

2011 Moving to Work Conference Report

APPENDIX B

DAY 1 PRESENTATIONS & HANDOUTS

2011 Moving to Work Conference Report

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DAY ONE

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New and Expanding MTW Agencies

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LHA PRESENTATION



Lincoln, Nebraska

- State Capitol
- Population 258,379
- Nation's Lowest Unemployment Rate 3.5%
- Home of the Huskers



MTW Units

- 200 Public Housing Family Units—Scattered Site
- 120 Public Housing Elderly & Near Elderly—High Rise
- 2,916 Housing Choice Vouchers

Non-MTW Units

- 20 Mainstream Housing Opportunity Program Vouchers
- 60 Veterans Affairs Supportive Housing Vouchers (VASH)
- 91 Units Section 8 New Construction (Elderly /Disabled)
- 32 Units Section 8 New Construction (Family)
- 10 Moderate Rehabilitation Units
- 805 Affordable and Below Market Rate Units
- 169 Tax Credit Units

Streamlining Initiatives

• Rent Calculation

- 27% of gross income with no deductions
- Hardship clause for existing households
 - From 232 to 52 cases

Time savings: 30%

- comparing same staff with MTW cases & non-MTW cases
- time savings is affected by this initiative and others

Streamlining Initiatives

ASSET INCOME

- Calculation of Asset Income –Less than \$5,000
 - Self-certification and excluded from gross income
- Calculation of Asset Income –\$5,000 or More
 - Verification by household provided documents
 - Use 2% passbook rate
 - Included in gross income
- Cost Savings (time, postage, supplies)
 - Public Housing \$5,000 per year
 - Housing Choice Voucher \$26,000 per year

Streamlining Initiatives

• Verifications

- EIV as first level of acceptable verification
- Tenant provided documents for:
 - Earned Income (3 months of pay stubs)
- and
- Social Security Income (most recent statement from SSA)

Streamlining Initiatives

• Interim Re-examinations

- no interim for temporary loss of income of 30 days or less duration
- for reduction or loss of employment, rent decrease will occur 90 days after the decrease unless reduction or loss for good cause
- immediate decrease in rent if family meets one of the exemptions to MEI (discussed later)
- 80% do not require rent decrease
- incentified to retain job or seek new employment

Streamlining Initiatives

Average Utility Allowance by bedroom size

- establishes a target rent
- easy for tenants, landlords, human service agencies, etc. to understand
- no errors (0% for MTW compared to 15% for non-MTW)

Bedroom Size	Fair Market Rent	Payment Standard	Payment Standard as a Percent of FMR	Target Rent	Utility Allowance
SRO	\$347	\$338	97.4%	\$306	\$32
0	\$463	\$451	97.4%	\$409	\$42
1	\$520	\$506	97.3%	\$441	\$65
2	\$661	\$644	97.4%	\$538	\$106
3	\$927	\$904	97.5%	\$758	\$146
4	\$1,124	\$1,095	97.4%	\$904	\$191
5	\$1,293	\$1,259	97.4%	\$1,037	\$222
6	\$1,461	\$1,423	97.4%	\$1,173	\$250
Lot Rent	\$264	\$258	97.7%		

Streamlining Initiatives

Biennial Re-examinations

- elderly or disabled households
- public housing 52% reduction from baseline
- vouchers 43% reduction from baseline
- challenges---tracking

Streamlining Initiatives

Inspection Waiver

- waiver of annual inspection for one year if annual inspection meets 100% of HQS on first inspection at initial or annual
- baseline 3,911 inspections
- first year outcome 2,390 inspections (38.9% reduction)

Streamlining Initiatives

Restricted Portability

- porting out allowed only for employment, education, safety, or medical/disability
- 13 out of 13 requests approved in past year

Minimum Earned Income (MEI)

- MEI is not a "streamlining initiative"
- a key concept in Lincoln's MTW program
- promotes and encourages employment; makes employment part of the agenda at reviews

Minimum Earned Income (MEI)

- Basic expectation that one work-able adult should work at least 25 hours per week at minimum wage or two work-able adults should work at least 40 hours total per week
- This Minimum Earned Income (MEI) is included in household income for every household
- offset by actual earned income
 - exemptions to MEI are provided

Minimum Earned Income (MEI)

- MEI can be up to....
- \$ 9,425 for 1 person ($\$7.25 \times 25 \times 52$)
 - \$15,080 for 2 persons ($\$7.25 \times 40 \times 52$)
- Not all MEI households are at maximum MEI.
 - Actual MEI is offset by actual earned income.
 - MEI has increased since 1999 in step with increases in minimum wage
- Percentage of non-elderly or non-disabled households with income from wages
- 81% of public housing households
 - 55% of housing choice voucher households

Minimum Earned Income (MEI)

EXEMPTIONS

- elderly or disabled
- caretaker for an ill or incapacitated family member
- medical---temporary illness, injury or pregnancy
- education---full-time student
- self-sufficiency participant---enrolled in either the FSS program or another approved self-sufficiency program

Minimum Earned Income (MEI)

Households affected (March 31, 2011)

- 15.9% of all Housing Choice Voucher Households
 - 8.8% of all Public Housing Households
- OR
- 29.7% of all non-elderly or non-disabled Housing Choice Voucher Households
 - 16.8% of all non-elderly or non-disabled Public Housing Households

Outcomes to MEI

- 30% end the MEI requirement by entering employment
- 18% enter a self-sufficiency program
- 9% become full-time students
- 5% become elderly or disabled
- 1% are caretakers
- 3% have a temporary medical issue
- 6% --the MEI person moved out of household
- 29% --the family terminated their participation in their housing program

Outcomes to MEI

Voucher households

18% of HCV turnover are households with MEI
15.9% of HCV households have MEI included

Public Housing

1.8% of PH turnover are households with MEI
8.8 % of PH households have MEI included

Community Response

Broad Community Acceptance of Policies

- Resident Advisory Board
- Landlords
- Human Service Agencies\Caseworkers
- Public Officials
- State Voucher Program
- VASH & Mainstream Participants



www.L-housing.com

HACSB PRESENTATION



Streamlining Agency Operations and Optimizing the Single Fund Budget

Maria Razo-Dale
Chief Administrative Officer

Moving to Work Conference | September 20, 2011

Building Communities, Changing Lives

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Background

- MTW Vouchers: 7,653
- Non MTW Vouchers: 612
- Public Housing: 1,316
- Authority Owned: 2,006



- Largest county in the contiguous U.S.

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MTW Activities

- 20 approved activities
 - Administrative Efficiency: 10 activities
 - Increase Self-Sufficiency: 7 activities
 - Expand Housing Choice: 3 activities



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Staff Savings

- Administrative Efficiencies gained in FY 2010 from MTW Activities equated to 1.75 staff (3,645 hours saved)
- Additional administrative efficiencies also gained from non MTW activities
- ...so what did we do with those staff savings?

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Program Integrity Unit

- Staff savings from MTW activities and other non MTW activities were redirected to Program Integrity Unit
 - Currently comprised of 5 staff:
 - Program Integrity Manager
 - Program Integrity Officer (2)
 - Program Integrity Technician
 - Administrative Clerk



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Additional MTW Activities- Resulting in Staff/Cost Savings

- Newly implemented MTW Activities
 - Biennial Inspections
 - Local Payment Standards
 - Local Income Inclusion
- Upcoming MTW Activities
 - Biennial Recertifications
 - Term limits with Flat Subsidies
 - Property Management Innovation
 - Utility Allowance Reform

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MTW Activities

- Upcoming non MTW activities:
 - outsourcing inspections
 - online waiting list
 - document imaging-enhancement
 - Front lobby kiosk
 - Restructuring Housing Administration staff structure
 - Community Development Initiatives department



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Anticipated Staff Savings

- For FY 2011:
 - 3 full time staff
 - Currently have 3 vacancies, have not and do not plan to backfill



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Questions?



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Contact Information

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HACSC PRESENTATION

Doing More with Less: Streamlining Agency Operations and Optimizing the Single-Fund Budget

Louise Hofmeister, Director of Housing Programs
Housing Authority of the County of Santa Clara

2011 Moving to Work Conference
Washington, D.C.

1

Agency Background

- Established in 1967, HACSC serves both the City of San Jose and the County of Santa Clara
- Administers housing voucher programs and develops, controls and manages affordable rental housing properties.
- Directly or indirectly assists over 18,000 households, about half of whom are comprised of senior citizens on fixed incomes.
- Became an MTW Agency in 2008



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Population



Santa Clara County encompasses the heart of Silicon Valley and includes an estimated 1.8 million residents; its largest city is San Jose, with more than 1 million residents

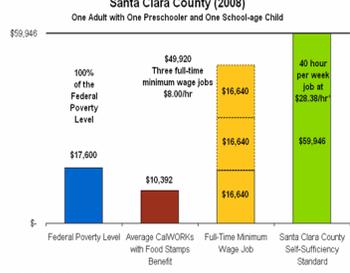


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Affordability

Santa Clara County (2008)
One Adult with One Preschooler and One School-Age Child



A significant number of households are extremely low- or very low-income (39% of Countywide households).

The Self-Sufficiency Standard indicates that a single parent with two children must earn about \$60,000 per year to live here

*Note: The Self-Sufficiency Standard includes the net effect of the addition of the Child Care and Child Tax Credits and the subtraction of taxes.



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Doing More with Less

- MTW Activities**
 - Efficiencies and mechanisms like Rent Reform allows redistribution/reductions to subsidies
- Policy Changes**
 - Guidelines and standards can be redefined resulting in HAP savings
- Process Improvement**
 - Eliminate, automate, consolidate



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MTW Activities

- In the first three years, HACSC focused on designing and implementing MTW activities to reduce administrative costs in its HCV program
- Sixteen of HACSC's twenty-three MTW activities involve streamlining routine processes
- These efficiencies produced over 50% reduction in key HCV program work tasks



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MTW Rent Simplification

- HACSC adopted rent simplification reforms which include eliminating excluded income from the rent calculation process.
- This activity has resulted in cumulative savings of:
 - 1,560 labor hours equating to approximately \$44,000 savings in associated labor costs

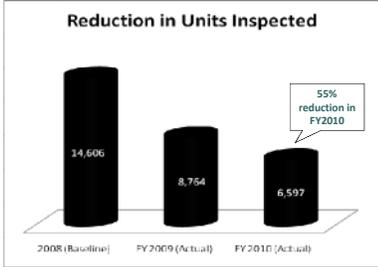


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MTW- Inspections

- In FY 2009, HACSC reduced the frequency of inspections for MTW families to every 2 years instead of every year.



Reduction in Units Inspected

Year	Units Inspected
2008 (Baseline)	14,606
FY 2009 (Actual)	8,754
FY 2010 (Actual)	6,597

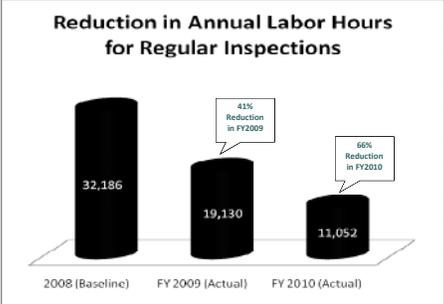
55% reduction in FY2010



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MTW- Inspections



Reduction in Annual Labor Hours for Regular Inspections

Year	Annual Labor Hours
2008 (Baseline)	32,186
FY 2009 (Actual)	19,130
FY 2010 (Actual)	11,052

41% Reduction in FY2009
66% Reduction in FY2010

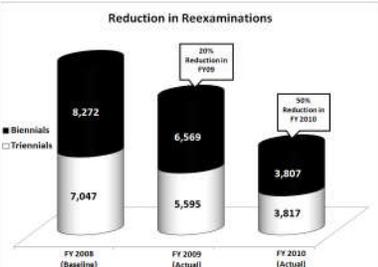


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MTW Re-certifications

- By reducing the frequency of re-certifications, HACSC achieved FY2010:



Reduction in Reexaminations

Year	Biennials	Triennials	Total
FY 2008 (Baseline)	7,047	1,225	8,272
FY 2009 (Actual)	5,595	974	6,569
FY 2010 (Actual)	3,817	0	3,807

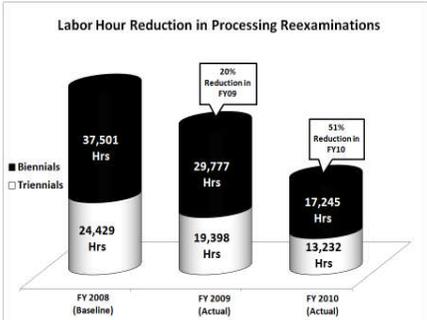
20% Reduction in FY09
50% Reduction in FY 2010



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MTW Re-certifications



Labor Hour Reduction in Processing Reexaminations

Year	Biennials (Hrs)	Triennials (Hrs)	Total (Hrs)
FY 2008 (Baseline)	24,429	13,072	37,501
FY 2009 (Actual)	19,398	10,379	29,777
FY 2010 (Actual)	13,232	4,013	17,245

32% Reduction in FY09
51% Reduction in FY10



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Summary of Cumulative MTW savings

- Capacity has been increased by approximately 36 full-time equivalent (FTE) positions by:
 - Reducing the frequency of tenant reexaminations (16 FTE's)
 - Simplifying the 3rd party verification requirements (2.7 FTE's)
 - Reducing the frequency of regular inspections (11 FTE's)
 - Increasing the timeline to correct HQS deficiencies (6 FTE's)
- Result: reduced processing time 225,000 hours equating to approximately \$2.1 million in potential salary savings**



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Summary of Cumulative MTW savings

- Estimated Program administration costs have decreased by \$879,000, which includes the following savings:
 - \$328,500 in use of a third party vendor to inspect HA owned properties and other extenuating circumstances.
 - \$255,000 in use of a third party vendor to provide administrative assistance in processing transaction paperwork
 - \$271,000 in postage & office supplies



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MTW - Design of Rent Reform

- Over the next several months, HACSC will be reviewing ways to streamline and reform how rents are calculated
- Next step takes a broader view
- Will include activities to encourage families to become more economically self-sufficient



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Evaluation Tools

Progress Scorecards



Implementation Date: Sep-08
 Scorecard for Month of: Oct-09
 Fiscal Year Start Month: Jul-09
 Months in Progress for Fiscal Year: 4

Activity #3: Reduced Frequency of Inspections
 Print Date of Report is Sep 9, 2011

On Track?	Metric	Baseline		YTD		Benchmark	
		FY2008	MTD FY2010	FY2010	YTD	FY2010	FY2010
X	Total No. Regular Inspections	14,600	492	2,880	2,434	7,303	7,303
✓	Labor Hours to Conduct Regular Inspections	32,386	2	8	4,130	12,331	12,331
X	Labor Dollars to Conduct Regular Inspections	\$804,770	\$3	\$10	\$0	\$938,867	\$938,867
	Outsourced Inspections	\$157,040	\$4	\$12			
	Cost of Gas	\$14,354	\$5	\$14			



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Evaluation Tools

Time Study

Type	Number of Steps			Estimated Time			Estimated Labor per Unit		
	Current	Proposed	%	Current	Proposed	%	Current	Proposed	%
CE-1: Interim Changes	35	21	60%	102	82	20%	\$69.56	\$38.36	16%
CE-2: Fraud Allegations	44	28	36%	143	108	24%	\$108.33	\$81.74	25%
CE-3: Intent to Vacate	27	15	44%	32	20	38%	\$30.69	\$14.24	21%
CE-4: Regular Reexaminations	34	16	33%	110	72	35%	\$76.61	\$51.26	33%
CE-5: Reasonable Accommodation	19	14	26%	44	35	26%	\$32.10	\$26.45	16%



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Evaluation Tools

- Surveys of owners and participants
- Customized Reports to measure the following:
 - Changes to administrative Costs
 - Changes to HAP and participants portion of the rent.
 - Changes to the utilization of vouchers



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Non-MTW Saving Initiatives: Local Policies

Estimated Annual HAP Savings of \$17 million

Additional initiatives HACSC may implement to reduce program cost:

- Local policy changes per PIH 2011-28 including:
 - Subsidy standards

Projection HAP Savings		
Current monthly HAP total	New monthly HAP total	Monthly Saving
\$19,712,459	\$18,215,314	\$1,497,145



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Non-MTW Saving Initiatives: Local Policies

Additional initiatives HACSC may implement to reduce program cost:

- ❖ Limitations on addition to family composition
- ❖ Payment Standards



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Non-MTW Saving Initiatives: Business Improvements

> Business process reform

HACSC: CE-4-Regular Reexaminations
\$2918
Assesses Family Reexamination

Est. Min. Units	Est. Labor Cost	Estimated Savings
Before: 112	Before: \$27	# Units Before: 91
After: 72	After: \$11	# Units After: 10
% Reduction: 36%	% Reduction: 59%	% Reduction: 88%

Current Process

Proposed Process



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Non-MTW Saving Initiatives: Business Improvements

- > Technology Investment
 - Comprehensive scanning
 - Handheld
 - Inspection mapping and routing tools
- > Staff Cross Training



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MTW Advantages – Doing More with Less

- > Helping more families
- > Engaging in non-traditional activities
- > Budgetary and regulatory flexibility
- > Positioned to better deal with reductions



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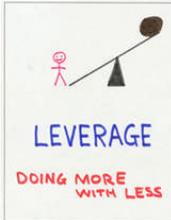
22

HABC PRESENTATION

Managing Capital Resources - Smartly



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LEVERAGE
DOING MORE WITH LESS

Doing More with Less





DO MORE WITH LESS
This is the order of today for organisations supporting civic...

Current Conditions – Pros and Cons



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To investors who want to retire comfortably.
If you have a \$500,000 portfolio, download the guide by Forbes columnist and money manager Ken Fisher's firm. It's called "The 15-Minute Retirement Plan." Even if you have something else in place right now, it still makes sense to request your guide!

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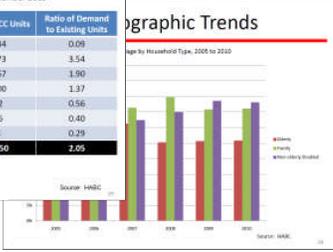
Plan, Plan, Plan

Demographic Trends

Ratio of Demand to Existing Units, December 2010

Unit Size	Public Housing Demand	Existing ACC Units	Ratio of Demand to Existing Units
0 BR	111	1,234	0.09
1 BR	13,000	3,673	3.54
2 BR	6,405	3,367	1.90
3 BR	2,741	2,000	1.37
4 BR	340	612	0.56
5 BR	54	136	0.40
6+ BR	8	38	0.20
Total	22,659*	11,050	2.05

*Includes 18 households where unit size was not specified



Fungibility I – HCV Funds In Lieu Of Public Housing Funds




Phase	Total	Under 60% -			Market
		Section 8	Not Section 8	60%-80%	
Rental I	100	50	50	0	0
Rental II	72	30	27	0	15
Rental III	77	77	0	0	0
Homeownership I	72	0	0	23	31
Homeownership II	123	0	0	0	123
Moravia	60	60	0	0	0

Fungibility II – More HCV Funds In Lieu Of Public Housing Funds

HAP

\$

→

- Waterproofing
- Tuckpointing
- Elevator Replacement
- Roof Replacement
- Plumbing Systems
- Revival of the Dead (Units)
- UFAS Retrofits
- Incentives for Creation of Certain Units

Soft Units

→

Hard Units

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Modified Total Development Cost Limits

The image shows a document with a large red 'X' drawn over it. The document appears to be a table or spreadsheet with multiple columns and rows, likely containing cost limits or project data. The text is mostly illegible due to the red 'X' and the small font size.

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Vouchers, Vouchers Everywhere

The photograph shows a man in a light-colored shirt and a woman in a dark top and hat. They appear to be in a social setting, possibly a restaurant or bar, with other people visible in the background.

- Qualified Allocation Plans (LIHTC)
- Public Housing Land Disposition
- Local Government Land Disposition
- RFPs
- NOFAs
- HOME
- CDBG
- Local Funds
- Inclusionary Housing
- Anything Else You Can Think of

Name That Movie for 15 Points (5 Bonus Points If You Can Recite The Line)

BALTIMORE HOUSING

peter.engel@hbc.org

www.baltimorehousing.org

Baltimore Housing reflects the combined efforts of the Housing Authority of Baltimore City and the Baltimore City Department of Housing & Community Development.

KCHA PRESENTATION

USING MTW TO LEVERAGE FUNDS FOR DEVELOPMENT

Moving to Work Conference
September 20, 2011
Connie Davis, King County (WA) Housing Authority

Key Tools to Use

- Waiver of Regulations
- Fungibility of Resources
- Reserves

Waivers of 1937 Act Provisions

- Develop a local Project-Based Section 8 Program
 - Allocate PBS8 non-competitively to both KCHA controlled units and third party developed housing
 - Waive 25% cap on the number of units in a development that can be project based
 - Eliminate or replace requirement to provide an exit voucher

Waivers-Administrative Simplification

- KCHA may inspect its own PBS8 units
- KCHA may modify HAP contracts to ensure consistency with MTW changes
- Rent reasonableness determined by KCHA using same process as TBS8 program
- Project sponsor may manage wait list, rather than KCHA
- Management entity may conduct initial inspections once trained in HQS by KCHA

Waivers-Swift Change from PH to Section 8 Subsidy

- Tenants go to bed as PH residents, wake up as Voucher holders
 - Conform Section 8 and PH rules to the greatest extent possible (rent, utility allowance, interim policy, etc)
 - Mixed finance developments have single set of rules where possible
 - Default to current PH rent, rather than recalculate to Section 8 rent

Fungibility

- KCHA has been able to use its subsidies outside of Sections 8 and 9 since its MTW contract was signed.
- Projected cash flow from the HCV rents may be combined with Replacement Housing Factor to support debt issuance.
- Since RHF is a subset of CFP, we took the position that it could be used fungibly

RHF

- Used RHF from demolished and disposition properties to redevelop former Public Housing property at Birch Creek
- Estimate of RHF from these units used to underwrite a portion of the debt for the property. Proceeds used to amortize debt.
- HUD now circulating contract amendment which confirms RHF usage for this purpose
- Not for the faint hearted since RHF can be simply inscrutable!

fpp1.com

Springwood Apartments

- Built in 1968 by affiliate of Boeing Aeromechanics Union with HUD-insured mortgage
- Apartments located in (then) remote area of King County
- Construction was inexpensive and project never achieved 100% occupancy, resulting in quick financial default
- In 1976-7 HUD gifted to KCHA with Public Housing Subsidies
- 40 years later buildings and site were at end of useful life
- In 2007 HUD approved Decommissioning as Public Housing
- In 2008 KCHA leased property to Soosette Creek LLC and agreed to provide Section 8 subsidies to renovated units
- In March 2009 the first units were reoccupied and in June 2010 the renovation was completed; property renamed **Birch Creek**

fpp1.com



2005 Aerial Photo

fpp1.com



Building 30 (Before)

fpp1.com



Building 32 (Before)

fpp1.com



Small Kitchens (Before)

fpp1.com



Neighborhood Play Equipment



Backyard



New Kitchen (2-Bedroom)

Financing Sources

• Tax-Exempt Bonds ¹	\$37,500,000
• LIHTC Equity 4%	\$31,158,000
• WA Housing Trust Fund	\$2,000,000
• KC Housing Finance Program	\$1,950,000
• KCHA Weatherization	\$1,438,000
• Lease Payments	\$22,175,000
• Developer Fee Loan	\$2,813,000
• Interest Income	\$222,000
Total	\$99,256,000

Uses of Financing

• Rehabilitation	\$54,464,000
• A&E, Survey, Environmental	\$6,980,000
• Financing, Syndication Costs	\$1,645,000
• Developer Fee	\$8,800,000
• Reserves, Lease-Up	\$130,000
• Relocation	\$2,562,000
• Acquisition (Lease)	\$24,675,000
Total	\$99,256,000

Reserve Use and Availability

Directly purchase public housing without HUD development funding (timing requires LOC use, MTW reserves take out debt)

Pacific Court-32 Units of PH-49 beds

- Purchase and rehab-County grant funds, MTW reserves and ARRA funding
- Targeted to mentally ill homeless and those coming out of state institutions
- Supportive services required for housing

Pacific Court

(adjacent to existing PH)



Reserve Use and Availability

Credit enhance other bonds through use of collateralized accounts-bond proceeds used to purchase or rehabilitate property

- Green River Homes-Built 1958-60 Units PH
 - Approximate cost \$12.5 million
 - Reserves collateralize bonds; reserves released as bonds are amortized
 - Cash flow from Section 8 Vouchers and RHF used pay debt

Green River Present Elevation



New Look



Reserve Use and Availability

Bridge gap between third party financing and sales of land in HOPE VI developments.

- Lenders only lending on credit enhanced debt with definite take out source (like tax credit equity)
- Collapse of housing market left KCHA with significant unsold land at Hope VI sites
- If lines of credit are not renewed, may need to replace with internal funds: MTW is the source
- Alternatively, reserves give comfort to lenders that LOC will be repaid

Greenbridge Site Map

Site is 93 Acres with 40 acres for sale



Reserve Use and Availability- Other

- Provide Section 8 vouchers to non-profit partner owned properties in low poverty areas. Shores up finances and expands housing choice. KCHA may temporarily need to overlease in order to provide vouchers
- Stronger balance sheet provides assurance to County that credit enhancement is lower risk

Future Uses

- Waivers are available to any MTW Authority
- Development and redevelopment by its nature requires long-term planning. Current HUD offsets, turmoil in housing market, reluctance of lenders and Federal budget deficits may significantly limit MTW as a leverage tool.

MPHA PRESENTATION

Managing Limited Capital Resources Smartly: Using MTW to Leverage Funds for Development and Critical Capital needs.



Bob Boyd  Tim Durose

Programs & People Served

- MPHA provides housing in Minneapolis to over 24,000 low-income individuals under two federal housing programs.
 - Public Housing where MPHA owns and manages approximately 5,900 housing units:
 - 41 Highrise buildings
 - 1 Family housing development
 - 753 Scattered Site units
 - Public Housing units are in every ward of the City
 - Section 8 Housing where MPHA administers over 5,000 housing vouchers.
- Ninety-eight percent of MPHA's funding comes from the Federal Government through direct funding or revenues from operating a federal program.

Capital Resource Challenges

- Preserving and improving MPHA's housing inventory.
- Reducing energy consumption, deriving energy related costs saving and improving our local environment.
- Serving our aging population.

Challenge

- Preserving and improving MPHA's housing inventory.

