

**Commonwealth of Massachusetts
Department of Housing & Community
Development**

**Moving To Work Program
Annual Plan for Fiscal Year 2014**

**Revised Plan Submitted:
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I. Introduction

On June 19, 2008, the Massachusetts Department of Housing and Community Development (DHCD) entered into an Amended and Restated Moving To Work Agreement (MTW Agreement) with the US Department of Housing and Urban Development (HUD). MTW is a demonstration program authorized by Congress, through which participating agencies are given the flexibility to waive certain statutes and HUD regulations in order to design and test approaches for providing housing assistance that:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and,
- 3) Increase housing choices for low-income families.

The three objectives listed above are referred to as “MTW statutory objectives”.

The MTW Agreement is effective through 2018. Through an earlier agreement between HUD and DHCD, DHCD has been a participant in the MTW program since 1999. From 1999 to 2008, the scope of DHCD’s MTW participation was limited to a small program that provided a financial assistance package of rent and stipends to participating low-income families. The program, which is ongoing, is administered in the Boston area by Metropolitan Boston Housing Partnership and in south Worcester County by RCAP Solutions, Inc¹.

The 2008 MTW Agreement replaces the earlier agreement between HUD and DHCD. It provides DHCD with the flexibility to test out new approaches consistent with the MTW statutory objectives and to expand the MTW demonstration to include all tenant-based Housing Choice Vouchers administered by DHCD with certain exceptions. Those exceptions are special purpose vouchers under the 2008 (and all subsequent) Veterans Affairs Supportive Housing (VASH), Five-Year Mainstream, Family Unification Program (FUP), Enhanced Vouchers/Tenant Protection Vouchers and Moderate Rehab programs - all of which are not covered under the Block Funding component of the MTW Agreement. While these special purpose vouchers are not included in MTW Block Grant funding, MTW operating flexibility may be applied to them in accordance with HUD’s published guidance.

Under the terms of the MTW Agreement, DHCD is required to prepare and submit to HUD an MTW Annual Plan and Annual Report. The required form and content of the Annual Plan and Report are defined by HUD in HUD Form 50900 “Elements for the Annual MTW Plan and Annual MTW Report”. For purposes of this document and the required submission to HUD, an “MTW activity” is defined as any activity that requires MTW flexibility to waive statutory or

¹ DHCD subcontracts with eight regional administering agencies (RAA) and one local housing authority to administer its portfolio of vouchers, assuring that all 351 cities and towns in Massachusetts are served by its HCVP. A list of the RAAs is included in Appendix C. In FY 2013, DHCD conducted a competitive procurement process for RAA services which is expected to result in contract awards prior to the start of FY 2014.

regulatory requirements. This document is DHCD's MTW Annual Plan for Fiscal Year 2014, i.e. the period from July 1, 2013 through June 30, 2014.

As of the date of issuance of this document, DHCD has not received confirmation regarding its federal funding for Calendar Year 2013. The information presented in this Plan assumes continuation of funding at approximately current levels adjusted for inflation. If decreases in funding occur, DHCD may need to modify, delay or cancel the proposals herein and/or take other necessary measures, including deferring issuance of turnover vouchers.

Prior to submission to HUD, DHCD made the Annual Plan and the proposed MTW Agreement Amendment available for public review and comment. In addition, DHCD conducted public hearings in Boston and Springfield during March 2013 to allow opportunities for the general public and program participants to provide comments on the proposed Annual Plan. DHCD reviewed and considered written and verbal comments received during the review period. Modifications to the plan were made based on comments received. Copies of public notices, sign-in sheets and written comments are included in Appendix D.

Overview of Annual Goals and Objectives

During Fiscal Year 2014, DHCD intends to undertake a range of MTW-related and other activities to promote the federal MTW statutory objectives and DHCD's overarching goals for the Housing Choice Voucher Program (HCVP) which are: 1) to demonstrate that housing stabilization can be the foundation for economic self-sufficiency for extremely and very low-income households²; and, 2) to demonstrate that administrative costs savings can be redirected to provide meaningful assistance and, potentially, subsidies to additional program participants and owners.

As noted in last year's Plan, DHCD has undertaken a competitive process for the selection of eight (8) Regional Administering Agencies (RAAs) which will be responsible for administering the HCVP statewide including both MTW and Non-MTW activities. The procurement process will be completed by the start of FY 2014. DHCD intends to work closely with the selected RAAs to implement enhanced quality control programs, to upgrade the skills and qualifications of HCVP program staff, and to improve customer service for applicants, program participants and property owners.

Other highlights of planned FY 2014 activities include:

- DHCD projects that it will provide federal rental assistance and other services to 19,669 eligible households during the Plan year. This represents an overall utilization rate of 98% or greater. As part of this effort, a projected twenty-six (26) additional developments will be placed under Project Based Voucher long-term contracts.

² Extremely low income households are those which have incomes of 30% or less of Area Median Income (AMI); Very low income households have incomes in the 30-50% of AMI range.

- Implementation of the Expiring Use Preservation Initiative, which is designed to preserve the long-term affordability of at-risk housing developments, will continue. Two developments are currently participating in this program, and other sites are in the planning stages. DHCD will work with HUD, developers, tenant groups and other stakeholders to identify additional appropriate sites, educate tenants about their choices, and enter into long-term project based contracts consistent with this HUD-approved MTW initiative.
- DHCD will continue to enroll participants in its new Youth Transition to Success (YTTS) program in partnership with the Massachusetts Department of Children and Families (DCF). This pilot program is designed to extend the current eighteen-month time limit for youth aging out of foster care who participate in the Family Unification Program. Participants in this three year program receive a flat rent subsidy based on regional housing costs, access to escrow and support accounts, and case management and other supportive services provided by DCF staff.
- DHCD will implement revised program guidelines and recruit new participants for the original MTW pilot program administered in the Boston area by Metropolitan Boston Housing Partnership (MBHP) and in Worcester County by RCAP Solutions, Inc. (RCAP). This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Families exercise considerable decision-making in the utilization of the funds, within some guidelines. Case management and program coordination are provided by designated MTW Advisors at each agency.
- Ongoing MTW initiatives such as biennial recertifications, revised utility allowances, asset self-certification, earned income disregard and other simplified rent procedures will continue to be implemented statewide consistent with policy/program descriptions developed by DHCD and approved by HUD. These initiatives help to improve administrative efficiency while promoting family economic self-sufficiency.
- DHCD will continue the statewide roll-out of its new biennial inspection policy initiative. Housing units that meet standards established by DHCD are now subject to a two year inspection cycle. The administrative efficiencies achieved will enable staff to focus on pro-active owner and tenant education efforts.
- DHCD will continue implementation of the previously approved MTW initiative to enhance the Family Self Sufficiency (FSS) program and promote asset development and savings among HCV participants. In the FY 2014 Plan, DHCD has proposed several modifications to the FSS program design which the agency intends to implement this year. Program modifications will strengthen the program's impact and help attract additional participants while also placing a cap on total escrow disbursements.
- Implementation of the MTW Owner Incentive Fund will continue in Berkshire County. This pilot program provides incentives to landlords in support of DHCD and Commonwealth goals including: expanding housing opportunities in underserved areas;

improving the quality of housing units under lease; and, increasing the number of units accessible to households with disabled members.

- DHCD plans to finalize the program design for the “Opportunity Neighborhood” MTW initiative during FY 2014. Under this initiative, DHCD plans to provide significant supports and encouragement to existing voucher participants and/or new voucher holders who wish to move to areas with improved educational systems, job opportunities, social services and other opportunities in the expectation that over time their need for housing and other subsidies will abate or diminish.
- DHCD will continue to meet the income selection requirements for the HCVP by assuring that 75% of all applicants selected for assistance each fiscal year are extremely low income, i.e. have incomes that do not exceed 30% of area median income.

II. General Operating Information

Housing Stock

DHCD currently has Annual Contributions Contracts (ACC) from HUD for a total of 20,112 vouchers. DHCD does not administer a federal public housing program.

Table 1 summarizes the inventory of both MTW and non-MTW vouchers by category. Note that the HCVP totals include both tenant-based and project-based vouchers.

Table 1: Voucher Inventory as of January 2013[†]

MTW	Voucher Inventory
Housing Choice Vouchers	19,228
MTW Sub-Total	19,228
Non-MTW[±]	
VASH*	392
Five Year Mainstream	75
Enhanced Vouchers** [±]	230
FUP*	187
Non-MTW Sub-Total	884
TOTAL ALL PROGRAMS	20,112

[†]Inventory includes units for which DHCD has received an Annual Contribution Contract from HUD. DHCD has been notified that it will receive an additional Enhanced Voucher ACC in the coming months for Commonwealth Ave; however, these units are not reflected in the above-listed inventory count.

[±] DHCD may apply MTW operating flexibility to Non-MTW vouchers including FUP, Enhanced Vouchers and other special voucher programs consistent with its HUD-approved MTW initiatives one year after the initial award; however, because these are special purpose vouchers which are not fungible under the MTW Block Grant, they are listed in the Non-MTW category.

*In FY 2013, DHCD was awarded 105 VASH Vouchers with an ACC effective date of 4/1/12.

** In FY 2013, DHCD was awarded ACCs of 120 Enhanced Voucher units effective 4/1/12 for Summerhill Glen, 103 Enhanced Voucher units effective 4/1/12 for Wilkins Glen, and 7 Enhanced Voucher units at Colonial Estates.

Table 2 below provides a summary of new Project Based Voucher (PBV) developments for which DHCD anticipates entering into Housing Assistance Payments (HAP) Contracts during FY 2014. A total of 536 units in 26 PBV developments are expected to come under HAP contract in the Plan year. This listing is subject to change due to unanticipated changes in development schedules, project financing or other factors. A complete listing of all PBV developments projected to be under contract in FY 2014 is found in Table 4.

Table 2: FY 2014 PBV Projected New Developments

RAA	Project	Community	Owner	AHAP	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
SSHDC	Dept Crossing	Wareham	SSHDC	11/15/2011		8			8
SSHDC	Ames Shovel Works Main & Oliver Streets	Easton	Beacon Communities	4/10/2012	8				8
CTI	Holcroft Park Homes Phase II	Beverly	YMCA of North Shore	5/8/2012	2	6			8
RCAP	Austin Corridor II	Worcester	Worcester Common Ground	6/1/2012		5			5
CTI	Conifer Hill Commons Phase I	Danvers	Kavanagh Advisory Group	6/25/2012	6	2			8
SSHDC	Oscar Romero 24 Allen St	New Bedford	Community Action	6/25/2012	4	3		1	8
HAP	221 Bay St Tapley Court	Springfield	Better Homes, Inc.	7/1/2012	1	7			8
CTI	Wadleigh House 170 Main Street	Haverhill	YMCA of the North Shore	7/16/2012				7	7
CTI	26-28 Marsh St Home Together	Gloucester	Action, Inc.	7/25/2012		4			4
SMOC	McCarthy Village	Acton	Acton Housing Authority	8/8/2012		12			12
CTI	St Josephs Redev. 135 Lafayette St	Salem	Planning Office of Urban Affairs	9/1/2012	5	3			8
RCAP	Tri-Town Landing II	Lunenburg	Great Bridge	9/1/2012		8			8
MBHP	Capital Sq Apartments	Arlington	Housing Corporation of Arlington	9/17/2012		8			8
MBHP	1323 Broadway St Veterans Supportive	Somerville	Volunteers of America	10/1/2012				7	7
CTI	Pleasant St. Apts.	Beverly	Peabody Properties w/ Windover Development	10/15/2012				32	32
HAP	Ames Priviledge 2	Chicopee	HallKeen	10/17/2012		4			4
BHDC	57 Main St	Lee	Berkshire HDC	10/19/2012		4			4
MBHP	St.Polycarp-Phase III	Somerville	Somerville Comm. Corp.	12/5/2012		8			8
HAC	Sally's Way	Truro	Community Housing Resources, Inc.	12/13/2012		4			4
CTI	YWCA Market St Apts. 11 Market St	Newburyport	YWCA of Greater Newburyport	12/17/2012		4			4
CTI	Conifer Hill Commons II 121 Conifer Hill Drive	Danvers	Kavanagh Advisory	12/17/2012	6	2			8
CTI	Hope In Action	Lawrence	Holly Street Associates	N/A		24		25	49
RCAP	North Village	Webster	Winn Development	N/A		67		67	134
SSHDC	Woods at Wareham	Wareham	HallKeen	N/A		22			22

RAA	Project	Community	Owner	AHAP	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
HAC	Kings Landing	Brewster	POAH	N/A		80			80
MBHP	Commonwealth Apts.	Boston	Alston Brighton CDC	N/A		80			80
			Totals		32	365	0	139	536

Leasing Information – Planned

During Fiscal Year 2014, DHCD projects that it will achieve the leasing targets shown in Table 3 below, subject to the award of sufficient HUD funding for calendar years 2013 and 2014.

Table 3: FY 2014 Leasing Projection

MTW	Vouchers Allocated	Projected Leased on 6/30/14	Percentage Leased
Housing Choice Vouchers*	19,228	18,840	98%
Other Households Served through MTW Broader Uses of Funds Authority**	130	130	100%
Non-MTW			
VASH***	392	343	88%
Five Year Mainstream	75	73	97%
Enhanced Vouchers	230	223	97%
FUP	187	183	98%
Non-MTW Sub-Total	884	859	97%
TOTAL	20,112	19,662	98%

* Total includes PBV vouchers that are detailed in Table 4.

** Units leased under the Broader Uses of Funds Authority are funded from the overall MTW voucher allocation. DHCD currently has 106 families enrolled in the Family Economic Stability Program out of a targeted program size of 122. In FY 2013, DHCD was not enrolling families in this program due to the ongoing program redesign, but the agency intends to be at 100% enrollment by the end of FY 2014. The Youth Transition to Success Program has 5 current participants and the agency believes the program will reach its targeted size of 8 participants by the end of FY 2014.

*** Assuming adequate veteran referrals from the three participating Veterans Affairs Medical Centers, DHCD's partners for its VASH program. DHCD has established the VASH leasing rate of 88% based on Assistant Secretary Henriquez's letter to PHAs dated February 19, 2013.

A total of 19,669 units are projected to be under lease as of the end of the Plan year. The projected overall leasing rate of 98% of authorized units highlights the success that DHCD has had in effectively managing and maximizing utilization through its network of Regional Administering Agencies.

Utilizing its HCV vouchers, DHCD operates a statewide Project Based Voucher program. Table 4 provides information on the total universe of PBV developments projected to be under contract in FY 2014 including 26 new PBV developments described in Table 2. In total, DHCD projects that 1,976 PBV units will be under contract by the end of FY 2014, of which 536 are anticipated to be newly contracted units. Note that actual PBV inventory fluctuates based on various factors including financing availability, construction schedules and modifications to existing PBV HAP contracts.

