

MOVING TO WORK ANNUAL REPORT

HHA FISCAL YEAR 2015
JANUARY 1, 2015 - DECEMBER 31, 2015

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HOLYOKE HOUSING AUTHORITY

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I. Introduction

In September 2013, the Holyoke Housing Authority (“HHA”) entered into a Moving To Work (“MTW”) Agreement with the US Department of Housing and Urban Development (“HUD”). HHA is one of only thirty-nine (39) Public Housing Authorities (PHAs) nationwide to be designated as MTW agencies.

MTW is a demonstration program created by Congress in 1996 which permits participating PHAs to combine Public Housing Operating Fund, Capital Fund and Housing Choice Voucher Program (HCVP) funding into a single, agency-wide block grant and to design and test flexible, locally-tailored approaches to administering its low-income housing programs. Subject to HUD approval in the MTW Annual Plan, MTW agencies are allowed to waive some provisions of the US Housing Act of 1937 to promote one or more of the following MTW statutory objectives:

- Reduce cost and achieve greater effectiveness in administering federally funded housing assistance programs;
- Provide incentives to families with children to obtain employment and become economically self-sufficient; and,
- Increase housing choices for eligible low-income families.

HHA’s MTW Agreement extends until December 31, 2018; however, recent legislation requires that HUD extend all current MTW Agreements for an additional ten (10) year period. The extension of HHA’s MTW Agreement is projected to occur in FY 2016.

MTW designation provides an opportunity to develop innovative local solutions to the City of Holyoke’s unique local needs and challenges while promoting MTW’s statutory objectives. Holyoke is one of the poorest communities in Massachusetts, with over 31% of residents living below the poverty line. In the context of enormous local need for housing, jobs and economic development resources, HHA believes that MTW designation provides an important set of tools to: help leverage and increase the positive impact of very limited federal funding; promote HHA’s long-term objectives to revitalize Holyoke’s public housing portfolio and surrounding neighborhoods including the City’s Arts and Innovation District; provide HHA residents with training and other supportive services so that they can obtain good-paying jobs and/or become first-time homebuyers; improve and streamline administration of both the Public Housing and Housing Choice Voucher programs; and, increase the range and quality of housing choices for low-income households.

While MTW affords HHA the opportunity to be more flexible in the implementation of federal housing programs, it does not provide any additional funding. Federal funding for HHA’s programs continues to be reduced: In FY 2015, HHA received only 85.36% of its eligible Public Housing Operating Funds, 81% of eligible HCVP Administrative Fees and 99% of HCVP Housing Assistance Payment (HAP) funds.

Adding to the challenge of ongoing federal funding reductions which are applicable nationwide, the current MTW funding formula has essentially frozen HHA’s HAP funds since 2013, while leasing costs have increased by more than 10%. HAP funds are used to lease units in the private housing market for low income families, seniors and people with disabilities who participate in HCVP. In FY 2015, HHA began discussions with HUD to attempt to resolve this situation through changes to the MTW funding formula. Resolution of the HAP funding issue is a top priority of HHA in FY 2016 in order to continue providing essential housing subsidies to current program participants.

HHA is required to submit an MTW Annual Report for HUD approval at the end of each fiscal year. This document, which is organized according to HUD's requirements, describes HHA's activities for Fiscal Year 2015, i.e. the period from January 1, 2015 through December 31, 2015.

MTW Goals and Objectives

As noted in prior Annual Plans and Reports, HHA has identified the following long-term MTW goals and objectives:

- *Increase the number of HHA residents who are working or actively engaged in educational or job training programs.*
- *Implement incentives for resident economic self-sufficiency.*
- *Increase High School Graduation Rates and Improving Educational Attainment.*
- *Reduce homelessness in Holyoke.*
- *Support sustainable development and community-wide neighborhood revitalization efforts.*
- *Streamline and reduce the cost of HHA operations.*
- *Leverage non-HUD resources to respond to the housing and related service needs of Holyoke's low-income households.*

The following are shorter term goals and objectives that are in support of HHA's long-term MTW vision. Progress towards these goals is more fully described in Section IV of the Report:

Resolve HCVP HAP funding issues to ensure that HHA is able to serve current and future low-income families with rental assistance. As previously noted, HHA is facing enormous financial challenges which are exacerbated by the current MTW Agreement funding formula. In FY 2015, HHA commenced discussions with HUD regarding options to resolve this issue, and will continue these discussions as needed in FY 2016. Securing adequate funding under MTW is critical to both ongoing efforts to house families through HCVP, as well as to HHA's efforts to revitalize Lyman Terrace.

Encourage employment and simplify program administration with Biennial Recertification and Streamlined Asset Certification Program for Public Housing and Housing Choice Voucher program households. To encourage adults to obtain employment and to simplify program administration, HHA modified its income recertification policy, moving from an annual process to a biennial process. Under the policy, HHA residents are recertified every two years; however, they continue to be eligible for interim recertifications in the event that there is a decrease in household income. In FY 2015, HHA received approval from HUD to modify the biennial recertification initiative including establishing a limit the number of voluntary interim recertifications that a family may complete between biennial recertifications. In tandem, HHA streamlined the recertification process by allowing residents to self-certify assets when the combined gross value of assets is less than \$50,000. The revised asset policies were initially implemented in May 2014. In FY 2015, the policies were applied to each client's first interim or regular recertification.

Provide training and jobs to residents through the Career Advancement Program ("CAP") in partnership with Holyoke Works, Holyoke Community College, Nuestras Raices and other community partner agencies. Through the CAP initiative, HHA plans to provide approximately sixty (60) HHA residents with training and employment placement assistance through established HHA partner programs. Training and placement will focus on "green" jobs and other employment sectors for which there is documented demand for trained workers in the Holyoke area. This initiative includes a "rent reform" component, i.e. employment income received by participating residents will be fully excluded from

income calculations for the entire first year, and then will be gradually phased in. In FY 2015, HHA finalized program requirements, conducted outreach and information sessions for prospective Public Housing Program participants and worked with HHA's evaluation partner to finalize plans for establishing control and treatment groups. For the Public Housing Program, control and treatment groups were established and five residents enrolled in the program during FY 2015. During the upcoming year, HHA plans to recruit additional Public Housing Program participants and begin implementation of the program for clients of the Housing Choice Voucher Program.