Response

- Identify and value MPHA's Asset Inventory
 - 5,895 units valued at \$513.8 million:
 - 41 highrises (4,958 units) - \$428,230,000
40 built from 1959 – 1972; 1 built in 2006
 - 753 scattered sites - \$146,807,500
Built from 1890 - 2006
 - 28 rowhouses (184 units) - \$31,755,490
Built in 1952
 - 2 office facilities - \$7,061,500

Response

- Conduct needs analysis



Response

- MPHA conducts a comprehensive needs assessment every five years.
 - As of 2009, MPHA's Physical Needs Assessment identified the following: (10 year need)
 - Highrises - \$186,2124,665 (\$37,558/unit)
 - Scattered Sites - \$44,378,312 (\$60,543/unit)
 - Rowhouses - \$11,084,180 (\$60,240/unit)
 - Management Offices - \$3,253,652

TOTAL CAPITAL NEED: \$244,930,809
Annual Capital funding was approximately \$13 million.

Response

- Assess condition of MPHA portfolio

Facility Condition Index (FCI)

Defined as the industry standard index used to track condition performance of facilities/portfolios.

$$\text{FCI} = \frac{\text{Facility Renewal and Repair Costs}}{\text{Replacement Cost of Asset}}$$

GOOD Range : FCI (0% to 5%)

FAIR Range : FCI (5% to 10%)

POOR Range : FCI (> 10% to 30%)

CRITICAL Range: FCI (> 30%)

Response

- Project condition into the future
 - FCI – MPHA Projection
 - 2009 FCI = 23% (poor range)
 - Projecting current capital funding of \$13 million for ten years against ten-year \$245million in capital needs
 - MPHA's FCI slips to 27% (edging toward critical)

Response

- Develop investment strategy
 - Engage in Energy Performance Contract (EPC) process
 - Seek grants
 - Utilize MTW flexibility

Response

- Develop asset investment strategies



Challenge

- Reducing energy consumption, deriving energy related costs, saving and improving our local environment.

Response

- Adopt Energy Performance Contract (EPC)
 - Develop Scope
 - Retrofit Common Area Lighting
 - Retrofit Tenant Area Lighting (Living Units)
 - Refrigerators in High Rises & Office/Maintenance Buildings
 - Low Flow Kitchen Aerators Retrofit
 - Low Flow Bathroom Aerators Retrofit
 - Low Flow shower Heads Retrofit
 - Low Flush Water Closets, Dual Flush
 - Building Envelope (Caulking/Weatherstripping)
 - Insulate Electrical Outlets
 - DDC Retrofit
 - Replace Steam Boilers with High Efficiency Boilers in High Rises
 - Replace Gas Stoves/Ranges with Electric Ignition
 - Remove Steam Traps
 - Replace Domestic Water Heaters in High Rises

Response

- Scope costs estimated at \$33,660,000
 - Total EPC Contract: \$33,660,000
 - Capital Lease \$28.4 million
 - CFP \$5.2 million

Response

- EPC additional benefit – Carbon Footprint Reduction
 - Electrical
 - 3,021,226 KW saved – enough to provide power to 1,259 average homes for twenty years
 - Water
 - 121,341 mgal saved per year – enough water to fill 186 Olympic pools per year for twenty years

Water and Electrical Savings = \$1.2 million/year

Response

- EPC additional benefit – Carbon Footprint Reduction *continued*
 - Gas
 - 106,263 MCF saved per year
 - Equal to the elimination of 148,256 tons of CO2 per year, or
 - Equal to the elimination of 24,627 cars per year over twenty years

Gas Savings = \$1.1million/year

Investment Bonus

- Energy Rebates



Investment Strategy

- Seek grants/development
- ARRA
 - Scattered Site 'Green'
 - \$11.6 million ARRA Competitive Capital Funds
 - \$1.165 million in leverage funds (combination of central office and EPC finance related)
 - Project Purpose
 - Weatherization and energy improvements
 - Project Value
 - Reduction in utility consumption
 - Improve living environment of residents
 - Reduce MPHA's carbon footprint

Investment Strategy

- Seek grants/development
- ARRA – 'Green' Memory Care Facility – serving our aging population.



Investment Strategy

- 'Green' Memory Care Facility – serving our aging population
 - \$9.7 million ARRA Competitive Capital Fund
 - \$5.1 million leveraged funding including \$872,234 in MPHA Central Office funds
- Project Purpose
 - Construct a four-story 'green' 48-unit building for older adults experiencing various levels of memory loss
- Project Value
 - This is a 'green' initiative including energy efficiency methods
 - 'Green' technologies including solar and geothermal

Investment Strategy

- Seek grants/development
- ARRA – Senior Community Center – serving our aging population



Investment Strategy

Senior Community Center – serving our aging population

- \$10.5 million ARRA Competitive Capital Funds
- \$4.3 million Tax Credit Equity
- \$1.2 million Replacement Housing Factor Funds
- Project Purpose
 - Construct a 50,000 square foot senior community center in North Minneapolis/Heritage Park
- Project Value
 - Addresses unmet health and wellness needs of older adults
 - MPHA and lower income neighborhood residents

MTW Role/Capital Fund Investment Impact

- Combined fund flexibility
 - Provided MPHA with impetus to take risks associated EPC
 - HUD funding and utility cost were uncertain
 - MTW reserves provided cushion of comfort

MTW Role/Capital Fund Investment Impact

- ARRA Capital Fund Projects
 - MTW funds could not be used for leverage for ARRA projects
 - MTW helped persuade HUD that RHF funds could be used with senior campus project
 - MTW reserves provided assurances to third-party lender that PHA would eventually contribute all grant funds to the project

MTW Role/Capital Fund Investment Impact

- ARRA Capital Formula Funds
 - MPHA utilized these funds to purchase a foreclosed 20-unit townhome development
 - MTW authority was used to create 'lease-to-own' initiative for this development
- MTW/ Capital Fund Investment Strategies
 - Implementation of the MTW and capital fund investment strategies leveraged millions of dollars in additional funding
 - MPHA expects FCI to achieve 8% within ten years from its current 23% rating

AHA PRESENTATION



USING MTW TO LEVERAGE RESOURCES

FACILITATING SELF-SUFFICIENCY THROUGH PARTNERSHIPS

Atlanta Housing Authority
Marvin Nesbitt Jr.



Using MTW to Leverage Resources

Moving-To-Work Background

- Approved as an MTW agency in September 23, 2003
- Began implementing in October 2004
- Most significant policy changes designed to encourage self-sufficiency
 - Increase in minimum rent
 - Sub market payment standards
 - 30% of adjusted income
 - Work/Program requirement across all subsidy programs



Using MTW to Leverage Resources

AHA's Work /Program Requirement

- All Adults between the ages of 18 - 61 must be working 30 hours or more per week
- Elderly and disabled are excluded
- Can be granted a deferment from the work requirement for approved conditions
- Must provide verification of employment or supporting documentation for deferments
- Compliance is verified annually at each resident's recertification (Earned Income Verification System, The Work Number and Department of Labor).



Using MTW to Leverage Resources

Human Development Services (HDS)

Departmental Objectives

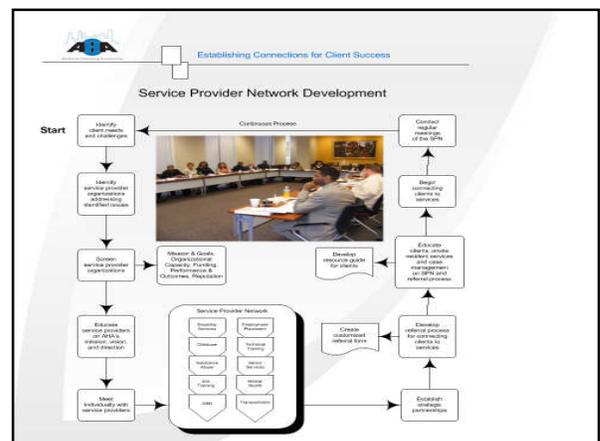
- Facilitate opportunities for families and individuals to build financial stability and reduce their dependence on subsidy, ultimately becoming self-sufficient.
- Facilitate and support initiatives and strategies to support great educational outcomes for children.
- Facilitate and support initiatives that enable elderly and persons with disabilities to live independently with advanced opportunities for aging well.



Using MTW to Leverage Resources

Service Provider Network (SPN)

- A service delivery strategy designed to connect AHA-assisted families to mainstream resources to achieve successful outcomes
- Currently a 59 Member Network of Partners
- Ability to leverage resources
- Comprehensive Referral System
- Funding strategy for service provision and pilot programs





Using MTW to Leverage Resources

Projects and Initiatives Resulting from the Service Provider Network

- CATALYST Workforce Preparation Program (AWDA)
 - Basic Computer Training
 - Soft Skills Development
 - Resume Preparation
 - Weekly Job Fairs
 - Direct Connections to Employment Opportunities
- Good 2 Great GED Program
- “Connecting You to CATALYST Success...”
 - Mechanism for Arming Families with Important Information
 - Electronic Job Posting
 - Resume Sharing
 - Job fairs, Employment Training, Childcare, After School Programs, etc.



Using MTW to Leverage Resources

Projects and Initiatives Resulting from the Service Provider Network

- MTW Seed Grants
- Annual \$25,000 grants used to leverage resources and offset costs associated with serving AHA assisted families
 - Boy & Girls Clubs Summer & Afterschool Program
 - Computer Assisted Debate Program
 - Literacy Action Inc.
 - YWCA of Metro Atlanta



Using MTW to Leverage Resources

Projects and Initiatives Resulting from the Service Provider Network

- “Aging Well” program at all 11 senior AHA-Owned Communities and for elderly & disabled participant families in the Housing Choice program
- Goals of “Aging Well”
 - Enhance socialization, learning, and wellness opportunities
 - Make the physical spaces vibrant and active with programming
 - Incorporate technology to make spaces alive and improve resident connections to family and friends
 - Enhance connectivity to broader external community



Using MTW to Leverage Resources

Projects and Initiatives Resulting from the Service Provider Network

- Human Development Case Management Services
 - Intensive coaching and counseling services through contract service providers to households impacted by HOPE VI revitalization and AHA’s Quality of Life relocation initiative
- Good Neighbor Program
 - Instructional program designed to educate participants on the values, roles and responsibilities in being a good neighbor in a mainstream, mixed-income environment
 - Conflict resolution and problem solving, Community expectations, and Valuing life-long learning
- Customer and Community Relations Center
 - Work with internal and external partners to ensure appropriate behavior of AHA clients and their families living in Atlanta neighborhoods
 - 1-888-AHA 4 You



Q & A



SAHA PRESENTATION

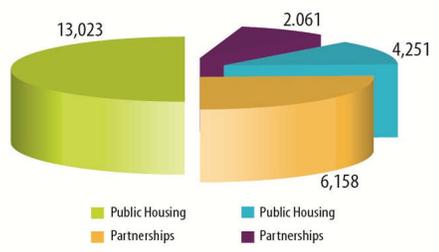

The San Antonio Housing Authority

**Partnerships Creating
Sustainable Communities
Promoting Self-Sufficiency**

1

Who we serve.....

Total households served, by program 25,493

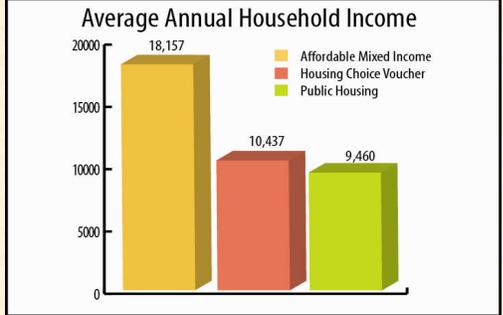


Program	Households Served
Public Housing	13,023
Partnerships	6,158
Public Housing	4,251
Partnerships	2,061

2

Income Served

Average Annual Household Income



Program	Average Annual Household Income
Affordable Mixed Income	18,157
Housing Choice Voucher	10,437
Public Housing	9,460

3

What we do.....

- Increasing MTW self-sufficiency initiatives
- Leverage city funded and non-profit grants
- Utilize partnerships to create sustainable communities
- Strengthen communication with residents and stakeholders through community meetings with stakeholder involvement
- Create healthy options that historically have not been promoted through low socioeconomic communities

4

Examples:

5

MTW self-sufficiency initiatives

- ✓ **Educational partnership with area Alamo Community College's District (ACCD)**
 - ❖ Gateway to College program
 - ❖ Texas Department of Transportation (TxDOT)
 - ❖ Time Warner Cable (TWC) Cable Installer
 - ❖ Section 3 Pilot Landscaping
 - ❖ Medical Records Representative

6

City Funded and Non-profit Grants

- ✓ City of San Antonio (COSA)
- ❖ Grants/rebates Promoting Sustainable Initiatives
- ✓ Metro Health/CPPW
- ❖ Increasing food stuffs that help prevent obesity and diabetes
- ❖ Increasing physical activity

7

Continued:

- ✓ United Way/Promise Neighborhoods
- ❖ Planning and Redevelopment of the Eastside of San Antonio
- ✓ Jobs Plus
- ❖ Employment related services

8

Continued:

- ✓ San Antonio Food Bank (SAFB) with Mayor's Fitness Council (MFC)
- ❖ Community gardens
- ❖ Farmer's Market
- ❖ Nutrition Education Partnerships
- ❖ Cooking demonstrations for fresh foods

9

Benefits of Partnerships Through MTW

- ❖ Increase employment and household earnings permanently
- ❖ Create strong sense of self and place
- ❖ Improve sustainable communities through health, wellness and Green healthy homes
- ❖ Community building through life-long educational opportunities

10

The result of what we do.....

- ★ As an MTW agency, SAHA's partnerships created opportunities to implement new policies outside of the usual scope of HUD policies and regulations. This has allowed us to achieve our mission and program goals by addressing unique needs and concerns of our communities while at the same time leveraging an expanded inter-agency partnership collaboratives, which has expanded funding sources. The result doing more with less! ☺

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Thank you!

For additional information please contact:

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OHA PRESENTATION



Sponsor Based Housing Assistance Program

Oakland Housing Authority

Presented by:
Janet Rice, Deputy Executive Director
Office of Finance & Program Administration

HUD MTW Conference - September 20, 2011



Agenda

- What is SBHAP?
- MTW Activity Information
- Description of the program
- Outcome measures
- Results
- Questions

2



What is SBHAP?

Sponsor Based Housing Assistance Program

- Designed to expand housing opportunities for low-income special needs populations who otherwise might not qualify for or be successful in either the Public Housing or Section 8 programs.

3



MTW Activity Information

- Local Housing Assistance Programs
- Identified and Implemented in FY 2010
- Authorizations Utilized:
 - Attachment C, Section B.1 – Single Fund Budget
 - Attachment D, Use of Funds
- Statutory Objective: Increase housing choices

4



Program Description

- Partnership with the City of Oakland
- Provides rental housing assistance to serve:
 - 40 homeless individuals living in encampments
 - 50 homeless individuals exiting the criminal justice system (includes 10 youth)
- Individuals must be receiving services from providers that are currently under contract with the City

5



Funding

- City receives no administrative funding from OHA
- Funding provided by OHA goes directly to service providers to pay for:
 - Direct housing subsidy costs
 - Security deposits
 - Monthly utility payments
 - Repairs and cleaning
 - Vacancy losses on master leased units
 - Housing placement services

6



Eligibility of Participants

- Referred by an approved service provider
- Currently homeless and living in an encampment or exiting the criminal justice system
- Income below 50% AMI
- Prohibited if convicted for the production or manufacture of methamphetamine or subject to a lifetime registration requirement
- Immigration eligibility requirements

7



Tenant Selection

City Responsibilities

- Develop Tenant Selection & Screening Plan
- Selection of eligible households
- Eligibility determination based on income and connection to an approved services provider

OHA Responsibilities

- Approve Tenant Selection & Screening Plan
- Eligibility determination based on convictions, back payment due, and immigration status

8



Unit Selection & Rents

- City responsible for finding housing placement sites located throughout the city
- OHA conducts HQS inspections
- Total rent must fall within FMR for Oakland
- Tenant portion of rent must be no more than 30% of income

9



Contractual Outcomes

- Based on Countywide Continuum of Care Plan
 - At least 95% of all persons who enter the program remain housed for greater than 6 months.
 - At least 85% of those who obtain permanent housing will maintain it for more than 1 year.
 - At least 65% of those who obtain permanent housing will maintain it for more than 3 years.
 - At least 95% of adults who enter the program with no income will have some form of income within 1 year.

10



Results for FY 2011

- Slower than anticipated start-up resulted in first clients housed in October 2010
- 57 households received assistance (1 participant exited the program, for a total of 56 housed)
- As of the end of the fiscal year, 17 had been housed for more than 6 months
- 16 households entered the program with no income
 - 5 obtained income within the first year (31%)

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Questions?

For more information contact
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Deputy Executive Director
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www.oakha.org

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HOME FORWARD PRESENTATION



homeforward
hope. access. potential.

Alternate Forms of Rent Assistance

Jill J. Riddle
Director of Rent Assistance Programs
Home Forward
(formerly the Housing Authority of Portland)

September, 2011



Making a Wise Investment Utilizing Our MTW Authority / Funding



Build on something that works



- The Short Term Rent Assistance (STRA) program was developed in 2006 through a county wide effort to consolidate housing assistance resources into one cost effective program.
- STRA consolidates funding from over six funding sources into one unified program administered by Home Forward. Program funding is a mix of local and federal funds.
- Home Forward has served as the conduit and administrator for these funds for the past four plus years.

Community Wide Engagement



- STRA Funding comes to the program via the City of Portland, the City of Gresham, and Multnomah County. Prior to STRA, each of these entities had its own short term rent assistance program, with its own program model and requirements. Consolidation of the community's fractured short-term rent assistance system was an early and central component of the 10-year Plan to End Homelessness.

Multiple Funding Sources



- City and County General Funds, (local)
- EFSP/ FEMA - Emergency Food and Shelter Program (Federal)
- HOME Program funds (Federal)
- ARRA - American Recovery Reinvestment Act of 2009 (Federal)
- HSP - Housing Stabilization Program (State)
- LIRHF - Low Income Rental Housing Fund (State)
- HPRP - Homelessness Prevention and Rapid Rehousing Program (Federal)

Multiple funding streams with various options and/or restrictions
– provide agencies with options or tools to meet varying needs of households they serve.

Agreed Upon Community Goals



- 15% for safety off the streets (emergency hotel/motel vouchers focus on DV)
- 45% for helping homeless households obtain permanent housing (security deposit, moving costs, utility costs)
- 40% for helping households maintain permanent housing. (eviction prevention, keeping folks stable)
- Must assist very low income. (Households 50% or less AMI)
- Residents of or homeless within Multnomah County.
- Maximum time to provide assistance is 24 months.

Service Providers Identified



- Competitive RFP process was used to identify service providers.
- Providers with a vast array of specialized services, target populations, and vast demographics / and geographic areas of service were selected. Example of a few includes:
 - Cascade AIDS Project,
 - Catholic Charities / El Programa Hispano,
 - Insights Teen Parent Program,
 - County Development Disabilities Services,
 - Volunteers of America (serving as a lead for collaboration of DV agencies)
- 19 agencies were identified and chosen.

Selection Process



- Agencies were selected based upon the following:
 - Proven ability to serve highly vulnerable populations including:
 - People with disabilities or special needs,
 - Adults over 55,
 - Chronically homeless,
 - People in areas of dense poverty,
 - Agencies who have a demonstrated expertise in housing people as well as the ability to target resources towards particular community needs.

Success Based On Flexibility



- Matching services to needs is a driving factor for success in STRA
- Housing retention outcomes are required and closely tracked.
 - 90% housing retention at 3 months after end of assistance
 - 80% housing retention at 6 months after end of assistance
 - 70% housing retention at 12 months after end of assistance
- Housing retention is tracked using two measurements. STRA requires follow-up with all households served to assess housing retention at 3, 6 and 12-months after assistance ends. Housing retention as a percentage of households served assumes all households STRA providers are unable to contact are not housed. Housing retention as a percentage of households contacted includes in the equation only contacted households. Actual housing retention falls between these two numbers.
- For 2010 – 2011 contact rates for the 3, 6, 1nd 12 month intervals ranged from 81% to 94%.

People & Households Served



People and Households served over the last three STRA years.

Year	People	Households
2008 – 09 full year total	3,911	1,715
2009 – 10 full year total	5,605	2,299
2010 – 11 full year total	5,728	2,365

STRA Household Composition



STRA Household Composition July 2010-June 2011
Households Served by STRA (includes households serviced with only emergency hotel vouchers):

STRA Household Composition	%
Families with Children	56%
Female Head of Household (includes singles)	68%
Disabled Head of Household	43%
Senior Head of Household (55 or older)	15%
Veteran Head of Household	4%
Homeless at entry in STRA (all people in household)	23%

STRA Monthly Income



Monthly income at entry of adults leaving STRA assistance during the year:

Income	%
No Income	28%
Under \$500	17%
\$510 - \$1,000	27%
\$1,001 - \$1,500	15%
\$1,501 - \$2,000	7%
\$2,000 +	4%

STRA Outputs July 2006 - June 2010



Unduplicated Households	#
Total households receiving assistance	6,700
Total households receiving homeless placement or eviction prevention assistance	4,746 (71%)
Average length of rent assistance	2.6 months
Percent of households receiving rent assistance that received only one month of assistance	54%
Percent of households receiving assistance (other than emergency hotel / motel vouchers) more than once (non-consecutively)	29%
Average gap between assistance for households receiving non-consecutive assistance	187 days
Percent of households in unsubsidized rental housing at end of STRA assistance (includes households served with emergency hotel vouchers)	66%
Percent of households in subsidized housing / program at end of STRA assistance	10%

Post Assistance Retention Outcomes



- Individual providers have discretion to match housing assistance with the unique needs of the households they serve.
- There are no service mandates within STRA, there are instead specific housing retention goals.

2010 – 2011 STRA Year	Permanent Placement			Eviction Prevention		
	3 months	6 months	12 months	3 months	6 months	12 months
Housing Retention Goals	90%	80%	70%	90%	80%	70%
Housing retention as percentage of total households served	86%	78%	70%	88%	83%	74%
Housing retention as percentage of total households contacted	92%	90%	85%	93%	92%	91%

Small Investment / Maximum Benefit



Outcomes based on July, 2006 through June, 2010 statistics:

- The average time of assistance received is 2 – 3 months.
- Average assistance payment made on behalf of a household = \$1,025.
- 22% of households served return to the STRA system more than once.

2010 / 2011 New Funding Source



Home Forward using MTW authority to further invest in STRA:

- Committed \$1 million to the STRA system 2010 – 2011, and intend this to be an ongoing commitment.
- In turn local cities and county have made like commitments.
- Proven outcomes.
- Community partnerships.
- Community wide support, funding, investment.
- Building upon existing infrastructure and economies of scale.
- For a small investment 6,700 households received assistance.
- Average cost \$1,025 per household, per year.
- Housing retention rate in excess of 70%.

SHA PRESENTATION

MTW Assessment System: Progress to Date

September 2011

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Original Purpose

- Develop an Alternative to PHAS and SEMAP
 - High Performer status
 - System should measure MTW broadly (3 Statutory Objectives), not just through a PH and HCVP
 - Timing of the essence with the Interim Rule
- Address system reporting issues that do not accurately reflect MTW activities

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Progress Overview

- Discussion at previous two MTW Conferences
- Researched accreditation and other alternative measurement methodologies
 - Informal meeting with HUD MTW staff
- West Coast MTW Agency Conference discussion
- Volunteer small working groups created in alignment with statutory objectives
- Discussion with David Vargas about thoughts emerging from small working groups
- *Tomorrow:* Discussion of collaborative next steps

3

MTW and PHAS

- MTW Agreement and Amendments provide Agencies flexibility with required HUD reporting
 - Provides option to opt-out entirely of PHAS and/or SEMAP
 - Provides option to develop a replacement to PHAS and/or SEMAP
 - Must include 6j indicators
 - High performer status

4

Interim PHAS Rule

- Released February 2011
- According to June 2011 David Vargas meeting the Interim PHAS rule does not apply to MTW Agencies
- *Of note that PHAS rule is missing many 6j indicators*

5

Interim PHAS Rule

- Timing of the final rule creates urgency to adopt replacement for those that want to retain high performer
- All Agencies can opt out of PHAS but once a PHA opts in they must continue reporting under PHAS for the duration of their MTW Agreement

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Alternatives Proposed

- Accreditation methodologies
- Standard and Poor's
- Malcolm Baldrige
- Draft Scorecard (Oakland Discussion)
 - Pass/fail thresholds for critical indicators
 - Including 6j indicators
 - Narrative corporate governance
 - Would be evaluated by third party

7

Preliminary Discussion with HUD

- HUD seems to like the idea of accreditation
- HUD doesn't seem to be willing to give up any reporting
- Still would have to submit:
 - Annual Plan and Report
 - FDS
 - VMS
 - PIC
 - REAC inspections

8

MTW Working Groups

- Volunteers participated on three work groups formed at the April conference with a focus on the statutory objectives
 - Operational Efficiency (led by Peter Beyer – Home Forward)
 - Housing Choice (led by April Black – Tacoma)
 - Family Self-Sufficiency (led by Marcia Waggoner – San Bernardino)
- Met with David Vargas and REAC team in July 2011

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Themes emerging from work groups

- As required by the Agreement, MTW Agencies are focused on achieving statutory goals in the context of their local reality
- Systems and measurements are focused on traditional programs (i.e. Public Housing and HCV only) and don't measure performance under statutory goals
- Inaccurate conclusions are sometimes drawn based on the non-MTW programmatic view of data

10

Financial Indicators

- Agency-Wide Quick Ratio
- Agency-Wide Months Expendable Net Assets Ratio (MENAR)
- Agency-Wide Debt Service Coverage Ratio (DSCR)

11

Housing Choice

- **Statutory Goal:** Increase housing choices for low-income families
 - Assess whether MTW agencies are serving substantially the same number of households
 - Assess whether MTW agency is committing to increase housing choice through its annual activities (as reported in annual plan)
 - Assess whether MTW agency has increased housing choice (as reported in annual report)

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Operational Efficiency

- **Statutory Goal:** Reduce cost and achieve greater cost effectiveness in Federal expenditures
 - Conducted review of MTW Agency measurements for identical or similar metrics
 - Very few commonalities among Agencies
 - Explored measuring against MTW Report
 - Possible development of key measures for all agencies

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Family Self-Sufficiency

- **Statutory Goal:** Give incentives to families with children whose Head 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
 - Assess whether MTW agencies have activities in place that promote self-sufficiency (as reported in Annual Report)
 - Assess whether MTW agencies are measuring the outcomes of these activities (as reported in Annual Report)

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Key Meeting Takeaways

- The Interim PHAS rule does not apply to MTW Agencies.
- REAC desires to measure housing authority performance in managing real estate in the context of an asset manager
- REAC believes that the performance against the Statutory Objectives are compliance measurements and should not have a determination on high performer status

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Key Meeting Takeaways

- REAC desires to have a very objective measurement system as opposed to anything that might be subjective like accreditation
- REAC is open to simplifying FDS for MTW Agencies.
- The MTW Office needs better and more consistent information electronically from MTW Agencies to demonstrate performance.