Table 4: FY 2014 Project Based Voucher Inventory Projection

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
CTI	Salem Harbor	Salem	Salem Harbor CDC	N/A	10/1/1997	2/28/2017		4			4
HAP	48 Franklin & 348 Chestnut Sts	Holyoke	Voces de la Esperanza	N/A	4/1/1998	3/31/2013		15			15
HAP	52 Franklin St	Holyoke	Voces de la Esperanza	N/A	5/1/1998	4/30/2013		9			9
CTI	Lincoln Hotel	Salem	Caritas	N/A	5/1/1998	4/30/2017		63			63
HAP	580 South Summer St	Holyoke	Eric Warren	N/A	6/1/1998	5/31/2013		12			12
HAC	885C State Highway	Eastham	Lower Cape Cod CDC	N/A	9/1/2002	9/30/2017		1			1
HAP	451-459 Main St	Holyoke	Puerta de la Esperanza	N/A	10/7/2002	10/6/2013		12			12
MBHP	32 Kent Street	Somerville	Kent Street housing LP	N/A	11/1/2002	10/31/2013	2	6			8
MBHP	1129 Dorchester Ave	Dorchester	Dudley Terrace LP/DBED	N/A	11/19/2002	10/31/2013	6	2			8
MBHP	14 - 24 Roach St	Dorchester	Dudley Terrace LP/DBED	N/A	11/19/2002	10/31/2013		8			8
MBHP	1285 -1291 Mass Ave	Dorchester	Dudley Terrace LP/DBED	N/A	11/19/2002	10/31/2013		4			4
BHDC	YMCA	Pittsfield	Pittsfield YMCA HousingAssociates	N/A	12/16/2002	12/31/2017	28		2		30
RCAP	220 Orchard Hill Dr	Oxford	New Orchard Hill, LP	N/A	1/1/2003	10/31/2013	8	17			25
HAP	342-346 Main & 76 Cabot St	Holyoke	Puerta de la Esperanza	N/A	1/21/2003	1/20/2013		15			15
MBHP	48 Water St	Wakefield	Caritas Communities	N/A	4/1/2003	3/31/2013			6		6
HAC	979 Falmouth Rd Founders Court	Hyannis	C. Johnson & Co.	N/A	4/18/2003	4/17/2013		2			2
BHDC	140 East St	Great Barrington	Construct, Inc.	N/A	5/1/2003	4/30/2013	2				2
CTI	Twelve Summer St	Man.by the Sea	Manchester Residence Corporation	N/A	5/1/2003	4/30/2013		4			4
MBHP	1202 Commonwealth Ave	Allston	Caritas	N/A	8/1/2003	7/31/2013			6		6
MBHP	430-436 Dudley St	Roxbury	Caritas	N/A	8/1/2003	7/31/2013			3		3
MBHP	28 Mount Pleasant St	Roxbury	Caritas	N/A	8/1/2003	7/31/2013			2		2
HAP	Westfield Hotel	Westfield	Domus, Inc.	9/1/2002	9/1/2003	8/31/2013				5	5
MBHP	82 Green St	Jamaica Plain	Pine Street Inn	N/A	9/1/2003	8/31/2013			10		10
MBHP	Russell Terrace	Arlington	Caritas	N/A	10/1/2003	9/30/2013			2		2
MBHP	19 Hancock St	Everett	Caritas	N/A	10/1/2003	9/30/2013			3		3

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
MBHP	4-6 Ashland St	Medford	Caritas	N/A	10/1/2003	9/30/2013			3		3
MBHP	1740 Washington St	Boston	Pine Street Inn	N/A	10/10/2003	9/30/2013			8		8
HAC	32 Old Ann Page Way	Provincetown	Conwell Street LLC	N/A	11/1/2003	10/31/2013	1	1			2
CTI	Salem Heights (Pope St)	Salem	Salem Heights Preservation Associates	N/A	12/1/2003	11/30/2013		72			72
CTI	Reviviendo	Lawrence	Reviviendo Family Housing	N/A	12/30/2003	11/30/2013			3		3
HAC	40A Nelson Ave	Provincetown	Housing Land Trust for Cape Cod	N/A	2/2/2005	1/1/2015		3			3
HAC	58 Harry Kemp Way	Provincetown	Lower Cape Cod CCDC / Harry Kemp Way	N/A	4/1/2005	3/31/2015		4			4
HAP	Hillside Village	Ware	Hillside Village	N/A	4/28/2005	4/27/2015		16			16
SMOC	The Preserve	Walpole	The Preserve	N/A	6/1/2005	5/31/2015		30			30
MBHP	Boston YWCA 140 Clarendon St	Boston	Boston YWCA	N/A	7/14/2005	6/30/2015			20		20
CTI	Conant Village	Danvers	Conant Village Partners	N/A	10/1/2005	9/30/2015		15			15
MBHP	Zelma Lacey Mishawum	Charlestown	Mishawum Assisted Living	N/A	11/1/2005	10/31/2015				20	20
MBHP	Marshall Place Apts	Watertown	Marshall Place Apartments	N/A	11/17/2005	10/31/2015	8				8
SMOC	Bethany School Apts	Framingham	Sisters of St Joseph	N/A	12/1/2005	1/30/2015		10			10
SSHDC	Acushnet Commons	New Bedford	Women's Institute	N/A	12/19/2005	12/18/2015		3			3
CTI	Stonybrook	Westford	Residences at Stonybrook	12/30/2004	1/6/2006	12/31/2016		4			4
HAP	Westhampton Senior	Westhampton	Westhampton Senior Housing	N/A	2/1/2006	1/31/2016	3				3
MBHP	Amory St	Roxbury	Amy Anthony	N/A	2/1/2006	1/31/2016		10			10
SSHDC	Westport Village Apts.	Westport	Westport Village Apartments	N/A	2/1/2006	1/31/2016	12				12
MBHP	Pelham House	Newton	Pelham House	N/A	3/1/2006	2/28/2016	3				3
MBHP	Ruggles Assisted Living	Roxbury	New Atlantic Dev Corp	N/A	3/1/2006	2/28/2016				35	35
CTI	Winter Street	Haverhill	Northeast Family YMCA	9/13/2005	9/1/2006	8/31/2016	13				13
HAP	Paradise Pond Apts	Northampton	Paradise Pond Apartments	N/A	12/8/2006	12/7/2016		8			8
MBHP	Harbor Cove '63 Washington Ave.	Chelsea	HarborCOV, Inc	8/31/2005	12/21/2006	11/30/2016				24	24
HAP	Earle Street	Northampton	HER, Inc.	11/28/2005	1/1/2007	12/31/2017		3		12	15
MBHP	The Moorings Squantum Gardens	Quincy	EA Fish & Associates	12/20/2005	3/7/2007	2/28/2017	39				39

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
CTI	Cordovan at Haverhill Station	Haverhill	Beacon Communities Corp	2/10/2006	3/26/2007	3/25/2017		8			8
CTI	Whipple School Annex	Ipswich	Whipple School Annex (salem harbor cdc)	2/6/2006	4/1/2007	3/31/2017	8				8
CTI	Fina House	Lawrence	Fina House	N/A	4/1/2007	3/31/2017		7			7
HAP	Village at Hospital Hill	Northampton	Village at Hospital Hill	N/A	4/13/2007	4/12/2017	8				8
MBHP	Casa Familias Unidas	Roxbury	Ricardo Quiroga	6/9/2006	5/14/2007	4/30/2017				8	8
MBHP	Four Addresses in Arlington	Arlington	Housing Corp. of Arlington	N/A	6/25/2007	5/31/2012		4			4
HAC	Morgan Woods Pennywise Path	Edgartown	TCB	6/12/2006	8/1/2007	7/31/2017		6			6
SMOC	Baker St	Foxboro	Foxborough HA	8/16/2006	8/1/2007	7/31/2017		20			20
CTI	Lafayette Housing Salem Point Rentals	Salem	Salem Harbor CDC (congress & prince sts)	N/A	8/15/2007	8/14/2017		8			8
SSHDC	Bliss School	Attleboro	Great Bridge Prop.	N/A	9/1/2007	8/31/2017		8			8
MBHP	Janus Highlands	Chelsea	Chelsea NHS	8/4/2006	11/1/2007	10/31/2017		8			8
BHDC	Pine Woods	Stockbridge	Pine Woods	N/A	2/1/2008	1/31/2013	3	2			5
MBHP	TILL Building	Chelsea	TILL, Inc.	5/26/2006	5/1/2008	4/30/2018		5			5
CTI	St Joseph's Apts	Lowell	Coalition for a Better Acre	8/1/2007	8/1/2008	7/31/2018		4			4
MBHP	Grandfamilies	Roxbury	Nuestra CDC	N/A	9/1/2008	8/31/2018				8	8
CTI	Sirk Bld	Lowell	The Caleb Foundation	N/A	11/1/2008	10/31/2018		8			8
HAP	Prospect Hill	Westfield	Domus, Inc	11/15/2007	1/1/2009	12/31/2019		4			4
RCAP	9 May Street	Worcester	WCG	9/20/2007	1/30/2009	1/29/2024	5	3			8
HAP	46-48 School St	Northampton	Valley CDC	9/14/2007	2/1/2009	1/31/2019		2			2
MBHP	Doe House	Mission Hill	PSI/Parker Hill Av LLC	N/A	2/1/2009	1/31/2019			5		5
RCAP	5 Benefit St	Worcester	Main South CDC	N/A	2/10/2009	2/9/2024		4			4
HAP	Village at Hospital Hill II	Northampton	TCB	3/20/2008	2/11/2009	2/10/2019	8				8
CTI	48-64 Middlesex St	Lowell	CBA	N/A	3/1/2009	2/29/2018		6			6
HAP	Sanford Apts 33 Elm St	Westfield	Domus Inc.	1/7/2008	3/10/2009	3/9/2019		2		3	5
CTI	Salem Point LP (Harbor, Ward, Peabody)	Salem	Salem Harbor CDC	N/A	3/10/2009	3/9/2019		7			7
MBHP	The Coolidge	Watertown	Mitchell Properties LLC	11/27/2007	3/30/2009	3/29/2019	4				4

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
HAC	Barnstable Senior Lombard Farm	W. Barnstable	HAC	3/12/2008	5/15/2009	5/14/2024	8				8
MBHP	St. Polycarp I	Somerville	Somerville Com. Corp	1/2/2008	7/1/2009	6/30/2019	2	6			8
HAC	Barnstable Family Kimber Woods	W. Barnstable	HAC	3/12/2008	7/1/2009	6/30/2025		7			7
MBHP	Granite St Housing	Quincy	Quincy CAP	7/25/2008	7/1/2009	6/30/2019				5	5
CTI	Loring Towers (Loring Ave)	Salem	AIMCO	N/A	7/1/2009	6/30/2019		8			8
SMOC	High Rock Homes	Needham	High Rock Homes Ltd Needham HA	N/A	7/1/2009	6/30/2024		8			8
SSHDC	Kensington Court @ Lakeville Station	Lakeville	KCLS Construction Holding Co. LLC	7/30/2007	7/7/2009	7/6/2024		8			8
BHDC	Hillside Avenue	Gt. Barrington	CDC of So. Berkshire	3/18/2008	7/13/2009	7/12/2024	2	3			5
RCAP	470 Main St	Fitchburg	Twin Cities CDC	1/30/2008	7/24/2009	7/23/2024	2	5			7
MBHP	Spencer Green 113 Spencer Ave	Chelsea	Chelsea NHS	3/3/2008	7/31/2009	7/30/2019	2	6			8
HAC	Residences at Canal Bluff	Bourne	HAC	6/23/2008	8/3/2009	8/2/2024		3			3
MBHP	109 Gilman St	Somerville	Somerville Com Corp	N/A	10/1/2009	9/30/2019		1			1
MBHP	447 Concord Road	Bedford	S-C Mgmt	1/7/2008	12/1/2009	11/30/2024		4			4
MBHP	Renwood-PWA Ltd. Part. 526 Mass Ave	Boston	Renwood PWA, LP.		2/1/2010	1/31/2013	7				7
MBHP	Renwood-PWA Ltd. Part. 158 Walnut Ave	Roxbury	Renwood PWA, LP.		2/1/2010	1/31/2013		8			8
MBHP	Renwood-PWA Ltd. Part. 36 Edgewood St	Roxbury	Renwood PWA, LP.		2/1/2010	1/31/2013		3			3
SMOC	Wilber School	Sharon	Beacon Communities Corp	10/7/2008	3/15/2010	3/14/2025		8			8
CTI	Palmer Cove (Palmer St)	Salem	Salem Harbor CDC	N/A	3/18/2010	3/17/2025	3	1		2	6
RCAP	1-7 Piedmont St	Worcester	Worcester Common Ground	12/5/2008	5/7/2010	5/6/2025	3				3
MBHP	Capen Court	Somerville	Somerville HA	10/23/2008	6/1/2010	5/31/2025	8				8
CTI	Hayes Building	Haverhill	POUA	7/1/2009	10/1/2010	9/30/2025	3	1			4
HAP	Reed House Annex at 182 Main St	Westfield	Domus, Inc.	9/15/2009	11/3/2010	11/2/2025				8	8
MBHP	1060 Belmont Street	Watertown	Watertown Community Housing	6/1/2009	11/18/2010	11/17/2025	2	5			7
HAC	Main St Ext.- Thankful Chase Path	Harwich	Lowe Cape CDC	2/1/2010	12/1/2010	11/30/2025	2	3			5
SSHDC	Village at 815 Main	Wareham	Conerstone Properties	10/19/2008	1/1/2011	12/31/2026		5			5

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
CTI	Sacred Heart	Lawrence	Beacon Communities Sacred heart LLC	12/16/2009	1/1/2011	12/31/2026	8				8
CTI	Acre High School Apts.	Lowell	Coalition for a Better Acre	2/1/2010	2/7/2011	2/6/2026	3	5			8
RCAP	Tritown Landing I	Lunenburg	Mass Housing Opportunities	2/5/2010	2/14/2011	2/13/2026		8			8
MBHP	Spencer Row 205-221 Spencer Ave	Chelsea	Chelsea Neighborhood Developers Saunders School LLC	11/23/2009	3/1/2011	2/28/2026	3	5			8
CTI	Saunders School Apartments	Lawrence	c/o E.A. Fish Companies	6/15/2010	3/1/2011	2/28/2026				16	16
HAP	Villa Borinquent	Springfield	Flores Development	5/1/2010	3/2/2011	3/1/2026	1	7			8
SMOC	Cutler Heights	Holliston	Cutler Heights LP	1/15/2010	3/15/2011	3/14/2026	3	4			7
CTI	Cabot St Homes	Beverly	Beverly Affordable Hsg Coal.	9/21/2009	4/1/2011	3/31/2026	8				8
SSHDC	Ocean Shores	Marshfield	Beacon Communities	2/2/2010	4/1/2011	3/31/2026	8				8
RCAP	Freedom Village	W. Boylston	FWC Affordable Hsg LLC	8/7/2008	4/29/2011	4/28/2026	2	4			6
RCAP	Southgate Place	Worcester	South Worcester Neighborhood Improvement	3/15/2010	6/17/2011	6/16/2026	3	3			6
LHA	Washington Sq.	Lynn	Lynn Home for Young Wom.	2/1/2010	7/15/2011	7/14/2026	2	6			8
CTI	Powderhouse Village	Ipswich	YMCA of North Shore	6/7/2010	8/10/2011	8/7/2026	8				8
SSHDC	Ingraham Place	New Bedford	Women's Institute	6/1/2010	9/15/2011	9/16/2026				8	8
HAC	Veterans Park Apts. Schoolhouse Green	Falmouth	Falmouth Housing Corporation	12/24/2010	10/15/2011	10/14/2026	8				8
HAP	King St	Northampton	Valley CDC	9/1/2010	10/24/2011	10/23/2026				5	5
CTI	Union Crossing	Lawrence	Lawrence Community Works	7/2/2010	12/1/2011	11/30/2026		8			8
CTI	Steven's Corner	North Andover	Neighborhood of Affordable Housing	6/14/2010	12/16/2011	12/15/2026	1	7			8
CTI	Firehouse Place 69 Willow Street	Hamilton	Harborlight Community Partners	4/25/2011	12/16/2011	12/15/2026	1	3			4
CTI	478-486 Moody St Unity House	Lowell	Coalition for a Better Acre	8/2/2010	12/20/2011	12/19/2026		2		6	8
CTI	Holcroft Park Apts. Mill & Grant Street	Beverly	YMCA of North Shore	3/23/2011	12/21/2011	12/20/2026	4	4			8
MBHP	6 Fort Street	Quincy	Asian CDC	11/1/2010	1/5/2012	1/4/2027	3	5			8
SMOC	Mayhew Court	Hopkinton	Hopkinton Housing Authority	10/14/2010	1/27/2012	1/26/2027		12			12
MBHP	St. Polycarp-Phase II 16 Butler Drive	Somerville	Somerville Community Corporation	2/9/2011	2/7/2012	2/6/2027		8			8
SSHDC	154-168 Eagle Street	Fall River	Community Care Services, Inc	3/31/2011	2/17/2012	2/16/2027		4		4	8