Support neighborhood revitalization and Holyoke's Center City Vision Plan through targeting of Project Based Vouchers. The Center City Vision Plan focuses on revitalizing the Arts and Innovation District through a comprehensive transit-oriented redevelopment strategy. The City envisions creating a vibrant, sustainable downtown with a thriving arts and culture component and easy access to regional transit. Construction of the regional multi modal transit bus hub is completed, the City also completed a new train platform on the Amtrak Northeaster rail line, and started the redevelopment of existing former manufacturing and office buildings for retail and housing uses. HHA initially plans to target up to 30 Project Based Vouchers in order to encourage private investment and ensure the continued availability of affordable housing in this newly revitalized community. This activity was not implemented during FY 2015; however, HHA plans to begin implementation during FY 2016.

Non-MTW Goals and Objectives

Non-MTW activities are defined by HUD as those activities that do not require MTW authority or flexibility to implement. In FY 2015, HHA continued to implement a broad array of housing management, maintenance and supportive services efforts including the Mod Rehab and Mod Rehab SRO programs that are not part of the MTW Demonstration and state-assisted public housing and leasing programs.

In March 2015, HHA's Lyman Terrace family development was awarded a Commitment to Enter into a Housing Assistance Payment Contract (CHAP) by HUD, which is an essential first step in converting the development to project-based assistance under the Rental Assistance Demonstration (RAD) program. Also, HHA's development partner secured an award of Low Income Housing Tax Credits in September 2015. To date, the Commonwealth of Massachusetts has committed approximately \$25 million in funds towards the redevelopment of Lyman Terrace; however, at present, the funds that will be generated through RAD conversion will not support the development's long-term operations. In 2016, HHA will continue to work with its development partner and HUD to identify options to ensure that there are adequate operating funds to support Lyman Terrace's revitalization.

HHA applied for the following funding opportunities during FY 2015:

- **Resident Opportunity and Supportive Services (ROSS)** - HHA applied for and was awarded \$246,000 in funding through the ROSS program.
- **Family Self-Sufficiency (FSS)** - HHA applied for and received funding of \$96,424 for the FSS Coordinator position under both the Public Housing and Housing Choice Voucher Programs.
- **Other**- HHA continued to monitor federal, state, municipal, and private funding opportunities and applied for and received the following awards, totaling over \$4 million, to support the goals of the MTW Demonstration, to support self-sufficiency for Holyoke:
 - HHA was awarded \$2,000 CDBG funds through the City of Holyoke for the Authority's FTHB Education program.

- HHA was awarded \$150,000 in HOME funds for the Authority's Borrowers Assistance Program (BAP), which provides down payment and closing cost assistance to income eligible FTHB who purchase homes in the City.
- HHA applied for Emergency Safety and Security funds in FY 2014 and received \$169,090 in funding in FY 2015. The grant award will provide security upgrades at Beaudoin Village.
- HHA was awarded \$4 million from Mass Works. The funds will be used for infrastructure work at Lyman Terrace.

II. General Housing Authority Operating Information

A. Housing Stock Information

New Housing Choice Vouchers that were Project-Based During the Fiscal Year

Property Name	Anticipated Number of New Vouchers to be Project-Based *	Actual Number of New Vouchers that were Project-Based	Description of Project
Holyoke Towers	54	54	Seven story, elderly high-rise with 6 two-bedroom units, 48 one-bedroom units, a community room with kitchen, and washer dryer access. Property is located at 582 Pleasant Street, Holyoke, MA.

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year *	Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year *
102**	97**

Actual Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	Actual Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
54	54

*From the Plan. Note that the "Anticipated Total Number of New Vouchers to be Project-Based" was revised.

HHA anticipated identifying additional Project-Based opportunities during FY 2015; however, no opportunities **other than Holyoke Towers were identified.

Anticipated Total Number of New Vouchers to be Project-Based *	Actual Total Number of New Vouchers that were Project-Based
54	54

Other Changes to the Housing Stock that Occurred during the Fiscal Year

As of 11/15/2015, units vacated at Lyman Terrace have not been re-occupied due to upcoming rehabilitation work scheduled for FY 2016.

General Description of Actual Capital Expenditures During the Plan Year

The table below provides a summary of the planned improvements, planned expenditures and actual expenditures for HHS's Federal Public Housing developments during FY 2015. In addition, the following emergency repair expenditures were made:

- Roof repair at 10-12 Wolcott Street, Ramos unit: \$11,728; and
- Elevator and power unit replacement at Falcetti Towers: \$35,000.

Public Housing Development	Planned Improvements	Planned Expenditures for FY 2015	Actual Expenditures for FY 2015
Beaudoin Village	HVAC Upgrades	\$10,000	\$9,209
	Main & Lateral Sewer Cleaning	\$13,000	\$14,312
	Roof Replacement	\$10,000	\$0
Rosary Towers	Common Area Floors and Community Room Upgrades	\$35,000	Projected start 2/1/2016
	Kitchen Upgrades	\$575,141	\$783,838
	Remove/Install Sidewalks	\$53,863	\$43,014
	Concrete Balcony & Band Repair	\$297,000	\$16,551 (design phase only; work out to bid 4/2016)
Toepfert Apts.	Floor Replacement	\$24,000	\$3,863
	Tree Trimming and Sidewalk Repairs	\$5,000	\$28,377 (landscape improvements added)
Zielinski Apartments	Remove Trees, Plant New	\$24,000	\$20,000

Overview of Other Housing Owned and/or Managed by HHA at Fiscal Year End

Housing Program*	Total Units	Overview of the Program
State Funded	72	State funded Public Housing
State Funded	140	MRVP Project Based
State Funded	23	MRV Mobile
Non-MTW HUD Funded	100	Section 8 MOD
Non-MTW HUD Funded	14	SRO Chapin Mansion
Total Other Housing Owned and/or Managed	349	

*Select Housing Program from: Tax Credit, State Funded, Locally Funded, Market Rate, Non-MTW HUD Funded, Managing Developments for other Non-MTW Public Housing Authorities or other

If Other, please describe:

N/A

HHH Owned Housing Stock

Federal Public Housing Development	Number of Units
Beaudoin Village, 40 Leary Drive	217
Beaudry-Boucher Apartments, 68 Cabot Street	34
Churchill Homes I, 334 Elm Street	50
Churchill Homes II, 334 Elm Street	50
Coughlin Apartments, 300 Walnut Street	54
Falcetti Towers Apartments, 475 Maple Street	85
Lyman Terrace, 5 Hampden Street	167
Ramos Units, Scattered Site	9
Rosary Towers, 21 Bowers Street	100
Toepfert Apartments, 22 North Summer Street	93
Zielinski Apartments, 70 Walnut Street	62
Total	921

B. Leasing Information

Actual Number of Households Served at the End of the Fiscal Year

Housing Program:	Numbers of Households Served*	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs **	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs **	0	0
Port-In Vouchers (not absorbed)	N/A	23
Total Projected & Actual Households Served	0	23

* Calculated by dividing the planned/actual number of unit months occupied/leased by 12.