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Next Steps

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LDCHA PRESENTATION

Encouraging Self-Sufficiency in a Time of High Unemployment



Work Requirement

- All non-disabled/non-elderly adults age 18 and over must work at least 15-20 hours a week.
- Full time enrollment in a job training or post-secondary education program meets the work requirement.
- A two parent household can satisfy the work requirement when one parent works 35 hours a week.



LDCHA RESIDENT SERVICES

- Employment Center with five computers for public use
- Employment focused workshops and computer training
- Assistance enrolling in education/training programs
- Tutoring for all students

Expand Employment Related Services

Provide funding for technical training, education, certifications, employment and counseling to permit heads of household to seek, obtain and retain employment.

Increase Training Focus of Resident Services Office Programs

Education and Training Partners



Resident Services Orientation

- 83 households that have entered the MTW program from the General Housing waiting list have been required to attend an orientation on the services and programs available to them through the Resident Services Office.
- Of the 54 individuals that received the orientation (48 households), 18 individuals (7 PH and 11 SS) have entered one of the agency's self-sufficiency programs which gives participants full access to the agency's case management and supportive employment programs. An additional 11 families that received orientation in 2010 have now entered into case management services in 2011.
- Of the 2011 move-ins who received orientation, there have, thus far, been no evictions.



Case Management

Provide case management for households below 40% AMI to:

- reduce barriers to employment and underemployment
- maximize household's potential for securing long-term employment.



Paid Training



- 13 Certified Nurse & Medication Aide



- 5 training positions in the Resident Services & HPRP Departments

- 1 new wage match with area employer

In house, Technology Based support



- Computer & Internet Access
- Computer based job search
- Resumes



- Writing for employment
- Word Processing
- Computer Skills Workshops

2011 Employment programming



Jobs Club
MS Word
MS Office
MS Excel



Skill Sets For Local Jobs
Computer Literacy
Unemployment Benefits
Workforce Orientation
Intro to Internet + Email
Clothes that Work

Strategies for Stress Management



2011 Employer Affiliates



Lawrence KS Chamber of Commerce
Lawrence Small Business Association
Jayhawk Chapter Society for Human Resource Management
KS Dept of Commerce
Heartland Works and the Lawrence Workforce Center
Neosho Community College Allied Health Program
Trinity In-Home Care
La Costa Staffing
Express Staffing
Sedona Staffing
Lawrence Memorial Hospital
USD 497
Blue Dot Heating and Cooling
Fred's Tune Up
Connex
Hawk Wash
Shamrock Tree Service
Lawrence Journal World
City of Lawrence
SRS/Vocational Rehabilitation
Adecco Staffing Services
City of Lawrence
Lawrence Diploma Completion Center
Head Start
Imagine Daycare

Car Repair

Use funds under the Single Fund Agency to provide financial assistance for vehicle repair to households with children in order to reduce a barrier to employment.

Expand Youth programming to support working parents

Partner with Douglas County Housing Incorporated, a 501(c)3 affiliate organization of the LDCHA, to create year round social, educational, health and recreational activities for youth, particularly the youth of parents participating in the MTW program.



Youth Services



The Full Circle program, in collaboration with community-based agencies and individuals, serves as a year round out of school program that provides a free, safe and positive place for youth ages 7-18, receiving housing assistance to spend time in a constructive manner and avoid educational regression. Services focus on out-of-school learning, self-development and mentoring through programming based on participants as unique individuals.

Youth Served



This innovative approach allows us to make meaningful connections and provide otherwise unobtainable experiences to low-income youth. This year we have served 117 youth from 62 families receiving housing assistance. Over the summer we served an average of 20 children a day with a high of 42. The overall the summer program served 187 children, including 60 children from the community who participated in the lunch program.



Walking School Bus

2011

YOUTH PROGRAM PARTNERS



- | | |
|-----------------------------------|--|
| AmeriCorps VISTA | Lawrence Memorial Hospital |
| AmeriCorps | Lawrence Parks and Recreation Department |
| Boy Scouts | New York Elementary |
| ECKAN | Northeast Kansas Library Systems |
| GaDuGi Safe Center | The Shelter |
| Girl Scouts | Unified School District 497 |
| Half Price Books | Van Go Mobile Arts |
| Haskell Indian Nations University | Roger Hill Volunteer Center |
| Just Food | Washburn University |
| K-State Research and Extension | University of Kansas |
| KU Educational Opportunity Center | Department of Applied Behavioral Science |
| Lawrence Arts Center | |
| Lawrence Community Theater | |

Self-Sufficiency



ELM CITY COMMUNITIES PRESENTATION

MTW Conference 2011
C.A.R.E.S Program
Caring About Resident Economic Sufficiency

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

KAREN DUBOIS-WALTON, PH.D, EXECUTIVE DIRECTOR
SHEILA ALLEN BELL, ASSISTANT EXECUTIVE DIRECTOR
RENEE DOBOS, CHIEF OPERATING OFFICER

Elm City Communities' Vision and Mission

Vision:
 Advancing Communities of Choice and Improving Residents' Lives

Mission
 To provide, now and in the future, affordable communities of choice and opportunities for greater self-sufficiency for residents of the City of New Haven

Elm City Communities

- **A place to live.**
- ***A community for living and growing.***

Agency Goals

- **Full use of MTW flexibility to improve family self sufficiency, improve housing choice and provide cost effective services**
 - Use of block grant funding flexibility
 - Supplement LIPH operating budget in order to fund a supportive services program that supports family's move toward self sufficiency
 - Invest in housing stock to modernize aging infrastructure
 - Redevelopment of public housing communities to create "communities that work"
 - Ease administrative burden on residents and Authority staff

MTW Annual Plan for FY2012

- **Building on MTW successes**
 - Existing FSS initiatives
 - Assessments and Plans
 - Education and Training Opportunities
 - Homeownership
 - SEHOP Capitol Improvement Program
 - Specialized Training
 - Supportive Housing Programs
 - Community Re-entry Program
 - Youth support services
 - Earned income disallowance
 - Rent simplification with phased in rent increases
 - 2 and 3 year recertification
 - Resident Owned business support/Revolving Loan Fund

Family Self Sufficiency- Achievements

Measure	Baseline	FY2011
Enrolled in job skills	25	60
Average LIPH income	\$12,664	\$13,686
Families on zero rent	66	43
Percent employed HOH	54%	47%
Percent employed other adult	18%	60%
Average years on housing assistance	12.1	11.1
Baseline families	4,915	3,673
Average income all families	\$14,780	\$15,881
Average income employed HH	\$19,990	\$23,415
Adults FT students	193	251

New *Proposed* Initiative

- ✦ C.A.R.E.S. Initiative- Caring About Resident Economic Self-Sufficiency
- ✦ New initiative introduced as part of the revitalization of the West Rock community (formerly 2 public housing developments known as Brookside and Rockview)
- ✦ Pilot program targeting 500 units (LIPH and HCV) out of a total portfolio of over 7000 assisted units (approximately 7% of assisted families)
- ✦ Features:
 - ✦ Individualized assessment
 - ✦ Supportive services
 - ✦ Limited length of subsidized housing
 - ✦ Escrow accounts/IDAs
 - ✦ Transition to market rate/non subsidized housing

BROOKSIDE AND ROCKVIEW REDEVELOPMENT



BROOKSIDE AND ROCKVIEW REDEVELOPMENT



BROOKSIDE AND ROCKVIEW REDEVELOPMENT



C.A.R.E.S.

- **PROGRAM CONCEPT**
- Goal- to increase the number of work eligible families in the new West Rock community who are achieving household income and level of self-sufficiency to be able to attain a market rate unit or other affordable housing without assistance
- Target population – All adult members of the 500 families who will reside in newly redeveloped community with the exception of adults deemed exempt

- Program assumptions-
 - ✦ HANH's families receive housing assistance for an average of 11 years
 - ✦ FSS programs shows promise in improved family skills, income and credit score
 - ✦ Escrow savings is important aspect of family's transition away from assisted housing
 - ✦ Long term community success is dependent upon improving social and economic status of families
 - ✦ Decreasing subsidy per family and decreased length of stay in subsidized housing allows more families to be served

• Program Concept

- All families subject to time limit- maximum of 72 months of rental assistance per family
- Families can opt in or out of CARES program elements
 - ✦ Opt out- after 72 months families remain in PHA unit but go to flat rent (less prorated amount for household members who are seniors, minors or otherwise exempt)
 - ✦ Opt in- Subsidy capped at 72 months but with CARES Program benefits
 - Assessment and Individualized Service Plan
 - Two year transition period
 - Year 3 deposit into escrow account amount equal to final year of subsidy cost
 - Seven years to reach self sufficiency

• Program Steps:

- Orientation
- Executes CARES Program Addendum –replaces HAP contract
- Years 1 and 2
 - ✦ Needs assessment completed
 - ✦ Individual Service Plan (ISP) established/Case management services
 - ✦ Enroll in FSS program
 - ✦ IDA established with family savings and PHA deposit of incremental earnings
 - ✦ Must reside in new West Rock community
- Year 3
 - ✦ PHA deposits into escrow account amount equal to final year of subsidy amounts
 - ✦ Recertification
 - ✦ Subsidy paid to resident/ Resident begins to pay landlord full amount of rent
 - ✦ Rental payment verification required

• Program Steps

- Years 3 through 7
 - ✦ Resident may draw on escrow account for approved self sufficiency purposes
 - ✦ Yearly COLA applied to annual subsidy amount
 - ✦ No further rental payment verification required
- Year 7
 - ✦ Self sufficiency achieved
 - ✦ Remaining funds in escrow account accessible to family

• Exemptions - The following factors will exempt families from transition to flat rent

- Returning residents of the former Brookside and Rockview developments that have a right to return; or
- Adult is disabled or deemed unemployable; or
- An adult is precluded from obtaining or maintaining employment due to domestic violence or other circumstance beyond his or her control; or
- Adult is employable but work hours are limited due to a documented medical impairment; or
- Adult is employable but work hours are limited due to the need to care for a disabled or elderly household member; or
- Adult is enrolled in a bona fide employment or educational program (minimum of 16 hours per week); or
- Adult is caring for a child under the age of 2.9 years : or
- Adult is pregnant and medical provide has certified that she is unable to work; or
- Adult is otherwise unemployable
- Adult is moving toward goals but has not achieved sufficiency

• Supportive Services

- Case Manager Assistance
 - ✦ The goal of case management is to ensure positive outcomes for the residents
 - ✦ Will conduct a minimum of two progress meetings each month to ensure that progress is being made.
 - ✦ Review of ISP will be conducted quarterly
 - ✦ All CARES participants must enroll in HANH's FSS Program
 - ✦ The Case Manager will coordinate all services needed
- Comprehensive Needs Assessment
- Development of an Individual Service Plan (ISP)
- 24-month Transition to Cares Program

• Supportive Services- services include

- Educational activities that promote learning
- Readiness and retention activities
- Employment training
- Pre-apprenticeship programs
- Parenting skills
- Financial management including simple budgeting
- Homeownership counseling
- Substance abuse intervention
- Mental health intervention

• **Escrow Account- Resident Enrolled Escrow Fund (REEF)**

- Funded by:
 - Subsidy amount that would have been paid in year 7
 - Agreed upon family savings amount
 - Income disallowance portion
- Acceptable uses
 - A hardship payment
 - Purchase of a vehicle to obtain or maintain employment
 - Start a small business
 - Purchase a computer
 - Down payment on a home
 - Tuition payment
 - Other acceptable uses
- Withdrawals reviewed and approved by CARES Oversight Committee

Fiscal Analysis

Year	COLA	1 person	2 person	3 person	4 person
Average HAP + UAP		\$917	\$1187	\$1357	\$1452
1- lease up		\$917/ \$11,004	\$1187/ \$14,244	\$1357/ \$16,284	\$1452/ \$17,424
2- supportive services	3%	\$944/ \$11,334	\$1222/ \$14,671	\$1397/ \$16,772	\$1495/ \$17,946
3-	3%	\$972/ \$11,674	\$1259/ \$15,111	\$1439/ \$17,275	\$1540/ \$18,485
4-	3%	\$1002/ \$12,024	\$1297/ \$15,564	\$1482/ \$17,793	\$1586/ \$19,039
5-	3%	\$1032/ \$12,385	\$1335/ \$16,031	\$1527/ \$18327	\$1634/ \$19,610
6-	3%	\$1063/ \$12,756	\$1417/ \$17,008	\$1620/ \$19,443	\$1733/ \$20,805
7- amount in escrow	3%	\$1094/ \$13,139	\$1417/ \$17,008	\$1620/ \$19,443	\$1733/ \$20,805
Total assistance		\$84,317	\$109,144	\$124,775	\$133,510

• **Resident protections**

- Violations of the program may result in terminations
- Residents may access all grievance and appeals processes
- Early graduation is available if goals have been met
- Hardship policy established to assist residents address hardships that may occur

Hardship Policy

- Each request will be reviewed by the Hardship Committee and evaluated on a case by case basis.
- Right to seek waiver based upon financial hardship
 - Extraordinary cost of living expenses exceed 40% of monthly income
 - Medical or disability expenses exceed \$6000
- Four potential remedies
 - REEF account pays for expenses due to a job loss for 90 days
 - REEF account pays for medical expenses in excess of \$6,000
 - Exclusion from CARES and re-entry into LIPH or PBV unit
 - Any combination of the above

• **Public Process- Achieving buy-in**

- Program planned and approved by West Rock Implementation Committee- committee of former residents of Brookside and Rockview, other resident leadership, community leadership and public and private partners
- Program reviewed by New Haven Legal Aid Association
- Public Hearing held
- Public Comment Period
- Incorporated into MTW Annual Plan with full public review process

Planned Evaluation

- Each year the number of residents enrolled will be tracked longitudinally until graduation from program.
- Annual Longitudinal data will track
 - Residents – family composition, bedroom size, income, years of employment.
 - Number of residents who have saved into IDA accounts and amount
 - Number of hardship requests/approved/amount/duration/reason
 - Number of early graduates and reason
 - Number of dropouts and reason

**Form 50900: Elements for the Annual MTW Plan, Annual MTW Report and FDS
Submission Instructions**

Attachment B

**to
AMENDED AND RESTATED MOVING TO WORK AGREEMENT
BETWEEN
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
AND
MOVING TO WORK (MTW) HOUSING AGENCIES**

The information on this form is being collected so that HUD is able to evaluate the impacts of MTW activities, respond to congressional and other inquiries regarding outcome measures obtained and promising practices learned throughout the Moving to Work (MTW) demonstration. The information reported through this form is not confidential. MTW housing agencies will report outcome information to accurately evaluate the effects of MTW policy changes on residents, the agency's operations and the local community. The estimated burden per year per agency is 81 hours. Responses to the collection of information are required to obtain a benefit or to retain a benefit. HUD may not conduct or sponsor, and MTW agencies are not required to respond to, a collection of information unless that collection displays a valid OMB control number. All MTW housing agencies will provide the following required elements in their Annual MTW Plans and Reports, consistent with the requirements of Section VII of the Standard MTW Agreement, and will follow the following order and format provided in this form 50900.

MTW Plan and Report Format and Submission Instructions
Some sections have been combined since the prior version of the form, resulting in the sections being renumbered. The sections are now as follows: I. Introduction, II. Operating Information, III. Proposed MTW Activities, IV. Approved MTW Activities, V. Sources and Uses of Funds, and VI. Administrative. MTW agencies are required to use the HUD generated spreadsheets for Sections II and V of Form 50900. There is no prescribed format for presenting the required information in sections I, III, IV and VI of Form 50900. Agencies can use a customized format or the same format the agency has been using for past Plan/Report submissions for these sections.
MTW agencies shall follow submission requirements as set forth in the Standard MTW Agreement and shall provide each year's initial submission of the Annual MTW Plan and the Annual MTW Report to HUD headquarters and the agency's local HUD Field Office via an electronic format, preferably via email but CD or DVD submissions are acceptable. Submissions using File Transfer Protocol (FTP) and other forms of data download that require HUD staff to logon to a web portal will require prior approval by the MTW Program Director.
The electronic submission shall include a Microsoft Word document version of the Plan/Report or a searchable PDF version (not a scanned PDF) of the Plan/Report. The body of the MTW Plan/Report shall be submitted as one file type and preferably in one file. The body shall include the HUD-generated spreadsheets for Sections II and V. These sections should also be provided as a separate excel file. Supplemental materials can be submitted in a different file type. For example, it is acceptable to submit the body of the Plan/Report in Microsoft Word and include supplemental materials (i.e. Capital Fund forms) in an alternate file type such as PDF or Microsoft Excel.
Once HUD has provided either an approval letter for the agency's Annual MTW Plan or an acceptance letter for the agency's Annual MTW Report, the agency will submit a final hard-copy and electronic copy of the Plan/Report to HUD headquarters and the agency's local HUD Field Office as stated in the Standard MTW Agreement Section VII.A.1.c. A hard-copy of the Plan/Report is not required until an approval/acceptance letter is issued by HUD.

Section I: Introduction
Agencies will include short-term and long-term MTW goals and objectives in this section. This new section combines Sections I and IV from the previous version of Form 50900: OMB Control Number 2577-0216, Expiration Date 12/31/2011.
Section II: General Housing Authority Operating Information
A pre-formatted Microsoft Excel table has been provided for agencies to report the required housing stock, leasing and waitlist information in this section. Agencies will copy and paste the Excel tables into Section II of the Plan/Report. When submitting the Plan/Report to HUD, the agency will include the Excel file with the electronic submission of the Plan/Report. An agency can include updates to its historical housing stock or leasing tables as an appendix and the agency can reference this appendix in Section II of the Plan/Report to direct readers to this information.
Section II.A Housing Stock Information:
Agencies are required to provide a general description of planned capital expenditures by development.
Section II.B: Leasing Information:
Definition of Households Served : Households Served under MTW includes all households who receive housing assistance directly or indirectly, using any amount of MTW funds; including through local, non-traditional MTW programs as long as they are designed to meet one of the three MTW statutory objectives. Assistance also includes subsidy loans, equity development and partnerships. Households served must be low-income with at least 75% of the fhouseholds assisted being very low-income as defined in section 3(b)(2) of the United States Housing Act of 1937.
Households Served data will be reported in four categories: <u>Federal MTW Public Housing Units to be Leased</u> , <u>Federal MTW Voucher (HCV) Units to be Utilized</u> , <u>Number of Units to be Occupied/Leased through Local MTW Funded Tenant-Based Assistance Programs</u> and <u>Number of Units to be Occupied/Leased through Local MTW Funded Project-Based Assistance Programs</u> . Non-MTW Households Served will be reported in the <u>Federal non-MTW Voucher (HCV) Units to be Utilized</u> category. Additionally, HUD will track <u>Households Served through Local, MTW Funded Non-Traditional Services Only</u> . However, these families will not be included in the Total Households Served/Units Leased calculation used to determine if the agency is continuing to assist substantially the same total number of eligible low-income families as would have been served had the agency not combined its funds. The definitions for these categories are provided below.
Federal MTW Public Housing Units to be Leased are households that reside in any unit of housing authorized and funded under an Annual Contributions Contract between the housing authority and HUD pursuant to the U.S. Housing Act of 1937.
Federal MTW Voucher (HCV) Units to be Utilized are households that receive rental assistance through Housing Assistance Payment (HAP) Contracts (pursuant to an ACC between HUD and the agency) paid for with MTW funds at a location selected by the household and not tied to a specific location OR households that receive rental assistance through HAP Contracts (pursuant to an ACC between HUD and the agency) paid for with MTW funds at a specific location that is not public housing.

Number of Units to be Occupied/Leased through Local MTW Funded Tenant-Based Assistance Programs and Number of Units to be Occupied/Leased through Local MTW Funded Project-Based Assistance Programs

are households that receive assistance through a local, non-traditional MTW tenant-based or project-based housing program outside of Sections 8 and 9 of the 1937 Housing Act. This includes all households at or below 80% AMI that receive housing through MTW funds but not through traditional Public Housing or Housing Choice Vouchers. This could include low-income housing tax credit households if MTW funds were used for development costs or as a subsidy and households that benefit from MTW funds that are not direct rental subsidies but are used in the development of below-market rate units restricted to eligible households.

Federal non-MTW Voucher (HCV) Units to be Utilized are households that receive rental assistance through Housing Assistance Payment (HAP) Contracts (pursuant to an ACC between HUD and the agency) paid for with non-MTW funds from alternate appropriations line items and competitive NOFAs at a location selected by the household and not tied to a specific location OR households that receive rental assistance through HAP Contracts (pursuant to an ACC between HUD and the agency) paid for with non-MTW funds from alternate appropriations line items and competitive NOFAs at a specific location that is not public housing.

Households Served through Local, MTW Funded Non-Traditional Services Only are households at or below 80% Area Median Income (AMI) provided services through the MTW-funded block grant and not through any type of housing assistance for the fiscal year and over the course of the agency's participation in the demonstration. Households that are only receiving services and are also on one of the agency's housing waiting lists should be included in this category.

Optional: Agencies have the option to report the number of **Households Transitioned to Self-Sufficiency**, including the total transitioned at the end of the fiscal year and the total transitioned during the demonstration. If the agency chooses to report this information, it will provide its own local definition of self-sufficiency and its unique method of calculating the number of households transitioned into self-sufficiency.

Section II.C: Waitlist Information

A pre-formatted Microsoft Excel template will collect three aspects of the agency's aggregate waitlists: the waitlist type, the number of households on the waitlist and whether the waitlist is open or closed. Waitlist information will include those managed by the agency and those managed by a third party. Agencies may include additional narrative to provide explanations for changes to the waitlist(s) in the body of the Plan/Report.

Sections III: Proposed MTW Activities and Section IV: Approved MTW Activities

All proposed and approved MTW activities from the agency's Annual MTW Plan should be included in Section IV of the corresponding fiscal year's Report with appropriate metrics, baselines, benchmarks and outcomes. Baselines, benchmarks and outcomes shall be numeric in nature except in the rare circumstance that HUD accepts a qualitative measure because the activity does not lend itself to a quantitative assessment. HUD prefers that agencies report this information in a table format that allows easy comparisons between baselines, benchmarks and outcomes.

Section IV: Approved MTW Activities

Section IV, "Approved MTW Activities," includes four subsections: Implemented, Not Yet Implemented, On Hold and Closed Out. Therefore, once an activity is approved it should be placed in Section IV under one of these four subcategories.

Implemented includes MTW activities in which the agency is actively engaged.

Not Yet Implemented includes activities in which the agency is not actively engaged but is preparing to implement during the fiscal year.

On Hold includes activities that were implemented and the agency has stopped implementing but plans to reactivate in the future, or activities that the agency has never implemented and is NOT in the process of preparing to implement within the fiscal year.

Closed Out includes activities that were MTW activities but are obsolete because they no longer require MTW authorization due to changes in regulation, activities completed because the agency accomplished its stated objectives, activities that the agency has decided to end before attaining the activity's objectives and activities the agency has never implemented and does not plan to implement at any point in the future. In the year the activity is ended the agency is required to provide information about the outcomes of the activity. The requirements for Closed Out activities are provided in Section IV.

HUD also requires agencies to re-propose activities that require "significant changes." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed or when an agency fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (for example changing the calculation of rent). In these cases a new public process is needed for residents to have the opportunity to be informed about the changes to the activity. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.

Section V: MTW Sources and Uses of Funds

A pre-formatted Microsoft Excel table has been provided for agencies to report the required sources and uses of funds information in this section. Agencies will copy and paste the Excel tables into Section V of the Plan/Report. When submitting the Plan/Report to HUD, the agency will include the Excel file with the electronic submission of the Plan/Report.

Section VI: Administrative

The most recently completed A-133 annual audit should be submitted to HUD within 30 days after completion in electronic form.

There is no predetermined format for submission of the required resolution signed by the Board of Commissions or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance.

There is no predetermined format for submission with the Annual MTW Report of the required certification that the agency has met the three statutory requirements.

Optional Appendix Items

Non-MTW Related Housing Authority Operating Information

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

<u>Annual MTW Plan</u>	<u>Annual MTW Report</u>
I. Introduction	
A. Table of Contents, which includes all the required elements of the Annual MTW Plan;	A. Table of Contents, which includes all the required elements of the Annual MTW Report;
<p>B. Overview of the Agency's short-term and long-term MTW goals and objectives. Short-term goals and objectives include those that the agency plans to accomplish within the fiscal year. Long-term goals and objectives include those that the agency plans to accomplish beyond the current fiscal year. Agencies have the ability to define the level of specificity in the short-term and long-term goals and objectives. If agencies are including non-MTW components in either the short-term or long-term goals and objectives, the agency should clearly delineate which are MTW and non-MTW goals and objectives. Agencies have the flexibility to include proposed and ongoing activities in this section if it assists in providing an explanation about short-term and long-term goals and objectives. However, this is not required.</p>	<p>B. Overview of the Agency's short-term and long-term MTW goals and objectives. The agency should include information about whether short-term goals and objectives were accomplished and report progress towards long-term goals and objectives.</p>

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

II. General Housing Authority Operating Information

MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

Inventory of Public Housing Units, Vouchers and MTW Funded Local Programs

Housing Program	Anticipated Total Authorized at the Beginning of the Fiscal Year
Federal Public Housing Units	X
Federal Authorized MTW Voucher (HCV) Units	X
Federal Authorized non-MTW Voucher (HCV) Units	X
Local, Non-Traditional MTW Units/Subsidies *	X
Totals	X

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

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units Fully Accessible / Adaptable	
	0	1	2	3	4	5	6+			Accessible	Adaptable
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X

Total Public Housing Units to be Added X

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

If Other, please describe: Description of "other" population type served

Planned Public Housing Units to be Removed During the Fiscal Year

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
AMP Name and Number	X	Explanation for Removal

Total Number of Units to be Removed X

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Property Name	X	Description of project 1
Property Name	X	Description of project 2
Property Name	X	Description of project 3
Property Name	X	Description of project 4
Anticipated Total New Vouchers to be Project-Based	X	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year X Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year X

* New refers to tenant-based vouchers that are being project based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year
Description of other changes to the housing stock anticipated during the fiscal year.
Description of other changes to the housing stock anticipated during the fiscal year.
Description of other changes to the housing stock anticipated during the fiscal year.

