	951	1,323	625	N/A
Essex Townhouses	716	239	167	156		220	190	N/A
Fairhaven Chatham	325	97	71	25	238	92	No data	N/A
Fairhaven Eastview	325	46	28	14	176	129	No data	N/A
Fairmont Heights	457	134	385	770	588	756	1024	N/A
Farnam Courts Mill River	186		0	94	298	607	1002	N/A
Katherine Harvey Terrace	203	63	69	43	111	172	132	N/A
Mathew Ruoppolo	358	135	319	504	440	535	607	N/A
McConaughy Terrace	2423	1092	1122	1369	1512	2,981	1,612	N/A
Newhall Gardens	152	69	128	81	106	312	360	N/A
Prescott Bush	311	152	235	165	165	734	464	N/A
Quinnipiac I	627	455	494	488	594	526	531	2013: 204
Quinnipiac II	514	498	415	481	660	566	608	2013: 273
Quinnipiac III	259	192	181	238	234	252	277	2013: 289
Ribicoff 4% & 9%	523	223	594	705	1222	404	122	N/A
Robert T. Wolfe	1017		399	516	336	978	465	N/A
Scattered Sites (All)	952	956	926	541	1348	1,586	990	N/A
St Anthony	255	No data	No data	175	No data	52	No data	N/A
Valley	544	112	126	534	775	1,339	1,470	N/A
Waverly	238		167		No data	No data	No data	N/A
Westville	1531	381	745	563	710	961	1,206	N/A
Wilmot	274	226	444	1199	1346	338	175	N/A
William T. Rowe	371	451	500	485	549	464	307	N/A
Winslow Celentano	440	175	403	341	649	933	765	N/A

Appendix 10: Utility Consumption, FY16 to Present

Electricity Consumption: Electricity Utility Costs Per Unit Per Month

Electricity

DEVELOPMENT	FY 2022	FY 2021	FY2020	FY2019	FY 2017	FY 2016
EASTVIEW I	$23.46	$ 31.53	$ 56.02	$ 25.71	$ 68.97	$ 75.07
FAIR HAVEN	$157.84	$144.14	$ 263.92	$ 111.83	$124.57	No data
QUINNIPIAC	No data	$ 232.04	$43.95	$80.00	No data	No data
RIBICOFF 4%	$169.39	$208.62	$ 180.70	$ 137.43	$ 159.52	No data
RIBICOFF 9%	$218.27	$219.42	$ 207.59	$ 154.61	$183.81	No data
WILMOT	$167.25	$168.25	$ 178.58	$ 133.07	$143.41	No data
WT ROWE	$68.52	$ 30.76	$ 23.54	$ 22.51	$22.25	$ 21.48
RAD II	$114.50	$115.82	$ 135.38	No data	No data	No data
MCQUEENY	$155.74	$163.87	$ 168.65	$ 133.97	No data	No data
MILL RIVER	$142.73	$ 67.02	$ 58.99	No data	No data	No data
Average	**$135.30**	**$ 138.15**	**$ 161.43**	**$ 99.89**	**$ 117.09**	**$ 48.28**

Gas Consumption: Gas Utility Costs Per Unit Per Month

Development	FY 2022	FY2021	FY 2020	FY2019	FY 2017	FY 2016
Eastview I	$51.59	$ 11.42	$ 11.26	$ 11.03	$ 11.99	$ 7.00
Fair Haven	$29.30	$ 18.83	$ 25.70	$ 14.84	$ 31.17	No data
Quinnipiac II	$161.55	$222.08	$ $53.84	$36.47	$98.02	$57.54
Ribicoff 4%	$31.70	$ 24.59	$ 23.46	$ 15.55	$ 13.28	No data
Ribicoff 9%	$30.80	$ 29.43	$ 25.91	$ 21.21	$ 22.21	No data
Wilmot	$37.07	$ 20.15	$ 26.09	$ 15.14	$ 9.88	No data
WT Rowe	$35.57	$ 10.98	$ 8.46	$ 30.41	$ 33.06	$ 16.74
RAD II	$63.48	$ 36.61	$ 85.28	No data	No data	No data
Mill River	$21.21	$ 23.94	$ 28.02	No data	No data	No data
McQueeney	$12.76	$ 34.26	$ 6.79	$ 6.79	$ 7.26	No data
Average	**$47.50**	**$ 19.72**	**$ 26.94**	**$ 16.05**	**$ 14.70**	**$ 6.51**

Appendix 11: LIPH Occupancy

Dev #	Site	Occupancy Rate FY19	Occupancy Rate FY20	Occupancy Rate FY21	Occupancy Rate FY22
CT004000001	Westville M	98%	97%	87%	98%
CT004000004	McConaughy	92%	97%	98%	89%
CT004000005	Valley 2s	87%	80%	80%	46%
CT004000010	Crawford	94%	94%	84%	87%
CT004000011	McQueeney	83%	n/a	n/a	n/a
CT004000012	Winslow	91%	n/a	n/a	n/a
CT004000013	Wolfe	92%	98%	87%	83%
CT004000014	Farnam	1%	0%	n/a	n/a
CT004000015	Ruoppolo 2s	84%	81%	n/a	n/a
	Fairmont 4s	84%	82%	n/a	n/a
CT004000016	QT I	97%	97%	98%	99%
CT004000017	QT II	100%	100%	98%	100%
CT004000018	QT III	100%	100%	100%	100%
CT004000020	Essex	91%	97%	97%	94%
CT004000021	Scattered Site Multi Family - St. Anthony II	96%	98%	98%	98%
CT004000022	Scattered Site III - West	95%	100%	100%	100%
CT004000023	Scattered Site III - East	87%	82%	85%	97%
CT004000075	Rowe	98%	100%	96%	100%

CT004000076	Brookside I	94%	94%	98%	100%
CT004000077	Brookside II	96%	90%	90%	96%
CT004000081	Rockview	97%	94%	93%	97%
CT004000082	Val Macri	100%	99%	94%	95%
Average		**89%**	**89%**	**93%**	**93%**

Appendix 12: Number of Major Crimes, FY12 to Present

Development	2022	2021	2020	2019	2018	2017	2016	2014	2012
Eastview I	4	4	6	3	9	7	1	0	0
Ribicoff 4%	0	0	0	0	N/A	1	0	N/A	N/A
Ribicoff 9%	0	0	0	0	N/A	1	0	N/A	N/A
Quinnipiac Terrace		1		0	7	0	2	4	3
Scattered Sites	3								
West Rock (122 Wilmot, Brookside I and II)	0	0	0	0	2	N/A	N/A	7	25
Westville	5	3	4	3	8	1	0	0	0
Robert T Wolfe	3	7	1	1	0				
Winslow Celentano		0	0	0	0	0	0	1	
Crawford Manor	2	2	0	0	1				
William T Rowe		0	0	0	4	0	1	0	0
McConaughy	3	12	4	3					
Farnam Phase I (Mill River Crossing)	1	1	0	1	1				
Fair Haven	1	1	0	1	3				
Wilmot	0	0	0	0	2	1	0	0	N/A
Average	1.8	2.2	1.2	0.9	3.4	1.4	0.5	1.7	5.6