** In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of Households served.

Housing Program:	Unit Months Occupied/Leased****	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs ***	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs ***	0	0
Port-In Vouchers (not absorbed)	N/A	276
Total Projected & Annual Units Months Occupied/Leased	0	276

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

**** Unit Months Occupied/Leased is the total number of months the housing PHA has occupied/leased units, according to unit category during the year.

There are no differences between planned and actual households served

	Average Number of Households Served Per Month	Total Number of Households Served During the Year
Households Served through Local Non-Traditional Services Only	0	0

Reporting Compliance with Statutory MTW Requirements: 75% of Families Assisted are Very Low-Income

Fiscal Year:	2011	2012	2013	2014	2015	2016	2017	2018
Total Number of Local, Non-Traditional MTW Households Assisted	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Percentage of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Reporting Compliance with Statutory MTW Requirements - Maintain Comparable Mix

Baseline for the Mix of Family Sizes Served					
Family Size:	Occupied Number of Public Housing units by Household Size when PHA Entered MTW *	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW **	Non-MTW Adjustments to the Distribution of Household Sizes ***	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained
1 Person	407	488	0	895	44%
2 Person	186	265	0	451	22%
3 Person	172	183	0	355	17%
4 Person	92	123	0	215	11%
5 Person	37	51	0	88	4%
6+ Person	14	17	0	31	2%
Totals	908	1,127	0	2,035	100%

*Data as of September 2013

**Data as of March 2014 – closest data available to date HHA entered MTW

**Data does not include Enhanced Vouchers.

*** “Non-MTW adjustments to the distribution of family sizes” are defined as factors that are outside the control of the PHA. Acceptable “non-MTW adjustments” include, but are not limited to, demographic changes in the community’s population. If the PHA includes non-MTW adjustments, HUD expects the explanations of the factors to be thorough and to include information substantiating the numbers used.

Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized

N/A

Mix of Families Served

	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained **	44%	22%	17%	11%	4%	2%	100%
Number of Households Served by Family Size this Fiscal Year ***	911	466	350	211	81	25	2,044
Percentages of Households Served by Household Size this Fiscal Year ****	45%	23%	17%	10%	4%	1%	100%
Percentage Change*	2%	5%	0%	-9%	0%	-50%	0%

*Percentage change is calculated using HUD’s formula from the 50900 Excel template.

Justification and Explanation for Family Size Variation of Over 5% from the Baseline Percentages

There are typical variations in households served by household size based on waiting list turnover.

Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End

Housing Program	Description of Leasing Issues and Solutions
Public Housing	In preparation for projected rehabilitation work at Lyman Terrace, all vacant units will remain unoccupied so that the units can either be rehabilitated without relocation or used as a relocation option.

Number of Households Transitioned to Self-Sufficiency by Fiscal Year End

Activity Name/#	Number of Households Transitioned *	Agency Definition of Self Sufficiency
Family Self-Sufficiency (FSS) Program – Public Housing**	3 public housing participants graduated from the FSS Program and reached self-sufficiency, including 1 homebuyer* **	See below
Family Self-Sufficiency (FSS) Program – Section 8**	3 Section 8 participants graduated from the FSS Program and reached self-sufficiency, including 1 homebuyer * **	See below

*** Note that the FSS Program is not an MTW activity. FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in metric SS #8.*

Households Duplicated Across Activities/Definitions	0
ANNUAL TOTAL NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	6**

* The number provided here should match the outcome reported where metric SS #8 is used.

HHA recognizes the challenges its clients face in obtaining self-sufficiency. The high cost of housing and obstacles to earning a living wage make the objective of self-sufficiency difficult to attain. HHA has adopted the definition of self-sufficiency listed below for the activities that have the statutory objective of self-sufficiency and/or for which HHA is required to report on Standard Metric SS #8 (Households Transitioned to Self-Sufficiency). The overarching definition for the families in these activities is a voluntary termination of housing assistance, as well as other forms of government assistance. The criteria generally used to identify these individuals are:

- Voluntary termination of housing assistance;
- Total household income of 80% of AMI or greater at time of termination; and
- Total household income from other forms of government assistance (TANF, cash aid, etc.) of \$0 at time of termination.

C. Wait List Information

Wait List Information at Fiscal Year End

Housing Program(s) *	Wait List Type **	Number of Households on Wait List	Wait List Open, Partially Open or Closed ***	Was the Wait List Opened During the Fiscal Year
Federal MTW Public Housing	Merged (excluding Churchill Homes)	2,022	Closed	Yes
Federal MTW Public Housing (Churchill Homes)	Site-Based	20	Partially Open	Yes
Housing Choice Voucher	Other 1	138,163	Open	Yes
Housing Choice Voucher	Other 2	3,701	Open	Yes

* Select Housing Program: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** Select Wait List Types: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

If partially open waiting list, please describe:

Churchill Homes' waiting list was open only to applicants in 50%-60% income tiers during the 2015 Fiscal Year.

If Local, Non-Traditional Program, please describe:

Not applicable

If Other Wait List Type, please describe:

Other 1: Housing Choice Voucher – The Holyoke Housing Authority participates in the MassNAHRO Centralized HCV waiting list. This list indicates the Statewide HCV waiting list of participating Public Housing Authorities.