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
HAP	Cumber Homes Apts. Cumberland & Dwight	Springfield	Beacon Communities	5/4/2011	4/4/2012	4/3/2027		8			8
MBHP	Putnam Green 625 Putnam Ave	Cambridge	Homeowners Rehab	2/10/2011	4/19/2012	4/18/2027		8			8
MBHP	Hearth at Olmstead Green	Dorchester	Hearth Olmstead LP	3/2/2011	5/1/2012	4/1/3027	15				15
SMOC	Old High School Commons	Acton	Common Ground Development Corp.	6/15/2011	7/1/2012	6/30/2027	3	3			6
HAC	Clay Pond Cove 101 Harmony Road	Bourne	HAC & Housing Investment, Inc.	7/8/2011	9/1/2012	8/31/2027		8			8
SMOC	Summerhill Glen	Maynard	Beacon Communities	N/A	9/1/2012	8/31/2027	86				86
SMOC	Wilkins Glen	Medfield	Beacon Communities	N/A	9/1/2012	8/31/2027		76			76
BHDC	Rice Silk Mill 55 Spring Street	Pittsfield	Rees-Larkin Development	8/5/2011	10/1/2012	9/30/2027		5			5
RCAP	Fitchburg Place 16 Prichard Street	Fitchburg	Winn Development	9/15/2011	10/1/2012	9/30/2027	8				8
MBHP	Winter Gardens 44 Winter Street	Quincy	Neighborhood Housing Services of South Shore	8/11/2011	11/15/2012	11/14/2027	3	3			6
MBHP	75 Cross Street	Somerville	Somerville Community Corporation	3/29/2012	12/1/2012	11/1/3027				8	8
MBHP	Highland Terrace 47-55 Garish St	Chelsea	Chelsea Neighborhood Developers, Inc.	9/26/2011	1/15/2013	1/14/2028	3	5			8
SMOC	Sudbury	Sudbury	Sudbury Housing Authority	2/14/2012	1/23/2013	1/22/2028		11			11
RCAP	Bowers Brook	Harvard	Russo, Inc.	1/11/2011	5/10/2012	5/9/2027	4				4
RCAP	Water Mill (formerly Whitney Carriage)	Leominster	Twin Cities CDC	10/1/2011	12/1/2012	11/30/2027	2	6			8
RCAP	KGH Phase 4 Hammond street	Worcester	Main South CDC	10/1/2011	12/13/2012	12/12/2027	3	2			5
SSHDC	Dept Crossing	Wareham	SSHDC	11/15/2011				8			8
SSHDC	Ames Shovel Works Main & Oliver Streets	Easton	Beacon Communities	4/10/2012			8				8
CTI	Holcroft Park Homes Phase II	Beverly	YMCA of North Shore	5/8/2012			2	6			8
RCAP	Austin Corridor II	Worcester	Worcester Common Ground	6/1/2012				5			5
CTI	Conifer Hill Commons Phase I	Danvers	Kavanagh Advisory Group	6/25/2012			6	2			8
SSHDC	Oscar Romero 24 Allen St	New Bedford	Community Action	6/25/2012			4	3		1	8
HAP	221 Bay St Tapley Court	Springfield	Better Homes, Inc.	7/1/2012			1	7			8
CTI	Wadleigh House 170 Main Street	Haverhill	YMCA of the North Shore	7/16/2012						7	7

RAA	Project	Community	Owner	AHAP	HAP	HAP End	PBV Eld/Dis.	PBV Fam	Homeless Ind.	PBV Supportive	Total PBVs
CTI	26-28 Marsh St Home Together	Gloucester	Action, Inc.	7/25/2012				4			4
SMOC	McCarthy Village	Acton	Acton Housing Authority	8/8/2012				12			12
CTI	St Josephs Redev. 135 Lafayette St	Salem	Planning Office of Urban Affairs	9/1/2012			5	3			8
RCAP	Tri-Town Landing II	Lunenburg	Great Bridge	9/1/2012				8			8
MBHP	Capital Sq Apartments	Arlington	Housing Corporation of Arlington	9/17/2012				8			8
MBHP	1323 Broadway St Veterans Supportive	Somerville	Volunteers of America	10/1/2012						7	7
CTI	Pleasant St. Apts.	Beverly	Peabody Properties w/ Windover Development	10/15/2012						32	32
HAP	Ames Priviledge 2	Chicopee	HallKeen	10/17/2012				4			4
BHDC	57 Main St	Lee	Berkshire HDC	10/19/2012				4			4
MBHP	St.Polycarp-Phase III	Somerville	Somerville Comm. Corp.	12/5/2012				8			8
HAC	Sally's Way	Truro	Community Housing Resources, Inc.	12/13/2012				4			4
CTI	YWCA Market St Apts. 11 Market St	Newburyport	YWCA of Greater Newburyport	12/17/2012				4			4
CTI	Conifer Hill Commons II 121 Conifer Hill Drive	Danvers	Kavanagh Advisory	12/17/2012			6	2			8
CTI	Hope In Action	Lawrence	Holly Street Associates	N/A				24		25	49
RCAP	North Village	Webster	Winn Development	N/A				67		67	134
SSHDC	Woods at Wareham	Wareham	HallKeen	N/A				22			22
HAC	Kings Landing	Brewster	POAH	N/A				80			80
MBHP	Commonwealth Apts.	Boston	Alston Brighton CDC	N/A				80			80
Totals							430	1157	73	316	1976

Waiting List Information

As of January 2013, there were 78,887 households on DHCD's Housing Choice Voucher Program waiting list. Waiting list characteristics are summarized in Table 5 below. Current waiting list totals are less than reported last year, reflecting the fact that over 33,000 applicant records were removed as a result of a waiting list update and purge completed in June 2012. DHCD anticipates that the total number of waiting list households will increase in FY 2014 due to strong demand for affordable housing along with statewide and national economic conditions.

As was described in previous Annual Plans, DHCD is in the process of making changes to the waiting list methods used for PBV developments. The revised policy will allow project owners to maintain site-based waiting lists with DHCD approval. DHCD has begun the process of establishing site based waiting lists for some of its newer PBV developments. As the process continues, some or all PBV waiting lists may be closed during the transition period. DHCD will issue public notices of waiting list openings and closings.

Table 5: Waiting List Information-January 2013

	# of applicants in 2013	% of total applicants in 2013
Waiting List Total	78,887	100%
Income (1)		
Extremely low income <30% AMI	71,211	90.3%
Very low income >30% but <50%	6,257	7.9%
Low income >50% but < 80%	765	1.0%
Family Type		
Families with children (2)	49,635	62.9%
Elderly families (3)	3,960	5.0%
Families with disabilities (3)	24,330	30.8%
Race/ethnicity (4)		
White/Hispanic	8,183	10.4%
White/non-Hispanic	24,234	30.7%
White/no ethnicity specified	3,625	4.6%
Black/African American/Hispanic	1,412	1.8%
Black/African American/non-Hispanic	14,293	18.1%
Black/African American/no ethnicity specified	2,959	3.8%
American Indian/Alaskan Native/Hispanic	178	0.2%
American Indian/Alaskan Native/non-Hispanic	896	1.1%
American Indian/Alaskan Native/no ethnicity specified	117	0.1%
Asian or Pacific Islander/Hispanic	112	0.1%
Asian or Pacific Islander/non-Hispanic	13,533	1.7%
Asian or Pacific Islander/no ethnicity specified	364	0.5%
Native Hawaiian/Other Pacific Islander/Hispanic	688	0.9%
Native Hawaiian/Other Pacific Islander/non-Hispanic	414	0.5%
Native Hawaiian/Other Pacific Islander/no ethnicity specified	88	0.1%
Hispanic, no race specified	17,674	22.4%
Non-Hispanic, no race specified	2,091	2.7%
No race or ethnicity specified	2,076	2.6%

(1) Based on HUD income limits effective as of 12/1/12.

(2) This number represents households with more than one member

(3) Includes households with only one member

(4) Applicants may specify more than one race therefore an applicant may be counted more than once

III. Non-MTW Information

In Fiscal Year 2014, DHCD will continue to administer Non-MTW special purpose voucher programs including VASH, FUP, Enhanced Vouchers and Five Year Mainstream programs, which are not included in the MTW program. Where allowed by HUD guidance and approved in DHCD's Annual Plan, DHCD may apply MTW operating flexibility to its Non-MTW special purpose voucher programs. Enhanced voucher funding may be rolled over into the MTW Block Grant after the initial year.

Sources and Uses of Non-MTW Funds

Table 6 below provides a projection of Non-MTW sources and uses for Fiscal Year 2014. Note that HUD funding amounts are preliminary, based on projected funding for calendar years 2013-14. The amounts listed below may change based on HUD's actual funding allocations. Actual sources and uses will be provided in the MTW Annual Report.

Table 6: FY 2014 Non-MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – VASH	\$1,466,000
HUD Subsidy – FUP FY 2008, 2009, and 2010	\$1,068,708
HUD Subsidy – Five Year Mainstream	\$713,200
HUD Subsidy Enhanced Vouchers	\$2,536,000
HUD Administrative	\$901,000
Non-MTW Sources Total	\$6,684,908
Uses	
HAP Payments	\$5,969,459
Administrative	\$901,000
Non-MTW Uses Total	\$6,870,459

Description of Proposed Non-MTW Activities

DHCD currently subcontracts with eight regional administering agencies (RAA) and one local housing authority to administer its portfolio of vouchers. All RAA contracts are slated to expire in FY 2013. In August 2012, DHCD issued a competitive Request for Responses (RFR) for services associated with the regional administration of the Moving to Work Housing Choice Voucher Program and other related programs. The review process is underway, and DHCD anticipates awarding contracts under this procurement in early 2013 prior to the start of FY 2014.

Also during the Plan year, DHCD intends to evaluate the feasibility of implementing some or all of the program efficiencies allowed pursuant to HUD's recent PIH Notices 2013-3 and 2013-4.

Consistent with PIH Notice 2012-32, DHCD may apply MTW flexibilities to units converted to PBV under the Rental Assistance Demonstration to the extent that said flexibilities are not in conflict with RAD provisions specified in HUD's Notice(s).

IV. Long Term MTW Plan

The MTW Agreement offers a unique and important opportunity to improve and enhance the HCV program. Building on lessons learned and successes of the existing small-scale MTW demonstration programs, DHCD intends to continue to utilize MTW flexibility to test out the efficacy of new approaches in support of MTW statutory objectives and the Commonwealth's housing goals.

DHCD intends to continue to explore the potential benefits of MTW: 1) to demonstrate that housing stabilization can be the foundation for economic self-sufficiency for extremely and very low-income households; and, 2) to demonstrate that administrative costs savings can be redirected to provide meaningful assistance and, potentially, subsidies to additional program participants and owners. DHCD believes that affordable housing can provide the foundation that allows extremely and very low-income households to enter the economic mainstream and access good jobs and education. Maximizing the value of limited federal program dollars to help families achieve important economic goals, enabling them to move on so that program dollars can help serve additional families is a key goal.

Additional principles that guide MTW planning for the long term include:

- All MTW activities must relate to one or more of the three MTW statutory objectives, i.e. reducing cost and/or promoting administrative efficiency, increasing housing choice, and supporting families in achieving economic self-sufficiency.
- MTW flexibility will be utilized to promote tighter linkages and synergy between the HCV program and other related Commonwealth programs and policy goals such as preventing or reducing homelessness, supporting self-sufficiency and economic independence initiatives; supporting project-based affordable housing for extremely low income households; supporting those who have one or more disabilities and stabilizing neighborhoods.
- By identifying and addressing administrative efficiency opportunities, MTW flexibility will be used wherever feasible to increase the number of extremely and very low-income households served and the overall quality of leased housing units.
- New MTW program initiatives will respond to differences among regional and local housing markets.

DHCD is committed to continuing to provide opportunities for broad-based input both from its regional administering agencies and outside stakeholders to inform the design of DHCD's MTW initiatives.

V. Proposed MTW Activities

DHCD is not proposing any new MTW activities in FY 2014.

VI. Ongoing MTW Activities

This section of the MTW Annual Plan provides information and updates on MTW activities that have been previously approved by HUD.

Description of Ongoing MTW Activities

Activity 2000-1: Family Economic Stability Program

Description/Update of MTW Activity: DHCD's original MTW Agreement and Plan focused on implementation of a small-scale program administered in the Boston area by Metropolitan Boston Housing Partnership (MBHP) and in Worcester County by RCAP Solutions, Inc. (RCAP). This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Families exercise considerable decision-making in the utilization of the funds, within some guidelines.

Case management and program coordination is provided by designated MTW Advisors at each participating agency. Families may select any housing unit which they deem affordable and appropriate for their needs and which meets the occupancy requirements of the local Board of Health and Massachusetts Lead Laws where applicable. There is no HUD Housing Quality Standards inspection or rent-reasonableness test.

In FY 2013, DHCD modified key components of the Family Economic Stability Program to better meet the changing needs of participants. Current components of the program include:

- A flat rental subsidy up to \$1200 per month in Greater Boston and \$500 per month in Worcester County;
- An annual support account up to \$1800 to be used for activities consistent with the client's economic stability plan;
- Participation time limit of five-years;
- DHCD contributions to the family's escrow account up to \$800 of DHCD funds per household annually; and,
- Revised and expanded eligibility requirements that include families who work at-least part time, who are imminently employed, or who are enrolled in a full-time job training program.

DHCD will continue to offer preference to Boston area applicants living in homeless shelters and to Worcester County families who have received TANF or other public assistance benefits in the last two years. DHCD will also continue the requirement that 75% of all participants must have incomes less than or equal to 30% of Area Median Income.

DHCD will periodically review and revise the program design based on experience and participants' needs. The specific components of the program including rent subsidy amounts,

support amounts, escrow terms and amounts, program participation period, number of participants and other components may be adjusted at DHCD's option. DHCD may also elect to expand the program into additional regions.

DHCD will begin enrolling clients in the revised program in FY 2014. Clients enrolled in the prior program model will continue to receive assistance and case management based on the original model until their graduation from the program. DHCD will assess the effectiveness of the revised program and make changes as necessary.

Initial Plan Year: 2000 - Implementation activities began in FY 2001.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: Prior approval granted by HUD. Authorizations cited include Broader Uses of Funds. The Broader Uses of Authority amendment was retroactively applied to this activity through HUD's letter of January 28, 2010.

Activity 2010-1: PBV Site Based Waiting Lists

Description/Update of MTW Activity: Under this initiative, owner/managers of PBV developments authorized by DHCD will be responsible for all PBV waiting list intake and management functions. Generally, DHCD will require PBV owners to assume and manage these functions; however, exceptions may be made at DHCD's option. Under the new system, applicants will contact the owner/manager of a specific development in order to file an application. Application files and the waiting list itself will be maintained at the development site. Owner/managers will be responsible for contacting and screening applicants who come to the top of the waiting list, collecting all needed information from the applicant, and then forwarding the applicant to the RAA for eligibility determination and processing.

The transition to site-based waiting lists is occurring in stages, with new PBV projects being the first to assume waiting list management responsibilities, followed by projects managed by larger and/or more experienced management companies. For existing PBV developments, all current applicants will maintain their waiting list places; however, the waiting list will be updated prior to transitioning to the owner/managers. During the transition period, waiting lists may be temporarily closed. DHCD will either use existing staff or contract with a Fair Housing organization to conduct periodic reviews of the system to ensure compliance with DHCD's approved tenant selection plan for each respective project and conformance to fair housing guidelines.

All PBV developments utilizing the new waiting list management methods are required to modify their tenant selection plans and other documents as needed, and must administer the waiting list in conformance with DHCD's Affirmative Fair Housing Marketing Plan and all other applicable HUD Fair Housing regulations and guidance.

Starting in FY 2013, DHCD has begun to authorize some of its newer PBV developments to establish and manage their own site based waiting lists. Additional existing and/or new developments may be added during FY 2014.

Initial Plan Year: 2010 – Implementation activities began in FY 2013.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.4

Activity 2010-2: Payment Standard Exceptions

Description/Update of MTW Activity: DHCD may approve any documented and reasonable exception to payment standards as a reasonable accommodation for HCV households with disabled household members without HUD approval. This policy is utilized without regard to the percentage increase requested over the payment standard.