Planned Uses of Capital Funds During the Plan Year
Narrative description of planned uses of Capital funds during the plan year.

II.2.Plan.Leasing
B. MTW Plan: Leasing Information

Anticipated Number of Households Served (Units to be Occupied/Leased) at the End of the Fiscal Year *	
MTW Households to be Served Through:	Anticipated Number of Households to be Served
Federal MTW Public Housing Units to be Leased	X
Federal MTW Voucher (HCV) Units to be Utilized	X
Number of Units to be Occupied/Leased through Local, Non-Traditional MTW Funded Property-Based Assistance Programs **	X
Number of Units to be Occupied/Leased through Local, Non-Traditional MTW Funded Tenant-Based Assistance Programs **	X
Total Households Projected to be Served	X

* This is a point in time data projection at year end.
 ** In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the agency should estimate the number of Households served.

Federal non-MTW Voucher (HCV) Units to be Utilized	X
Households to be Served through Local Non-Traditional Services Only	X

Reporting Compliance with Statutory MTW Requirements

If the Agency has been out of compliance with any of the required statutory MTW requirements listed in Section III(C) of the Standard MTW Agreement, as determined by HUD in its review of the previous fiscal year's Annual MTW Report, the Agency will provide a narrative discussion and a plan as to how it will return to compliance. If the Agency is currently in compliance, no discussion or reporting is necessary.

Vacancy Information

Actual Public Housing Vacancies at the Beginning of the Fiscal Year	X
Projected Vacancies at the End of the Fiscal Year	X

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Housing Program 1	Description of specific leasing issues and possible solutions. (if applicable)
Housing Program 2	Description of specific leasing issues and possible solutions. (if applicable)
Housing Program 3	Description of specific leasing issues and possible solutions. (if applicable)

Optional: Anticipated Number of Households Transitioning into Self-Sufficiency During the Fiscal Year

Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned

Optional: Agency Definition of Self-Sufficiency

* Indicate if the agency has changed the definition of self-sufficiency since the last Plan year.

II.3.Plan.WaitList				
C. MTW Plan: Wait List Information				
Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No

More can be added if needed.

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

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

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

Housing Program and Description of the populations for which the wait list is open.
Housing Program and Description of the populations for which the wait list is open.
Housing Program and Description of the populations for which the wait list is open.

If Other Housing Type, please describe:

Name and Description of "other" Housing Program
Name and Description of "other" Housing Program
Name and Description of "other" Housing Program

If Other Wait List Type, please describe:

Name and Description of "other" wait list system
Name and Description of "other" wait list system
Name and Description of "other" wait list system

* If there are changes to the wait list, provide a narrative detailing the changes in the body of the Plan.

MTW Report

II.4.Report.HousingStock

A. MTW Report: Housing Stock Information

Inventory of Public Housing Units, Vouchers and MTW Funded Local Programs

Housing Program	Anticipated Total Authorized at the Beginning of the Fiscal Year	Total Authorized at the End of the Fiscal Year
Federal Public Housing Units	X	X
Federal Authorized MTW Voucher (HCV) Units	X	X
Federal Authorized non-MTW Voucher (HCV) Units	X	X
Local, Non-Traditional MTW Units *	X	X
Totals	X	X

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

Explanation for changes from the numbers projected in the MTW Plan:

Housing Program	Explanation of Changes from the Plan
Housing Program 1	Describe and explain change
Housing Program 2	Describe and explain change
Housing Program 3	Describe and explain change

Actual New Public Housing Units Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
AMP Name and Number	X	X	X	X	X	X	X	X	Type Noted *	X	X
Total Public Housing Units Added								X			

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other
 If Other, please describe: Description of "other" population type served

Actual Public Housing Units that were Removed by Fiscal Year End

AMP Name and Number	Number of Units that were Removed	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
AMP Name and Number	X	Explanation for Removal
Total Number of Units to be Removed		X

New Housing Choice Vouchers that were Project-Based by Fiscal Year End			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Actual Number of New Vouchers that were Project-Based	Description of Project
Property Name	X	X	Description of project 1
Property Name	X	X	Description of project 2
Property Name	X	X	Description of project 3
Property Name	X	X	Description of project 4

		Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year *	Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
Anticipated Total New Vouchers to be Project-Based *	Actual Total New Vouchers that were Project-Based	X	X
X	X	Actual Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year *	Actual Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
		X	X

* From the Plan

Other Changes to the Housing Stock that Occurred During the Fiscal Year
Description of other changes to the housing stock during the fiscal year.
Description of other changes to the housing stock during the fiscal year.
Description of other changes to the housing stock during the fiscal year.

Actual Uses of Capital Funds During the Plan Year
Narrative description of actual uses of Capital funds during the plan year.

Overview of Other Housing Owned and/or Managed by the Agency by Fiscal Year End		
Housing Program *	Total Units	Overview of the Program
Housing Program 1 *	X	Overview of the program
Housing Program 2 *	X	Overview of the program
Housing Program 3 *	X	Overview of the program

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

If Other, please describe: Description of "other" Housing Program

II.5. Report Leasing								
B. MTW Report: Leasing Information								
Actual Number of Households Served (Units that were Occupied/Leased) at the End of the Fiscal Year *								
MTW Households Served Through:			Households Served					
			Projected	Actual				
Federal MTW Public Housing Units Leased			X	X				
Federal MTW Voucher (HCV) Units Utilized			X	X				
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs **			X	X				
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs **			X	X				
Total Households Projected and Actually Served			X	X				
* This is a point in time data at year end.								
** In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the agency should estimate the number of Households served.								
Federal non-MTW Voucher (HCV) Units Utilized			X	X				
Households Served through Local Non-Traditional Services Only			X	X				
Vacancy Information								
Actual Public Housing Vacancies at the Beginning of the Fiscal Year			X					
Projected Vacancies at the End of the Fiscal Year			X					
Actual Vacancies at the End of the Fiscal Year			X					
Reporting Compliance with Statutory MTW Requirements								
In order to demonstrate that the statutory objective of "assuring that at least 75 percent of the families assisted by the Agency are very low-income families" is being achieved, the Agency will provide information in the following format:								
Fiscal Year:	2011	2012	2013	2014	2015	2016	2017	2018
Total Number of Newly Admitted Households Assisted *	X	X	X	X	X	X	X	X
Number of Households with Incomes Below 50% of Area Median Income	X	X	X	X	X	X	X	X
Percentage of Households with Incomes Below 50% of Area Median Income	X	X	X	X	X	X	X	X
* Total number of newly admitted households assisted" is defined as all households that have been admitted to federal housing assistance during the fiscal year in question. Therefore, this does not mean that all households assisted by the Agency will be captured in this figure. Instead, the figure only captures the initial admittees' income, just as they begin to receive housing assistance.								
Reporting Compliance with Statutory MTW Requirements								
In order to demonstrate that the statutory objective of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the Agency will provide information in the following formats:								
Baseline for the Mix of Family Sizes Served								
Family Size:	Occupied Number of Public Housing units by Household Size when Agency Entered MTW	Utilized Number of Section 8 Vouchers by Household Size when Agency Entered MTW	Non-MTW Adjustments to the Distribution of Household Sizes *	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained			
1 Person	X	X	X	X				
2 Person	X	X	X	X				
3 Person	X	X	X	X				
4 Person	X	X	X	X				
5 Person	X	X	X	X				
6 Person	X	X	X	X				
7 Person	X	X	X	X				
Totals	X	X	X	X				
Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized	Provide Narrative with Explanation							

Mix of Family Sizes Served							
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	Totals
Baseline Percentages of Household Sizes to be Maintained **	X	X	X	X	X	X	X
Number of Households Served by Family Size this Fiscal Year ***	X	X	X	X	X	X	X
Percentages of Households Served by Household Size this Fiscal Year ****	X	X	X	X	X	X	X
Percentage Difference	X	X	X	X	X	X	X

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

Provide Narrative with Explanation

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

** These numbers in this row will be the same numbers in the chart above listed under the column "Baseline percentages of family sizes to be maintained."

*** The methodology used to obtain these figures will be the same methodology used to determine the "Occupied number of Public Housing units by family size when Agency entered MTW" and "Utilized number of Section 8 Vouchers by family size when Agency entered MTW" in the table immediately above.

**** The "Percentages of families served by family size this fiscal year" will reflect adjustments to the mix of families served that are directly due to decisions the Agency has made. HUD expects that in the course of the demonstration, Agencies will make decisions that may alter the number of families served.

Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End	
Housing Program	Description of Leasing Issues and Solutions
Housing Program 1	Description of specific leasing issues and possible solutions (if applicable)
Housing Program 2	Description of specific leasing issues and possible solutions (if applicable)
Housing Program 3	Description of specific leasing issues and possible solutions (if applicable)

Optional: Number of Households Transitioned into Self-Sufficiency by Fiscal Year End	
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned

Optional: Cumulative Number of Households Transitioned into Self-Sufficiency During the Demonstration	
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned
Housing Program	Number of Households Transitioned

Optional: Agency Definition of Self-Sufficiency

* Indicate if the agency has changed the definition of self-sufficiency during the plan year.

II.6.Report.WaitList

C. MTW Report: Wait List Information

Wait List Information by Fiscal Year End

Housing Program(s) *	Wait List Type **	Number of Households on Wait List	Wait List Open, Partially Open or Closed ***	Was the Wait List Opened During the Fiscal Year
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No
Housing Program(s)	Wait List Type	Number of Households	Open, Partially Open or Closed	Yes or No

More can be added if needed.

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

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

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

Housing Program and Description of the populations for which the wait list is open.
Housing Program and Description of the populations for which the wait list is open.
Housing Program and Description of the populations for which the wait list is open.

If Other Housing Type, please describe:

Name and Description of "other" Housing Program
Name and Description of "other" Housing Program
Name and Description of "other" Housing Program

If Other Wait List Type, please describe:

Name and Description of "other" wait list system
Name and Description of "other" wait list system
Name and Description of "other" wait list system

* If there are changes to the wait list, provide a narrative detailing the changes in the body of the Report.

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Annual MTW Plan	Annual MTW Report
III. Proposed MTW Activities: HUD approval requested	
(provide the listed items below grouped by each MTW activity)	
A. Describe each proposed MTW activity;	<p>(Section III in the Report will be included and left blank. However, agencies should include a placeholder stating, "All proposed activities that are granted approval by HUD are reported on in Section IV as 'Approved Activities'.")</p>
B. Describe how each proposed activity will achieve one or more of the three statutory objectives;	
C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s);	
D. Provide the anticipated schedules for achieving the stated objective(s);	
E. Describe the metric(s) that will be used to quantify the changes that the agency anticipates as a result of the MTW activity;	
F. Describe the baseline performance level for each metric (a numeric value) prior to the implementation of the MTW activity;	
G. Describe the yearly benchmarks for each metric (a numeric value) and	
H. Describe the final projected outcome of the MTW activity for each metric (a numeric value);	
I. List the data source;	
J. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the Agency the flexibility to conduct the activity;	
K. Explain why the cited authorization from Attachment C or D is needed to engage in this activity;	
<p>Every reasonable effort will be made by the agency to reference the complete and correct authorizations from Attachment C or D that are applicable to a particular initiative when proposing the activity. A failure to cite the correct or entire statute or regulation will require a technical revision to the activity to include the correct authorization from Attachment C or D of the agency's Standard MTW Agreement.</p>	

<p>L. Provide the following information for all rent reform initiatives: Impact Analysis, Hardship Case Criteria, Annual Reevaluation of Rent Reform Initiative and Transition Period.</p>	<p>(Section III in the Report will be included and left blank. However, agencies should include a placeholder stating, "All proposed activities that are granted approval by HUD are reported on in Section IV as 'Approved Activities'.")</p>
<p>Rent Reform: HUD defines rent reform as any change in the regulations on how rent is calculated for a household. Any policy that an MTW agency enacts that alters the rent calculation would be considered a type of rent reform and will require an impact analysis.</p>	
<p>Impact Analysis: To assess the impacts of the rent reform initiative, four steps are suggested for conducting an impact analysis, including:</p> <ol style="list-style-type: none"> 1. A description of the rent reform initiative; 2. Tracking and documenting the implementation of the rent reform initiative; 3. Identifying the intended and possible unintended impacts (including changes to the amount of rent resindets pay) of the rent reform initiative; and 4. Measuring the impacts of the rent reform initiative. 	
<p>Ideally, a separate impact analysis would be completed for each individual component of the rent reform initiative, so the agency is able to measure the actual impact of each component of the overall initiative. However, in some cases, it may make more sense to complete an analysis for the aggregate of all rent reform initiatives, e.g., if the agency implements biennial recertifications for working households and triennial recertifications for elderly/disabled Householdlies.</p>	
<p>Hardship Case Criteria: MTW agencies that implement rent reform initiatives should establish a hardship policy to define circumstances under which households may be exempted or temporarily waived from the new rent determination rules.</p>	

<p>Description of Annual Reevaluation of Rent Reform Initiative: MTW agencies should provide an overview as to how they will reevaluate rent reform activities on a yearly basis and revise as necessary to mitigate the negative impacts of unintended consequences.</p>	<p>(Section III in the Report will be included and left blank. However, agencies should include a placeholder stating, "All proposed activities that are granted approval by HUD are reported on in Section IV as 'Approved Activities'.")</p>
<p>Transition Period: MTW agencies shall develop a plan for transitioning residents out of the current rent structure and into a new rent structure.</p>	
<p>*For additional information on these issues, the agency can reference the MTW Office Website at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw.</p>	

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

<u>Annual MTW Plan</u>	<u>Annual MTW Report</u>
IV. Approved MTW Activities: HUD approval previously granted	
(provide the listed items below grouped by each MTW activity)	
A. Implemented Activities	A. Implemented Activities
1. List approved, implemented and ongoing activities continued from the prior Plan year(s) that are actively utilizing flexibility from the MTW Agreement; specify the Plan Year in which the activity was first approved and implemented;	1. List approved, implemented and ongoing activities continued from the prior Plan year(s); that are actively utilizing flexibility from the MTW Agreement; specify the Plan Year in which the activity was first approved and implemented;
2. Provide an update on the status of the implemented activity;	2. Provide detailed information on the impact of the activity, comparing outcomes to baselines and benchmarks, and indicating whether the activity is on schedule.
3. For the Plan year, indicate if the Agency anticipates any nonsignificant changes or modifications to the activity;	i. For rent reform initiatives, describe the number and results of any hardship requests.
4. For the Plan year, indicate if the agency anticipates any changes or modifications to the metrics, baselines or benchmarks;	3. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective;
5. If the agency uses a different authorization from Attachment C or D when implementing the activity than was initially proposed, the agency must re-propose the activity and include all required elements in Section III, Proposed Activities; and	4. If benchmarks or metrics have been revised, identify original indicator(s) and new indicator(s) of activities status and impact; and

<p>6. HUD requires agencies to re-propose activities that require a "significant change." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed or when an agency fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (for example changing the calculation of rent). In these cases a new public process is needed for residents to have the opportunity to be informed about the changes to the activity. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.</p>	<p>5. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.</p>
<p>B. Not Yet Implemented</p>	<p>B. Not Yet Implemented</p>
<p>1. Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented;</p>	<p>1. List any approved activities that were proposed in the Plan, approved by HUD, but not implemented; and</p>
<p>2. Provide an update on the plan for implementation of the activity;</p> <p>3. Provide a timeline for implementation;</p> <p>4. Provide an explanation of any nonsignificant changes or modifications to the activity since it was approved;</p>	<p>2. Discuss any actions taken toward implementation during the fiscal year.</p>
<p>C. On Hold</p>	<p>C. On Hold</p>
<p>1. Describe any approved activities that have been implemented and the agency has stopped implementing but has plans to reactivate the activity in the future;</p>	<p>1. List any approved activities that have been implemented and the agency has stopped implementing but has plans to reactivate the activity in the future; and</p>
<p>2. Discuss why these activities have been placed on hold;</p> <p>3. Provide an update on the plan for reactivating the activity;</p> <p>4. Provide a timeline for re-implementation; and</p> <p>5. Provide an explanation of any nonsignificant changes or modifications to the activity since it was approved.</p>	<p>2. Report any actions taken toward re-implementing the activity in future fiscal years.</p>

D. Closed Out	D. Closed Out
1. List any approved activities that have been closed out, including activities that have never been implemented, the agency does not plan to implement and obsolete activities;	1. List all approved activities that have been closed out, including activities that have never been implemented, the agency does not plan to implement and obsolete activities;
2. Explain why these activities were closed out; and	2. Provide the year the activity was closed out; and
3. Provide the year the activity was closed out.	3. In the year the activity was closed out provide the following:
	i. Discuss the final outcome and lessons learned;
	ii. Describe any statutory exceptions outside of the current MTW flexibilities that might have provided additional benefit for this activity;
	iii. Provide a summary table, listing outcomes from each year of the activity (since the execution of the Standard MTW Agreement); and
	iv. Provide a narrative for additional explanations about outcomes reported in the summary table.

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

V. Sources and Uses

V.1.Plan.Sources and Uses of Funding

MTW Plan: Sources and Uses of Funding

A. Planned Sources and Uses of MTW Funds for the Coming Fiscal Year

Planned Sources of MTW Funds	Projected or Adopted Budget	
	Projected Budget	Adopted Budget
Public Housing Rental Income	\$ X	\$ X
Public Housing Subsidy	\$ X	\$ X
Public Housing MTW Capital Funds	\$ X	\$ X
HCV Subsidy and Fees	\$ X	\$ X
Investment / Interest Income	\$ X	\$ X
Non-Rental Income	\$ X	\$ X
RHF Funding (If RHF is block granted)	\$ X	\$ X
Reserves	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Total Planned Sources:	0	0

Planned Uses of MTW Funds	Projected or Adopted Budget	
	Projected Budget	Adopted Budget
HCV Housing Assistance Payments	\$ X	\$ X
HCV Administration	\$ X	\$ X
Agency Managed Housing Operations	\$ X	\$ X
Privately Managed Housing Operations	\$ X	\$ X
Utility Payments	\$ X	\$ X
Public Housing Rehabilitation Expenses	\$ X	\$ X
Debt Service Repayment Expenses	\$ X	\$ X
Development Activities	\$ X	\$ X
Resident Services Expenses	\$ X	\$ X
Protective Services Expenses	\$ X	\$ X
Local Housing Program Expenses	\$ X	\$ X
Added to Reserves	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Other:	\$ X	\$ X
Total Planned Uses:	0	0

Use Projected Budget Column if Budget has not yet been adopted by the Agency. Otherwise, use Adopted Budget column.

B. Planned Sources and Uses of Non-MTW Federal Funds for the Coming Fiscal Year

Planned Sources of Non-MTW Federal Funds	Projected Budget	or	Adopted Budget
HOPE VI Funding	\$ X		\$ X
Non-MTW Capital Funding	\$ X		\$ X
ROSS Grant Funding	\$ X		\$ X
FSS Grants	\$ X		\$ X
Non-MTW HCV Funding	\$ X		\$ X
RHF Funding (If RHF is not block granted)	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Total Planned Sources:	0		0

Planned Uses of Non-MTW Federal Funds	Projected Budget	or	Adopted Budget
HOPE VI Authorized Activities	\$ X		\$ X
ROSS Grant Authorized Activities	\$ X		\$ X
FSS Grant Authorized Activities	\$ X		\$ X
Non-MTW HCV Program Expenses	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Other:	\$ X		\$ X
Total Planned Uses:	0		0

C. Local Asset Management Plan

Is the agency allocating costs within statute?

Is the agency implementing a local asset management plan (LAMP)? or

*If the agency is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the agency provided a LAMP in the appendix? or

Agencies should provide a brief summary of any changes in the Local Asset Management Plan in the body of the Plan.

D. Describe the Planned Use of MTW Single-Fund Flexibility

Planned Uses of Funds made possible via the MTW block grant that are permissible under Sections 8 & 9 of the 1937 U.S. Housing Act and that do not require the use of any other MTW flexibility, can be described in this section. Agencies shall provide a thorough narrative detailing each activity benefitting from single fund flexibility. Agencies are not required to provide metrics but are encouraged to track the outcomes of significant activities.

Agencies should provide this narrative in the body of the Plan.

E. Actual Reserve Balances at the Beginning of the Fiscal Year

Reserve Account	Reserve Balance
Reserve Account 1	\$ X
Reserve Account 2	\$ X
Reserve Account 3	\$ X
Reserve Account 4	\$ X
Reserve Account 5	\$ X
Reserve Account 6	\$ X
Total Reserve Balance Amount:	0

In the body of the Plan, agencies shall provide, in as much detail as possible, an explanation of plans for future uses of reserve funds, including what funds have been obligated or committed to specific projects.

V.2.Report.Sources and Uses

MTW Report: Sources and Uses of Funding

A. Actual Sources and Uses of MTW Funds for the Fiscal Year

Note: If a Projected Budget was presented in the MTW Plan for this fiscal year, complete the Projected Budget column, the Adopted Budget column and the Funds Received / Expended column. If the Adopted Budget was presented in the MTW Plan, the Projected Budget column is not applicable.

Actual Sources of MTW Funds	Projected Budget	Adopted Budget	Funds Received
Public Housing Rental Income	\$ X	\$ X	\$ X
Public Housing Subsidy	\$ X	\$ X	\$ X
Public Housing MTW Capital Funds	\$ X	\$ X	\$ X
HCV Subsidy and Fees	\$ X	\$ X	\$ X
Investment / Interest Income	\$ X	\$ X	\$ X
Non-Rental Income	\$ X	\$ X	\$ X
RHF Funding (If RHF is block granted)	\$ X	\$ X	\$ X
Reserves	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Total Sources:	0	0	0

Actual Uses of MTW Funds	Projected Budget	Adopted Budget	Funds Expended
HCV Housing Assistance Payments	\$ X	\$ X	\$ X
HCV Administration	\$ X	\$ X	\$ X
Agency Managed Housing Operations	\$ X	\$ X	\$ X
Privately Managed Housing Operations	\$ X	\$ X	\$ X
Utility Payments	\$ X	\$ X	\$ X
Public Housing Rehabilitation Expenses	\$ X	\$ X	\$ X
Debt Service Repayment Expenses	\$ X	\$ X	\$ X
Development Activities	\$ X	\$ X	\$ X
Resident Services Expenses	\$ X	\$ X	\$ X
Protective Services Expenses	\$ X	\$ X	\$ X
Local Housing Program Expenses	\$ X	\$ X	\$ X
Added to Reserves	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Total Uses:	0	0	0

B. Actual Sources and Uses of Non-MTW Federal Funds for the Fiscal Year

Actual Sources of Non-MTW Federal Funds	Projected Budget	Adopted Budget	Funds Received
HOPE VI Funding	\$ X	\$ X	\$ X
ROSS Grant Funding	\$ X	\$ X	\$ X
Non-MTW HCV Funding	\$ X	\$ X	\$ X
RHF Funding (If RHF is block granted)	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Total Sources:	0	0	0

Actual Uses of Non-MTW Federal Funds	Projected Budget	Adopted Budget	Funds Expended
HOPE VI Authorized Activities	\$ X	\$ X	\$ X
ROSS Grant Authorized Activities	\$ X	\$ X	\$ X
Non-MTW HCV Program Expenses	\$ X	\$ X	\$ X
RHF Funding	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Other:	\$ X	\$ X	\$ X
Total Uses:	0	0	0

C. Local Asset Management Plan

Has the agency allocated costs within statute during the plan year?

Has the agency implemented a local asset management plan (LAMP)? or

*If the agency is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the agency provided a LAMP in the appendix? or

In the body of the Report, agencies should provide a narrative updating the progress of implementing and operating the Local Asset Management Plan during the fiscal year.

D. Describe the Planned vs. Actual Uses of MTW Single-Fund Flexibility

Planned vs. Actual Uses of Funds made possible via the MTW block grant that are permissible under Sections 8 & 9 of the 1937 U.S. Housing Act and that do not require the use of any other MTW flexibility, can be described in this section. Agencies shall provide a thorough narrative detailing each activity benefitting from single fund flexibility and compare actual activities to those proposed in the Report. Agencies are not required to provide metrics but are encouraged to track the outcomes of significant activities.

Agencies should provide this narrative in the body of the Report.

E. Actual Reserve Balances at the End of the Fiscal Year

Reserve Account	Reserve Balance	
	Planned	Actual
Reserve Account 1	\$ X	\$ X
Reserve Account 2	\$ X	\$ X
Reserve Account 3	\$ X	\$ X
Reserve Account 4	\$ X	\$ X
Reserve Account 5	\$ X	\$ X
Reserve Account 6	\$ X	\$ X
Total Reserve Balance Amount:	0	0

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Annual MTW Plan	Annual MTW Report
VI. Administrative	
The Agency will provide the following:	The Agency will provide the following:
A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B);	A. General description of any HUD reviews, audits or physical inspection issues that require the agency to take action to address the issue that has been highlighted through an oversight review;
B. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates and locations of public hearings for the draft Annual MTW Plan, (to ensure agencies have met the requirements for public participation, HUD reserves the right to request additional information to verify agencies have complied with all requirements as set forth in the Standard MTW Agreement);	B. Results of latest Agency-directed evaluations of the demonstration, as applicable;
C. Description of any planned or ongoing Agency-directed evaluations of the demonstration for the overall MTW program or any specific MTW activities, if applicable;	C. A copy of the most recently completed A-133 audit pursuant to Section VII.B.3 of the Standard MTW Agreement should be submitted with the Report if the agency did not provide a copy to the MTW Office at HUD headquarters at the time the audit was completed. If the most recently completed audit has already been submitted to the MTW Office, the agency should provide a statement to this effect.
D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1) for MTW and non-MTW Capital Fund grants for each grant that has unexpended amounts, including estimates for the plan year and all three parts of the report; and	D. Certification that the Agency has met the three statutory requirements of: 1) assuring that at least 75 percent of the families assisted by the Agency are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration; and
E. The form SF-LLL, Disclosure of Lobbying Activities, form 50071, Certificate of Payments to Influence Federal Transactions and form 50700, Requirements for a Drug-Free Workplace.	