Other 2: Housing Choice Voucher – The Holyoke Housing Authority participates in the MassNAHRO Centralized HCV waiting list. This list indicates the HCV applicants who have residency preference.

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

HHA did not make any changes to the organizational structure of the wait list or policy changes regarding the wait list during the fiscal year.

III. Proposed MTW Activities

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

IV. Approved MTW Activities

This section provides HUD-required information detailing previously approved MTW activities.

A. Implemented Activities

2013-1: Biennial Recertifications

1. Description/Impact:

HHA has used its MTW Authority to recertify clients in both the Housing Choice Voucher Program and the Public Housing Program on a biennial schedule. The documentation requirements for the recertification process are time consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, HHA was able to reallocate staff resources to other program areas and staff has more time to ensure income reviews are accurate and thorough.

The biennial recertification initiative was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May 2013 and was implemented by HHA in FY 2014. In FY 2015, HHA received approval from HUD to modify the biennial recertification initiative and include a limitation on the number of voluntary interim recertifications a family may complete between biennial recertifications to two (2). Required interim recertifications (i.e. for changes in family composition or otherwise required by HHA) do not count against the limit. Elderly and disabled households are exempt from this provision and will be able to complete an interim recertification at any time. Zero-income households and households on minimum rent will continue to be subject to annual or more frequent recertification requirements. In addition, clients participating in the Career Advancement Program may be subject to additional interim reporting requirements described in the applicable section of the MTW Plan and/or implementing policies/procedures. This initiative is designed to maintain the administrative efficiencies gained by completing regular recertifications every other year.

2. Changes to Benchmarks, Baseline, and Metrics:

Baseline measurements have been revised to reflect adjustments to the FY 2015 Annual Plan. Benchmarks and outcomes are reported below.

<i>2013-1 Biennial Recertifications</i>				
<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Recertifications performed in FY 2013: 1,887	Estimated number of recertifications performed in FY 15: 1,126	Recertifications performed in FY 2015: 1,290	HHA substantially achieved the benchmark.
	Time per recertification: 105 minutes	Time per recertification: 85 minutes	Time per recertification: 85 minutes	HHA experienced higher than expected recertification
	Time spent on		Time spent on	

2013-1 Biennial Recertifications CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	recertifications in FY 13: 3,302 hours Interims performed in FY 13: 1,321 Time per interim: 45 min. Time spent on interims in FY 13: 991 hours Total time spent on interims and recertifications: 4,293 hours Average hourly wage for staff: \$23.87 Total cost in FY 2013: \$102,474	Time spent on recertifications in FY 15: 1,595 hours Estimated number of interims performed in FY 15: 1,500 Time per interim: 45 minutes Anticipated time spent on interims: 1,125 hours Total time spent on interims and recertifications: 2,720 hours Average hourly wage for staff: \$23.87 Total cost after implementation of activity: \$64,926	recertifications in FY 15: 1,828 hours Interims performed in FY 15: 1,293 Time per interim: 45 minutes Time spent on interims in FY 15: 970 hours Total time spent on interims and recertifications: 2,798 hours Average hourly staff wage Public Housing: \$25.20 Average hourly staff wage HCV: \$25.40 Total cost after implementation of activity: \$70,864	activity. The hourly wage for staff was increased and resulted in additional costs.

2013-1 Biennial Recertifications CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Recertifications performed in FY 2013: 1,887 Time per recertification: 105 minutes Time spent on recertifications in FY 13: 3,302 hours	Estimated number of recertifications performed in FY 15: 1,126 Time per recertification: 85 minutes Time spent on recertifications in	Recertifications performed in FY 2015: 1,290 Time per recertification: 85 minutes Time spent on recertifications in FY 15: 1,828 hours	HHA substantially achieved the benchmark. HHA experienced higher than expected recertification activity.

2013-1 Biennial Recertifications CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	Interims performed in FY 13: 1,321 Time per interim: 45 minutes Time spent on interims in FY 13: 991 hours Total time spent on interims and recertifications prior to implementation of activity: 4,293 hours	FY 15: 1,595 hours Estimated number of interims performed in FY 15: 1,500 Time per interim: 45 minutes Anticipated time spent on interims: 1,125 hours Anticipated time spent on interims and recertifications after implementation of activity: 2,720 hours	Interims performed in FY 15: 1,293 Time per interim: 45 minutes Time spent on interims in FY 15: 970 hours Total time spent on interims and recertifications: 2,798 hours	

2013-1 Biennial Recertifications CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Average tenant rent share in HCV: \$350.46 Average tenant rent share in public housing: \$299.76	Average tenant rent share in HCV: \$350.46 Average tenant rent share in public housing: \$299.76	Average tenant rent share in HCV: \$346.71 Average tenant rent share in public housing: \$315.01	HHA substantially achieved the benchmark; however, HHA does not believe it is applicable in the context of this metric.

**HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.*

2013-2: Revised Asset Policies

1. Description/Impact:

Holyoke Housing Authority has used its MTW Authority to revise the requirements for the verification, calculation, and inclusion of asset income. Verifying and calculating assets is a time consuming process, and clients rarely have enough assets to impact the final rent determination.

In order to streamline the recertification process, HHA made three revisions to the existing asset policy:

- **Self-Certification of Assets** - Clients are permitted to self-certify all assets, when the family’s combined market asset value is less than or equal to \$50,000. For families whose market value of their assets is greater than \$50,000, asset verification is subject to standard HUD verification requirements. HHA determines asset value using market, rather than cash value.
- **Calculation of Asset Income** - When determining asset income, HHA uses the market value of the asset and imputes asset income using HHA’s established passbook savings rate.
- **Exclusion of Asset Income** - All asset income below \$500 is excluded.

This activity was first proposed in HHA’s MTW Year 1 Annual Plan submitted to HUD in May 2013. HHA developed policies and procedures regarding the revised asset policies. HHA educated clients and trained staff on the new asset requirements in the first quarter of FY 2014. The policies were implemented in May of 2014 and during FY 2015 were applied to each client’s first interim or regular recertification.

2. Changes to Benchmarks, Baseline, and Metrics:

HHA has not made any changes to the benchmarks, baselines and metrics in the 2015 Annual Plan. The metrics for this MTW activity include public housing and HCV clients; however, the Churchill Homes public housing development is managed by a third-party and HHA does not have easy access to the managing company’s data systems. As such, the metrics do not currently include the residents at Churchill Homes. HHA is currently working to integrate the two systems and will update the baselines and benchmarks accordingly.