Additionally, DHCD may approve other documented and reasonable exceptions to payment standards without seeking HUD approval if such requests will support participants' ability to find suitable rental housing in "low poverty, high-opportunity" neighborhoods, and clearly achieve the statutory objectives of the MTW program.

In FY 2014, DHCD will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval.

Initial Plan Year: 2010 – Implementation activities began in FY 2010.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2010-3: Owner Incentive Fund

Description/Update of MTW Activity: Beginning in 2010, an Owner Incentive Fund pilot program was established to promote upgrades to the housing stock in areas of the state with a large percentage of older, deteriorated housing stock. When this type of deteriorated housing is the prevailing housing type available to HCV participants in a community/region, it has several undesirable consequences including: 1) limiting the tenants' ability to secure better quality housing in neighborhoods of lower concentrations of poverty; 2) resulting in inefficient use of the HCV inspection staffs' time by continually having to re-inspect units that frequently fall out of compliance; 3) resulting in few, if any, handicapped accessible units; and 4) discouraging new owners with better quality housing from making their units available to HCV households.

Program goals for this activity are: leasing higher quality units including incentivizing owners to upgrade existing housing at least one grade level, i.e. from a "C" to a "B" grade, or from a "B" to an "A" grade; increasing the number of units that are accessible to persons with disabilities; expanding the number of units leased in currently underserved neighborhoods, and encouraging new owner participation.

Participating owners are eligible for a flat fee financial incentive (initially established at \$1,200) payable in 4 quarterly installments over the first year of the HAP contract. At the end of the first year under HAP contract, owners are eligible for an additional one-time payment (initially established at \$500) if one or more of the following applied: the owner had not previously been part of the HCV program; the unit had not previously been under contract to an HCV participant; the unit was new construction or substantial rehabilitation; or, the unit was a foreclosed property prior to leasing and at least a "B" grade level. A program requirement that the tenant remains in occupancy, or the owner has agreed to lease to another HCVP referral from the RAA was implemented in the second year and will continue during indefinitely.

In order to be eligible for incentive payments, the unit must be compliant with HQS at all times during the HAP term. An agreement is signed certifying that the incentive payments are not part of the monthly rent to owner.

DHCD will continue to implement this activity in FY 2014. At present, there is an annual cap of ten units per owner and an overall program total of forty units. DHCD will periodically review and revise program components based on actual experience and community need. The incentive amounts, participation criteria, unit caps and other factors may be adjusted by DHCD at its discretion. DHCD may also elect to expand this initiative to new regions.

Initial Plan Year: 2010 – Implementation activities began in FY 2010.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2010-4: Modifications to HUD Standard Forms

Description/Update of MTW Activity: Under this initiative, required standard HCV program forms published by HUD may be modified by DHCD as needed to streamline processing, utilize “plain language”, and address local housing market features. New forms are rolled out to RAA contractors as they are completed. As required under the MTW Agreement, any changes to the HAP form will include language noting that funding for the contract is subject to the availability of appropriations.

To date, DHCD has implemented modifications to the PBV standard HAP and AHAP forms as needed to incorporate relevant MTW provisions. The revised forms have been implemented at two expiring use projects. In FY 2014, DHCD will continue to utilize this authority as needed.

Initial Plan Year: 2010 – Implementation activities began in FY 2013.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.1.

Activity 2011-1: Value Vouchers

Description/Update of MTW Activity: DHCD plans to implement a new “MTW value voucher” targeted to the homeless and those with disabilities. This initiative will provide a lower cost subsidy than a conventional voucher. Participants will be offered units in privately assisted housing developments where the rental costs are lower (generally by 25% or more) than current HUD published FMRs but still not affordable to very-low and extremely low-income households. These would generally be units in LIHTC, 236, and certain state funded developments, for example, where rents are generally set at or below 60% of AMI.

For value voucher units, the rent reasonableness determination process will consist of verification of the regulated rent amount, which will always be at or below the Payment Standard. The value voucher will make up the difference between the rent and 30% of the tenant’s adjusted income.

Partner agencies will include MassHousing, a quasi- public agency that promotes housing opportunities for low and moderate income households, and various management companies that have a solid track record of providing assisted units to vulnerable populations. MassHousing will make units available to clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities (DDS) under their 3% set-aside program for this target population in effect since 1978. DHCD may also identify and establish partnerships with agencies that provide services to homeless individuals, regardless of disability status, and may also make units available to clients of the identified agencies.

Clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities Services (DDS) will be provided with continuing services and support from these two respective agencies. DHCD’s partnership with MassHousing and certain private management companies will make it possible for the participants to live in good quality housing. DHCD will work with its partner agencies to establish realistic time limits for these vouchers within the time permitted by its MTW Agreement with HUD, currently in effect until June 2018.

Due to the substantial level of activity associated with other MTW initiatives described herein, implementation of this initiative has not begun. In FY 2014, DHCD may begin implementation of this activity pending the outcome of discussions among affordable housing advocates and other state agencies.

Initial Plan Year: 2011 – Implementation activities have not begun.

Proposed Changes to Activity: As a clarification, DHCD may work with a broader range of potential partners than those state agencies noted above and in the approved Value Vouchers initiative.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW authorization: MTW Agreement, Attachment C, paragraphs B.2, D.1.a, D.2.a, D.2.b, D.4.

Activity 2011-2: Opportunity Neighborhoods

Description/Update of MTW Activity: DHCD plans to establish an “Opportunity Neighborhoods” program in one or more selected neighborhoods in different regions throughout the Commonwealth. The majority of academic research and literature indicates that where a person lives determines (to various degrees), the opportunities afforded to them.

The purpose of DHCD’s “Opportunity Neighborhood” MTW initiative is to provide significant supports and encouragement to existing voucher participants and/or new voucher holders who wish to move to areas with empirically-documented improved educational systems, job opportunities, social services and other opportunities in the expectation that over time their need for housing and other subsidies will abate or diminish. Existing participants and/or voucher holders moving into these areas will be provided with case management support both before and after the move through the participating regional administering agencies. Other incentives may be provided based on family needs and budget availability such as transportation assistance, child care referrals, training stipends, etc. Families will be encouraged or required to develop a family plan to access opportunities in their new neighborhoods with a special focus on positive outcome educational programs for children and available jobs for adults. Where appropriate, participants will also be encouraged to participate in the Family Self Sufficiency Program.

DHCD has conducted research concerning educational outcomes of school age children. Using this research to identify Opportunity Neighborhoods, DHCD may implement a pilot mobility program to increase access to communities with high quality school districts in one or more of DHCD’s eight regions.

During the past fiscal year, DHCD has worked with local graduate students to review this data and finalize the design of the “Opportunity Neighborhood” Program. In its current form, the program will offer revised payment standards, longer housing search periods, security deposit assistance, and move assistance to support moves to communities with high quality schools. In FY 2014, DHCD plans to complete the program design process.

Initial Plan Year: 2011 – Implementation activities have not begun.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW authorization: MTW Agreement, Attachment C, paragraphs B.1.iii, D.2.a, D.4.

Activity 2011-3: Biennial Inspections

Description/Update of MTW Activity: Commencing in November 2012, DHCD began to phase in modifications to its HQS inspection policies and procedures to allow for biennial inspections under certain defined circumstances. Under the new policy, tenant-based units that pass an annual inspection on the first attempt are placed on a biennial inspection cycle. In subsequent years, units must continue to pass on the first inspection attempt to remain on a biennial inspection cycle. If deemed necessary, DHCD may consider other related factors, including but not limited to the severity of the repair. DHCD also reserves the right to change any units' inspection frequency based upon management discretion.

DHCD intends to put all project-based units on a biennial inspection cycle. At DHCD's management discretion, each project-based building will either have all of its units biennially on the same schedule or half the units will be inspected each year. DHCD will track the percentage of units that do not pass HQS inspection at each site and adjust inspection frequency accordingly. DHCD also reserves the right to change any units' inspection frequency based upon management discretion.

In tandem with this effort, DHCD intends to expand the use of inspectors to provide tenant and landlord training related to HQS standards, unit upkeep, and other related maintenance matters. A key driver is to more firmly establish DHCD's statewide inspection staff as a valuable and accessible resource to property owners in their respective regions that will result in new owner participation and a continued listing of quality housing for program participants.

In FY 2014, DHCD will continue to implement this initiative. The initial phase-in effort will be completed in October 2013. Based on the results of this implementation, DHCD may elect to further modify this initiative to meet the original goals: creating administrative efficiencies while continuing to ensure HQS compliance; expanding pro-active landlord and tenant training efforts; and, improving housing choice for tenants in good quality units.

Initial Plan Year: 2011 – Implementation activities began in FY 2013.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative. DHCD will conduct HQS inspections on a sample of units on the biennial inspection schedule. The inspections will be conducted on the off year to confirm that units on the biennial inspection frequency continue to remain in compliance with HQS during the period between biennial inspections.

MTW authorization: MTW Agreement, Attachment C, paragraph D.5.

Activity 2011-4: Biennial Recertification Process

Description/Update of MTW Activity: Starting in January 2012, DHCD streamlined and simplified its recertification policies including the following components:

- Conduct biennial recertifications for all MTW households; however, any household that believes they would benefit from an annual income recertification may request one;
- Limit the number of voluntary interim recertifications that a MTW family may complete between regular biennial recertifications to two. Required interim recertifications do not count against the limit, i.e., interims required for changes in family composition or otherwise required by DHCD. A hardship policy has been adopted to allow households whose loss of income is greater than 30% and beyond the household's control to request an exemption from the limit on interims. Elderly and disabled households, as well as households who live in an Expiring Use project on the conversion date and select a PBV, are exempt from this provision and are able to complete an interim recertification at any time; and
- Allow household self-certification of assets valued up to \$50,000 and the exclusion of the income from these assets. When assets are valued at over \$50,000, verification is required. For assets with market/face value in excess of \$50,000, DHCD calculates asset income by taking the market/face value and multiplying that value by the HUD passbook savings rate. At the present time, less than .001% of DHCD's current participants report assets at greater than \$50,000.

DHCD utilizes the Enterprise Income Verification (EIV) system for screening of applicants and new household members and during the regular and interim recertification process. The EIV system's existing tenant search, prior debt and adverse termination reports are run for applicants and new household members. EIV Income reports are used to verify and calculate SS, SSI benefits and Medicare insurance premiums, but are not generally used to calculate earned income and unemployment benefits. EIV income reports are used to validate income from sources such as wages and unemployment benefits. EIV income reports are also used during the regular and interim reexamination process to identify any current and/or prior discrepancies between tenant-reported income and income shown in the EIV system. EIV is also used to verify that families claiming zero income are not receiving income from any of the EIV reported sources. DHCD utilizes the EIV Identity Verification Reports on a continuous basis for ID discrepancy matching errors with respect to PIC50058-MTW as a primary compliance tool after conversion from conventional PIC50058. The EIV Deceased Tenant Report is monitored by DHCD on a weekly basis.

In FY 2014, DHCD will continue implementation of this initiative. DHCD also plans to assess progress and compliance with these new policies through ongoing quality control and to conduct follow-up training as needed.

Initial Plan Year: 2011 – Implementation activities began in FY 2012.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW authorization: MTW Agreement, Attachment C, paragraph D.1.c.

Activity 2011-5: Youth Transitions to Success

Description/Update of MTW Activity: Among the most often cited concerns for youth aging out of foster care is the lack of adequate and affordable housing. Youth who lack housing may have difficulty staying in school and/or maintaining employment. These youth are expected to succeed on their own long before a vast majority of their peers. By the time they receive their FUP voucher, they have already experienced more challenges than many people experience in a lifetime.

To address these issues, DHCD launched the Youth Transitions to Success Program. This is a time-limited pilot program to provide continued support to and build upon the successes of youth currently participating in its Family Unification Program Aging Out of Foster care program that are facing the current 18 month expiration date. The program offers a shallow short-term and time-limited subsidy, supportive services funds for education, training and employment related expenses, an escrow account and case management. Up to 25 current participants facing the expiration date for the Family Unification Program Aging Out of Foster care program will be eligible to participate in the extension. Eligible participants for the extension must be in good standing and be making progress toward their education and employment goals.

DHCD and the Department of Children and Families (DCF) have entered into an MOU for the YTTS Program, and staff from both agencies worked collaboratively to design and finalize the administrative elements.

The three-year YTTS Program provides participants with:

- A flat rental subsidy that steps down annually by 15%. Rental subsidy amounts vary by region. In the first year, the rent subsidy is calculated at 80% of FMR. The rent subsidy amount is reduced by 15% each year;
- A matched savings account. DHCD will match up to \$200 per year in participant savings with a 4:1 match, i.e. the maximum annual match is \$800; and
- An annual support budget of \$500 for expenses related to sustaining employment and meeting educational goals.

In FY 2013, DHCD launched the program and began assisting targeted youth. Five participants enrolled, and two new referrals will begin the program in February and May of 2014. All five current participants are enrolled in post-secondary degree programs at local colleges and universities and meeting their program goals. DHCD and DCF expect that up to eight new participants will join the program each year. DHCD will continue to monitor and revise components of this program based on the outcomes of the initial cohort of participants.

Initial Plan Year: 2011 – Implementation activities began in FY 2013.

Proposed Changes to Activity: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW authorization: MTW Agreement, Broader Uses of Funds amendment.

Activity 2012-1: MTW Utility Allowances

Description/Update of MTW Activity: Under this initiative, DHCD will implement changes to its Utility Allowance policies including adopting a simplified Utility Allowance schedule and eliminating Utility Assistance Payments (UAP) of \$25 or less.

Models for simplified Utility Allowance schedules will continue to be developed in FY 2014. DHCD expects that the eventual changes will result in reduced processing errors while simplifying the schedules for participants, owners and staff.

In FY 2014, DHCD will continue its policy of producing UAP checks only for amounts greater than \$25. DHCD has found that clients receiving UAPs for small amounts are less likely to deposit or cash the checks that they receive. This results in bookkeeping issues for the finance staff at the RAA and DHCD level which demand time and resources out of proportion to the relatively small amounts of money. Through this effort, DHCD intends to reduce the incidence of outstanding checks, and alleviate the need for finance staff to spend time and resources reconciling these accounts.

Initial Plan Year: 2012 – Implementation of the policy applicable to UAPs of \$25 or less began in FY 2012. Implementation of the simplified Utility Allowance schedule has not begun.

Proposed Changes: No changes are proposed.

Evaluation: DHCD will utilize internal reporting systems to collect and analyze data on the number of households impacted, the change in error rates and changes to Utility Allowance Payments.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2012-2: Rent Simplification

Description/Update of MTW Activity: Starting in January 2012, DHCD implemented the following rent simplification strategies in tandem with its biennial recertification initiative:

- Apply the Payment Standard in effect at the effective date of the regular recertification regardless of any change in the Payment Standard.
- Apply the Utility Allowance and Payment Standard in effect at the effective date of the last regular recertification to calculate rents at interim recertifications.
- Replace the Earned Income Disregard with a similar disallowance that is more straightforward for staff to administer. The revised policy allows households which would be eligible for EID to instead select a single period between regular recertifications to have additional earned income excluded from their rent calculation.
- Exclude all Full-time student income for household members other than the Head, Spouse or Co-Head.

In FY 2014, DHCD will continue implementation of these policies, while also exploring other options and models for rent simplification.

Initial Plan Year: 2012 – Implementation activities began in FY 2012.

Proposed Changes: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative including data estimates from one or more RAAs on staff time spent on recertifications and error rates determined from quality control reviews.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2012-3: Project Based Voucher Discretionary Moves

Description/Update of MTW Activity: Effective as of January 2012, DHCD has revised its Project Based Voucher program guidelines to establish reasonable limits on discretionary moves. This policy promotes efficiency in the operation of the PBV program, while also ensuring that tenant-based vouchers continue to be available to eligible households on the waiting list. Except as noted below, PBV households are able to terminate the assisted lease and receive priority for an available tenant-based voucher only after the second year of occupancy provided that they remain in good standing with their lease and HCV program responsibilities. In addition, for each RAA, DHCD establishes an annual target number of vouchers available to PBV households who have requested a tenant-based voucher. The annual target number is equal to the total number of turnover vouchers from the prior year for each RAA multiplied by the percentage of PBV units managed by the RAA. If demand exceeds supply over the course of the year, those additional PBV participants who wish to move will remain at the top of the waiting list until the following year.