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Annual MTW Plan

**Annual Moving to Work Plan
 Certifications of Compliance**

**U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing**

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

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

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
6. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
7. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
8. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
9. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
10. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

 PHA Name

 PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

 Name of Authorized Official

 Title

 Signature

 Date

Revisions to HUD Form 50900: Elements for the Annual MTW Plan, Annual MTW Report and FDS Submission Instructions

Comments Received and HUD Responses to the 60-Day Federal Register Comment Period

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I. Background

HUD Form 50900 (otherwise known as Attachment B to the Moving to Work Agreement) is for use by MTW agencies and details certain reporting requirements applied to MTW agencies, particularly the required elements for the Annual MTW Plan and Annual MTW Report submissions. Form 50900 is an Office of Management and Budget (OMB) approved data collection instrument, and as such, must be re-approved by OMB every 3 years. The current Form 50900 will expire on December 31, 2011; hence, HUD is required to seek re-approval and is using the re-approval process to make certain changes to the Form. The changes are under three key categories: clarifications based on experience using the form for the last 3 years, additions of information needed by HUD but not captured on the current form, and the removal of information not needed by HUD to reduce burden on the MTW agencies.

The revised Form 50900 was published in the Federal Register for public review on May 15, 2011 and the 60-day public comment period ended on July 16, 2011. HUD has reviewed the comments received and made revisions based on some of the feedback received. HUD has also written responses to each comment so commenters can understand what change was made/not made as a result of the feedback provided.

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October 31, 2011

IV. HUD’s Office of Public Housing and Voucher Programs

Two comments were received from HUD’s Office of Public Housing and Voucher Programs:

Overall, the proposed revisions to the current form HUD-50900 appear to provide for an excellent, streamlined MTW Annual Plan and Report data submission process for PHAs. Duplicative information has been eliminated, and the form greatly improves and strengthens data reporting for MTW agencies. For example, on page 2 of the proposed revised form, Section II, which addresses General Housing Authority Operating Information, now provides a pre-formatted Microsoft Excel Table for PHAs to report the required housing stock, leasing, and waitlist information. Further, on page 15 of the revised form, Section III: Proposed MTW Activities: HUD approval requested requires that PHAs must report all rent reform initiatives, including an impact analysis, hardship case criteria, a description of the PHA’s annual reevaluation of the rent reform initiative, and a plan for transitioning residents out of the current rent structure and into a new rent structure. Also, Section V: MTW Sources and Uses of Funds also provides a pre-formatted Excel table for PHAs to report the required sources and uses of MTW funds and Non-MTW Federal funds.

HUD Response: HUD appreciates you sharing your thoughts.

PHMOD has a comment regarding Section II.2.B: MTW Plan: Leasing Information on page 9 of the proposed revised form. The subject table does require the PHA to enter the anticipated number of public housing and HCV units to be occupied/leased at the end of the fiscal year. However, the table does not show vacancies at the beginning of the fiscal year contrasted with projected vacancies at the end of the fiscal year. PHMOD really needs a complete picture of actual vacancies given that some PHAs are removing public housing units from their inventories.

HUD Response: HUD agrees that this would be useful and will add it to Form 50900.

V. Joint Comments from the Seattle Housing Authority, Housing Authority of the County of San Mateo, Oakland Housing Authority, San Antonio Housing Authority, San Diego Housing Commission, Tacoma Housing Authority, Vancouver Housing Authority

The following comments were received from the aforementioned agencies:

We are writing regarding the language in HUD’s draft revisions to Form 50900 that requires re-approval for previously approved and ongoing Moving to Work (MTW) activities if there is a “significant change” in the agency’s implementation of the activity. HUD’s proposed definition of a “significant change” is either a change in the cited authorization or any change with the potential to differently impact a tenant. This proposed definition of a significant change and resulting re-approval requirement is so broad that it could easily include the types of adjustments that MTW agencies regularly make and are encouraged to make in response to changes in local conditions or in response to data that shows opportunities for improvement. If Form 50900 is

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II. About this Document

HUD received comments from 8 organizations/groups of organizations in response to the 60-day Federal Register publication. The full text of such comments is listed in this document, in the following order:

1. San Diego Housing Commission
2. HUD’s Office of Public Housing and Voucher Programs
3. Joint Comments from the Seattle Housing Authority, Housing Authority of the County of San Mateo, Oakland Housing Authority, San Antonio Housing Authority, San Diego Housing Commission, Tacoma Housing Authority, Vancouver Housing Authority
4. Housing Authority of Portland, d.b.a. Home Forward
5. Council of Large Public Housing Authorities (CLPHA)
6. Seattle Housing Authority
7. Center for Budget and Policy Priorities (CBPP)
8. National Housing Law Project

Following each comment, HUD has provided its response. In some instances, conflicting comments were provided from various sources, and in such instances, HUD has provided the same or similar responses to each.

As noted in the responses to certain comments, HUD does intend to make changes to the Form based upon the feedback received from commenters. HUD sincerely appreciates the time taken by commenters to provide feedback on the proposed revisions to Form 50900.

III. San Diego Housing Commission

Two comments were received from the San Diego Housing Commission:

Requiring all of the Non-MTW Sources and Uses of Funds to be included in the Plan/Report seems to be duplicating effort as the information is available in REAC. Propose to remove it in the Plan and Report.

HUD Response: HUD believes that this information is critical for context in the MTW Plan/Report and helps stakeholders reviewing the Plan/Report to understand the PHA’s programs and resources. Information provided to REAC via the FDS submission is not provided until after the fiscal year ends and thus cannot provide such context.

“RHF Funding (if RHF is block granted)” is included here, shouldn’t it be in the first chart, A, as an MTW Funding source? Propose it is changed to “RHF Funding (If RHF is not block granted)”.

HUD Response: HUD has corrected the typo that appeared in Chart B. The line item now reads “not block granted.”

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October 31, 2011

implemented with the currently proposed language, it will create a new bureaucratic burden that could greatly constrain MTW agencies’ ability to try new approaches, learn from their results, and make improvements to more effectively serve households.

The proposed language conflicts with the intent of MTW and deviates significantly from current requirements.

The new language that is proposed represents a dramatic change in requirements and deals a major blow to MTW agencies’ ability to create innovative and effective programs. Under the current Form 50900, MTW agencies are not required to seek re-approval for previously approved activities. In fact, the current language in Attachment B specifically states that “failure to cite to the correct or entire statute or regulation will not be grounds for disapproval of such initiative in an Annual Plan nor will such failure invalidate the use of the MTW authority necessary to implement and support the initiative.” In contrast to the new proposed language, current Attachment B instructions encourage agencies that are not meeting their benchmarks to identify changes in strategies to better pursue their goals, without a re-approval process.

Current requirements encourage agencies to identify and discuss changes in implementation of ongoing MTW activities as a learning opportunity for all agencies and for HUD. The current requirements in Form 50900 already provide HUD and MTW agencies with a plethora of tools to monitor the impacts and effectiveness of MTW activities, including detailed benchmarks, metrics, annual results, and hardship requests that agencies report each year. With these safeguards already in place to monitor any negative impacts as they arise, an additional re-approval process for ongoing activities is hardly needed.

HUD Response: HUD believes this requirement is consistent with the structure and intent of the Standard Agreement. The MTW Agreement is structured such that flexibilities are available to agencies and can be activated through the approval of an activity in the Annual MTW Plan. Thus if an agency needs to change the activity such that another authorization is needed or the activity is not consistent with the previously conducted public process, this activity needs to receive re-approval. This is consistent with the structure of the agreement. Per the Standard MTW Agreement, Section VII.A.i.h, “the activity shall remain approved as long as it is included in the Agency’s Annual MTW Plan submissions subsequent to the initial approval of the MTW activity. The approval shall remain in effect until such time as the Agency proposes to modify the activity, initiative, or program.” Through the definition provided in the revised Form 50900, HUD is clarifying this text in the MTW Agreement, not instituting a new requirement. Such clarification is of benefit to both the MTW agencies and HUD.

The proposed language redefines the roles and responsibilities of agencies and HUD in proposing and approving MTW activities.

The proposed re-approval requirement presents a major shift in the way that MTW activities are proposed, approved, and monitored and undercuts the agreements that HUD has made with MTW agencies. Currently, a MTW agency identifies the areas of law that it is waiving in order to propose a new MTW activity, but requires no additional authorization from HUD to proceed with the activities that it describes in its Annual Plan. Rather, it is HUD’s role to confirm that the

proposed new activities are permissible under MTW authority and consistent with requirements outside the 1937 Act. HUD's responsibility in no way extends to approving agency modifications in its implementation of previously approved activities, which instead are properly reported on by the agency in its Annual Reports.

The Statement of Authorizations in Attachment C makes these roles clear, as it states that the purpose of the authorizations is for HUD to "delegate to the Agency the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient ways to provide housing assistance and incentives to self-sufficiency to low, very-low, and extremely low-income families. The authorizations listed in this Attachment C are granted fully without requiring any additional HUD authorizations, as necessary to implement the activities described in the Annual MTW Plan."

The proposed new language for Attachment B conflicts with the authorizations stated in Attachment C. However, Attachment B is an inappropriate vehicle to introduce new regulations or redefine responsibilities, as its purpose is instead to define Annual Plan and Annual Report components in order to collect information needed for program evaluation.

HUD Response: As stated in the response to the above comment, clarifying this issue in the revised Form 50900 is actually of benefit to both the MTW agencies and HUD, as the MTW Agreement clearly states an approval only remains in effect until such time as the agency modifies an activity, but does not define what circumstances rise to the level of a modification requiring re-approval.

Ongoing and successful MTW activities that have been in place for years could require repeated re-proposal and re-approval processes.

While we understand the importance and are committed to reporting to HUD and the public any planned changes in the implementation of MTW activities, requiring us to re-request authorization is unduly onerous and in conflict with the commitments that have been made by HUD. For example, Seattle Housing Authority, like many MTW agencies, has received HUD approval to adopt a local inspection protocol as an MTW activity. In 2003 the agency began conducting inspections biennially in selected properties. In the future, the agency might consider experimenting with triennial inspections to see if a less frequent schedule could reduce costs while safeguarding housing quality. As the proposed language in the draft 50900 reads, HUD could require a re-approval process if the agency decides to pursue triennial inspections. However, no re-approval should be required, as the previous authorization gives the agency the authority to implement a local inspection protocol – which includes, but is not limited to, biennial inspections. This type of a change represents a change in implementation strategy rather than a fundamentally different MTW activity.

If implemented, the proposed new language regarding re-approval will have the unintended effect of derailing the implementation of permissible MTW activities. The Annual Plan presents an agency's best effort to describe the intent and direction of a new MTW activity and provides the public and HUD an opportunity to learn about and comment on the initiative. However, an agency is unable to flesh out an initiative's every detail until it begins implementation.

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innovation. This type of approach would mimic how HUD manages traditional housing authorities and render useless the value of the MTW program in identifying new strategies to improve housing and service delivery.

We strongly recommend that HUD remove the proposed new language regarding the definition of significant changes that would require re-approval of previously approved MTW activities. This onerous new requirement will stifle MTW agencies' ability to try new approaches, evaluate the effectiveness of different strategies, and adjust implementation strategies to accommodate the local environment and to improve the effectiveness of our programs over time.

HUD Response: HUD appreciates these comments, but as stated above, believes that the requirement to re-approve activities that have been significantly modified is well within the confines of the MTW Agreement. In contrast to these comments, HUD received other comments on this topic requesting more stringent terms for re-approvals and the definition of significant changes. The definition HUD has developed thus far serves as a middle-ground to such comments that minimizes the burden on PHAs by limiting re-approvals to appropriate circumstances only.

VI. Housing Authority of Portland, d.b.a. Home Forward

HUD received four comments from Home Forward in response to the Federal Register publication:

We did want to report that in our experience the time required currently to complete the Plan/Report has been far in excess of the 81 hours mentioned and expect that the new format will require even more staff time.

HUD Response: HUD agrees that the estimate of 81 hours may have been low when the reporting structure changed significantly in 2008; however, HUD believes that this should be an accurate average number going forward. When agencies transitioned to reporting on each individual activity in 2008, there was a learning curve associated with breaking information out in this way. However, most agencies now have a form in place that they are simply updating year-to-year. Further, the implementation of standardized spreadsheets in two of the major sections of the Form should reduce the time it takes agencies to prepare this information in the future.

With regard to re-proposing an activity, we think your directions here are fairly clear in terms of what constitutes "significant change". It might help however if you could tighten that up a bit to provide more clarity.

HUD Response: With the large variety of MTW activities undertaken by MTW agencies, and the plethora of authorizations available in the MTW Agreement, HUD does not believe it is possible to create a more specific threshold that would apply across all circumstances.

We look forward to receiving your guidance and/or definitions around "Sources" and "Uses" and other terms such as "debt service" and "repayment expenses" as well as "development activities" (are those capital balance sheet activities?)

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Suspending an initiative because HUD deems revisions "significant changes" could potentially halt valuable services to residents, derail development deals, destroy partnerships, and damage an agency's credibility with partners, funders, and community members.

HUD Response: HUD disagrees, and from practice implementing this policy to date, HUD has not encountered any instances where a re-approval has caused an adverse impact on a PHA or on a resident. In fact, HUD believes this policy provides a protection to residents, ensuring that significant changes to activities do not pass unnoticed, and that residents have a fair opportunity to be apprised of changes and to provide input. Regarding the example provided in the comment, of a change from a biennial to triennial inspection time period, such a change would not constitute a significant change per HUD's definition. This policy change would not require a new MTW authorization to implement, nor would it have a significant impact on residents directly. If over the longer period a unit quality issue arose, a resident could simply request a quality control inspection of the unit and any PHA would be obliged to conduct such an inspection.

The proposed language is vague and potentially far-reaching.

In the most recent version of the Form 50900 HUD states that it will require agencies to re-propose activities that require "significant changes." HUD proposes the following definition: A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed or when an agency fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (for example changing the calculation of rent).

HUD does not include a threshold for the potential of a different impact on residents. It is unclear where HUD would draw the line – for example, would an increase of \$1 a year in rent, the removal of a form, or the collection of new tenant information require re-approval of the entire MTW activity? Further, HUD "reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed," raising further concerns about this vaguely defined and yet highly burdensome new requirement for MTW agencies.

HUD Response: HUD believes this definition is as specific as possible. With the large variety of MTW activities undertaken by MTW agencies, and the plethora of authorizations available in the MTW Agreement, it is impossible to include a more specific threshold that would apply across all circumstances.

Conclusion

With the proposed new re-approval requirement, HUD appears to be making an effort to more tightly regulate MTW agencies. The rationale for HUD's concern in this area is unclear, as MTW agencies already undergo a thorough public process for each new MTW activity proposed in the Annual Plan and monitor the impacts of each ongoing MTW activity in the Annual Report. Creating a new role for HUD in re-approving ongoing and previously approved MTW activities will result in a cumbersome central bureaucracy that is antithetical to experimentation and

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HUD Response: HUD looks forward to providing clarification on these terms if they are unclear to MTW agencies.

Do you have a sense of what next steps are and when the finalized document will be available for use?

HUD Response: HUD expects the revised Form to be approved in advance of the current Form's expiration at the end of calendar year 2011. Once the revised Form is approved, the following timetable will apply. If an agency's Annual MTW Plan or Report is due within 120 days after the approval of the new form by OMB then the agency can provide the Plan/Report in the old format. If an agency's Plan/Report is due more than 120 days after the approval of the new form by OMB then the agency must provide the Plan/Report in the new format.

VII. Council of Large Public Housing Authorities (CLPHA)

The Council of Large Public Housing Authorities (CLPHA) appreciates that HUD is using their Form 50900 renewal process to make MTW-agency-requested revisions to the form. The goal of these revisions, providing a better way for MTW participants to report on all of their activities in a standard way, is an important one. CLPHA understands that this type of standard reporting is essential to sharing the full story of the impacts that these agencies are having in their communities. The proposed revisions, however, still fail to account fully for the widely varying operations of MTW agencies. The following comments highlight elements of the proposal that are overly limiting and will thus interfere with the goal of collecting full information about MTW activities or with the wider goals of the MTW program itself.

Page 1. CLPHA encourages HUD to reassess the burden hours for the finalized new form. MTW agencies spend a great deal more time than 81 hours on preparing their annual Plans and Reports.

HUD Response: HUD agrees that the estimate of 81 hours may have been low when the reporting structure changed significantly in 2008; however, HUD believes that this should be an accurate average number going forward. When agencies transitioned to reporting on each individual activity in 2008, there was a learning curve associated with breaking information out in this way. However, most agencies now have a form in place that they are simply updating year-to-year. Further, the implementation of standardized spreadsheets in two of the major sections of the Form should reduce the time it takes agencies to prepare this information in the future.

Page 3. First, though the form now refers to units occupied/leased in the households served category, the definitions still refer to households rather than units. Further, the definition of Housing Choice Voucher Households refers only to households that receive rental assistance paid for with MTW funds. However, in later sections, respondents are asked for numbers for non-MTW HCV units. Thus, the definition cannot solely refer to MTW-funded units. Additionally, CLPHA had previously expressed concern that not all local non-traditional MTW programs can be described in terms of authorizing a particular number of subsidies. In some sponsor-based program arrangements, for example, the PHA provides a program partner with a fixed amount of funding to be used as short-term rental assistance for a target population. The

number of subsidies that will be provided will depend on the extent of the need of the program participants and the speed with which they transition off of the rental assistance. HUD has indicated that in such cases, the agency should provide an estimate or a minimum of the number of households to be served. That guidance should be included in the definition of Local, Nontraditional MTW Units.

HUD Response: HUD is making a number of changes to the form to address the above comments. First, HUD is adjusting the text on page 9 and 13 of the form to ensure consistency in the language used. Second, HUD is adding a definition for non-MTW Housing Choice Vouchers. Finally, HUD is adding a footnote on pages 7, 9, 11, 13 to provide clarity on the estimation of local, non-traditional subsidies available and households to be served through such subsidies.

Finally, this is one of the areas in which the strict categorization of households fails to capture the breadth of the MTW agencies' efforts. Residents of MTW Public Housing Units or MTW or non-MTW HCV participants may be served by local, nontraditional services. However, there is nowhere in this form to report that information, so that innovation will not be recorded and brought to attention.

HUD Response: HUD disagrees with the comment that there is no place on the form to report on families served through local non-traditional services. There is a place to specifically report this item in Section II. Further, any use of local, non-traditional flexibility must be included as an MTW activity in Sections III and/or IV with corresponding outcome metrics.

Page 9, Section II.2.B, Page 13, Section II.5.B. CLPHA appreciates that HUD has clarified that the annual numbers of households served are reflective of a point-in-time count at the end of the fiscal year. It is important to note, however, that this is not how annual numbers of households served are calculated for non-MTW agencies. The numbers collected by the revised form 50900 will thus not be directly comparable to annual numbers for non-MTW agencies.

HUD Response: The information collected in the MTW Plan and Report is meant to be a snapshot of a point in time, to provide a general picture of the agency's performance. This information is not intended to be used to compare against non-MTW PHAs. HUD data in PIC and VMS can be used to accurately compare MTW and non-MTW agencies.

Page 10, Section II.3.C and Page 14, Section II.6.C. We do not understand what "perspective" HUD hopes to gain by collecting raw numbers of waiting list families. Even if HUD does not intend to use these numbers to assess performance, other groups may, despite their extremely limited value in doing so. Waiting list numbers can vary depending on a number of factors, such as how recently the list was opened, how recently it was purged, etc. We do not see the goal of collecting these numbers.

HUD Response: HUD believes that it is important to obtain a sense of the status and length of the wait list(s) and how that may or may not change over time. Given the MTW Plan substitutes for the 5(a) Agency Plan, and the Agency Plan template does ask questions about the population

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FDS Instructions. CLPHA urges HUD to create a working group with MTW agencies to review and improve the FDS protocols. Although a previous focus group was consulted in the development of this guidance, many agencies have reported challenges in implementation. FDS for MTW agencies still needs modification to make sense for the way that agencies keep their books.

HUD Response: HUD will consider this idea going forward, depending upon the availability of funds for system modifications, which would result from such a group's work.

VIII. Seattle Housing Authority

HUD received the following comments from the Seattle Housing Authority:

General Comments

The revised draft 50900 (Attachment B) continues to constrain the ability of MTW agencies to implement innovative new strategies, adjust and improve them in response to evaluation data, and share the lessons that we have learned from our successes and failures with HUD, other housing authorities, and the general public. Most imperative of our concerns is the proposal to require re-authorization for ongoing activities, as is fully described in the joint comments submitted separately by Seattle Housing Authority and six other MTW agencies. However, in addition, the format and categories that are currently proposed make it difficult and in some cases impossible for us to provide contextual information and paint a meaningful picture of our programs and strategies, which in some cases fall outside of the narrowly prescribed categories and required spreadsheets in the draft 50900.

HUD Response: While HUD does not want to constrain agencies, HUD does need consistent reporting of information across agencies to report to Congress and the industry. If SHA has specific concerns those should be articulated, and HUD will address such concerns when and where possible.

Submission Instructions

It is important that the annual plan and annual report for the same year follow the same format, in order to allow us, HUD, and the general public to compare and discuss expectations and results. Changing formats mid-year between the plan and report will render incomprehensible any comparison of the data that we report. Agencies that use the current format of the 50900 for the 2012 Annual Plan should be able to continue to use the same format for the 2012 Annual Report and implement the new requirements for the 2013 Annual Plan and 2013 Annual Report.

HUD Response: Inquiries from Congress and industry groups require detailed information, particularly on MTW households served, thus the need for agencies to report such information in the revised form. While HUD has made some changes, most aspects of the new reporting form will be similar to those in the old format, so comparisons of information should be possible.

Section II

Description of all planned capital expenditures

The current text requires that agencies provide a general description of all planned capital expenditures by development. This is a significant departure from the current requirement that

needing assistance, this requirement in the MTW Plan is HUD's attempt to gauge the need for assistance and how that may change over time in a way that puts a minimal burden on PHAs.

Page 15, Section III.K, Pages 20-21, Section IV.A.5 and IV.A.6. CLPHA believes that requiring technical amendments and re-proposal of already-approved activities values form over substance. Agencies' Standard Agreements already provide them the specific authorizations included in their Attachments C and D. The purpose of these authorizations is "to delegate to the Agency the authority to pursue locally-driven policies, procedures and programs with the aim of developing better, more efficient ways to provide housing assistance and incentives to self-sufficiency to low, very-low, and extremely low-income families. The authorizations listed in this Attachment C are granted fully without requiring any additional HUD authorizations, as necessary to implement the activities described in the Annual MTW Plan." Activities should be approved if they are consistent with those Attachments C and D, regardless of which specific authorizations the activities require. More importantly, reauthorization should not be required for such a broad definition of "significant change," which could include any different impact on a tenant, regardless of the significance of that change in impact. Requiring reapproval could have serious detrimental effects on MTW agencies' ability to implement their plans and to adjust them to current community needs during their implementation, as processes are delayed, deals fall through, and community look for partners who can follow through in a timely manner. Agencies may further be hampered in their ability to improve the effectiveness of their programs as they develop. CLPHA recommends removing proposed language about reapproval of activities.

HUD Response: As stated in response to other comments received from a joint group of MTW PHAs, HUD believes this requirement is consistent with the structure and intent of the Standard Agreement. Per the Standard MTW Agreement, Section VII.A.1.h, "the activity shall remain approved as long as it is included in the Agency's Annual MTW Plan submissions subsequent to the initial approval of the MTW activity. The approval shall remain in effect until such time as the Agency proposes to modify the activity, initiative, or program." Through the definition provided in the revised Form 50900, HUD is clarifying this text in the MTW Agreement, not instituting a new requirement. Such clarification is of benefit to both the MTW agencies and HUD. HUD believes this definition is as specific as possible. With the large variety of MTW activities undertaken by MTW agencies, and the plethora of authorizations available in the MTW Agreement, it is impossible to include a more specific threshold that would apply across all circumstances. In contrast to these comments, HUD received other comments on this topic requesting more stringent terms for re-approvals and the definition of significant changes. The definition HUD has developed thus far serves as a middle-ground to such comments that minimizes the burden on PHAs by limiting re-approvals to appropriate circumstances only.

Page 21-26, Section V. Definitions are needed for all of the categorizations for sources and uses of funds, particularly if HUD intends them to be prescriptive. Additionally, a definition is needed for "reserve balances." There are a number of ways for agencies to calculate reserves.

HUD Response: HUD believes these line items to be relatively consistent with the categorization used in the FDS. However, HUD does intend to provide MTW agencies with guidance on the line items used in the Sources and Uses section of the revised Form 50900.

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agencies report only on major capital activities that comprise 30 percent or more of capital funding received through the block grant. While we understand that HUD may desire information about capital projects that fall below this threshold, providing information on every capital project, no matter how small, that may occur during the year would be impossible for an agency to legitimately predict. Seattle Housing Authority will have nearly 45 developments next year. If HUD desires more information about planned capital projects, we would encourage requiring a general description of planned capital expenditures above a certain threshold, such as 10 or 20 percent, or simply removing the word "all" from the description of capital activities. Verbally, HUD has stated that the reason for this new request is that the percentage threshold is confusing to some. This could easily be remedied with clarifying guidance.

HUD Response: HUD has made revisions to the requested information in this section to clarify that information is not needed at the AMP-level. However, HUD does need general information on how capital funds are being utilized by MTW agencies. The current reporting requirement of only reporting on major capital activities (comprising 30% or more of the capital funding) does not provide the needed information, and given most MTW agencies list capital fund expenses under the MTW BLI on HUD Form 50075.1, the information in the MTW Plan/Report serves as HUD's and the public's primary source as to how capital fund dollars are used. Thus, HUD has revised this element of the form to request a general description of planned/actual capital fund expenditures during the plan year. For each expenditure, the PHA should provide the award year of the funds utilized, given capital funds may not be expended in the year awarded, and MTW PHAs remain subject to the 2 and 4 year obligation and expenditure deadlines of Section 9(j) of the 1937 Act. PHAs should not provide very minuscule expense but should use relevant categories to describe expenditures in a summary fashion.