<i>2013-2 Revised Asset Policies CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	HCV households with assets: 229 PH households with assets: 411 Time per asset verification: 20 minutes	HCV households with asset over \$50,000: 0 PH households with assets over \$50,000: 0 Total cost after implementation of	HCV households with assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20	Yes. There were 2 households with assets over \$50,000, which HHA did not anticipate.

2013-2 Revised Asset Policies CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	Total time spent verifying assets: 213 hours Average hourly staff wage: \$23.87 Total cost to verify assets prior to implementation of activity: \$5,084	activity: \$0	minutes Average hourly staff wage Public Housing: \$25.20 Average hourly staff wage HCV: \$25.40 Total cost after implementation of activity: \$16.87	

2013-2 Revised Asset Policies CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	HCV households with assets: 229 PH households with assets: 411 Time per asset verification: 20 minutes Total time spent verifying assets: 213 hours	HCV households with asset over \$50,000: 0 PH households with assets over \$50,000: 0 Total time spent after implementation of activity: 0	HCV households with assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Total time spent after implementation of activity: 40 minutes	Yes. There were 2 households with assets over \$50,000, which HHA did not anticipate.

2013-2 Revised Asset Policies CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	HHA quality control samples demonstrate that 0% of files have asset related errors.	HHA anticipates the number of files with asset related errors will be less than 10%.	<5% error rate	Yes

2013-2 Revised Asset Policies				
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Average tenant rent share in HCV: \$350.46 Average tenant rent share in public housing: \$299.76	Average tenant rent share in HCV: \$350.46 Average tenant rent share in public housing: \$299.76	Average tenant rent share in HCV: \$ \$346.71 Average tenant rent share in public housing: \$315.01	HHA substantially achieved the benchmark; however, HHA does not believe it is applicable in the context of this metric.

**HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.*

2013-3: Career Advancement Program

1. Description/Impact

HHA has used its MTW Authority to partner with local non-profit and educational institutions to develop the Career Advancement Program (CAP). CAP participants can participate in a number of programs, including HiSET prep, job readiness, job training, certificate programs, and college. Additionally, the participants receive case management support and self-sufficiency support from HHA. The goal of this activity is to encourage HHA clients to improve their long-term employment prospects, to increase the number of HHA clients with earned income, and to increase the savings of program participants.

HHA offers an incremental income disregard for all clients who have graduated from an approved professional development program and who have obtained employment. This disregard is open to any HHA Public Housing or HCV client who participates in the CAP initiative and completes all of the requirements. To be eligible for participation, the head of household must be capable of working and household income must be below 30% of Area Median Income (AMI). All clients must meet eligibility requirements of the partner program they choose, which in some cases may limit participation to clients who are currently unemployed. HHA will divide clients into a control and treatment group for purposes of its rent reform study. The control group will not be eligible for this income disregard.

Once HHA has verified that the client participating in CAP successfully completed an approved job training program, the individual's income disregard will be structured as follows:

- 100% of the individual's earned income less the client's prequalifying earned income will be disregarded for the first twelve months following graduation from the program.
- 75% of the individual's earned income less the client's prequalifying earned income will be disregarded for the second twelve months following graduation from the program.
- 50% of the individual's earned income less the client's prequalifying earned income will be disregarded for the third twelve months following graduation from the program.
- 25% of the individual's earned income less the client's prequalifying earned income will be disregarded for the fourth twelve months following graduation from the program.
- After the final twelve months at the 25% disregard level, the individual's rent and income calculation will be in accordance with standard HHA rent and income calculation policies. There will be no earned income disregard.

This activity was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May of 2013. Final HUD approval was received by HHA on September 24, 2013. During FY 2014 HHA began the planning process and prepared policies for CAP. During FY 2015 HHA worked with its evaluation partner to further refine the eligibility criteria and metrics used to track the effectiveness of CAP and to begin implementation of the program for Public Housing Program households. Each public housing household, which met CAP eligibility criteria, was placed in either the control group or treatment group based on a random assignment. During the summer of 2015, HHA began recruiting eligible public housing households from the treatment group. HHA sent potential participants mailings and promotional brochures, and conducted an informational session for prospective participants. Five (5) individuals were enrolled in CAP and HHA staff worked actively with these participants. HHA plans to recruit additional

public housing participants for the Program and to expand the program to Housing Choice Voucher Program households.

2. Changes to Benchmarks, Baseline, and Metrics:

HHA's FY 2015 Plan did not include metrics for CAP as the Program had not been implemented. Baselines and benchmarks are included for the Public Housing Program; however, baselines and benchmarks are not included for HCV since CAP has not yet been implanted for HCV. HHA will establish baselines and benchmarks for the HCV Program after HCV households have been assigned to the control and treatment groups. Please note that baseline and benchmark measurements have been revised from the FY 2016 Annual Report to reflect revisions to the CAP eligibility criteria. The Churchill Homes public housing development is managed by a third-party and the data is not maintained in HHA's data systems. As such, universe for this MTW activity does not currently include the residents at Churchill Homes. Baseline data is as of January 2016. As reflected in the benchmarks for this activity, HHA did not anticipate any changes since the program was implemented for less than a full year. HHA did not determine outcomes for each metric below, as the program has been implemented for less than a full year for public housing households and has not yet been implemented for HCV households. Outcomes will be reported in the FY 2016 Annual Report.