The new guidelines do not apply to PBV households who meet one or more of the following criteria:

- Households which are over or under-housed;
- Households which are victims of domestic violence pursuant to the VAWA policy;
- Households which require tenant-based voucher to address an approved reasonable accommodation request;
- Non-disabled households that occupy an accessible unit and that have been requested to move to allow a disabled household to move into the accessible unit; and,
- Households that can document the need to move in order to obtain or maintain employment.
- Households that can document that a household member has been accepted into a higher education institution and can document the need to move in order to attend the institution.

PBV households who meet one or more of the above criteria will continue to receive a priority for an available tenant-based voucher and these vouchers will not be counted towards the annual target limit.

In FY 2014, DHCD will continue implementation of this policy.

Initial Plan Year: 2012 – Implementation activities began in FY 2012.

Proposed Changes: DHCD has clarified that families living in Expiring Use Preservation Initiative projects on the conversion date who select a PBV, as well as families living in units converted to PBV through the RAD program, will be permitted to request a discretionary move after the first year of assisted tenancy following conversion. Therefore, the requirement that a PBV family wait until the end of the second year of assistance before requesting a transfer is revised in these instances. RAD and Expiring Use PBV participants who are deemed eligible to move will be added to the waiting list for a tenant-based voucher.

Evaluation: DHCD will utilize data generated by RAAs to track and monitor actual performance under this policy.

MTW authorization: MTW Agreement, Attachment C, paragraph D.1.b

Activity 2012-4: Expiring Use Preservation Initiative

Description/Update of MTW Activity: DHCD has begun to implement an initiative designed to preserve the long-term affordability of expiring use properties. This affordable housing preservation tool makes use of the resources provided by HUD in the form of Enhanced and Tenant Protection Vouchers to continue the affordability of the units in these projects by converting eligible units immediately to Project-Based Units with a 15 year affordability period.

DHCD may consider the following criteria when determining eligibility of projects for conversion:

- Located in neighborhoods which offer economic and educational opportunities and relatively low concentrations of poverty;
- The cost per unit will ensure long-term viability for both DHCD and the Project;
- The cost per unit will generally fall within DHCD's then current PBV MTW voucher per unit cost;
- There is substantial community and tenant support for units to be converted to Project-Based Units as documented by the Project developers;
- The Project Developer must request from HUD that DHCD be the Administrator of the Enhanced Vouchers resulting from the conversion action;
- Prior to HUD designation of DHCD as Administrator of the Enhanced Vouchers, an initial survey of residents of each development will be conducted to gauge interest in participating in the PBV program. Results will be forwarded to HUD. Based on the results, HUD will decide whether to assign the Administrator duties to DHCD or to the Local Housing Authority; and,
- The Project Developer agrees to participate in and support MTW-related self-sufficiency activities for the tenants of the project. The type and extent of support provided will be determined by site. For example, a project may provide case management services to its MTW residents.

DHCD may modify the selection criteria listed above at its discretion, and may place limitations on the number, types and/or characteristics of units to be supported under this initiative. In addition, tenants of the development who are eligible to receive vouchers are given the option to receive an Enhanced Voucher or to have their unit converted to a Project-Based voucher. DHCD requires that tenants of impacted projects be provided with detailed information so that they can make an informed choice.

Pursuant to HUD's 2012 updated guidance on the use of special purpose vouchers, DHCD may apply MTW operating flexibilities to Enhanced Vouchers upon issuance provided that these flexibilities do not infringe on the protections applied to Enhanced Voucher households pursuant to HUD regulations and notices. Operating flexibilities that may be applied to Enhanced Vouchers include, but are not limited to, biennial recertifications, biennial inspections, rent simplification (provided that it does not infringe on EV protections), and utility allowances. Until the Enhanced Voucher household either moves from the unit or is terminated from the program, they will continue to be subject to the Enhanced Voucher minimum rent policies,

including the applicable provisions related to income decreases. Enhanced Voucher income limits and payment standards will also continue to apply to these households. DHCD does not apply term limits to any of its Housing Choice Voucher participants.

For existing tenants on the conversion date who elect to receive a Project-Based Voucher and who are considered overhoused, DHCD may waive the subsidy standard policy, provided that there must be at least one household member for each bedroom in the apartment. In addition, tenants may request a reasonable accommodation if applicable. The only Enhanced Voucher provision which applies to tenants selecting the Project-Based option is the initial income eligibility requirement. DHCD's other MTW PBV policies apply upon the conversion action, except for the following:

- Tenants who live in the development at the time of the conversion action and who select a PBV will be permitted to move after the first year of assisted tenancy following the conversion action. They will be added to the waiting list for a tenant-based voucher at that time if requested;
- Tenants who live in the development at the time of the conversion action and who select a PBV will not be subject to the limit on voluntary interim rent decreases; and,
- DHCD may waive the limitation on the number of units per project generally applied to PBV developments and allow up to 100% of units in all types of developments to be Project-Based.

As of January 2013, DHCD is currently working to finalize PBV contracts for two developments under this initiative. Discussions with several other developers are ongoing. In FY 2014, DHCD will continue to implement this program focusing on preserving additional affordable housing developments.

Initial Plan Year: 2012 – Implementation activities began in FY 2013.

Proposed Changes: In FY 2014, DHCD will modify the components of its project-based voucher program in order to streamline administration of the Expiring Use Preservation Initiative and maximize the number of units benefitting from these efficiencies.

- Consistent with PIH Notice 2012-32, DHCD may apply MTW flexibilities to units converted to PBV under the Rental Assistance Demonstration to the extent that said flexibilities are not in conflict with RAD provisions specified in HUD's Notice(s).
- DHCD may revise standards for acceptable income verification documents for clients at the time of conversion. Specifically, when completing initial certifications at the time of a RAD or Expiring Use conversion, DHCD may waive the HUD requirement that verification documents not be more than 120 days old at the time of effective date. Authorized in Attachment C Section D of DHCD's MTW Agreement.
- Notwithstanding proposed changes to PBV regulations, DHCD will continue to define "existing housing" as "Housing units that already exist on the proposal selection date and

that substantially comply with the HQS on that date.” Authorized in Attachment C Section D of DHCD’s MTW Agreement.

- DHCD may institute other changes, on a case by case basis, as long as such changes are consistent with the MTW authorizations granted herein.

Evaluation: DHCD will utilize data generated by DHCD and property owners to track and monitor actual performance under this policy including replacement or rehabilitation costs of units that have preserved if available.

MTW authorization: MTW Agreement, Attachment C, paragraph D.1.e, D.1.f , D.3.a, D.7.b, D.7.c.

Activity 2012-5: Family Self Sufficiency Program Enhancements

Description/Update of MTW Activity: DHCD will use its budgetary flexibility to use MTW funds to enhance the existing Family Self-Sufficiency (FSS) Program. These new features will encourage participation and successful completion of the program:

- Provide escrow funds for clients who would otherwise be ineligible for the escrow component of the FSS due to their level of earned income at the time they join the program;
- Establish a discretionary fund to assist FSS participants with short term assistance in order to enable household members to participate in employment or educational activities (i.e., funding for car insurance or child care, etc.);
- Set aside funding to reward families who choose to delay full-time employment in order to pursue education and/or training which will better prepare them to attain long-term self-sufficiency than immediate entry into the work force;
- Establish goal-specific incentive payments to be awarded when a family attains an established goal (i.e., completion of a GED, successful completion of a semester of college courses, etc.).

DHCD has met with RAA senior staff and FSS Coordinators to discuss potential changes to the FSS program and the most effective strategies for implementing those changes. In FY 2014, additional FSS program modifications will begin to be implemented as noted below. DHCD expects to begin utilizing some or all of these strategies to strengthen the FSS program by improving the retention rate, increasing participants ability to access employment and or educational opportunities by providing “gap” funding to address financial barriers to employment, and increasing participants’ long-term economic capacity by providing incentives to encourage participants complete education and training programs before entering the workforce.

Initial Plan Year: 2012 – Implementation activities have not begun.

Proposed Changes: DHCD proposes the following FSS related modifications in FY 2014: 1) Implement an absolute cap on the amount of escrow regardless of prior FSS participation at any of DHCD’s RAAs statewide. The cap, which may be periodically reviewed and updated at DHCD’s discretion, will be set at \$25,000 per household; 2) Modify the requirement that an FSS applicant must have an interim or annual recertification within 120 days prior to FSS enrollment; 3) Modify the extension policy to allow for six month extensions for up to two years with revised extension eligibility requirements; 4) Modify FSS re-enrollment eligibility criteria to require that re-applicants demonstrate consistent progress since prior FSS participation ended. DHCD will provide an exception when the participant loses a job due to no fault of their own; 5) Modify escrow calculation methodology by calculating FSS credits using the same method for all participants regardless of income level. The method used for very low income households will apply to all participants; and, 6) Establish an incentive payment for FSS graduates that choose to withdraw from the HCV program within 2 years of completing the FSS program and that pursue homeownership or secure a non-subsidized rental unit. The initial incentive payment amount, which may be periodically reviewed and updated at DHCD’s discretion, will be set at

\$5,000 per household. These modifications are authorized in Attachment C, Section E of the MTW Agreement.

Evaluation: DHCD will utilize data generated by the FSS coordinators at each RAA to track and monitor actual performance under this policy.

MTW authorization: MTW Agreement, Attachment C, paragraph B.1.b, paragraph E.

Activity 2013-1: Rent Reasonableness

Description of MTW Activity: DHCD modified its rent reasonableness policies and will no longer re-determine reasonable rents 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.

DHCD 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 DHCD deems it necessary.

DHCD will continue to implement this revised policy in FY 2014.

Initial Plan Year: 2013 – Implementation activities began in FY 2013.

Proposed Changes: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraph D.2.a.

Activity 2013-2: PBV Rent Reasonableness

Description of MTW Activity: In FY 2013, DHCD modified its rent reasonableness policies for re-determined rents under the Project Based Voucher (PBV) program. Under the new policy, re-determined rents to owners of PBV units, except for certain tax credit units as defined in 983.301(c), shall not exceed the lowest of the reasonable rent or the rent requested by owner. This policy change eliminates consideration of the then current Fair Market Rent (FMR) limits when re-determining PBV rents. Consistent with the tenant-based MTW Rent Reasonableness policy initiative, DHCD has also waived 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.

The new policy does not change DHCD's policy for determining initial rents, i.e. initial PBV rents continue to be determined in conformance with the provisions of 24 CFR 983.301 through 983.305 as applicable.

DHCD will continue to implement this policy in FY 2014.

Initial Plan Year: 2013 – Implementation activities began in FY 2013.

Proposed Changes: No changes are proposed.

Evaluation: DHCD will utilize internal plans, reports and staff resources to evaluate this initiative.

MTW Authorization: MTW Agreement, Attachment C, paragraphs D.2.a and D.7.

VII. Sources and Uses of Funding

DHCD's operates an MTW program that involves only Housing Choice Vouchers. Table 7 below provides a projection of sources and uses for the MTW program for Fiscal Year 2014. Note that no state or local funds are utilized. Note also that HCV funding is allocated on a calendar year (CY) basis. As of the drafting of this Plan, DHCD has not been notified of either its CY 2013 or CY 2014 funding; thus, the amounts listed below are likely to change based on actual funding levels. DHCD will provide information on actual source and use amounts as part of the MTW Annual Report.

In December 2011, HUD issued PIH Notice 2011-67, which describes new cash management requirements and procedures for the HCV program nationwide. HUD will now disburse HCV funding on a monthly basis, using adjusted Housing Assistance Payments and leasing data from the most recently completed quarter. DHCD continues to be concerned that this Notice is inconsistent with its MTW Agreement, which defines a funding formula that is not directly linked to actual costs or leasing levels. DHCD intends to work with HUD to ensure that its funding needs are fully met consistent with the MTW Agreement.

Table 7: FY 2014 MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – MTW Housing Choice Voucher *	\$212,482,000
Administrative	\$18,788,727
MTW Sources Total	\$231,270,727
Uses	
HAP Payments	\$209,340,000
Administrative	\$18,536,000
MTW Local Initiatives**	\$1,220,000
MTW Uses Total	\$229,096,000

**Includes all PBV units*

*** The MTW Local Initiatives estimated amount includes the cost of MTW Activity 2000-1 and the Owner Incentive Fund at the pilot sites. This number is reduced from 2013 as a result of DHCD's decision to temporarily freeze enrollment while program design changes were made.*

VIII. Appendices

- Appendix A is the required signed Resolution adopting the FY 2014 MTW Annual Plan Certification of Compliance.
- Appendix B provides a description of DHCD's planned and ongoing MTW evaluation efforts.
- Attachment C provides a listing of each DHCD regional administering agency.
- Attachment D includes the public hearing notice, sign-in sheets, and written testimony received as part of the MTW Annual Plan public hearing process.

Appendix A: Resolution Adopting Certification of Compliance

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Appendix B: Evaluation

DHCD, in collaboration with its network of Regional Administering Agencies, utilizes internal resources to track and monitor performance of proposed and ongoing MTW activities. At the present time, no third party evaluation is planned. DHCD has previously submitted information on an evaluation of the small-scale 183 unit pilot program completed by a graduate student as a thesis project. This information was also presented at HUD's April 2009 MTW conference. DHCD is presently working with a group of local graduate students to research options and finalize program design for the Opportunity Neighborhoods initiative.

Appendix C: Listing of Regional Administering Agencies

Submitted under separate cover

Appendix D: Public Hearing/Public Comment Materials and Responses
Submitted under a separate cover

Listing of Regional Administering Agencies

Berkshire Housing Development Corp.

1 Fenn Street, 3rd fl.
Pittsfield, MA 01201
Elton Ogden, Executive Director
413.499.4887

Community Teamwork, Inc.

155 Merrimack Street
Lowell, MA 01852
Karen Frederick, Executive Director
978.459.4887

Housing Assistance Corp.

460 West Main Street
Hyannis, MA 02601
Frederic Presbrey, Executive Director
508.771.5400

HAP Inc.

322 Main Street
Springfield, MA 01105
Peter Gagliardi, Executive Director
413.233.1500

Lynn Housing Authority

10 Church Street
Lynn, MA 01902
Charles Gaeta, Executive Director
781.581.8700

Metropolitan Boston Housing Partnership

125 Lincoln Street
Boston, MA 02111
Chris Norris, Executive Director
617.859.0400

RCAP Solutions

12 East Worcester Street
Worcester, MA 01604
Karen Koller, Executive Director
800.488.1969

South Middlesex Opportunity Council

300 Howard Street

Framingham, MA 01702

James Cuddy, Executive Director

508.620.2335

South Shore Housing Development Corp.

169 Summer Street

Kingston, MA 02364

Carl Nagy-Koechlin, Executive Director

781.422.4200

Massachusetts Department of Housing and Community Development (DHCD)

Funding Agency for the regional Section 8 Programs administered by:
Berkshire Housing Development Corporation in Pittsfield, MA; Community Teamwork, Inc. in Lowell, MA; HAP Housing in Springfield, MA; Housing Assistance Corporation in Hyannis, MA; Lynn Housing Authority and Neighborhood Development in Lynn, MA; Metropolitan Boston Housing Partnership in Boston, MA; RCAP Solutions, Inc. in Gardner, MA; South Middlesex Opportunity Council in Framingham, MA; South Shore Housing Development Corporation in Kingston, MA

NOTICE OF PUBLIC HEARING
REGARDING DHCD'S HOUSING CHOICE VOUCHER PROGRAM (HCVP) DRAFT MOVING TO WORK (MTW) PROGRAM ANNUAL PLAN FOR FY 2014

MARCH 27 AND MARCH 28, 2013 AT 1:00 P.M.