Point in time data

While we appreciate HUD's clarification that it is seeking point in time rather than annualized data, we are concerned about the use of point in time data in some of the plan and report categories. For example, reporting point in time data for total households served in our transitional housing units operated by community partners (where households are intended to reside for significantly less than a year) would be grossly misleading. Similarly, point in time data will not accurately capture service levels for households receiving only services throughout the year. We recommend that HUD allow housing authorities to select point in time or cumulative data and just indicate which type of data they are using.

HUD Response: HUD cannot allow agencies to choose how to report this, because the information would be inconsistent across agencies, and thus not comparable for reporting to Congress and the industry. However, after further consideration of this comment, HUD has made some changes to the households served data in Section II to allow agencies to report actual households served for the year in unit months leased/occupied.

Leasing Information definitions

While the definition of families served includes MTW and non-MTW Housing Choice Vouchers, non-MTW voucher holders are not described in the definition of Housing Choice Voucher Households. Please clarify where non-MTW voucher households should be reported.

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Clarification is needed as to how housing authorities should treat Local Nontraditional MTW Households that are being served in Public Housing units. As an example, Seattle leases public housing units to service providers who use the units for short-term transitional housing.

HUD Response: HUD has added a definition on page 3 for non-MTW Housing Choice Vouchers. Non-MTW vouchers should be reported in the appropriate lines on pages 7, 9, 11, and 13 of the Form.

In regards to the second part of this question, Seattle should discuss such agency-specific examples with its MTW Coordinator so that HUD can ensure it has enough information to respond accurately.

Population type for housing stock

We need a "general" rather than "family" population type for housing stock. "Family" is no longer used in PIC and is not an appropriate designation for housing stock. "Family" implies a multiple person household, which is often not the case in housing not designated as elderly, disabled, or mixed.

HUD Response: HUD will change the term on the form to "general."

Planned and actual information

It would make sense for HUD to allow for a column for planned totals as well as year-end totals for housing stock inventory and project-based Housing Choice Vouchers to allow comparison and discussion of variations from the plan.

HUD Response: HUD will include columns for planned as well as year-end on p. 11, as suggested.

Justification for public housing units to be removed

HUD should not require a "justification" for units removed from the agency's inventory over the course of the year, since approval for this activity does not occur through the annual plan or report. A description of planned and actual demo/diso activities would be more appropriate, since the agency is not seeking HUD permission for demo/diso activities through either the plan or the report.

HUD Response: HUD has revised the text to read "explanation" as opposed to "justification." This should avoid confusion regarding the actual approval mechanism (which is the PHAS application to the SAC and the SAC's subsequent approval) for the demolition/disposition. The MTW Plan/Report does however serve as an important venue for informing the public of planned changes to the public housing inventory and allowing the opportunity for feedback via the public process required for the MTW Plan.

Excel table constraints

The Excel table formats are a difficult fit for planning and reporting for MTW agencies, which are by nature and design not uniform in our strategies. There are many examples of areas that are

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currently included in the tables that do not provide enough space for MTW agencies to report on their multiple programs and activities. For example, for leasing information in II.2.B (Plan Leasing Information), MTW agencies may need to report more than three different housing programs under the description of any anticipated issues related to leasing. Similarly, a narrative description of planned uses of capital funds during the plan year is unlikely to fit within the small box provided in the Excel form.

HUD Response: While HUD understands the desire to personalize MTW Plans and Reports, there is core programmatic information that HUD needs to collect from all MTW PHAs that need to be collected in a uniform way to enable comparisons. The pre-formatted spreadsheets, which are only used for two sections of the Form, accomplish this goal. In instances where there is not enough room, additional rows can be inserted into tables, or if additional space is needed for narrative text, it can be included in the body of the Plan/Report.

Waiting list information

The information on waiting lists that HUD requires in the proposed 50900 is extremely detailed (more detailed than what is required from non-MTW agencies) and therefore quite burdensome for agencies - and yet the information that would be provided is relatively meaningless given that many agencies have duplication between waiting lists and make operational decisions about whether or not to close them that limits or increases their size, meaning that waiting lists are in no way a good measure of unmet need. For example, because we have site-based waiting lists for various programs, a single applicant could easily be on 9 or 10 different waiting lists. Seattle operates more than 200 distinct waiting lists (when factoring in bedroom sizes) for more than 60 properties/programs within public housing alone. Our project-based housing choice voucher partners operate 130+ waiting lists.

HUD Response: HUD believes that it is important to obtain a sense of the status and length of the wait list(s) and how that may or may not change over time. Given the MTW Plan substitutes for the 5(a) Agency Plan, and the Agency Plan template does ask questions about the population needing assistance, this requirement in the MTW Plan is HUD's attempt to gauge the need for assistance and how that may change over time in a way that puts a minimal burden on PHAs. HUD expects agencies to report this information at the aggregate housing program level therefore for example; all site based waiting lists would be reported as one entry on the spreadsheet. HUD recognizes that households may be on multiple waiting lists but the intent of this information is to obtain a sense of the status of the agency's waiting lists and how they change over time.

Section III – Proposed MTW Activities

Numeric values

HUD is missing an opportunity to really learn from our successes and failures by requiring only numeric values, rather than also allowing percentages and qualitative information, to measure the effectiveness of our MTW activities. Often, the best baseline is a control group rather than a static number. In such cases, the benchmark is not a numeric value, but a percentage relative to the control group. For example, we require all of our subsidized residents in selected communities to comply with a self-sufficiency requirement above HUD's Community Service Requirement. Our primary metric for this activity is related to non-exempt households who count

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wages as their primary source of income. There are a number of variables that make a percentage relative to a control group far more meaningful than a numeric value, including the job market and changes in the number of households that are exempt from the requirement. As vacancies occur in communities, we cannot predict how many of the new families will be exempt or not. Also, because this requirement applies to tenant-based voucher holders a numeric value benchmark would be more a judge of our ability to predict the number of non-exempt tenant-based voucher holders rather than the success of the program.

HUD Response: As discussed in the definition on page 4, numeric values should predominantly be raw numbers; however, in certain instances metrics could be approved that utilize percentage values or even qualitative measures. If an agency is proposing an activity and having difficulty creating raw number numeric values, it should consult its MTW Coordinator at HUD to discuss other options.

Hardship case criteria

Please specify that the hardship policy will apply to rent reform initiatives that have a negative impact and add that households may be exempted or temporarily waived from some or all of the new rules.

HUD Response: HUD cannot include such text in the form, but is willing to discuss specific activities that may not need a hardship policy with agencies, and make case-by-case decisions. HUD has already included the language on exemptions or temporary waivers in the definition on page 16.

Annual reevaluation of rent reform initiatives

The proposed new language regarding annual reevaluation is potentially quite cumbersome. For newly proposed activities, the language in 50900 implies that we should describe, if the evaluation shows negative impacts of unintended consequences, the policy revisions we would make rather than, what we think is intended here, which is to describe that we will meaningfully consider revising the policy to address the negative impacts.

Please define "excessive" rent burden and "disparate impact."

Because poverty itself disproportionately impacts many of the protected classes listed in this section there will likely be a number of challenges arising out of producing such evaluation. We ask that HUD thoroughly consider the implications of this requirement before finalizing it. Also, housing authorities do not routinely collect national origin information. We are, however, required to collect citizenship

HUD Response: If a policy enacted by an MTW agency using MTW flexibility results in major negative impacts, HUD expects the PHA to address such impacts. PHAs should discuss impacts of their MTW activities with their local community and stakeholders and work together to determine appropriate responses. However, in reviewing the language set forth and this comment, HUD believes it makes sense to clarify the requirement on the Form. HUD has removed the text after the term "consequences." This deletion has removed the reference to the

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terms "excessive" and "disparate impact" so there is no further need for HUD to provide formal definitions of these terms.

Draft Guidance for Moving to Work Agencies: Impact Analysis and Hardship Policies for Rent Reform Initiatives

To what extent will this cited document remain guidance rather than mandatory requirements? Provided it remains as guidance, it is fine. However, if HUD desires to make the document more prescriptive, HUD should work closely with housing authorities to come to agreement about how best to define standards for these issues.

HUD Response: HUD intends for this guidance to remain as guidance. The form has been revised to simply provide a link to the general HUD MTW website for more information.

Section IV – Ongoing MTW Activities

Implemented Activities

Most imperative of our concerns is the requirement to resubmit activities as outlined in items 5 and 6 of this section. Our comments are outlined in the comments submitted jointly with six other MTW agencies.

HUD Response: Please see HUD's response to the jointly submitted comments.

Not yet implemented activities

Line items 2 and 3 requiring an update on implementation and a timeline on implementation are repetitive and should be combined.

HUD Response: HUD lists both of these items separately because they are two distinct requirements. However, if an agency wishes to combine these two elements into one description that adequately covers both topics, it can choose to do so.

On hold activities

Many of our MTW activities that would be categorized as "on hold" are only necessary under certain conditions that vary from year to year, such as the housing market, funding climate, or job market. For example, we would only use our MTW flexibilities concerned investment policies if it was to our financial advantage. Therefore the language in line item 1 that defines on hold activities as activities that the agency "has plans" to reactivate is too narrow. We recommend defining on hold activities as approved and previously implemented activities are not currently underway but may be activated in the future.

Line items 2 and 3 requiring an update on implementation and a timeline on implementation are repetitive and should be combined.

HUD Response: HUD believes that changing this language would create ambiguity regarding which category an activity belongs in.

Again, HUD lists items 2 and 3 separately because they are two distinct requirements. However, if an agency wishes to combine these two elements into one description that adequately covers both topics, it can choose to do so.

Closed out activities

The information requested in line items 3.iii. and 3.iv. are redundant and burdensome. To require this information duplicates information that HUD already has. HUD should consider how this would play out if an activity is closed out, for example, after eight years and had six metrics. The summary required in 3.i. should be more than sufficient for closing out activities.

HUD Response: HUD disagrees that this is burdensome. Agencies have metric information for each year, and when summarizing a completed activity, it would make sense to summarize that information. The text in 3.i. is not quantitative and since metrics (quantitative information) is a critical component of evaluating MTW activities, it seems reasonable to HUD to discuss that information here.

Item 1 conflicts with the guidance that we have previously received (including HUD's comments on our 2010 Annual Report) that we should stop including closed out and obsolete activities after having listed them once.

HUD Response: The current 50900 HUD does not require this information, hence the change to the form.

Section V – Sources and Uses

Actual sources and uses of MTW funds

In response to the comments it has already received from agencies on the previous version of the 50900, HUD says that the source and uses categories "are meant to be prescriptive to ensure continuity across all MTW Plans." However, the categories are not mutually exclusive and remain vague about where different costs should be reported. This could result in another layer of reporting with different requirements than FDS and GAAP. If the categories are not aligned with FDS and GAAP, reconciling these reports would be an administrative nightmare. HUD mentions that it will prepare guidance for MTW agencies that further defines the terminology of the various sources and uses categories. This puts us in a predicament because it is impossible for us to knowledgeably comment on the proposed reporting requirements until we know how HUD will define these items. For example, we need clarification about HUD's expectations regarding capital planning and actual reporting, and definitions of debt and depreciation before we can adequately comment on this section.

HUD Response: HUD believes that these categories are consistent with the basic structure of the FDS; HUD is not looking to create different definitions than the common industry standards.

Section VI – Administrative

HUD reviews, audits, or physical inspection issues

In line item A for the Annual Report, HUD requires a "general description of any HUD reviews, audits, or physical inspection issues that require the agency to take action to address the issue that has been highlighted through an oversight review." The sentence is unclear. Is it meant to

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say that we need to describe only those items highlighted through an oversight review? How does HUD define an oversight review? Please clarify which types of issues would fall under this category.

HUD Response: HUD has shortened this to remove the reference to "oversight review." The revision should make this sentence clear.

Housing authorities are already responsible for following up with HUD on any reviews, audits, or physical inspections. Requiring additional reporting in the MTW report is duplicative and administratively burdensome.

HUD Response: HUD believes requiring this information in the MTW Report provides a level of transparency to the public about the performance of MTW agencies and thus is critical.

FDS Submission Instructions

It is unclear as to why FDS instructions are provided in this document. Instructions may very well change during the three year period that the adopted 50900 is in effect, making this section obsolete. In response to Seattle's prior submission of this comment to HUD in March, HUD moved the instructions to the end of the 50900 and titled it differently. However, the instructions are still part of the 50900 so it is unclear how this change resolved the issue. HUD should remove everything but the first two paragraphs of general requirements. The remaining information should be issued separately as guidance.

In addition, we believe that modifications are still needed to FDS for MTW agencies. As contemplated in the negotiations of the Restated Agreement, we would be well served by a working group of MTW agencies working with HUD to determine how FDS can best work for both groups.

HUD Response: After further consideration of this issue, HUD agrees that including the FDS instructions in this form is not the best fit. These instructions were developed with the input of a working group of MTW agencies and published to the REAC website in December of 2009. Agencies were required to use this format to submit into the FDS with fiscal year-ends starting on June 30, 2010. Now that this reporting format has been in effect for some time, HUD will assess if additional changes are needed and how such changes can best be accomplished.

IX. Center for Budget and Policy Priorities (CBPP)

The Center for Budget and Policy Priorities provided a letter to HUD with its comments on the revised Form 50900:

HUD's proposed changes to the Moving to Work (MTW) planning and reporting process would gather some additional information that would make it easier to determine the MTW agencies' effectiveness in meeting the goals and requirements of the MTW statute. Nonetheless, the clarity and usefulness of the information to be collected are inadequate in a number of areas, and should be improved.

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These comments focus on recommendations to enhance reporting of data related to the requirements in the MTW statute that agencies serve substantially the same number and mix of families as they would have had they not combined voucher and public housing funds, and that 75 percent of families assisted have very low incomes. These requirements have applied to agencies throughout the history of the MTW demonstration, but HUD has not required agencies to provide data showing that they complied or even fully explained how agencies should determine compliance. Unfortunately, HUD's proposal would do little to rectify this situation. It is critical that HUD take advantage of this revision to finally implement these key statutory requirements, by requiring agencies to demonstrate their compliance in a consistent, transparent manner.

In addition to enabling HUD and agencies to meet the requirements of the statute, meaningful compliance with these requirements likely would result in tens of thousands of additional families receiving assistance, and could also target more assistance on families lower on the income scale. These changes would benefit many needy families and contribute significantly to the Administration's goal of ending homelessness, as well as HUD's high priority performance goal of providing rental assistance to a substantial number of additional families.

Number of Families Assisted

The proposed changes would increase the amount of data reported on the number of families assisted outside of the regular public housing and voucher programs. As written, however, the changes are unlikely to gather adequate data to consistently determine compliance with the statutory requirement to serve substantially the same number of families or to meaningfully compare numbers of families assisted among MTW agencies or between MTW and non-MTW agencies.

The requirements and instructions are vague enough that they would allow agencies to arrive at very different numbers of families served based on the same data. They would also favor policies that scatter MTW resources across large numbers of families, since they would not differentiate between families assisted by these policies and those receiving substantial assistance comparable to regular public housing and voucher subsidies. As a result, HUD's proposal could provide an incentive for agencies to adopt policies that scatter resources, by making it far easier for them to comply with the statutory requirement to assist substantially the same number of families. The proposal would also be unfair to agencies that use their funds primarily for the regular voucher and public housing programs or that interpret the reporting instructions conservatively.

Language on page 3 of HUD's proposed form 50900 offers a particular problematic example. The language instructs agencies to count as families assisted "low-income housing tax credit families if MTW funds were used for development costs" which appears to mean that if even one dollar of MTW funds was used in constructing a development, residents could be counted as assisted families indefinitely. This policy would give agencies extremely broad license to evade the requirement to serve substantially the same number of families. In the extreme, an agency that had provided small amounts of MTW funds to a large number of LIHTC developments in previous years could have little or no obligation to provide monthly rental assistance to families in the current year. It is essential that HUD rectify this policy if data on families assisted and the substantially the same requirement are to have any meaning.

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HUD should strengthen the collection of data on number of families assisted by adding the following six points to its instructions and report template.

- **Consistent time periods.** Neither the current MTW report template nor the proposed changes indicate what period should be covered by data on the number of families assisted. Many agencies currently report point-in-time data for the end of the agency fiscal year, while others report average leasing for the full fiscal year. HUD should explicitly require that agencies use average full-year data, which gives a more complete picture of the level of assistance provided and prevents data from being distorted by anomalous trends in a single month.

HUD Response: HUD has made clarifications to Section II.A. and II.B of the form regarding the timeframe of the data and has also added an element to allow agencies to report on households served based upon unit months leased/occupied.

- **Separate reporting for each non-traditional program.** Non-traditional programs may vary widely in the amount and nature of assistance they provide. Agencies should be required to report the number of families assisted separately for each such program.

HUD Response: HUD agrees with this comment, thus the form requires each non-traditional program to be reported as an MTW activity in Sections III/IV of the Plan/Report.

- **Proration when MTW and other funds are mixed.** Some MTW agencies use MTW funds to supplement on-going funding from state or local programs or from separate federal programs. For example, Cambridge has provided supplemental funds to support the Massachusetts Rental Voucher Program. Such assistance should count toward the number of families an agency serves, but it should not be equivalent to a voucher or public housing unit funded entirely with MTW funds. The fairest approach would be to prorate the number of families based on the share of funding provided by MTW funds. For example, four units where 25 percent of funding is provided through MTW could be counted as equivalent to one fully MTW-funded unit. Agencies should be required to report these prorations separately for each program.

HUD Response: By allowing MTW agencies to use MTW funds to serve families outside of Sections 8 and 9, HUD has provided agencies with a significant amount of leeway to define what level of assistance is needed in order to secure a housing opportunity for a family. In some instances, a fixed amount of funding is provided to house a specific family. In other instances, MTW funds are leveraged with other funds or resources to secure housing for a family. In either case, the contribution of MTW funds led to the housing opportunity, thus HUD believes it is appropriate to count the family assisted with MTW funds, in recognition of the fact that the contribution of the MTW funds led to the ability to house the family.

- **Exclusion of families funded only through prior year funds.** HUD's instruction to PHAs to include families living in developments that only received assistance in prior years seems inconsistent with the statutory requirement that agencies continue to assist substantially the same number of families. It is difficult to see how a family could be counted as assisted for purposes of this requirement if neither the family nor the development receives any funds through MTW in the reporting period.

HUD Response: One of the parameters listed in PIH Notice 2011-45 for the use of MTW funds in development projects is that the property must remain affordable for a minimum of 30 years. Thus, the use of MTW funds for such a purpose has led to the creation of an affordable unit that should continue to be counted for the term of affordability as long as it is occupied.

- **Limitation to families receiving meaningful housing assistance.** Even when properties do receive ongoing MTW funds, residents should be counted only if the MTW subsidies actually result in lower housing costs for the families. Families paying rents at or above the market rate -- which could be estimated readily using HUD's Small Area Fair Market Rents -- should not be counted. (HUD's proposal limits one type of non-traditional assistance to units with below-market rents, but it is not clear how broadly applicable this limitation is intended to be.) Similarly, agencies should be instructed to exclude residents of developments that charge the maximum rent permitted under the LIHTC program (or the same rent to "MTW" families as to others in tax credit units).

HUD Response: As per the MTW statute and PIH Notice 2011-45, MTW funds can only be used to serve low-income families (those at or below 80% of AMI). Any housing opportunities created with MTW funds must be created as affordable housing to that population.

- **Clear exclusion of families receiving only non-housing assistance from determination of compliance with statutory requirements.** HUD's proposal requires agencies to report data on the number of families that receive only services and gives them the option of reporting numbers of families that "transitioned to self-sufficiency." Such data are potentially useful (and would be more useful if they were broken down by the types of services families received). But HUD should make clear that only families currently receiving housing assistance should be included in determining compliance with statutory requirements regarding number, demographic mix, and income of assisted families.

HUD Response: In its methodology for tracking the MTW statutory requirement to "serve substantially the same number of families", HUD is clear that for purposes of interpreting the MTW statute's requirements, the statute refers to housing assistance only. Thus, in order to count a family towards the MTW statutory requirement to "serve substantially the same number of families", the family must be receiving housing assistance through the PHA or as a result of the PHA's use of MTW funds.

HUD has included an element in the revised Form 50900 for reporting families served only through services, in order to ensure that this is recognized as an allowable use of

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MTW funds for applicable agencies. Some MTW agencies have significant accomplishments to report in this arena. HUD has also included the optional element to allow agencies to report on families transitioned to self-sufficiency, but as HUD allows the MTW PHAs to define what self-sufficiency means for their agency, HUD has not set strict parameters on how this is to be calculated by an agency. Many MTW PHAs requested the ability to report on this important information, but did not note that for a variety of reasons providing substantial detail in the Annual Report would be difficult. Hence, HUD believes that the way the information is currently requested is appropriate.

Demographic and Income Data on Families Assisted

Under HUD's proposal, agencies would not be required to report any data on demographic characteristics or incomes of families assisted. As a result, it would be impossible to know how agencies determined that they complied with the statutory requirements that they assist a comparable mix of families to what they would have assisted had funds not been combined, that all families assisted had incomes below 80 percent of the local median income, or that 75 percent of families assisted had incomes below 50 percent of area median income. The lack of data also further undermines efforts to assess agency policies.

HUD should require agencies to report data on demographic characteristics and income relative to the local area median separately for the public housing and voucher program and for each non-traditional housing assistance program. It should also make clear that since the requirements regarding number of families, demographic mix, and income all cover the full set of families assisted by the agency, the pool of families included in determining compliance with these requirements must be identical. If an agency does not have demographic or income data about a family and include that data in its demographic and income reporting, it should not be permitted to count the family toward its total number of families assisted.

HUD Response: In order to address this concern, HUD has added tables to the MTW Report, Section II, of the form to capture information on the requirements to serve at least 75% very low income households and to maintain a comparable mix of families by family size. Further, while HUD presently captures demographic information in PIC for Section 8 and 9 households, PIC does not currently capture this information for households served outside of Sections 8 and 9. HUD is currently working to modify PIC to enable the collection of this information so that HUD can better track these statutory requirements internally.

Calculations of How Many Families Would Have Been Assisted Had Funds Not Been Combined

To permit consistent determination of whether agencies complied with the requirement to assist substantially the same number of families as would have been assisted had funds not been combined, it will also be necessary for HUD to establish criteria for estimating the number of families that agencies would have assisted had funds not been combined. For the voucher program, this could be calculated by assuming the agency would have used 95 percent of its budget authority (the current minimum budget utilization performance standard for non-MTW agencies under SEMAP1) and dividing that amount by the agency's average per-voucher cost. For public housing, HUD could use the total number of units for which the agency received operating funds, multiplied by a reasonable occupancy rate. The combined figure could then be

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compared to the number of families actually assisted (calculated as described above) to determine if the amounts are substantially the same. It is essential that HUD establish a clear policy applicable to all participating agencies to implement this statutory directive.

HUD Response: In the last year, HUD has developed a methodology to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. HUD intends to pilot the methodology in the coming year and to issue the policy formally in FY13. HUD will consider this feedback as it pilots the current methodology and works toward a formal issuance.

Definition of "Substantially the Same"

Finally, HUD should establish an objective definition of how large a divergence in the number or mix of families assisted would constitute a violation of the "substantially the same" requirement. In the case of the number of families, it would seem reasonable to consider an agencies in violation if it assists fewer than 95 percent as many families as it would have had funds not been combined. For the mix of families, a variation of more than five percentage points in the share of families assisted accounted for by a particular type of families compared to the share assisted before MTW was implemented could be considered a violation.

HUD Response: In the last year, HUD has developed a methodology to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. HUD intends to pilot the methodology in the coming year and to issue the policy formally in FY13. HUD will consider this feedback as it pilots the current methodology and works toward a formal issuance.

X. National Housing Law Project

The National Housing Law Project submitted a letter detailing its comments on the revised Form 50900. The comments were organized under twenty-five numbered headings:

1. Resident Outreach and Engagement

Proposed Location: Plan § VI, Administrative, at 27; Report § VI, Administrative, at 27.

Resident involvement is consistent with the MTW demonstration legislation which seeks to substitute local accountability for federal regulation. With respect to the initial application for MTW authority, the MTW demonstration legislation included public participation through a public hearing and comment requirement. The PIH Notice inviting applicants awarded up to 10 points to an applicant based on the degree of resident involvement.

The spirit of the legislation and Notice takes concrete form beyond the application stage in the text of the MTW Standard Agreement. The importance of community involvement in the MTW demonstration is reflected in four components of the Standard Agreement:

- Part II, "Requirements and Covenants," Paragraph C.
- Part V, "Amendments and Continuation of Activities," Paragraphs A "Amendments of this Restated Agreement" and B "Amendment of the Annual MTW Plan."

- Part VII, "Administrative Responsibilities," Paragraph A "Annual MTW Planning and Reporting," items 1.f and 1.g.
- Attachment C, Part A "General Conditions," item 3.

HUD's proposed changes to form HUD 50900 do not contain provisions that would demonstrate compliance with basic resident and community involvement in the Annual Plan and Report process. In fact, one HUD proposed change to form HUD 50900 would delete the sole reference to any resident involvement: the requirement for the PHA to provide documentation of a public hearing regarding any rent reform initiative (V. Proposed MTW Activities: HUD Approval Requested, item G.).

Instead of deleting an obligation to demonstrate community involvement, form HUD 50900 should, at §VI "Administrative," add considerably more detail.

Also there should be community involvement with respect to the MTW Report. Currently, there is no HUD requirement for community involvement regarding the Report. Such involvement is essential because these Reports review whether the objectives of the Annual Plan were met, which is of utmost importance to the residents and community. Moreover, the Reports most likely will form the basis of any HUD assessment of the MTW program and resident consultation is essential to that effort.

The form should include a community involvement section detailing the public participation activities carried out through the MTW Annual Plan process, including the MTW Report. The information collected should include:

- The date the draft Annual Plan and/or Report was made available to residents.
- The dates and locations of public hearings.
- The number of tenants present at the public hearing. In conjunction with the RAB and any Resident Council or other resident organization, HUD should urge the MTW PHA to establish a minimum number of tenants (a quorum) to be at a public hearing. A tenant sign-in sheet from each hearing should be attached.
- The number of community members (advocates, public officials, others) present at the public hearing.
- A description of any additional efforts made to inform tenants and obtain their input, if undertaken.
- An attachment summarizing public comments, distinguishing tenant and tenant representative comments from those who are not tenants.
- A list of resident and community comments accepted without modification; accepted but with modifications, along with an explanation of the reason for modification; and not accepted, along with the reason for not accepting the suggestion.
- The number of working days between the last public hearing and action by the Board of Commissioners.