2013-3 Career Advancement Program				
SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Average earned income of households affected by this policy in dollars (increase).	PH - Average earned income: \$7,875	PH - Average earned income: \$7,875	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Average earned income of households affected by this policy in dollars (increase).	PH - Average earned income: \$7,907	PH - Average earned income: \$7,907	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

2013-3 Career Advancement Program				
SS #2: Increase in Household Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	PH – Average savings/escrow balance: \$137	PH – Average savings/escrow balance: \$137	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Average amount of savings/escrow of households affected	PH - Average savings balance: \$604	PH - Average savings balance: \$604	N/A – See Changes to Benchmarks,	N/A – See Changes to Benchmarks,

2013-3 Career Advancement Program SS #2: Increase in Household Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
by this policy in dollars (increase).			Baselines, Metrics Above	Baselines, Metrics Above

2013-3 Career Advancement Program SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>				
Control Group				
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	(1) and (2)* PH - Have earned income: 74 Have earned income: 51% of PH (3) and (4)** (5) PH - Are unemployed: 72 Are unemployed: 49% of PH (6) Other: Not applicable	(1) and (2)* PH - Have earned income: 74 Have earned income: 51% of PH (3) and (4)** (5) PH – Are unemployed: 72 Are unemployed: 49% of PH (6) Other: Not applicable	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed	(1) and (2)* PH - Have earned income: 78 Have earned income: 52% of PH (3) PH - Are enrolled in an educational program: 3 Are enrolled in an educational program: 2% of	(1) and (2)* PH - Have earned income: 78 Have earned income: 52% of PH (3) PH - Are enrolled in an educational program: 3 Are enrolled in an educational program: 2% of	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

2013-3 Career Advancement Program				
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	PH (4) PH - Are enrolled in job training program: 2 Are enrolled in job training program: 1% of PH (5) Public Housing - Are unemployed: 73 Are unemployed: 48% of PH	PH (4) PH - Are enrolled in job training program: 2 Are enrolled in job training program: 1% of PH (5) Public Housing - Are unemployed: 73 Are unemployed: 48% of PH		

**HHA does not track full-time employment vs. part-time employment.*

***HHA does not track this information for the control group.*

2013-3 Career Advancement Program				
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Number of households receiving TANF assistance (decrease).	PH – Number of households receiving TANF: 32	PH – Number of households receiving TANF: 32	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Number of households receiving TANF assistance (decrease).	PH – Number of households receiving TANF: 37	PH – Number of households receiving TANF: 37	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

2013-3 Career Advancement Program				
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Number of households receiving services aimed to increase	PH - Number of households receiving services to increase self-	PH - Number of households receiving services to increase self-	N/A – See Changes to Benchmarks, Baselines,	N/A – See Changes to Benchmarks, Baselines, Metrics

2013-3 Career Advancement Program				
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
self-sufficiency (Increase).	sufficiency**	sufficiency**	Metrics Above	Above
Treatment Group				
Number of households receiving services aimed to increase self-sufficiency (Increase).	PH - Number of households receiving services to increase self-sufficiency: 0	PH - Number of households receiving services to increase self-sufficiency: 0	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

** HHA does not track this information for the control group.

2013-3 Career Advancement Program				
SS #6: Reducing Per Unit Subsidy Cost for Participating Households***				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	There were no HCV participants in the program.	There were no HCV participants in the program.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	There were no HCV participants in the program.	There were no HCV participants in the program.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

***HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity.

2013-3 Career Advancement Program				
SS #7: Increase in Agency Rental Revenue***				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
PHA rental revenue in dollars (increase).	PH – PHA rental revenue: \$290	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
PHA rental revenue in dollars (increase).	PH – PHA rental revenue: \$309	PH – PHA rental revenue: \$309	N/A – See Changes to	N/A – See Changes to

2013-3 Career Advancement Program				
SS #7: Increase in Agency Rental Revenue***				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
			Benchmarks, Baselines, Metrics Above	Benchmarks, Baselines, Metrics Above

***HUD is requiring the use of this metric; however, HHA does not believe it is applicable in the context of this MTW activity. HHA is using TTP for this metric.

2013-3 Career Advancement Program				
SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Control Group				
Number of Households transitioned to self-sufficiency (increase).	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above
Treatment Group				
Number of Households transitioned to self-sufficiency (increase).	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	PH - Number of households transitioned to self-sufficiency: 0 FSS participants are not eligible for participation in the Career Advancement Program and therefore are not included in this metric.	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

2015-2: Rent Reasonableness

1. Description/Impact

HHA eliminated the requirement to re-determine reasonable rent if there is a 5% decrease in the published Fair Market Rent (FMR) in effect 60 days before the contract anniversary date as compared to the FMR in effect 1 year before the contract anniversary. HHA continues to complete a reasonable rent determination when a unit is placed under HAP contract for the first time, when an owner requests a contract rent adjustment, and at any other time HHA deems it necessary. As rent increases will continue to be allowed during the lease-prescribed time periods, HHA assumes that owners will request a rent increase within market fluctuations as warranted. Therefore, HHA believes that reasonable rent determinations will continue to be made with regular frequency.

Generally, a 5% or greater decrease in the published FMR compared to the FMR in effect 1 year before is not typical in the Holyoke area. Although infrequent, when this does occur, it places a significant administrative burden on HHA staff who must conduct reasonable rent determinations. Staff may also need to renegotiate rents and if negotiations are unsuccessful, tenants will be required to move, which will further increase the administrative burden on staff and place an onerous burden on tenants.

The savings generated from this initiative are realized only when the FMRs decrease by 5% or more. Between FY 2014 and FY 2015 the FMR for the Holyoke area decreased by approximately 3%. As such, HHA would not have had to redetermine reasonable rent in FY 2015.

This activity was first proposed in HHA's FY 2015 Annual Plan and was implemented by HHA in FY 2015 upon approval by HUD.

2. Changes to Benchmarks, Baseline, and Metrics

HHA did not set baselines for this activity in the FY 2015 MTW Annual Plan. The baseline information in the table below reflects those presented in HHA's FY 2016 Annual Plan. Since the FMR decreased by less than 5% from FY 2014 to FY 2015, there was no time savings associated with this activity.

<i>2015-2 Rent Reasonableness</i>				
<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of HCV units leased in FY 2015: 1,203 Time to complete RR: 15 minutes Staff Hourly Wage: \$23.87 Cost to re-determine RR in FY15 if 5% decrease in	\$0	\$0	Since the FMR decreased by less than 5% there was no savings realized for this activity.

2015-2 Rent Reasonableness CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	published FMR: \$7,179			

2015-2 Rent Reasonableness CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Number of HCV units leased in FY 2015: 1,203 Time to complete Reasonable Rent: 15 minutes Time spent to re-determine reasonable rent in FY 15 if 5% decrease in published FMR: 301 hours	\$0	\$0	Since the FMR decreased by less than 5% there was no savings realized for this activity.