MARCH 27TH AT DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
100 CAMBRIDGE STREET
BOSTON, MASSACHUSETTS 02114

MARCH 28th AT HAP HOUSING, 322 MAIN STREET, SPRINGFIELD, MA. 01105

On June 19, 2008, DHCD entered into an Amended and Restated MTW Agreement with the U.S. Department of Housing and Urban Development (HUD) to expand its current 183 unit MTW initiative to include over 18,000 units of its HCVP portfolio over the next several years. In accordance with its MTW Agreement, DHCD will hold a public hearing prior to finalizing its FY 2014 Moving to Work Annual Plan. This plan provides details about DHCD's proposed MTW activities that will commence beginning July 1, 2013.

DHCD's draft MTW Annual Plan is available on DHCD's Website at: www.mass.gov/dhcd/. Additionally, this document will be mailed upon request, or an appointment scheduled to view it, by calling DHCD at (617) 573-1206 between the hours of 9 a.m. and 4:00 p.m.

DHCD will accept written comments through Wednesday, April 3, 2013. Written comments should be addressed to:

Bureau of Rental Assistance
Massachusetts Department of Housing and Community Development
100 Cambridge Street - Suite 300
Boston, MA 02114
Attention: MTW Annual Plan Comments
FAX: (617) 573-1345

If you plan to attend the hearing in Springfield on March 27th, please call 413-233-1670 to confirm your attendance.

If you plan to attend the hearing in Boston on March 28th, please call 617-573-1206 to provide your name, which will be forwarded to the building's security staff. Please bring photo I.D. Failure to list your name in advance could delay your attendance at the hearing.

If you require an accommodation (materials in Braille/large print, sign language interpreters, etc.), please contact DHCD at 617-573-1206 no later than March 18, 2013.





Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
 COMMUNITY DEVELOPMENT**

Deval L. Patrick, Governor ♦ Timothy P. Murray, Lt. Governor ♦ Aaron Gornstein, Undersecretary

SIGN-IN SHEET

PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE: March 27, 2013

LOCATION: Boston, MA

NAME	REPRESENTING
Courtenay Loiselle	RCAP Solutions
Sue Nohl	MBHP
Maureen Fitzgerald	RHN
Carol	RCAP Solutions
Ailly Amorullo	RCAP Solutions
John Wahl	Edgmer
Ed Cameron	CTI



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
 COMMUNITY DEVELOPMENT**

Deval L. Patrick, Governor ♦ Timothy P. Murray, Lt. Governor ♦ Aaron Gornstein, Undersecretary

SIGN-IN SHEET

PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE: 3/28/13

LOCATION: Springfield, MA

NAME	REPRESENTING
Linda Morley	HAP, Inc.
Ellen Hatzakis	HAP Inc
Nancy Riner	HAP
Luc Rivera	HAP
Chris Moterney	HAP
Logan Pata	HAP



Submitted
3.27.13

Testimony of behalf of the
Regional Housing Network of Massachusetts
By
Maureen Fitzgerald, Executive Director

March 27, 2013

Thank you for the opportunity to comment on the Department of Housing and Community Development's draft Moving To Work Annual Plan for Fiscal Year 2014. The Network, which has been in existence for 35 years, is comprised of eleven regional nonprofit agencies that develop, manage, and deliver housing and related services to low- and moderate-income individuals and families in every city and town in Massachusetts. Eight of our members are also the delivery system for a number of the housing programs available through the Department including the Housing Choice Voucher Program (HCVP), Massachusetts Rental Voucher Program, pilot Moving To Work programs at RCAP Solutions and Metro Boston Housing Partnership, and the Housing Consumer Education Centers. In that capacity, we have a unique perspective on the state's program. It is the employees of our member agencies who ultimately have the direct relationship with the people throughout the Commonwealth who are served by the state's programs.

We represent the following eleven regional housing agencies. Their principal office locations are listed as well:

- Berkshire Housing Development Corporation – Pittsfield
- Berkshire County Regional Housing Authority – Pittsfield
- Central Massachusetts Housing Alliance - Worcester
- Community Teamwork Inc. – Lowell
- Franklin County Regional Housing and Redevelopment Authority – Turners Falls
- HAPHousing – Springfield
- Housing Assistance Corporation – Hyannis
- Metropolitan Boston Housing Partnership – Boston
- RCAP Solutions, Inc. – Worcester and Gardner
- South Middlesex Opportunity Council – Framingham
- South Shore Housing Development Corporation – Kingston

We appreciate the Department's continued efforts to expand its Moving To Work (MTW) program and encourage its implementation efforts. Based on our own experiences with the Department's original MTW program and successive modifications, we believe that a program that emphasizes family self-sufficiency and housing choice along with greater administrative flexibility can yield positive and long-lasting outcomes for the family, the community and the administering agency.

Member Agencies:

Berkshire Housing Development Corporation . Community Teamwork, Inc. . Franklin County Housing and Redevelopment Authority . HAPHousing . Housing Assistance Corporation
Metropolitan Boston Housing Partnership, Inc. . RCAP Solutions, Inc. . South Middlesex Opportunity Council, Inc. . South Shore Housing Development Corporation

The draft Plan lays out a number of overarching goals and objectives. We are pleased to see the emphasis on continued expansion through the resumption of the original MTW programs in Worcester and Boston, additional Project-Based Vouchers (PBVs) and the Expiring Use Preservation Initiative. We are particularly pleased to see the commitment to expansion of the Youth Transition to Success program. Although this program serves a very specific and limited number of participants, it provides a critical bridge to those aging out of foster care; a uniquely vulnerable, and historically overlooked, population.

We are also extremely eager to see the administrative efficiencies fully implemented in order to provide greater capacity to address family self-sufficiency and housing choice goals. We are interested in working with you to implement the use of "MTW value vouchers" targeted to those who are disabled and households who are homeless. We strongly support efforts to assist more vulnerable households with permanent affordable housing. We look forward to exploring the "Opportunity Neighborhood" MTW initiative providing supports and encouragement to participants seeking to move to high opportunity neighborhoods. However, it is challenging to take on these new initiatives without having realized some administrative benefit from the proposed efficiencies. We need to move on those efficiencies swiftly.

There are a number of activities we would like to highlight below:

Activity 2010-1: PBV Site Based Waiting Lists We are pleased to see the Department move forward in implementing this requirement with all new PBV projects. In order to continue to achieve greater efficiency in the administration of the PBV program, we recommend that the Department promptly extend this requirement to all new *and existing* PBV projects. We look forward to working with the Department and PBV owners to transition the responsibility for this function smoothly.

Activity 2010-3: Owner Incentive Fund This pilot program has worked effectively in the Berkshires, with approximately 20 property owners in the last twelve months taking advantage of the opportunity and improving the quality of their units. We support the Department's willingness to expand this to other specific regions on a limited basis.

Activity 2010-4: Modifications of HUD Standard Forms We would like to see this activity expanded to simplify some of the frequently-used HUD forms, such as the Request for Tenancy Approval. We look forward to working with the Department to propose changes and implement simpler revisions of key standard forms.

Activity 2011-1: MTW Value Vouchers, Activity 2011-2: Opportunity Neighborhoods, Activity 2011-5: Youth Transitions to Success, and Activity 2012-4: Expiring Use Preservation Initiative As noted above, we welcome the opportunity to expand the availability of vouchers, preserve affordable housing, and amplify the benefit of the voucher with supports and incentives for families moving to high opportunity neighborhoods.

Activity 2012-1 MTW Utility Allowances We urge the Department to implement the revised utility allowances in this calendar year. Through the collaborative efforts of the regional administering agencies and the Department, considerable progress has already been made on this initiative. We encourage the Department to finalize any details and move forward with implementation. This will create the program efficiency needed, minimize costly calculation errors, and will enable participants to better understand the rent calculation process.

Activity 2012-2: Rent Simplification We support the continuation of the current rent simplification efforts and encourage the Department to consider further refinements. Specifically, we propose that the Department consider eliminating the current medical deduction/expense verification requirement and develop a standard flat rate medical deduction for all elderly and/or disabled households. This would eliminate the need for clients to provide receipts for all of their medical expenses, save staff time to calculate, create efficiency and eliminate errors. Our understanding is that effective models have been established by other MTW agencies. We are interested in exploring this option further with the Department.

Activity 2012-3: Project Based Voucher (PBV) Discretionary Moves We strongly support the Department's policy establishing modest limits on PBV discretionary moves. The proposed limits and exceptions are fair and reasonable. They result in increased efficiency and decreased program administration costs (in keeping with MTW goals) and importantly, do not serve to unduly increase the length of time that extremely low-income applicant families are on the waiting list.

Activity 2012-5: Family Self-Sufficiency (FSS) Program Enhancements The FSS Subcommittee of the Regional Housing Network's Rental Assistance Committee has reviewed the current plan and has specific technical suggestions regarding the discretionary fund and the incentive payments. Please see the testimony submitted by Tania DiDuca on behalf of the Committee for details.

Additional Changes We support the additional changes to the Family Self-Sufficiency Program for the MTW Annual Plan proposed by the FSS Subcommittee. Again, please see the memo submitted by Tania DiDuca on behalf of the Committee for details and the supporting rationale. Their comments are based on practical experience administering the program and are made with the goals of encouraging family participation and advancement as well as administrative efficiency.

We congratulate the Department on its continuing support for, and further refinement of, the Moving To Work program. We have a history of program development and implementation focused on greater family self-sufficiency and increased housing choice for low-income households. We are also continually striving to find more efficient ways to get the job done and invest our staff time and resources to achieve the greatest outcome. We continue to hold those values and welcome the opportunity to work with the Department on its efforts. We encourage you to continue to work collaboratively and transparently with us and other stakeholders.

Thank you for your consideration of this testimony.

3.27.13



metropolitan boston housing partnership

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**Metropolitan Boston Housing Partnership's Comments
Department of Housing and Community Development
Moving To Work Program Annual Plan for FY 2014
by
Susan Nohl, Deputy Director**

March 27, 2013

On behalf of Metropolitan Boston Housing Partnership (MBHP), thank you for the opportunity to present comments regarding the Department of Housing and Community Development's Moving to Work Program Annual Plan for FY 2014.

MBHP is a regional nonprofit housing agency. We administer a wide range of programs to low-income populations in Boston and 29 surrounding communities. Our customers include a cross-section of the local population: people who are homeless and disabled veterans; elders struggling to maintain their independence and families trying their best to make ends meet with minimum wage jobs. We provide rental assistance to 7,700 households, work with 4,300 property owners, and respond to more than 12,000 housing inquires each year. We are one of eleven agencies comprising the Regional Housing Network serving as a vital link in the Commonwealth's housing delivery system. Our largest program is administering the Section 8 Housing Choice Voucher program on behalf of the Department of Housing and Community Development (DHCD). MBHP currently administers more than 5,750 Section 8 Housing Choice Vouchers.

Our mission is to ensure that individuals and families with low and moderate incomes have choice and mobility in finding and retaining decent affordable housing. Our programs and initiatives are designed to encourage housing stability, increase economic self-sufficiency, and enhance the quality of the lives of those we serve. To achieve our mission and to promote efficient service delivery, we work collaboratively with a broad array of service providers and neighborhood-based organizations.

MBHP supports the new initiatives and the ongoing activities of the program that are part of the FY 2014 MTW Plan. We respect the work that the department has done during the initial three years of MTW implementation and have appreciated the opportunity to actively participate in planning many of these changes.

The following are comments related to the activities in previous years plans that are still current, being implemented or have proposed changes.

Activity 2000-1

As one of two of the original administrators of the MTW program, MBHP has worked closely with the department during FY '13 to incorporate the proposed changes into a new program design for the small scale MTW program administered in Boston. We look forward to working with DHCD in the upcoming year as we make an effort to implement some of the recommended changes.

Activity 2010-1

MBHP appreciates that during FY '10, FY '11 and FY '12 we were part of discussions that would give Section 8 PBV property owners and managers the responsibility for the waiting list intake and management functions. MBHP currently administers a significant number of PBVs, 400 PBVs in 46 developments, and four new projects are anticipated in FY '14 for a total of 103 additional units. We know that the current Section 8 PBV waiting lists for the older projects hinder the ability of both MBHP and the individual properties to quickly and efficiently fill vacant units. It is good that the department has allowed the new projects that came on line this year to establish and manage their own site-based waiting lists. We hope that all new projects will continue to have this option because it has increased our efficiency in filling vacant units. However, we ask the department to prioritize this activity in FY '14 so that the older projects not currently eligible for this flexibility will have the opportunity to maintain their own lists. We are committed to working with DHCD and the other administering agencies to do whatever it takes to complete this process.

Activity 2011-3

DHCD's commencement of biennial inspections in November 2012, for a limited number of units, demonstrates positive movement on this activity. MBHP is pleased that DHCD intends to place all project-based units on a biennial inspection cycle because those units tend to be newer construction and professionally managed so that they tend to be higher quality units.

MBHP urges DHCD to consider expanding the pool of eligible units for the biennial inspection status at the end of the initial phase in effort (October 2013) or earlier if possible. Biennial inspections should increase administrative efficiencies, and if implemented across the portfolio the reduction in staff time and administrative costs with fewer annual inspections to complete would be significant. At the same time we share with the department the desire to maintain program integrity and safe, decent units; however, we do not believe that this desire necessitates significantly limiting the pool of units eligible for biennial inspections.

Activity 2011-4

MBHP fully implemented the biennial reexaminations for all MTW households on January 1, 2012. MBHP is committed to continuing to work with DHCD in assessing the impact of this policy. We also encourage DHCD to work with the Regional Administering Agencies to explore other administrative efficiencies that could be achieved by making additional changes to the reexamination process as we strive to develop administrative efficiencies to address potential administrative fee cuts.

Activity 2012-1

In January 2012, MBHP implemented the policy that ceases Utility Assistance Payments (UAP) of \$25 or less and we have achieved modest cost savings as well as program efficiencies from this policy. Although there was no implementation of a simplified utility allowance schedule during FY '13, we encourage the department to resume analyzing this option during FY '14 for possible implementation in FY '15. MBHP believes that a simplified utility allowance schedule will make it easier for program participants who are searching for housing to find housing within an acceptable rent range. The current utility allowance schedule is quite cumbersome and is confusing to both participants and prospective owners. A simplified utility allowance will also improve the integrity of the program by minimizing calculation errors that are made with the current, more complex schedule. In addition, MBHP would like the department to explore the feasibility of possibly changing how the utility allowance is applied. Currently, if a family rents a larger unit than the voucher size they are eligible for, the utility allowance is based on the actual unit size and not the voucher size. We understand that this is rationalized by the fact that the household would be responsible for higher utility costs. However, due to the higher utility allowance, the actual contract rent that can be approved is lower than what the owner may expect because we are applying the lower voucher payment standard based on the actual voucher size but the larger utility allowance based on the actual unit size. We believe that implementing this change would encourage families to really only rent larger units if they can afford the utilities and make it more likely the owner is not going to be "penalized" for a situation in which his contract rent is reduced due to the higher utility allowance.

Activity 2012-4

DHCD's plan to implement an initiative to maintain long-term affordability of expiring use is ambitious and MBHP commends DHCD for their continued commitment to affordable housing. In FY '14, MBHP will likely begin administering the first project in our region that is part of this plan. As such, we support the changes that DHCD has proposed in this plan.

Activity 2012-5

MBHP is excited to work with DHCD to implement some or all of the new changes proposed to the Family Self-Sufficiency (FSS) Program and supports many of the proposed changes. 1) MBHP does not support setting a cap for initial participation. While the proposed cap is high and we tend to see graduates receive escrows below that cap, we believe implementing a cap for initial participation is not in the spirit of the program, which is designed to encourage self-sufficiency. We are opposed to setting limits on the potential level of self-sufficiency a participant may achieve. However, we do encourage the department to implement a cap on escrow for participants who re-enroll in the program after successful graduation. 2) MBHP strongly supports the change that modifies the requirement that an FSS applicant must have a regular or interim reexamination completed within 120 days of signing a Contract of Participation. We have identified a population of current HCVP participants who chose not to participate in FSS because they will face an immediate increase in their tenant rent share at the time that they are interested in joining and therefore make the decision to not enroll due to this. 3) MBHP has concerns that modifying the extension policy would have unintended negative consequences for some participants. Again, MBHP recommends a small working group be convened to determine if modifying the extension policy to allow for only one six-month extension would be more beneficial to program participants than the current policy. 4) MBHP supports modifying the FSS re-enrollment eligibility criteria. As stated above, MBHP would support instituting a cap on escrow for those participants that re-enroll. 5) The modification to the escrow calculation methodology proposed is an administrative efficiency that MBHP supports. 6) The incentive for FSS graduates who voluntarily withdraw from the HCV program within 2 years of FSS graduation to pursue homeownership or a non-subsidized rental unit is a generous change that MBHP supports, provided the funding for such proposal exists.