HUD Response: HUD removed the reference to providing specific documentation of a board hearing in regards to rent reform activities, because such reference was duplicative to the board hearing in regarding to the entire MTW Plan (which would include the rent reform activity). As

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noted in the preceding comments, the requirements relative to public process are clearly articulated in multiple sections of the Standard MTW Agreement. Thus, it would be inappropriate to use this form as a venue to institute an additional public process requirement relative to the Annual MTW Report.

HUD does agree that some of the information listed by the commenter regarding the public process would be useful to collect, in order to validate the public process requirements have been met. HUD has added relevant elements to Section VI of the revised form.

The value of a 30-day availability period for a draft Annual Plan is diminished if residents are not aware that it is available. Therefore, the introductory section of form HUD 50900 (pages 1 – 6 of Attachment B as currently proposed) should promulgate minimum requirements. These requirements should address:

- Notification of residents and the community.
o Notice of the availability of the draft Annual Plan and/or Report and of upcoming hearings and other means of public input should be sent to each RAB member, each Resident Council president (where Resident Councils exist), other resident organizations, and any resident or advocate requesting to be informed of any MTW Annual Plan or Report activity.
o Notices should be placed in common areas and other areas where residents are likely to gather or see such a notice.
o Articles in resident newsletters should also be considered if their publication date is timely.
• Notification in the legal section of newspapers should not be considered adequate. (HUD's Consolidated Plan regulations specifically state that small print notices in newspapers a few days before a hearing are not considered adequate notice).
• The 30-day comment period should not commence until 2 days after the first formal notice has been delivered (giving residents time to actually obtain the draft Annual Plan and/or Report).
• Copies of the draft Annual Plan and/or Report should be available at each development as well as at the PHA's central office or Central Office Cost Center (COCC).
o In addition, draft Annual Plans and/or Reports should be provided at no cost to each RAB member, Resident Council President, resident organization, resident-designated advocate, or any resident requesting a copy for personal use.
o Draft Annual Plans and/or Reports should be posted on the PHA's website.
• Public hearings must be at times and locations convenient for residents, including residents working varying shifts.
• Public notices and hearings must address residents with limited English proficiency when relevant.
• Public notices and hearings must be accessible for people with physical disabilities.

HUD Response: HUD disagrees with the commenter that the revision to this form is an appropriate place to promulgate minimum requirements. The Standard MTW Agreement sets forth minimum requirements for public participation in the MTW planning process and HUD monitors these requirements as appropriate.

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In regards to the specific comment that notification in the legal section of the newspaper is not adequate, this regulation only applies to the Consolidated Plan, not to the PHA Agency Plan or the Annual MTW Plan submission.

Form HUD 50900 should be further modified to require MTW PHAs to demonstrate how they have complied with the above additional suggestions.

When the MTW Plan and the MTW Report are each finalized at the local level and sent to HUD, the PHA should provide notice as suggested above and make copies available as suggested above. These actions should also be reflected on form HUD 50900. The process of posting and making the documents available must be repeated once HUD approves the Plan and Report.

HUD Response: HUD reminds MTW PHAs of this obligation in the text of Annual MTW Plan approval letters and Annual MTW Report acceptance letters.

The instruction section of form HUD 50900 should echo the CDBG statute and the Consolidated Plan regulations which require jurisdictions to "encourage" public involvement, particularly by those who will be most affected. In addition, the Consolidated Plan regulations require jurisdictions "to take whatever actions are appropriate" to encourage involvement by minorities and non-English speaking people, as well as people with disabilities.

HUD Response: HUD believes that the public process framework outlined in the Standard MTW Agreement is sufficient for obtaining the necessary resident input.

2. Require PHAs to Report on Numbers of Deep Subsidy Units (ACC Rental Units and Housing Choice Vouchers)

Proposed Location: Plan § II.1. A., Housing Stock Information, at 7; Report § II.4. A., Housing Stock Information at 11.

PHAs should be required to report deep subsidy unit data for the period before they became MTW PHAs, the initial year of MTW participation, and each subsequent year. Further, they should be required to report this information by the following categories so that changes in the inventory during MTW participation can be tracked.

- Federal public housing units (ACC rental units)
Rental
Ownership/Management:
Conventional PHA owned and operated (if privately managed indicate manager)
Mixed Finance (if privately owned and/or managed indicate owner and/or manager)
Type of Occupancy
Elderly only
Disabled nonelderly only
Mixed elderly and nonelderly disabled

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- Family/General Occupancy
Homeownership
Authorized HCV units
Included in MTW Block Grant
Not included in MTW Block Grant
Type of Voucher (use categories reported in VMS system and reports)
Tenant based
Used as Project-based Voucher
General Occupancy/Family
Elderly only
Disabled nonelderly only
Mixed elderly and nonelderly disabled
Used as HCV Homeownership
Family Unification
Litigation
Welfare to Work
Enhanced voucher
Tenant Protection Vouchers
Public Housing Replacement
Public Housing Relocation
Housing Conversion Actions
Port-Outs Administered by the PHA
Port-Ins Billed to Another PHA
Other: _____ (please specify)
Federal Authorized non-MTW Voucher (HCV) Units
VASH
Mainstream
Other: _____ (please specify)

HUD Response: In regards to the first part of this comment on requiring MTW agencies to collect data pre-implementation and at implementation of an agency's MTW demonstration, HUD has developed a methodology over the last year to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. This methodology is based upon data at the time of an agency's admittance to MTW and each year going forward.

Further, HUD believes that the information currently in the revised form is an appropriate level of reporting detail, given HUD can delve further into agency data via PIC and VMS when additional information is needed. Requesting more detailed information from MTW agencies in the MTW Plans/Reports as contemplated in the above comment would be duplicative to HUD's other reporting systems.

3. Provide Greater Details about Housing Stock

Current Location: Plan § II.1.A., Housing Stock Information, at 7; Plan § II.2.B., Leasing Information at 9; Report § II.4.A., Housing Stock Information, at 11; Report § II.5.B., Leasing Information, at 13.

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As proposed, the Plan and the Report include a breakdown of the households served in public housing, vouchers, and non-traditional units/subsidies, but do not provide much additional detail about the different programs within these general categories. For example, under Federal Authorized MTW Voucher (HCV) units, there is no breakdown by tenant-based and project-based. Under Federal Authorized non-MTW (HCV) units, there is no breakdown by program type (e.g. VASH, FUP, Mainstream, DHAP, enhanced voucher). A housing authority may have several many types of non-Traditional MTW Units/Subsidies, but, as proposed, they are all grouped together with no breakdown by program.

In order to meaningfully comment on a proposed initiative, e.g. a new non-traditional voucher program or changing a project-based voucher program, it is important for residents and the community to have the data described above. For example, by having a breakdown among the types of non-traditional programs, the residents and public will know the size of the proposed initiative (e.g. a few versus a large number) and whether the housing authority is creating new resources or transferring from existing programs. Likewise, the breakdown between tenant and project-based vouchers raises important policy questions.

HUD Response: MTW agencies are required to include any local, non-traditional uses of MTW funds as an MTW Activity in Sections III/IV of the MTW Plan/Report. Detailed information on how such a program functions, how many individuals that specific program is intended to serve, etc would be captured in this part of the revised form.

In addition, a new category needs to be added so that HUD, residents, and the public can determine how many units the housing authority formerly owned and administered (just prior to MTW) and how many it currently owns and/or administers and the source of new units. For example, are the new units incremental vouchers due to the conversion of assisted housing units to enhanced vouchers? How many public housing units existed in the past and have been converted to vouchers?

Thus the following information ought to be provided, by year from the beginning of the granting of the MTW status to the present:

- Federal public housing units
Rental (by bedroom size)
Elderly only
Disabled nonelderly only
Mixed elderly and nonelderly disabled
Family
Homeownership
Federal Authorized MTW vouchers (HCV)
Tenant-based
Project-based
If applicable, breakdown by Family, Elderly only, Disabled nonelderly only, and Mixed elderly and nonelderly disabled
Enhanced voucher
Tenant Protection Vouchers

Federal Authorized non-MTW Voucher (HCV) Units

VASH
Mainstream
DHAP
FUP
Other (please specify)

Mod Rehab
Other (please specify)

Local Non-Traditional MTW Units
Tenant-based (separate for each program)
Project-based (separate for each program)
Other (separate for each program)

HUD Response: As discussed above, HUD believes that the information currently in the revised form is an appropriate level of reporting detail, given HUD can delve further into agency data via PIC and VMS when additional information is needed. Requesting more detailed information from MTW agencies in the MTW Plans/Reports as contemplated in the above comment would be duplicative to HUD's other reporting systems.

4. Require PHAs to Report on the Location of Replacement Units

Current Location: Plan § II.1, A., Housing Stock Information, at 7; Report § II.4, A. Housing Stock Information, at 11.

The number and location of planned as well as actual replacement units, bedroom size and intended occupancy should be reported. This information will assist with evaluating whether the goal of improving housing choice is met and if the PHA is affirmatively furthering fair housing (see Section 6, below).

HUD Response: HUD already asks for this information on the revised form in Section II, pages 7 and 11. HUD believes the current level of detail provides the information cited in the above comment.

5. Require PHAs to Report how Many Units are Funded

Current Location: Plan § II.1, A., Housing Stock Information, at 7; Report § II.4, A., Housing Stock Information, at 11.

MTW PHAs should be required to report the number of authorized units, the initial number of baseline MTW units, and the number of units currently funded. For HCV's, this information should also include the number of vouchers leased as reported in HUD's VMS system and should be broken out separately for HCV's included in the MTW block grant and not included in the block grant. This information is currently available to HUD and PHAs through HUD's Voucher Management System (VMS) but often is not provided in an understandable format to residents, voucher holders, local officials or other stakeholders. In addition, the VMS data may not be released to the public at all until well after a PHA's MTW report is submitted.

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6. Collect Data Related to Fair Housing

Proposed Location: Report § II.5, B., Leasing Information, at 13.

MTW agencies are required to Affirmatively Further Fair Housing, and an AFFH certification is included in the MTW proposed form. But the proposed Annual Report form collects no demographics by which to evaluate whether actions undertaken by MTW PHAs are promoting residential segregation, or whether they have a disparate impact on protected classes (defined by race, color, national origin, disability, age, gender, and familial status). Such impacts should be measured by numerical data describing the number and protected-class-status of families served separated out by program and by project, and tracked over time. Demographic data on neighborhoods where new assisted housing units are sited, as well as neighborhood characteristics for all Section 8 voucher families should be collected. This data should also include impacts of loss of units, if any, on protected classes, and the location of replacement housing and locations of relocated families. To assess the impacts of admissions policies and practices, data on the racial and ethnic characteristics of families on the waitlist, and families recently admitted, are also important as well (see Section 11, below). All data should be separated by program and by project, and tracked over time.

One of three statutory goals of the MTW demonstration is to increase housing choice for families, but there is no data requested to demonstrate if this goal is met. The type of data that would be helpful is a comparison of the number, unit size and type of housing (elderly or family, rental or homeownership) by location such as by zip code or census tract and income and racial and ethnic mix of the housing pre-MTW, over time, and currently. Similar information should be reported for the location, census tract and household demographics of HCV families.

HUD Response: MTW PHAs, like non-MTW PHAs, are required to adhere to all Fair Housing laws and are subject to the same Fair Housing reviews conducted by HUD as non-MTW PHAs. To further clarify Fair Housing requirements, PIH and FHEO have jointly issued a notice to reiterate the applicable statute and regulations. See PIH Notice 2011-31. MTW agencies are not given any waivers of Fair Housing statute, and continue to be monitored as do non-MTW PHAs, thus HUD does not see a need to request additional information via the Annual MTW Plan/Report.

7. Collect Data Related to Income and Other Characteristics of Persons Served

Proposed Location: Plan § II.2.B., Leasing Information at 9; Report § II.5, B., Leasing Information, at 13.

The proposed Annual Plan and Report form collects no demographics by which to evaluate how actions undertaken by MTW housing authorities have served households at particular income levels (low-income, very low income, extremely low income as statutorily defined) or the mix of family size. Such impacts should be measured by numerical data describing the number and income levels of families served by each category in Section II.B (Public Housing, Housing Choice Vouchers, MTW Households, etc.) and tracked over time. This data should include impacts of loss of units on families within each income level.

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Public Housing:

Authorized units: The number of units in the PHAs inventory and under an ACC amendment as of October 1, 1998

MTW Baseline units: The number of units under ACC amendment that were included in determining the PHA's base year funding for operating subsidy and capital funds pursuant to the PHA's MTW Agreement, Attachment A, Calculation of Subsidies

Current MTW funded units: The number of units under ACC amendment included in the calculation of the PHAs current year funding for operating subsidy and capital funds pursuant to the PHA's MTW Agreement, Attachment A, Calculation of Subsidies as adjusted for any subsequent removal or addition of units to the inventory

Housing Choice Voucher Program:

Number of Authorized Vouchers

MTW Baseline Vouchers: Number of vouchers under lease as determined by VMS used to calculate the PHA's baseline Housing Choice Voucher funding pursuant to the PHA's Moving to Work Agreement, Attachment A, Calculation of Subsidies

Subsequent Allocations of incremental or tenant protection vouchers by year and purpose

MTW Currently Funded Vouchers: Number of vouchers currently covered by the PHA's voucher funding, calculated by dividing the agency's funding level by its average cost per voucher

Number of leased vouchers as reported in HUD's VMS system

PHA's HCV success rate (number of vouchers leased divided by number of vouchers issued during fiscal or calendar year)

Amount of HCV dollars used for leasing as reported in HUD's VMS system and the PHA's average Per Unit Cost (PUC)

HUD Response: Given the information noted in this comment is captured in other HUD systems, HUD believes it would be duplicative and overly burdensome on PHAs to also require this information as part of the Annual MTW Plan/Report. Also, as noted in response to an earlier comment, HUD has developed a methodology over the last year to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. This methodology is based upon data at the time of an agency's admittance to MTW and each year going forward.

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The collection of such data is in accordance with the rules that at least 75% of the families assisted by a MTW housing authority must be very low income; a MTW housing authority must assist substantially the same total number of eligible low income families as would have been served had voucher and public housing funds not been combined; and a MTW housing authority must maintain a comparable mix of families by family size as would have been provided had the amounts not been used under the demonstration.

HUD Response: In order to address these concerns, HUD has added tables to the MTW Report, Section II, of the form to capture information on the requirements to serve at least 75% very low income households and to maintain a comparable mix of families by family size. Further, while HUD presently captures demographic information in PIC for Section 8 and 9 households, PIC does not currently capture this information for households served outside of Sections 8 and 9. HUD is currently working to modify PIC to enable the collection of this information so that HUD can better track these statutory requirements internally.

Also, as noted in response to an earlier comment, HUD has developed a methodology over the last year to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. This methodology is based upon data at the time of an agency's admittance to MTW and each year going forward.

Families not housed through the PHA, but served through MTW funded local non-traditional services only, should be accounted for separately as this data does not count toward the PHA's obligations to serve substantially the same number of households with MTW-funded housing as would have been served had voucher and public housing funds not been combined, nor does it count toward the obligation to house 75% very low income households.

HUD should also establish more specific guidelines for how non-traditional housing assistance should be counted in determining the number of families assisted. For example, in cases where MTW funds are combined with other government funds or tax credits to provide assistance, the number of families counted as assisted should be prorated by the share of total subsidies covered by the MTW funds. In addition, HUD should establish some standard for excluding minor forms of housing. For example, families whose rents are not reduced substantially below market levels should not be counted toward the total number of families receiving housing assistance.

HUD Response: In its methodology for tracking the MTW statutory requirement to "serve substantially the same number of families," HUD is clear that for purposes of interpreting the MTW statute's requirements, the statute refers to housing assistance only. Thus, in order to count a family towards the MTW statutory requirement to "serve substantially the same number of families," the family must be receiving housing assistance through the PHA or as a result of the PHA's use of MTW funds. HUD has included an element in the revised Form 50900 for reporting families served only through services, in order to ensure that this is recognized as an allowable use of MTW funds for applicable agencies. Some MTW agencies have significant accomplishments to report in this arena.

In regards to how local, non-traditional households are counted, by allowing MTW agencies to use MTW funds to serve families outside of Sections 8 and 9, HUD has provided agencies with a significant amount of leeway to define what level of assistance is needed in order to secure a housing opportunity for a family. In some instances, a fixed amount of funding is provided to house a specific family. In other instances, MTW funds are leveraged with other funds or resources to secure housing for a family. In either case, the contribution of MTW funds led to the housing opportunity, thus HUD believes it is appropriate to count the family assisted with MTW funds, in recognition of the fact that the contribution of the MTW funds led to the ability to house the family.

Accordingly, we request that HUD add the following requirements to the Annual Report:

- 1) In the first box on page 13 starting with "Actual Number of Units..." a column should be added for data as of the baseline (e.g. the households served on the date just prior to the implementation of MTW).
- 2) Chart(s) showing income brackets, ethnicity, race, and number of bedrooms by each program type.

HUD Response: Please see HUD's specific responses to the major components of this comment above.

8. Define "Local Non-Traditional MTW Units" and Collect More Specific Data about Non-Traditional Units

Current Location: Plan § II.2 B., Leasing Information at 9; Report § II.5, B., Leasing Information, at 13.

Provide more detail about all "Non-traditional MTW Housing Units" listed in the MTW Plan or Report, or otherwise administered by the PHA, including a breakdown of the form and amount of MTW funding received in connection with a unit, the amount of other federal, state, and local subsidies provided for the unit, the number, type and income levels of people served by each distinct type of non-traditional housing, and average tenant rent burden as a dollar amount and percentage of income. Again, historical information should be included so that it is clear if, for example, a PHA had a Section 8 mod rehab property that it is listed here or if a Non-Traditional MTW unit was built on a former public housing site, etc.

- Tenant based
- Project-based
 - General (family) occupancy
 - Elderly only
 - Disabled only
 - Mixed Elderly/Disabled
 - Other (please specify)

The PHA should also provide information on other federal project-based housing assistance administered or owned by the PHA, such as Section 8 moderate rehab units, Section 236, etc.

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HUD Response: Information on specific local, non-traditional MTW projects will be captured in the write-ups of individual MTW activities in Sections III and IV of the Plan/Report. In regards to the request to provide information on other federal-project-based housing assistance, this information is already required on page 12 of the revised form (Overview of Other Housing...).

In addition, as a technical matter, the same categories and descriptive language should be used in each section or if it is not, then an explanation for the difference should be provided. For example, use the term "non-traditional" throughout, if relevant. The term "non-traditional" is missing from page 9.

HUD Response: HUD has made this change for consistency on the revised form.

9. Households Served by Local Non-Traditional Services Only Should Not Count Toward the Number of Units Occupied

Current Location: Plan § II.2 B., Leasing Information at 9; Report § II.5, B., Leasing Information, at 13.

The title of the first block is "Anticipated [or Actual] Number of Units to be [that were] Occupied/Leased at the End of the Fiscal Year (Households Served)." Two separate concepts are confused in this section. One is the number of households served and the other is the number of households that received housing assistance. The most important number is the number of households that received housing assistance. The total number of units occupied or households receiving housing assistance should not include those served through local non-traditional services only. The number of households served through local non-traditional services only should be in a separate category/box to avoid confusion. Alternatively, at the very minimum there should be a subtotal of those who received housing, i.e. the number of units occupied or leased at the end of the fiscal year and a total of all households served which could include those who only received services.

HUD Response: On pages 9 and 13 of the revised form, HUD has adjusted the text to clarify this issue and avoid confusion. HUD has also moved families served through services and non-MTW Vouchers below the MTW households served total, to clarify that these are not a part of the MTW households served.

In addition, the information provided under families served only through services should also be broken down into extremely low income, very low income and low income categories. As noted above, a PHA should not be allowed to include families that received services only in the calculation of the 75% obligation to serve very low income families.

HUD Response: As previously noted in this response, HUD only counts households receiving housing assistance towards meeting the MTW statutory requirements. Households receiving services only must be at or below 80% of AMI as the MTW statute only allows MTW funds to be used to support low-income families.

10. Self-Sufficiency Data and Definition Should Be Required, Not Optional

Current Location: Plan § II.2 B., Leasing Information at 9; Report § II.5, B., Leasing Information, at 13.

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One of the three purposes of the MTW program is "give incentives to families . . . to obtain employment and become economically self-sufficient." PHAs should be required to report on their efforts and the results in assisting families to become self-sufficient. The proposed version of the form allows MTW PHAs the option of planning for and reporting on families transitioning to self-sufficiency. This section should not be optional. Moreover, if PHAs report on families transitioned to self-sufficiency, the agency definition of self-sufficiency should be required, not optional.

HUD Response: In Sections III/IV of the Plan/Report, MTW agencies are required to propose metrics and report on self-sufficiency outcomes for each MTW activity that is designed to further the second MTW statutory objective. HUD believes this information to be more useful than the summary information provided in Section II, hence the decision for the information in Section II to be optional. Further, as stated earlier in this document, data collection of a total number is difficult because agency definitions of self-sufficiency differ.

11. Collect Data about Characteristics of Households on the Waitlist and Other Waitlist Issues

Current Location: Plan § II.3, C., Wait List Information at 10; Report § II.6, C., Wait List Information, at 14.

Waitlist data should also include metrics describing the income levels and protected-class status of households on each waitlist and the cumulative total for the waitlists of the housing authority and any affiliates receiving MTW capital or operating assistance. The data should include applicants' ethnicity, race, income brackets, and for each of the programs the bedroom sizes applicants need. . .

Where there are site-based waitlists maintained by a PHA, it should include these demographics by site. For non-MTW housing authorities, 24 CFR § 903(b)(2)(v) requires those with site-based waitlists to assess changes in demographics of the housing by race, ethnicity, and disability based on MTCS occupancy data. It also requires the use of testers every three years and requires PHAs to correct problems that arise in the review. MTW sites ought to conduct similar reviews and report similar information as HUD does not have authority under MTW to waive civil rights related statutes, regulations or program requirements.

HUD Response: As noted in an earlier response, HUD has reinforced the obligation of PHAs, both MTW and non-MTW, to follow Fair Housing statute and regulation in the recently issued PIH Notice 2011-31. This PRA request is an information collection, not a notice, and for the purpose of this PRA request HUD believes including the items cited in the comment would place an excessive level of burden on PHAs as it would require instituting new reporting requirements.

This section lists "Wait List Types," but does not sufficiently define them so that residents and the public can understand what is meant. Under "Select Wait List Types," it would be helpful if each waitlist type was better defined or described. For example, it could read as follows. Select Wait List Types: Community-Wide, Site-Based, Merged (combined public housing or voucher waiting list or if not describe), Program Specific (limited by HUD or local PHA rules to

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certain categories of families, which are described), None (if program is new waitlist may not exist), or Other (please describe).

HUD Response: With the exception of "or if not describe" for Merged waiting lists, HUD will make these changes on pages 10 and 16 of the revised form.

Nationwide there is a severe shortage of affordable housing. Those families most in need, including homeless individuals, those who are disabled and individuals with limited English proficiency (LEP) are often the last to know that affordable housing is or might be available. It is very important that the public, including potential applicants and their advocates, have as much advance notice as possible as to whether a waitlist will be open. Thus, we urge that the Plan include whether the waitlist will open in the coming year.

HUD Response: HUD has added this information to pages 10 and 16 of the revised form.

12. Collect More Information about Planned Demolition and Disposition

Current Location: Plan § II.1, A., Planned New Public Housing Units to be Removed during Fiscal Year, at 7; Report § II.4, A., Housing Stock Information, at 11.

PHAs must include authorized demolition or disposition of public housing units in their annual plans. Therefore, the MTW Plan must include a section detailing authorized demolitions and dispositions. The information that is currently requested is insufficient. The PHA should be required to provide the name of the development (the Asset Management Project (AMP) Name. may not be sufficient as PHAs often include more than one development within an AMP), unit sizes, and accessibility features of the units planned for removal, a timetable for the removal and a statement of the plans for replacement and relocation. The form should also specify that Section 18 continues to apply and that the PHA must seek separate HUD approval to remove units. A cross reference to the Special Applications Center (SAC) website would also be helpful

HUD Response: The MTW statute and MTW Agreement both clearly state that Section 18 of the 1937 Act continues to apply to MTW PHAs. Given MTW PHAs are still held to the requirements of Section 18, they are required to go through the demo/dispo application process and meet all requirements associated with that process. HUD believes that the information requested in the Annual MTW Plan and Report is sufficient in terms of informing the public of demolition and disposition activity. In fact, requiring MTW agencies to report on actual activity for the year in the MTW Report provides an added level of information that non-MTW PHAs do not provide in Agency Plan submission.

13. Report on Project-Based Voucher Units Lost in Prior Year or Expected to Not Be Renewed

Current Location: Plan § II.1, A., New Housing Choice Vouchers to be Project-Based During Fiscal Year, at 8; Report § II.4, A., New Housing Choice Vouchers that were Project-Based by Fiscal Year End at 12.

In this section, there should be a place for PHAs to report any anticipated reduction in the number of Project-Based Voucher (PBV) units. Also, this section should track this information

over time. A voucher participant, tenant or PHA Board member should not have to refer to prior Plans and Reports to view the trend in the number of available and occupied PBV units.

HUD Response: Project-based vouchers under MTW are tenant-based Housing Choice Vouchers that have been project-based at a specific property. Vouchers that are no longer project-based go back to the MTW agency's allocation of tenant-based voucher funding.

As a point of clarification, the term "in use" should be changed to "leased up." If the term leased up is not used, then the term "in use" should be defined to explain if it means under contract, leased up or something else.

HUD Response: HUD has clarified the text on page 8 of the revised form to address this.

If a provision is not added to the form to permit reporting on the number of PBV units that might be lost, the instructions for the section entitled "Other Changes to the Housing Stock Anticipated During the Fiscal Year" and the equivalent section in the Report, should state that any anticipated or actual loss or conversion of PBV units should be described in this section.

HUD Response: As noted in the response above, project-based vouchers are accounted for."

14. Collect Data for Rent Reform Impact Analysis

Current Location: Plan § III, L., Impact Analysis, at 16.

Proposed Location: Report § IV.