2015-3: PBV Rent Reasonableness

1. Description/Impact

Under this initiative HHA modified the requirement for conducting rent reasonableness for re-determined rents under the Project Based Voucher (PBV) program. Note that no change was implemented to the existing policy for determining initial rents, i.e. initial PBV rents will continue to be determined in conformance with the provisions of 24 CFR 983.301 through 983.305 as applicable.

Under the new policy, re-determined rents to owners of PBV units, *except for certain tax credit units as defined in 983.501(c)*, shall not exceed the lowest of the reasonable rent or the rent requested by owner. This policy change eliminated consideration of the then current Fair Market Rent (FMR) limits when re-determining PBV rents. HHA also eliminated the requirement at 983.303(b) to re-determine the reasonable rents for PBV units whenever there is a five percent or greater decrease in the published FMR in effect sixty days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary.

Affordable housing developers use the PBV commitment to secure project funding and project lenders assume rent trending when underwriting projects; therefore, this policy change helps to ensure the long-term viability and affordability of PBV developments while also promoting housing choice.

This activity was first proposed in HHA's FY 2015 and was implemented by HHA in FY 2015 upon approval by HUD.

2. Changes to Benchmarks, Baseline, and Metrics

HHA did not set baselines for this activity in the FY 2015 MTW Annual Plan. The baseline information in the table below reflects those presented in HHA's FY 2016 Annual Plan. Since the FMR decreased by less than 5% from FY 2014 to FY 2015, there was no time savings associated with this activity.

<i>2015-3 PBV Rent Reasonableness</i>				
<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of PBV developments receiving assistance leased in FY 2015: 2 Time to complete Reasonable Rent: 30 min. Staff Hourly Wage: \$23.87 Cost to re-determine	\$0	\$0	Since the FMR decreased by less than 5% there was no savings realized for this activity.

2015-3 PBV Rent Reasonableness CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	reasonable rent in FY 15 if 5% decrease in published FMR: \$23.87			

2015-3 PBV Rent Reasonableness CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Number of PBV developments receiving assistance leased in FY 2015: 2</p> <p>Time to complete Reasonable Rent: 30 min.</p> <p>Time spent to re-determine reasonable rent in FY 15 if 5% decrease in published FMR: 1 hour</p>	\$0	\$0	Since the FMR decreased by less than 5% there was no savings to be realized for this activity.

2015-4: Project-Basing Enhanced Vouchers (renamed Preservation after Conservation)

1. Description/Impact

HHA has preserved the long term affordability of expiring use properties by project-basing Enhanced and Tenant Protection vouchers for up to a 15 year extendable term. Households that reside in a preservation eligible project as of the conversion date are be given the choice between an Enhanced or Tenant Protection voucher or a Project-Based Voucher. Prior to the conversion date, HHA meets with tenants to explain the advantages/disadvantages and the impact of an Enhanced Voucher vs. a Project-Based Voucher so the tenants can make informed decisions. When a household opts for an Enhanced or Tenant Protection Voucher, HHA may apply their MTW operating flexibilities (i.e. Biennial Recertification and Inspections; Revised Asset Policies) to the Voucher provided the operating flexibilities do not infringe on the enhanced nature of the Voucher. The only Enhanced Voucher provision which will apply to tenants selecting the Project-Based option is the initial income eligibility requirement.

For tenants that are over-house as of the conversion date and elect to receive a Project-Based Voucher, HHA may waive the subsidy policy provided there is at least one household member per bedroom. Tenants may also request a reasonable accommodation if applicable.

HHA may waive 24 CFR 983.56 in its entirety including the 25% per building/project which will allow for every eligible household in a preservation eligible project to elect to receive a Project-Based Voucher. Additionally, should a household that elects to receive an Enhanced or Tenant Protection Voucher move from the property, HHA may add the unit to the Project-Based HAP Contract at any time during the term of the HAP contract.

This activity was included as an amendment to HHA’s FY 2014 MTW Annual Plan, which was approved by HUD in January 2015 and was implemented by HHA in FY 2015.

2. Changes to Benchmarks, Baseline, and Metrics

HHA did not set baselines for this activity in the FY 2015 MTW Annual Plan. The baseline information in the table below reflects those presented in HHA’s FY 2016 Annual Plan. HHA did not determine the outcome for the metric below, as this activity has been implemented for less than one year. As such, FY 2015 results cannot adequately be compared to established benchmarks. HHA will report on outcomes in the FY 2016 MTW Annual Report.

<i>2015-4 Project-Basing Enhanced Vouchers HC #2: Units of Housing Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 units	127 units	N/A – See Changes to Benchmarks, Baselines, Metrics Above	N/A – See Changes to Benchmarks, Baselines, Metrics Above

B. Not Yet Implemented Activities

2013-4: Neighborhood Revitalization

1. Description and Update of Approved Activity

Holyoke Housing Authority used its MTW Authority to set-aside project based vouchers to be targeted at new or renovated developments in Holyoke's Arts & Innovation District. In August 2009, the City of Holyoke began the implementation of the Holyoke Center City Vision Plan, the transit-oriented redevelopment plan for Center City and its surrounding neighborhoods. The revitalization of Holyoke's Arts & Innovation district is an essential component to this plan, and HHA's commitment of thirty project-based units to the area will help ensure that affordable housing is a central component of the area's revitalization.

HHA may waive the requirement limiting the number of PBV units in a project to 25% of the total number of units in that project. Additionally, HHA may allow PBV sites to develop their own tenant selection plans, provided the plans receive HHA approval and are consistent with the goals of the city's transformation plan.

Lastly, HHA will waive or revise the requirement that HHA offer tenant-based rental assistance to clients after one-year of occupancy in the assisted unit. HHA believes this is necessary to ensure the PBVs are serving the intended purpose of revitalizing the Arts & Innovation District and are not being used as a means of obtaining tenant-based vouchers. This limitation will not apply to households seeking to move due to domestic violence under VAWA and/or as a reasonable accommodation for a person with a disability.

The goal of this activity is to promote development in the Art's & Innovation District which will allow low-income households to move to a new or rehabilitated unit in a neighborhood of opportunity. HHA will initially set aside thirty project-based vouchers for this activity; however, this number may be revised in future years depending on the success of this activity. HHA will award project-based contracts as the city's transformation plan progresses and as new units come on line in the area.