Thank you for this opportunity to submit comments. MBHP looks forward to our continued partnership with the Department of Housing and Community Development, the other Regional Administering Agencies, and various stakeholders, in administering the Moving to Work Program.



HAPHousing's Comments on
Department of Housing and Community Development
Moving To Work Program Annual Plan for FY 2014

By

Nancy E. Rivera, Associate Executive Director

Submitted on March 28, 2013

On behalf of HAPHousing, we want thank you for the opportunity to submit comments on the Massachusetts Department of Housing and Community Development (DHCD)'s Moving to Work (MTW) Program Annual Plan for Fiscal Year 2014.

HAPHousing is a regional non-profit agency, which has been in existence for 40 year. We administer a wide range of programs for low income families and individuals in Hampden and Hampshire counties in Western Mass region. Our customer base includes people who are homeless or at risk of becoming homeless, disabled veterans, elders struggling to maintain their independence, homeowners who are facing foreclosure, and young families who are trying to make ends meet with minimum wage jobs. Under contract with DHCD, we administer a variety of rental assistance programs including the Section 8 Housing Choice Voucher Program. We provide rental assistance to approximately 5600 households, and work with 4200 property owners who receive rental payments from us on behalf of program participants. Our largest program is the Section 8 Housing Choice Voucher program which we currently administer more than 4200 Section 8 Housing Choice Vouchers throughout the region.

Our mission is to ensure that individuals and families with low and moderate income have maximum choice and mobility in finding and retaining decent affordable housing. Our programs and initiatives are designed to encourage housing stability, increase economic self-sufficiency and enhance the quality of life of those we serve. To achieve our mission and to promote an efficient service delivery, we offer an array of services and resources through our Housing Consumer Education Center and work collaboratively with other service providers and neighborhood-based organizations.

HAPHousing supports the new initiatives and ongoing activities that are part of the FY'14 MTW Plan. We appreciate the Departments continued efforts to transition their HCV program to a Moving to Work, which is consistent with our mission, and the opportunity to participate in the planning of many of these changes. We believe that a program that emphasizes family self-sufficiency and housing choice along with greater administrative flexibility can produce positive outcomes for the families and communities we serve.

The following comments relate to new activities in this year's plan and those noted in previous year plans, which have not yet been implemented or have been changed.

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Activity 2010-1: PBV Site Based Waiting Lists

We are pleased to see the Department has moved forward in implementing this requirement with all new PBV projects. In order to continue to achieve greater efficiency in the administration of the PBV program, we recommend that the Department continues to extend this requirement to all new projects that are coming on line. However, in order to continue to increase our efficiency in filling vacancies, we encourage the Department to extend this activity in FY'14 to existing projects that do not have this flexibility to manage their own wait list. We look forward to working with the Department and other regional administrative agency to transition this responsibility to PBV owners.

Activity 2011-4: Biennial Recertification Process

HAPHousing has fully implemented the biennial recertification for all MTW household as of January 1, 2012. We look forward to working with the Department to assess the impact of this policy. In addition, we encourage DHCD to work with the regional administrating agencies to explore other options for creating administrative efficiencies to address the potential administrative fee cuts.

Activity 2012-1 MTW Utility Allowances

In January 2012, HAPHousing implemented the policy of eliminating the Utility Allowance Payment (UAP) of \$25 or less, we experienced some modest cost savings and efficiencies from this policy. Although there was no further discussion about implementation of a simplified Utility Allowance schedule in FY'13, we encourage the Department to resume these discussions with regional administrative agencies in FY'14, which could lead to implementation of revised utility allowances in FY'15. This will create the program efficiency needed, minimize costly calculation errors, and will enable participants to better understand the rent calculation process.

Activity 2012-2: Rent Simplification

We support the continuation of the current rent simplification efforts and encourage the Department to consider further refinements. Specifically, we propose that the Department consider eliminating the current medical deduction/expense verification requirement and develop a standard flat rate medical deduction for all elderly and/or disabled households. This would eliminate the need for clients to provide receipts for all of their medical expenses, save staff time to calculate, create efficiency and eliminate errors. Our understanding is that effective models have been established by other MTW agencies. We are interested in exploring this option further with the Department.

Activity 2012-4: Expiring Use of Preservation Initiative

The Department's plan to implement this initiative to maintain long-term affordability of expiring use is ambitious; we commend DHCD's continued effort and commitment to affordable housing in the Commonwealth. We support the changes that DHCD has proposed in this plan and look forward to working with the Department as we begin the first projects in our program in late FY'14.

Activity 2012-5: Family Self-Sufficiency Program Enhancement

We are committed and look forward to working with DHCD to implement some or all of the new changes proposed to the Family Self-Sufficiency Program. In addition, HAPHousing also supports the recommendations from the FSS Committee which will be further addressed in the comments submitted by the committee Chair Tania DiDuca. The following are our comments on the proposed changes to the program:

1. We believe that setting a cap for initial participation is not in the spirit of the program, which is to promote self-sufficiency. Many of our FSS clients' goals are to become homeowners, which we have seen a rise in the number of clients who purchase homes. Although the cap is high, many of our clients receive escrows that are below that cap. We do however support a cap on escrows for participants that re-enroll in the program after successful graduations and received a final escrow disbursement. HAPHousing encourages the department to reconsider either removing the cap for initial participation or increase the limit.
2. HAPHousing supports the change that modifies the requirement that an FSS applicant must have an interim or regular annual recertification within 120 days prior to FSS enrollment. This will open the door for more clients to participant in the FSS program.
3. HAPHousing has concerns that modifying the extension policy would have unintended negative impact for some participants. The changes do not take into consideration the complicated and challenging lives of the FSS participants and their families. Some of our clients are the "hardest to serve" and need additional time to get their education, resolve their credit issues, re-gain their self-confidence and get better jobs. We strongly recommend that the current contract extension policy remain as is.
4. We support modifying the FSS re-enrollment eligibility criteria.
5. We support the modification to the escrow calculation methodology.
6. HAPHousing supports the establishment of an incentive payment to FSS gradates that chose to withdraw from the HCV program within 2 years of completing the FSS program goals and pursue homeownership or secure a non-subsidized rental unit.

Thank you for this opportunity to submit comments. We look forward to our continued partnership with the Department of Housing and Community Development, the other Regional Administering Agencies and other stakeholders in the administration of the Moving to Work Program.

From: Judith Liben <jliben@mlri.org>

Date: April 2, 2013, 6:03:04 PM EDT

To: "Graham, Thomas (OCD)" <Thomas.Graham@MassMail.State.MA.US>

Cc: "Goddard, Deborah (OCD)" <Deborah.Goddard@MassMail.State.MA.US>, "LeClair, Margaux (OCD)" <Margaux.LeClair@MassMail.State.MA.US>

Subject: Draft 2014 MTW plan - brief comments

Thomas Graham
Associate Director
Bureau of Rental Assistance
DHCD
100 Cambridge Street - Suite 300
Boston, MA 02114
Re: MTW Annual Plan Comments

Dear Mr. Graham:

Thank you for the opportunity to comment on the Draft FY 2014 MTW plan. In general, the plan is excellent and we especially appreciate the Opportunity Neighborhood proposal.

Due to time constraints, I regret that I cannot write detailed comments, but will instead refer to just two issues related to fair housing.

1. Activity 2010-2: PBV site-based waiting list: We have expressed some concern about this approach previously. We are worried that leaving the marketing and application process up to a many individual site managers may result in precisely the fair housing problems, especially for people with disabilities, that DHCD has sought to avoid in its Affirmative Fair Housing Marketing Plan.

To meet this concern, DHCD has included general language in this section concerning fair housing. Although that language is much appreciated, DHCD should consider a more direct approach to make sure that civil rights problems are avoided. We suggest that the Plan include a requirement that PBV site managers follow the provisions of DHCD's Affirmative Fair Housing Marketing Plan. That would erase any doubt about possible unfairness or civil rights violations in this de-centralized process.

2. Activity 2011-1: Value Vouchers. This is an excellent idea. However, although the introductory paragraph mentions use of value vouchers for both homeless families and people with disabilities, the remainder of the item appears to concentrate only on people with disabilities. If this program is meant for both populations, it should be made clearer.

Additionally, it does not appear that DHCD is looking to "opportunity neighborhoods" for this program. We suggest that, like the expiring use initiative which refers to "neighborhoods which offer economic and educational opportunities and relatively low concentrations of poverty" and like the Opportunity Neighborhoods initiative itself, value vouchers should also work to enable households to move to areas with the characteristics that DHCD has outlined as comprising opportunity.

Again, I apologize for the abbreviated nature of these comments and not being able to attend the public hearing. Nevertheless, I hope you will consider them carefully and, of course, please feel free to call or email with any questions or follow up.

Best regards,

Judith Liben

Judith Liben
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April 2, 2013

BY FAX: (617) 573-1345

Bureau of Rental Assistance
Mass. Department of Housing and Community Development
100 Cambridge Street – Suite 300
Boston, MA 02114

RE: DHCD's Draft MTW Annual Plan for FY 2014

Dear Sir/Madam:

We are submitting these comments based on our many years representing tenants in the areas of expiring use and DHCD's Section 8 programs, and our recent experience specifically with DHCD's Expiring Use Preservation Initiative. This year, our comments are limited to the Expiring Use Preservation Initiative and the related project-based voucher (PBV) proposals/information.

1. Activity 2012-3 Project Based Voucher (PBV) Discretionary Moves (page 36)

In its Proposed Changes section, DHCD states that its PBV discretionary move policy (allowing PBV tenants to obtain mobile vouchers to move after two years for certain reasons and applying a formula to limit the number of mobile vouchers available for such discretionary moves) does not apply to tenants living in Expiring Use Preservation Initiative projects at the time of conversion. In the past, the discretionary move policy did apply to such Expiring Use tenants except that tenants had a one year (versus two year) wait. DHCD should clarify here (and in Activity 2012-4, first bullet, page 38) whether it means just the waiting time has been shortened, but the other aspects of the discretionary move policy still apply or it really means that the entire discretionary move policy will no longer be applicable and such PBV tenants will be allowed to request a mobile voucher at any time for any reason so long as one is available.

Based on our experience, the decision of tenants with mobile enhanced vouchers (EVs) to convert these to project-based vouchers frequently is impacted by the ease with which they are able to move from the development (when e.g. personal circumstances change). We urge therefore that DHCD allow the greatest mobility rights as possible for the Expiring Use Preservative Initiative.

2. Activity 2012-4 Expiring Use Preservation Initiative (pages 37-39)

Although we have some comments listed below, we do appreciate that DHCD has made changes to this Initiative which respond to some comments we had made earlier (on last year's draft MTW Plan and on issues which arose in the course of our work with tenants in the first two developments under this Initiative).

A. In its list of criteria which it may consider in determining the eligibility of developments for its Expiring Use Preservation Initiative (allowing tenants the choice of converting EVs to PBVs), DHCD lists two factors which concern us (although we recognize and appreciate that this list is just permissive).

The 4th bullet ("substantial community and tenant support") we think should be deleted, as tenants' consent is already required for each conversion to a PBV unit and community support could be negated in geographic areas where there is resistance to affordable housing.

The 6th bullet (owner's preliminary survey of tenant interest in PBVs) should be deleted or modified. While we recognize that in 2012, DHCD revised its MTW Plan to include this survey requirement (presumably at HUD's request), such a survey seems unnecessary and possibly harmful. Without any tenant education, it will be difficult for tenants to understand their choices and the short and long-term pros and cons of a tenant-based versus a project-based voucher. Even if only a handful of tenants are interested in PBVs, DHCD should still be allowed to proceed with its Initiative (either through its RAA or under an arrangement with the local housing authority) because preservation of *any* number of project-based units is a win-win outcome for both the tenants and larger community. There are no criteria for HUD to make any determination as to how much preliminary tenant support is needed. Importantly, it also appears that having this survey requirement can be a disincentive for owners to pursue this critical means of preserving expiring use housing. This should not be part of DHCD's requirements.

B. On page 38, DHCD lists two exceptions to its MTW PBV policies (tenants not being subject to the PBV discretionary moves and allowing up to 100% of the units to be PBV). In addition, at the three developments under this Initiative to date, DHCD also made an exception to its MTW PBV rent policies to allow unlimited interim rent decreases for existing tenants who opt to convert their mobile voucher to a PBV (even if they are not elderly or disabled). This exception should be set forth here, as well.

C. On page 38, under its Proposed Changes, we assume that four bullets under the introductory sentence are the ways that DHCD will modify its PBV program in the upcoming year. We request that DHCD also add a provision to allow other changes, on a case by case basis, so long as such changes are not detrimental to existing or future tenants. Based on our experience so far (and in Cambridge), each development has unique issues so that having some administrative flexibility (which does not harm tenants) may be needed without having to formally go through a MTW Annual Plan amendment process. Suggested language for a 5th

bullet would be along the lines of: "DHCD may institute other changes, on a case by case basis, so long as such changes are not detrimental to existing or future tenants at the development."

3. Table 4 (pages 9 – 15)

In this table, DHCD seems to list (in part) the HAP beginning and end dates for its PBV inventory.¹ Some of the dates appear to be incorrect. For example, on page 14, Summer Hill Glen and Wilkins Glen are listed as having a HAP start date of 2/1/06 and a ten year term, whereas the HAP contracts were signed in late 2012 or early 2013 (or not yet) and have 15 year terms. On page 15, the 1323 Broadway, Somerville development is listed as having a 11/1/08 start date but the building is still under construction and not habitable. Also, on page 15, Kings Landing is listed as having a HAP start date of 5/15/09 and we do not believe that the PBV contract has been signed. It would be helpful for housing advocates, the public, and others to have correct start and end dates of the PBV contracts between DHCD and the owners.

Thank you for your consideration of these comments.

Sincerely yours,



Susan Hegel
Cambridge and Somerville Legal Services'
Office of Greater Boston Legal Services



Ann Jochnick
Greater Boston Legal Services

¹ / If the dates following "HAP" and "HAP End" mean something different than the start and end dates of the HAP PBV contracts, this should be clarified in the table.

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Testimony on Behalf of the
Family Self Sufficiency (FSS) Sub-Committee

By

Tania DiDuca, Committee Chair
March 28, 2013

Thank you for the opportunity to comment on the Department of Housing and Community Development's draft Moving To Work Annual Plan for Fiscal Year 2014. This group is a sub-committee of the Rental Assistance Committee through the Regional Housing Network. We are comprised of the following eight regional housing agencies:

- Berkshire Housing Development Corporation
- Community Teamwork Inc.
- HAP Housing
- Housing Assistance Corporation
- Metropolitan Boston Housing Partnership
- RCAP Solutions, Inc.
- South Middlesex Opportunity Council
- South Shore Housing Development Corporation

FSS Coordinators from each agency participate on this committee. We are focused on preserving the core facets of the FSS Program that have contributed to its years of success while at the same time eager to promote growth and expansion in the pursuit for self-sufficiency. We are pleased with the new opportunities that this plan affords for FSS participants as outlined in the Up Front Disbursement/ Flex Fund, Training/ Education Incentive, and Homeownership Incentive as well as any administrative efficiencies that are proposed. As always, we are committed to connecting with our participants through our various styles of case management. We strive to balance the data collection and direct service of FSS in a continued effort to quantify the hard work of our Coordinators and participants. However, we never lose sight of the human connection that is so vital to our participants' success.

There are a number of comments listed below specific to the FSS Initiatives and Proposed Changes.