This activity was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May 2013. Final HUD approval was received in September 2013. This activity has been delayed and was not implemented during FY 2015; however, HHA plans to begin implementation of this activity during FY 2016 by issuing an RFP for PBV units in the Arts & Innovation district and selecting a developer(s). HHA will negotiate with the selected developer(s) on the number and type of units to receive project-based assistance. Implementation of this initiative will be based on the construction schedule of the selected developer.

2015-1: Rent Simplification

1. Description and Update of Approved Activity

HHA's rent simplification activity includes the following components. The payment standard portion of this initiative is being applied solely to Housing Choice Voucher (HCV) Program households and the FT student income exclusion and elimination of the FT student deduction is being applied to both Public Housing and HCV program households.

- Use the Payment Standard in effect at the effective date of the regular recertification regardless of any change in the Payment Standard.
- Exclude all Full-time student income for household members other than the Head, Spouse or Co-Head.
- Eliminate the adult full time student deduction.

The current regulations regarding the application of payment standards (see 24 CFR 982.505) are very complex and are often applied incorrectly. Applying the Payment Standard in effect at the effective date of the regular recertification regardless of any change in the Payment Standard will simplify this procedure for staff and, therefore, improve the accuracy of rent calculations.

Staff spends a great deal of time verifying full-time student income only to exclude all but \$480 of the income when calculating the household's income. The household is then given a \$480 deduction which negates the \$480 of full-time student income that is included in the household income. By eliminating both the \$480 deduction and the \$480 full-time student income HHA saves staff time and, therefore, money.

This activity was first proposed in HHA's MTW FY 2015. In August of 2015, HHA received approval from HUD to proceed with the Rent Simplification initiatives; however, HHA has not implemented this activity since it requires customization of HHA's software system. HHA will reevaluate whether or not to implement this activity.

C. Activities on Hold

Not applicable.

D. Closed Out Activities

2013-5: Biennial HQS Inspections

This activity was first proposed in HHA's MTW Year 1 Annual Plan submitted to HUD in May of 2013. Final HUD approval was received by HHA on September 24, 2013. In FY 14, HHA closed out this activity as an MTW initiative due to the 2014 Appropriations Act which allows HHA to transition to a biennial inspection schedule without MTW authority.

V. Sources and Uses of MTW Funds

A. Sources and Uses of MTW Funds

HHA submitted their unaudited and audited information in the prescribed FDS format through HUD's Financial Assessment System (FASPHA).

Activities Using Only Single Fund Flexibility

HHA did not use single fund flexibility for broader use purposes during FY 2015.

B. Local Asset Management Plan

Has the PHA allocated costs within statute during the plan year?	Yes
Has the PHA implemented a local asset management plan (LAMP)?	No
Has the PHA provided a LAMP in the appendix?	No

C. MTW Report: Commitment of Unspent Funds

HUD has indicated that MTW agencies are not required to provide information in this section of the Annual Report until subsequent guidance and clarification is provided by HUD.

VI. Administrative

A. General description of any HUD reviews, audits, or physical inspection issues that require the agency to take action to address the issue.

In FY 2015, HHA did not receive any HUD review, audit or physical inspection issues that would require HHA to take action to address the issue.

B. Results of latest PHA-directed evaluations of the demonstration, as applicable.

As previously reported, HHA has partnered with the University of Massachusetts-Amherst (UMass) to evaluate the design and implementation of the rent reform study and to conduct a block grant evaluation. Dr. Michael Krezmien, who has experience conducting similar evaluations, is leading this effort. Dr. Krezmien's academic career has focused on social and educational inequities and much of his research has focused on populations that are heavily represented in subsidized housing programs, including current programs serving HHA families. Below is an update on the evaluation initiatives:

Rent Reform Study

During FY 2015, Dr. Krezmien conducted evaluations of the Career Advancement Program. As part of these efforts:

- HHA worked with its evaluation partner to further refine the eligibility criteria and metrics used to tract the effectiveness of CAP and to begin implementation of the program for public housing households.
- A control and treatment group was established and each public housing household, which met CAP eligibility criteria, was placed in one of the groups based on a random assignment.
- During the summer of 2015, HHA began recruiting eligible public housing households from the treatment group. HHA sent potential participants mailings and promotional brochures, and conducted an informational session for prospective participants. The recruitment process implemented by HHA was monitored and the impact of recruitment activities was examined.
- Five (5) individuals were enrolled in CAP and HHA staff worked actively with these participants. On-going efforts to monitor program participation, including attendance and performance measures, will help HHA to provide additional supports and motivation to participants.
- Plans were made to recruit additional public housing participants for the Program and to expand the program to Housing Choice Voucher Program households. As the number of program participants increases, specific outcomes of CAP participants, such as certificates obtained and training programs completed, will be evaluated to help HHA understand the impact of the program and to identify which programs are most effective.
- The evaluation process will also monitor changes in employment and employment activities, and income levels.

Detailed MTW Block Grant Evaluation

During FY 2015, HHA continued to work with the evaluator to track and report on the baseline and benchmark cost savings metrics that are discussed and reported on above in the Approved MTW Activities section of the Report. With respect to single fund flexibility, to date, HHA has not utilized MTW Block Grant flexibility, i.e. Public Housing Operating Fund, Capital Fund and HCVP HAP funds have been used for the original program purposes and there have been no internal transfers for other authorized MTW

activities. HHA's ability to utilize single fund flexibility is severely constrained due to the funding formula issue previously noted.

C. Certifications of MTW Statutory Requirements

See the attached certification regarding the statutory requirements in Appendix A.

Appendix A

The Holyoke Housing Authority ("HHA") hereby certifies that between the periods of January 1, 2015 and December 31, 2015, HHA met the following three MTW statutory requirements of:

- 1) Assuring that at least seventy-five (75) percent of the families assisted by HHA are very low-income;
- 2) Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- 3) Maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

Holyoke Housing Authority

MA005

PHA Number/HA Code

I hereby certify that all the information stated herein is true and accurate.

Matthew Mainville

Name of Authorized Official

Executive Director

Title



Signature

3/24/16

Date