Activity 2012-5 Family Self- Sufficiency Program Enhancements

Up-Front Disbursement/ Flex Fund

There is concern if all disbursements under this fund have to be approved by DHCD that this added layer of approval will delay the payment and assistance. Many of these financial requests are time sensitive

(car repairs, child care, education/training cost). We recommend that each agency have an internal approval process in place, similar to how interim escrow disbursements are currently managed, so that these funds can be accessed and utilized with the short turnaround time that they often require. In regards to the repayments clause for disbursements over \$1500, the recommendation is that this be a standard document that DHCD develops for all agencies to use. We would like to see the repayment clause address the scenario of how the money would be paid back if at the end of the program the participant did not have enough escrow to pay back the loan.

Further clarification on the criteria for receiving this fund will be necessary. There is confusion on how to determine "significant progress towards FSS goals" when the participant has just started the program. If it is a new participant receiving the funds, then they may not have made significant progress yet.

Education/ Training Incentive Fund

The recommendation is not to exclude anyone under Eligible Participants. The criteria is narrow and may exclude participants that could take advantage of this opportunity and succeed. We also wanted to make sure that G.E.D. was included as part of Education.

2014 MTW Proposed Changes

120 Day recertification Rule for FSS Enrollment

Under the exception to the policy, there is concern that if an interested participant has to wait to sign the contract 30 days prior to the recertification date, that the participant may lose interest and momentum. In these cases, could an interim still be done to enroll the participant faster? An example of this would be a potential participant that is due for reexamination on July 1st. They start the FSS process in April while they are also in the middle of the reexamination process. They could not sign a FSS contract until 6/1 since the FSS contract must be signed within the month of June in order to be effective for July 1st. If the participant wanted to join FSS sooner, could they opt for an interim for 5/1 or 6/1?

Cap on Escrow

If the ultimate goal of FSS is to become a homeowner, then a cap on escrow is very restrictive and creates a barrier to motivating clients to keep striving for more. The recommendation would be to eliminate a cap altogether. We polled the agencies and final escrow disbursements above \$25,000 is not standard and does not occur often. We also need to keep in mind the vast differences in cost of living across the state- which does impact participants' escrow and ability to purchase a home. If eliminating the cap is not an option, then we propose 2 alternatives:

1. No cap for first time enrollees but a cap for anyone that enrolls more than once.
2. A second alternative is to raise the cap to \$50,000. The consensus was that the \$25,000 cap is too low.

Tracking between agencies will be very difficult. There is currently no mechanism in Tracker to do this. Will this be available and reliable before 7/1/13? We would like to recommend that a cut off date be established for re-enrollments. For instance, anyone that was on the program as of 1/1/2010 would be tracked as a re-enrollment and subject to any regulations regarding re-enrollment. It will not be efficient nor will it be simple for FSS Coordinators to have to research this information as new people enroll because there is not a standard and reliable place where this exists that all Coordinators can access. We would need clarification on the process to ensuring re-enrollments are being tracked uniformly. The other question on re-enrollments is whether people can enroll more than twice. The plan only mentions re-enrolling a second time. We want to clarify that it could be more than twice- understanding there may still be a cap in place.

Modify the Contract Extension Policy

There is a strong and unanimous consensus to leave the current Contract Extension Policy in place as it is. The proposed policy is limiting and punitive. It does not take into consideration the complicated and challenging lives of the FSS participants and their families. The participants who have physical and/ or mental health issues will be majorly impacted by the new policy. Many participants and / or their children have chronic health conditions that unexpectedly can take them off track. The new policy would penalize the participants who have made significant progress in spite of instability in other part of their lives. The discretion of the FSS Coordinator to review these case by case cannot be underestimated. The Coordinators know the participants and their situations best. We propose that extensions be granted in six month increments for up to two years with documentation of good cause. One way the policy can be tightened up is by developing a standard list of documentation for good cause and ensuring each agency has an extension approval process which requires a Case Manager and Supervisor sign off on the approved extension. These are alternative ways to tighten up the policy without restricting the potential success of the clients and the program.

A few examples and testimonials that agency FSS Coordinators shared are listed below:

- Some of our clients are the “hardest to serve” and need additional time to get their education, resolve their credit issues, re-gain their self-confidence and get better jobs. This takes time and having the option to allow them 2 more years is invaluable.
Jan Nelson- HAC
- We have lots of clients who suffer from depression, and/or anxiety. Also clients whose kids have mental health issues. I’ve had a couple with kids that were suicidal and needed to focus on them for a while instead of their goals. Clients whose family is ill and needs their help (terminally ill siblings for example). These types of things can cause them to lose a year or two out of their 5. Our clients have such high rates of anxiety/depression. I would think these are exactly the type of people we should be granting extension to, so that we can stand by them and help them through.
Bonnie Gage- Anderson- CTI
- The Head of Household is a single mother with two kids. She is working and has completed all of her goals. She has been an ideal FSS program participant and is about to graduate with \$8,000 in

her escrow account. All of a sudden, her oldest daughter who is 17 has a baby and moves back in with her mom because she has nowhere else to go. The daughter is collecting TAFDC. The mom can't graduate until the daughter has been welfare-free for 12 consecutive months. The mother has a tough decision to make . . . forfeit the escrow after all of her hard work and continue to care for her child and grandchild, kick her daughter and grandchild out on the street to collect her \$8,000, or assist her daughter over a 12-14 month time period in obtaining employment in an effort to decrease the dependence on TAFDC and then ultimately still be allowed to graduate and collect her escrow. This changes rules out option number three for mom and is not fair.

Jamie Delude, MBHP

- As the Family Self Sufficiency Coordinator at South Shore Housing, I strongly urge DHCD not to modify the contract extension rule. Why change a rule that works? Currently, HUD states that the contract may be extended, in writing at the family's request, for up to an additional two years for good cause. Good cause is defined as "circumstances beyond the control of the family, and which prevent completion of the ITSP." Why should we give up the ability to use a provision that all FSS programs are able to use. It will hurt our numbers as well as our most vulnerable clients.

There can be many reasons for a good cause extension. One is that many of our FSS clients are battling mental illnesses. Say for example, you have a client who suffers from bipolar and anxiety disorders, who over the course of the program becomes an advocate for the Recovery Learning Community and completes the classes to become a peer specialist. She spends time volunteering for the community and then finds employment. She works for years but ends up hospitalized because of her illness in the last year of her contract. It takes her time to recover to again be ready for employment. In cases like this, an extension can save thousands from being sent back to HUD, funds that may be critically important to keep a vehicle on the road and keep the client moving forward.

Also, we are not a little housing authority with 25 clients but have much larger numbers and are frequently transferring clients between agencies. Say you have a client who transfers to your agency in the last year of the contract because she has a child with cycle cell anemia and needs family help with child care and medical appointments. Because of the move, she is now unemployed and the family is on DTA benefits. While on the program, she completed her BA, found work as a substitute teacher and established a large escrow account. She has a resume in hand and is diligently out looking for work which has proved harder then she thought. An extension in this case saves the escrow account which the family is counting on. Sending this account back to HUD, asking the family to rejoin FSS and wait another 5 years for another possible escrow account just does not make sense.

These are extensions we currently have in place at South Shore Housing. I feel strongly that taking them away would be breaking faith with our clients. Our priority should always be looking out for their best interest.

Joanne Wilmot, South Shore Housing

Homeownership Incentive

There were numerous questions on this modification- all comments were positive.

- Is the \$5,000 part of the \$15,000 for the Flex Fund and Incentive Funding or completely separate?
- How does this work administratively- would the agency front the \$5,000 and then be reimbursed by DHCD?
- How to address voluntary program withdrawal policy where a participant has 60 days to return to the program. If a participant voluntarily withdrew to move to a market rate rental, received the \$5,000, and then within 60 days came back to the program? We recommend an agreement form be developed that would incorporate how the assistance works and these types of scenarios.

Joanne Wilmot 3/28/13

Mass Law Reform

2010-2: PBV site-based waiting list

Comment

MLF is concerned that this change will result in fair housing problems that DHCD has sought to avoid in its Affirmative Fair Housing Marketing Plan. They suggest DHCD should consider a more direct approach to make sure that civil rights problems are avoided. We suggest that the Plan include a requirement that PBV site managers follow the provisions of DHCD's Affirmative Fair Housing Marketing Plan

DHCD Response

DHCD has followed MLF's suggested and included language that requires property owners administer their wait lists in conformance with DHCD's Affirmative Fair Housing Marketing Plan and all other applicable HUD Fair Housing regulations and guidance

Activity 2011-1: Value Vouchers

Comment

MLF supports this initiative, but requests that DHCD clarify the populations to be served.

DHCD Response

DHCD added clarifying language to the plan in response to this comment

Comment

MLF suggests that Value Vouchers be used to enable households to move to areas with the characteristics that DHCD has outlined as comprising opportunity

DHCD Response

DHCD will explore this possibility

Greater Boston Legal Services

2012-3 Project Based Voucher discretionary moves

Comment

GBLS requests that DHCD allow the greatest mobility rights possible under the expiring use preservation initiative to encourage the selection of PBVs and preserve affordability by encouraging the choice of a PBV

DHCD Response

DHCD agrees and added clarifying language allowing this

2012-4 Expiring Use Preservation Initiative

Comment

GBLS requested that DHCD remove the reference to the need for substantial community support for the conversion as documented by property developers, as there could be conversion properties in areas that may resist the idea of affordable housing preservation

DHCD Response

DHCD understands this concern but did not remove the bullet as this is not a requirement for conversion, just one of several elements that could be considered

Comment

GBLS requested that DHCD modify the language requiring a survey of tenant interest prior to conversion

DHCD Response

DHCD modified the language, and will work with the HUD Field Office to determine the best approach for advising and education tenants about their options

Comment

GBLS requested that clarifying language about two policies related to discretionary moves and voluntary interim certifications be included in the activity description

DHCD Response

DHCD added the requested clarifying language to the activity description

Comment

GBLS requested that DHCD include language allowing more administrative flexibility in the approach to Expiring Use Preservation projects to accommodate the unique issues that accompany these developments.

DHCD Response

DHCD agrees that this is useful, and added language to address this request

Table 4

Comment

HAP Contract dates appear to be incorrect on this table. It would be helpful to advocates, the public and others to have correct start and end dates on this table.

DHCD Response

The table has been corrected

Family Self-Sufficiency Sub-Committee

2012-5 Upfront disbursement and Flexible Funding

Comment

Request that DHCD does not require all disbursement requests be approved by DHCD staff, as they are concerned about delays in approvals

DHCD Response

DHCD will develop a process to expedite requests and simplify the approval for effective turnaround time. DHCD wants to monitor how the money is being used, by whom, and how quickly. We will revisit after a year to see if the requests are straight forward enough to eliminate this tracking

Comment

Subcommittee requests clarification on repayment mechanism for the upfront disbursement

DHCD Response

This information will be developed in conjunction with the Regional Administering Agencies (RAAs) prior to implementation

Comment

Subcommittee requests clarification on criteria for receiving funding through this mechanism

DHCD Response

This information will be developed in conjunction with the RAAs prior to implementation

Education and Training Fund

Comment

Subcommittee recommends that this be implemented in as broad a manner as possible

DHCD Response

We will work with Subcommittee to clarify the intended goal of this funding, as well as who will be eligible for it and under what circumstances

2014 Proposed MTW Changes

120 Day recertification changes

Comment

Request clarification on when and how interims can be conducted under this policy

DHCD Response

This information will be developed prior to implementation

\$25,000 Cap on Escrow

Comment

The subcommittee recommends that the cap on escrow be eliminated. If this policy remains, the Subcommittee proposes two alternatives:

- No cap on first time enrollees but a cap on all re-enrollments
- Raise the cap to \$50,000

DHCD Response

DHCD understands the concerns of the FSS sub-committee but intends to implement a \$25,000 cap on all new enrollees. DHCD is confident that potential participants will still be attracted to the program, as other matched savings programs such as IDAs have demonstrated that much smaller financial incentives still attract participants; create meaningful change in participants' lives; and promote asset development. DHCD will work with our partners to make sure that communication about this change is positive, and the opportunity to earn an escrow check of up to \$25,000 represents a significant benefit to all new enrollees. This positive communication will be incorporated in all marketing and outreach materials to potential participants

Modify the Contract Extension Policy

Comment

The FSS Subcommittee strongly disagrees with the proposed change, and believes it will have a very negative impact on participants' ability to succeed in the program. The subcommittee

proposes an alternative:

Contract extensions be granted in six month increments for up to two years with documentation of good cause. This will be bolstered by the development of a standard list of documented "good cause", and the implementation of a uniform extension approval process which requires a Case Manager and Supervisor to approve each extension request.

DHCD Response

DHCD appreciates the dedicated commitment of FSS staff to working with the hardest to serve population and as well as the staff's on the ground understanding of the challenges faced by many participants. DHCD will modify the contract extension policy as recommended by the subcommittee.

Homeownership Incentive

Comment

There were implementation and clarification questions presented by the sub-committee

DHCD Response

DHCD will address these questions prior to implementing this change

Metropolitan Boston Housing Partnership

2010-1 Project Based Voucher Site-Based Waitlist

Comment

MBHP encourages DHCD to extend this activity beyond new projects coming on-line to existing projects. This will result in greater administrative efficiencies for the RAAs

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2012-1 Utility Allowance Payments

Comment

Urge DHCD to implement the revised utility allowances based on work that has already been done by RAAs and DHCD

Urge DHCD to explore feasibility of changing how UAP is applied – to align the UAP to the actual size of the unit rented

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2012-5 Family Self Sufficiency Enhancements

Comment

MBHP supports the recommendations of the FSS Sub-Committee

DHCD Response

See above

2011-4 Bi-ennial Recertifications

Comment

MBHP encourages DHCD to work with RAAs to identify new administrative efficiencies to address possible future admin fee cuts

DHCD Response

DHCD staff will work with RAAs to explore this during the coming year

2011-3 Bi-ennial Inspections

Comment

MBHP encourages DHCD to expand the pool of eligible units for this initiative

DHCD Response

DHCD staff will work with RAAs to explore this during the coming year

HAP, Inc.

2010-1 Project Based Voucher Site-Based Waitlist

Comment

HAP encourages DHCD to extend this activity beyond new projects coming on-line to existing projects. This will result in greater administrative efficiencies for the RAAs

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2012-1 Utility Allowance Payments

Comment

Urge DHCD to implement the revised utility allowances based on work that has already been done by RAAs and DHCD

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2012-2 Rent Simplification

Comment

HAP proposes DHCD consider eliminating medical deductions/expense verification requirement and replace with a flat medical deduction for all elderly and/or disabled households

DHCD Response

DHCD will explore this possibility, looking closely at data to ensure there will be no adverse effect on elderly and/or disabled tenants

2012-5 Family Self Sufficiency Enhancements

Comment

HAP supports the recommendations of the FSS Sub-Committee

DHCD Response

See above

2011-4 Bi-ennial Recertifications

Comment

HAP encourages DHCD to work with RAAs to identify new administrative efficiencies to address possible future admin fee cuts

DHCD Response

DHCD staff will work with RAAs to explore this during the coming year

Regional Housing Network (RHN)

2010-1 Project Based Voucher Site-Based Waitlist

Comment

RHN encourages DHCD to extend this activity beyond new projects coming on-line to existing projects. This will result in greater administrative efficiencies for the RAAs

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2010-4 Simplification of HUD Standard Forms

Comment

Urge DHCD to continue to implement this, particularly the Request for Tenancy Approval and other key standard forms

DHCD Response

DHCD will continue to explore this administrative efficiency in partnership with the RAAs and RHN

2012-1 Utility Allowance Payments

Comment

Urge DHCD to implement the revised utility allowances based on work that has already been done by RAAs and DHCD

DHCD Response

DHCD will work with the RAAs and other parties to explore this during the coming year

2012-2 Rent Simplification

Comment

RHN proposes DHCD consider eliminating medical deductions/expense verification requirement and replace with a flat medical deduction for all elderly and/or disabled households

DHCD Response

DHCD will explore this possibility, looking closely at data to ensure there will be no adverse effect on elderly and/or disabled tenants

2012-5 Family Self Sufficiency Enhancements

Comment

HAP supports the recommendations of the FSS Sub-Committee

DHCD Response

See above