The proposed form requires a prospective impact analysis for any change in the regulations on how rent is calculated for a household (rent reform) in the Annual Plan. It also requires that an MTW agency provide an overview as to how it will reevaluate rent reform activities on a yearly basis and revise as necessary to mitigate the negative impacts, such as excessive rent burdens. Unfortunately, it does not require tracking and documentation of changes in rent in the implementation and impacts section of the Annual Report. This information should be collected and tracked year-to-year. An MTW agency engaged in Rent Reform initiatives should have to report the impact that its initiatives have had on tenant rent burdens and include a copy of the Annual Reevaluation of Rent Reform Initiative as part of its Annual Report.

HUD Response: HUD believes that the level of detail currently requested is sufficient. The revised form requires agencies to report on the outcomes of MTW activities, including negative outcomes, and on hardship requests. HUD believes this provides enough information to assess the outcomes of the activity.

The proposed form states that for additional information on these issues, MTW agencies may wish to reference the Draft Guidance for Moving to Work Agencies: Impact Analysis and Hardship Policies for Rent Reform Initiatives and provides a link to where this document may be found. To our knowledge, HUD did not consult with tenants or their advocates in preparing the draft guidance. This is a major oversight. HUD should distribute this draft guidance to tenants and their advocates, give them an opportunity to provide comments, and consider these comments before finalizing this guidance. This request is consistent with the HUD obligation,

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To fulfill this obligation the PHA should analyze how many families it would serve if it used its voucher funds for voucher assistance and its public housing operating and capital funds within its public housing program and compare that to how many families it actually serves. Thus if the PHA currently receives sufficient funding to cover 13,000 vouchers and has 8,000 public housing units that would be the baseline for analysis regarding the number of households that would have been served had funds not been combined (with adjustments for voucher utilization and public housing occupancy rates consistent with the performance standards applied to non-MTW agencies). Additional adjustments could be permitted under certain circumstances, for example when an agency can show that fewer public housing units would have been occupied had it not shifted current year voucher funds to repair vacant units, but such adjustments should be narrowly defined and require clear supporting evidence. The PHA should then compare that with the number of families actually assisted (excluding families served by local non-traditional services only and not housing assistance as discussed above in Section 9) to determine whether it served substantially the same number of families. HUD should also establish a quantitative standard for substantially the same (for example, a difference of less than five percent) so that agencies can make their certifications in a consistent manner.

HUD Response: In the last year, HUD has developed a methodology to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. HUD intends to implement the methodology in the coming year. HUD will consider this feedback as it pilots the current methodology and works toward a formal issuance.

In conducting this analysis, it is important that the data collected by HUD does not inadvertently result in a PHA showing an increase in the number of families served which is the result of other factors unrelated to the PHA's MTW status, such as an increase in vouchers to the jurisdiction because of incremental vouchers or enhanced vouchers.

18. PHAs Should Cite Statutory or Regulatory Provisions Waived for Each MTW Activity

Proposed Location: Plan § IV, A., Implemented Activities, at 18; Report § IV, A., Implemented Activities, at 18.

The version of form HUD 50900 that the proposed form seeks to replace included a Report provision asking MTW PHAs to cite the specific Act or regulation that is waived under MTW and that authorized the PHA to make the change, and to briefly describe how the waived section was necessary to achieve the MTW activity (§ VI, G). This language was eliminated in the revision, but should be retained in the new version of the form. It is critical to include such language because MTW PHAs have extraordinary flexibility to design their own programs outside of the federal regulatory scheme. At the local level, tenants, applicants and their advocates need to know which rules the PHA is seeking to waive. Without this knowledge, it is difficult to understand the full impact of what is being proposed and to know what rules the PHA will no longer follow or enforce. Requiring such statements and descriptions will also increase transparency.

HUD Response: HUD did not eliminate this language but instead moved it to the Plan requirements. See Section III.K. of the revised form.

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noted above, to consult with residents and their representatives in making an assessment of the MTW demonstration.

HUD Response: HUD disagrees that this document needs to be vetted further, given HUD does not intend this document to be prescriptive to MTW agencies but for it to remain as draft guidance. The form has been revised to simply provide a link to the general HUD MTW website for more information.

15. Collect Data about Implementation of Hardship Case Policies

Current Location: Plan § III, L., Hardship Case Criteria, at 16.

Where rent rules are changed, MTW PHAs are required to establish hardship policies to define the circumstances under which households may be exempted or temporarily waived from new rent determination rules. See Section III (page 5) of the Amended and Restated MTW Agreement template. While these policies are to be described in the Annual Plan, the MTW PHAs are not required to report on their usage or success. To evaluate how these policies are implemented, the PHA should be required to report how they communicate hardship policies to tenants; how many tenants have requested hardship exemptions or waivers; what the tenants asked for; and whether they were approved or denied and why.

HUD Response: In Section IV.A.2.i. of the form, MTW PHAs are required to report on the number and results of hardship cases.

16. Familial Status Should Be Added to the List of Protected Classes

Current Location: Plan § III, L., Description of Annual Reevaluation of Rent Reform Initiative, at 17.

Add "familial status" to the list of protected classes to be included in impact analysis related to rent reform initiatives.

HUD Response: The subject text was revised.

17. Baselines Should Account for Funding Increases

Proposed Location: Plan § IV, A., Implemented Activities, at 18; Report § IV, A., Implemented Activities, at 18.

One purpose of the MTW demonstration is to give PHAs and HUD the flexibility to design and test various approaches for providing and administering housing assistance to determine which are most effective. It is impossible to do so without measuring progress against an accurate baseline.

In addition, the MTW demonstration provides that the PHA "continue to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined."

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19. Require PHAs to Provide Metrics Showing How Activities Relate to Statutory Objectives

Proposed Location: Report § IV, A., Implemented Activities, at 18.

The three statutory objectives of the MTW demonstration are to reduce cost, increase self-sufficiency and increase housing choices. The proposed form requires MTW PHAs to describe how each proposed activity will achieve one or more of the three statutory objectives in the Annual Plan (§ III, B, at 15), but does not require PHAs to report on whether those objectives were actually achieved in the Annual Report. The part of the Annual Report requiring PHAs to provide information about impacts, baselines and benchmarks is not sufficient (§ IV, A, at 18). Each activity should be described and evaluated relative to specific statutory objectives, and such evaluations should be based on quantitative metrics supporting the PHA's claims.

Among other things, this would require PHAs to report how many families served include a head of household who is working, seeking work, or preparing for work and the location of the housing that receives federal housing assistance.

HUD Response: HUD believes that what is required on the revised form is sufficient. MTW PHAs define metrics to measure the anticipated impacts of the activity including the impact of the activity on the MTW statutory objectives, and to report on progress each year in the Annual MTW Report.

20. Approved Activities Not Yet Implemented or on Hold Should Be Re-Approved Before Implementation if Not Described With Sufficient Detail or if Significant Changes Have Been Made

Proposed Location: Plan § IV, B., Not Yet Implemented at 19; Plan § IV, C., On Hold, at 19.

All planned MTW activities described in an Annual Plan should be described in detail sufficient to solicit meaningful public comment. However, we recognize that at times it may not be possible for a MTW PHA to provide sufficient detail of a proposed initiative, particularly where the PHA staff has not fully developed its thinking on a given policy initiative and, therefore, includes vague language as a "placeholder." For example, in FY 2008 and FY 2009, the Cambridge Housing Authority described a proposed "Opportunity Voucher Program" but provided very few details about the eligibility or operation of this proposed new subsidy program in its Annual Plan.²⁸ Some of the information omitted included the scope of self-sufficiency requirements, grounds for termination, the time limit on the subsidy, how the subsidy would be determined, and whether participants could exit back to the "regular" housing choice voucher program. Under circumstances such as these, it would be impossible to provide meaningful feedback on the proposed MTW activity. Accordingly, we urge that (in the box at the bottom of page 4 of Attachment B) HUD also require MTW PHAs to amend their Annual Plan to re-propose activities (with details) that were not sufficiently described in its most recent Annual Plan; hold a new public process for residents and the community to provide feedback prior to implementation; and after the public process, submit the revised Annual Plan to HUD for review and approval.

HUD Response: HUD believes that the policy as articulated previously regarding significant changes addresses this issue.

21. Collect More Data about Planned and Actual Uses of MTW Funds

Current Location: Plan § V.1, A., Planned Uses of MTW Funds, at 21; Report § V.2, A., Actual Sources and Uses of MTW Funds, at 24.

Several items under Planned Uses of MTW Funds in the Annual Plan and under Actual Uses of MTW Funds in the Annual Report require more specificity. Money budgeted or expended on Agency Managed Housing Operations, Utility Payments, Resident Services, Protected Services and Local Housing Program Expenses should each be broken into subsections to require reporting on costs attributable to the central office, and those attributable to each specific development. The form should also require the PHA to state where more detailed financial information can be obtained and when it is available. Thus, residents and the public should be told in accordance with 24 C.F.R. § 990.280 that the project-based budget is available for each development and/or Asset Management Project (AMP).

HUD Response: Both non-MTW and MTW PHAs are required to engage in project-based budgeting and accounting; however, HUD does not collect project-based budgets from either group. The information in Section V of the revised form is intended to be an overview of the agency's MTW budget. Detailed information will be included in the agency's annual financial submission at year-end.

22. Require PHAs to Report How Much Money Was Used for Other Purposes Pursuant to Single Fund Flexibility

Current Location: Plan § V.1, A., Planned Uses of MTW Funds, at 21; Report § V.2, A., Actual Sources and Uses of MTW Funds, at 24; Plan § V.1, D., Describe the Planned Use of Single-Fund Flexibility, at 23; Report § V.2, D., Describe the Planned vs. Actual Uses of MTW Single-Fund Flexibility, at 26.

The Plan's Sources and Uses of Funding should require MTW PHAs to describe the amount of funds used for purposes other than they were originally intended pursuant to single fund flexibility afforded by MTW. The form should also require PHAs to specifically describe where the funds were moved from and what they were used for to reflect how the PHA shifted money and for what particular projects or purposes. For example, X dollars of voucher funds were used to rehabilitate 100 units of vacant public housing at Y development, or X dollars of public housing capital funds were used to cover Y dollars in shortfalls in the HCV program.

HUD Response: MTW agencies are authorized to combine the three statutory funding sources into a single fund, thus they do not transfer funds between programs, but instead spend on eligible program costs from one pool of funds. HUD believes financial reporting should track the statutory authorization. HUD financial reporting systems have been modified to reflect this capability, which includes transfers of funds to and from the combined funding account.

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HUD Response: HUD has provided information to both MTW and non-MTW agencies about their obligations under this requirement in PIH Notice 2011-31, thus including it in the certifications accompanying the MTW Plan is not necessary.

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23. Require PHAs to Provide Metrics Supporting Certification They Meet Statutory Requirements

Current Location: Report § VI, C., at 27.

MTW PHAs should be required to provide numerical data showing they meet the three statutory requirements of: 1) assuring that at least 75 percent of the families assisted by the Agency are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

HUD Response: As previously noted, HUD has added tables to the MTW Report, Section II, of the form to capture information on the requirements to serve at least 75% very low income households and to maintain a comparable mix of families by family size. In addition, HUD has developed a methodology over the last year to track the statutory requirement to "serve substantially the same number of families" and has worked through calculations of baseline numbers with each individual MTW agency. This methodology is based upon data at the time of an agency's admittance to MTW and each year going forward.

24. Add a Section 3 Reporting Requirement

Proposed Location: Report § VI, at 27.

One of the statutory goals of MTW is to promote economic self-sufficiency. PHAs could go a long way toward achieving this goal by fulfilling their Section 3 obligations. The form should include a section for reporting on compliance with Section 3. Alternatively, the Annual Report should include a reference to relevant forms HUD 60002 with a copy attached, so that residents and the public will know the outcomes of complying with Section 3. Cross-referencing to the form HUD 60002 would also facilitate HUD's enforcement of Section 3.

HUD Response: HUD's Office of Fair Housing and Equal Opportunity (FHEO) is tasked with overseeing Section 3 requirements, and that office has developed the relevant reporting requirements. HUD recently published a notice clarifying Fair Housing requirements for both MTW and non-MTW agencies. This notice also discusses how the requirements are reported on and monitored. See PIH Notice 2011-31.

25. Include Compliance with Limited English Proficiency Regulations in Certification of Compliance

Current Location: § VI, Certifications of Compliance with Regulation, at 28.

The certifications should be amended to include the limited English proficiency requirements by referencing "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" ("HUD Final LEP Guidance") 72 Federal Register 2732."

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**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

SPECIAL ATTENTION OF:

NOTICE PIH-2011-45 (HA)

Regional and Field Office Directors of Public Housing; Section 8 Financial Management Center; Moving to Work Public Housing Agencies

Issued: August 15, 2011

Expires: This notice will remain in effect until supplemented by subsequent HUD directive or guidance.

Cross References: PIH Notice 2011-31

Subject: Parameters for Local, Non-Traditional Activities under the Moving to Work Demonstration Program

- Purpose.** This notice clarifies HUD policies, Federal statutes and regulations that apply to local, non-traditional activities implemented under the Moving to Work (MTW) demonstration program.
- Applicability.** This notice applies to all MTW PHAs that have been authorized through their MTW Agreements to implement local, non-traditional activities, defined as those which use MTW funds provided under the MTW block grant for activities outside of the Housing Choice Voucher and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937 (1937 Act).
 - Activities Implemented Prior to Issuance of this Notice**
 - HUD will work with MTW PHAs to bring into compliance any activities that were approved prior to issuance of this notice and that are not in compliance with the parameters set forth in this notice.
 - MTW PHAs that have undertaken local, non-traditional development activities prior to issuance of this notice will not face penalty for failure to comply with the parameters set forth in this notice. This exemption does not apply to civil rights laws and regulations.
- Background.** MTW agencies have the authority to use their MTW funds to implement local, non-traditional activities, as long as they have this authority formalized in their Standard MTW Agreement (MTW Agreement), serve exclusively families at or below 80% of area median income (AMI) and use the MTW funds for activities that meet one of the three MTW

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participating in the MTW demonstration program may combine public housing operating and capital funds provided under Section 9 of the U.S. Housing Act of 1937 (the "1937 Act") and voucher program funds provided under Section 8 of the 1937 Act "to provide housing assistance for low-income families, as defined in section 3(b)(2) of the 1937 Act, and services to facilitate the transition to work on such terms and conditions as the agency may propose and the Secretary may approve.

Notwithstanding any language to the contrary, those provisions in this Agreement or its attachments that restrict the use of funds to Sections 8 and 9 are repealed, and the Agency may use MTW Funds to provide housing assistance for low-income families, as defined in section 3(b)(2) of the 1937 Act, and services to facilitate the transition to work, whether or not any such use is authorized by Sections 8 or 9 of the 1937 Act, provided such uses are consistent with other requirements of the MTW statute [i.e., including but not limited to the requirements to maintain a comparable mix of families and serve substantially the same number of families as would have been assisted if the Agency were not in the MTW demonstration, assuring that housing assisted under the demonstration meets housing quality standards established or approved by the Secretary, that at least 75 percent of the families assisted be very low income families, that the agency has established a reasonable rent policy that is designed to encourage employment and self-sufficiency by participating families, that the requirements of sections 12 of the 1937 Act are applied to any housing assisted under the demonstration other than housing assisted solely because of occupancy by families receiving tenant-based assistance, and that Section 18 of the 1937 Act shall continue to apply to public housing notwithstanding the use of any use of the housing under the demonstration] and have been proposed in an Agency's Annual MTW Plan and approved by HUD.

Notwithstanding the above, such funds remain Federal funds, and are subject to any and all other Federal requirements outside of the 1937 Act (e.g., including but not limited to Appropriations Acts, competitive HUD notices of funding availability under which the Agency has received an award, state and local laws, Federal statutes other than the 1937 Act, and OMB Circulars and requirements), as modified from time to time."

MTW PHAs whose MTW Agreements do not have the above language may not implement local, non-traditional activities. However, all MTW agencies may at any time request the authority to implement local, non-traditional activities by following the administrative procedures detailed in Section 6 of this Notice.

- Examples of Local, Non-Traditional Activities.** MTW Funds awarded to a PHA under Sections 8(o), 9(d), and 9(e) of the 1937 Act can be utilized per statute and regulation on the eligible activities listed at Sections 9(d)(1), 9(e)(1), and 8(o) of the 1937 Act. Any use of these funds outside of the allowable uses listed in the 1937 Act constitutes a local, non-traditional activity.

HUD organizes local, non-traditional activities into four categories. The table below defines each category and provides examples of possible activities, though the list of possible activities is not exhaustive. MTW agencies with the authorization to implement local, non-

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statutory objectives of increasing the efficiency of Federal expenditures, incentivizing self-sufficiency of participating families and increasing housing choice for low-income families. Per the MTW Agreement, MTW agencies prepare and submit an Annual MTW Plan. The Department must approve each Annual MTW Plan, and accordingly has broad authority to accept or reject provisions of the Plan that fail to comport with other applicable laws and such terms as the Secretary may require.

An MTW PHA may combine its public housing and Housing Choice Voucher funding, as provided under Sections 8 and 9 of the 1937 Act, in order to provide housing assistance and services for low-income families. The MTW statute (Section 204(a) of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, Pub. L. 104-134) in part states:

"Under the demonstration, notwithstanding any provision of the United States Housing Act of 1937 except as provided in subsection (e), an agency may combine operating assistance provided under section 9 of the United States Housing Act of 1937, modernization assistance provided under section 14 of such Act, and assistance provided under section 8 of such Act for the certificate and voucher programs, to provide housing assistance for low-income families, as defined in section 3(b)(2) of the United States Housing Act of 1937, and services to facilitate the transition to work on such terms and conditions as the agency may propose and the Secretary may approve."

The Department has interpreted this statute broadly to mean that public housing and Housing Choice Voucher funding may be used to provide housing assistance and services to low-income families outside of the public housing and Housing Choice Voucher regulations, and the Department granted the authority to use MTW funds in this way to several MTW PHAs pursuant to their Original MTW Agreements.

When transitioning to the Standard MTW Agreement in 2008, the Department made a policy decision that only those MTW agencies implementing local, non-traditional activities pursuant to their Original MTW Agreements would be allowed to retain this authorization under the Standard MTW Agreement. Several other MTW agencies requested to have the authority to implement local, non-traditional activities in order to serve more families through activities such as leasing additional MTW vouchers, offering residents stronger supportive services through partnerships with providers, and using tax credit programs to provide more affordable housing units.

In October 2010, HUD made the decision to allow all MTW agencies to use their MTW funds to implement local, non-traditional activities, provided those activities continue to serve families at or below 80% AMI and meet one of the three MTW statutory objectives. HUD sent a letter to all MTW agencies that did not already have this authority in their MTW Agreement, informing them of the decision, outlining the administrative procedures for requesting the authority to implement local, non-traditional activities, and explaining how to amend the MTW Agreement to add the following standard language:

"The Agency and HUD acknowledge that Section 204(a) of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Pub. L. 104-134) provides that an agency

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traditional activities are at liberty to propose a large variety of concepts, which HUD reviews and approves via the Annual MTW Plan.

Category	Definition	Examples
Rental Subsidy Programs	Programs that use MTW funds to provide a rental subsidy to a third-party entity (other than a landlord or tenant) who manages intake and administration of the subsidy program.	<ul style="list-style-type: none"> Supportive housing programs and services Homeless/transitional housing programs and services Support of existing local rental subsidy programs Creation of unique local rental subsidy programs to address special needs populations
Homeownership Programs	Programs in which a PHA uses MTW funds to act as a mortgager in providing homeownership assistance to low-income families.	<ul style="list-style-type: none"> Homeownership assistance programs in which the PHA guarantees a mortgage or acts as a mortgager
Housing Development Programs	Programs that use MTW funds to acquire, renovate and/or build units that are not public housing or Housing Choice Voucher units.	<ul style="list-style-type: none"> Gap financing for non-PHA development of affordable housing Tax credit partnerships
Service Provision	The provision of HUD-approved self-sufficiency or supportive services that are not otherwise permitted under the public housing and Housing Choice Voucher programs, or that are provided to eligible individuals who do not receive either public housing or Housing Choice Voucher assistance from the PHA.	<ul style="list-style-type: none"> Services for residents of other PHA-owned or managed affordable housing that is not public housing or Housing Choice Voucher assistance Services for low-income non-residents Supportive services subsidies or budgets for low-income families

- Parameters on Local, Non-Traditional Activities.** Parameters, for purposes of this Notice, are defined as the regulations, statutes and guidelines that cannot be waived under MTW, and which serve as the boundaries in implementing all MTW activities, including local, non-traditional activities.

A. **General Parameters.** These parameters apply to all local, non-traditional activities implemented under MTW.

- **Statutory objectives.** Any proposed activity has to meet at least one of the three MTW statutory objectives listed in the MTW Statute, and must receive HUD approval via the Annual MTW Plan prior to implementation.
- **Income eligibility.** MTW funds can be used only to serve eligible families at or below 80% of AMI, consistent with other requirements (see the last bullet of this section).
- **Fair housing and equal opportunity.** Recipients of MTW funds for local, non-traditional activities are considered recipients of federal financial assistance and must comply with civil rights requirements in 24 CFR 5.105(a), including, but not limited to, the Fair Housing Act; Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Title II of the American Disabilities Act of 1990; and regulations to affirmatively further fair housing. It is the duty of the MTW PHA to ensure that recipients of funds for local, non-traditional activities are in compliance with civil rights laws and regulations. The Office of Public and Indian Housing (PIH) and the Office of Fair Housing and Equal Opportunity (FHEO) have jointly published a notice, PIH Notice 2011-31/FHEO Notice 2011-1, that provides detailed information regarding which statutes and regulations are applicable.
- **Labor standards.** Davis-Bacon labor requirements, pursuant to Section 12 of the 1937 Act, continue to apply at both public housing and non-public housing homeownership properties (at 24 CFR 906.37) as well as at all units acquired, renovated and/or built using MTW funds.
- **Economic Opportunities for Low- and Very low-Income Persons** (Section 3). Section 3 of the Housing and Urban Development Act of 1968 requires recipients to ensure, to the greatest extent feasible, that training, employment, and contracting will be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns that provide economic opportunities to low- and very-low income persons in the area in which the project is located. Recipients of covered funding are required to comply with the requirements of 24 CFR part 135, particularly subpart B – Economic Opportunities for Section 3 Residents and Section 3 Business Concerns, and Subpart E – Reporting and Recordkeeping. Additional information on the requirements can be found at: <http://www.hud.gov/offices/fheo/section3/section3.cfm>.
- **Community service requirement.** The community service requirement, detailed in Section 12 of the 1937 Act, applies only to non-exempt adult residents of a public housing project and thus does not apply to non-public housing families assisted through local, non-traditional MTW programs, except for those exempted under Section 12(c) of the Act. However, if an MTW agency creates units through its local, non-traditional MTW authority which are later added to the public housing

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rent is calculated for an assisted household (See 24 C.F.R. 960, Subpart C. Rent and Reexamination for regulations pertaining to the public housing program and 24 C.F.R. 982, Subpart K. Rent and Housing Assistance Payment for regulations pertaining to the Housing Choice Voucher program).

- **Calculation of income for eligibility and rents.** The MTW statute allows HUD to provide MTW PHAs with relief from portions of the 1937 Act and its implementing regulations. However, housing assistance and services can only be provided to low-income families, as defined in section 3(b)(2) of the United States Housing Act of 1937. Additionally, the MTW statute at Section 204(c)(3)(A) states that 75 percent of the families assisted by participating demonstration public housing authorities shall be very low-income families, as defined in section 3(b)(2) of the United States Housing Act of 1937. Finally, the MTW statute also requires that the PHA continue to “assist substantially the same total number of eligible low-income families” (Section 204(c)(3)(C)).

An interpretation of very low-income and low-income to include additional income sources could disqualify families eligible under the section 3(b)(2) definition as being over-income, and conversely excluding income sources could qualify otherwise ineligible families. HUD has defined “Annual Income” at 24 CFR 5.609. This regulation defines what annual income includes and does not include. To ensure that the above referenced requirements are met; MTW agencies must determine the eligibility of families in accordance with the provisions of that regulation.

However, MTW agencies do have the ability under the MTW statute and their MTW Agreements to calculate rents at variance with statute and regulation, and this could include interpretations of annual income as set forth at 24 CFR 5.609.

Notwithstanding the above, HUD does not have the authority to waive other Federal statutes, so annual income calculations for individuals assisted under MTW programs can not include amounts specifically excluded by any other Federal statute from consideration as income for the purposes of determining either eligibility or rents. Consequently, for any rental subsidy program created with local, non-traditional MTW flexibility, the regulation pertaining to the calculation of income found in 24 CFR 5.609(c)(17) must apply to both eligibility and rent determinations.

- C. **Homeownership Programs.** These parameters apply to all programs in which a PHA uses MTW funds to act as a mortgagee in providing homeownership assistance to low-income families.

- **Principal Residence Requirement.** The property sold to an eligible family must be used as the principal residence of the family, and homeownership assistance may only be paid while the family is residing in the home. (See public housing

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inventory, families residing in such units would then become subject to the community service requirement.

- **Court orders.** The PHA will comply with the terms of any applicable court orders, consent decrees or Voluntary Compliance Agreements that are in existence or may come into existence during the term of the PHA’s participation in MTW.

- **Inspections.** For any unit receiving assistance from a PHA, the PHA must ensure that the property is safe, decent, sanitary, and in good repair, according to an inspection protocol established or approved by the Secretary. This does not preclude the PHA from using approved alternate MTW inspection protocols as long as such protocol meets the housing quality standards established or approved by the Secretary. Further, this requirement does not necessitate units meeting HUD inspection standards prior to the completion of rehabilitation work, as long as the units are not occupied during the rehabilitation period.

PHAs are still subject to state and local building codes, and housing codes, and state and local public housing law on inspections. Projects must meet HUD Housing Quality Standards (HQS) performance requirements (as provided in 24 CFR 982.401), both at commencement of occupancy and throughout the term of the time restriction on affordable units. This requirement applies to all local, non-traditional MTW units/subsidies, including assistance provided to projects as gap financing.

- **Expenditure of Federal funds.** PHAs must maintain documentation which verifies compliance with their General Depository Agreement (HUD-51999) and any other Treasury expenditure requirements related to the expenditure of Federal funds upon drawdown from the Line of Credit Control System (LOCCS).

- **Other requirements.** Other federal, state and local requirements applicable to all federally assisted housing shall continue to apply notwithstanding any term contained in a PHA’s MTW Agreement or any authorization granted thereunder. Accordingly, if any requirement applicable to public housing contains a provision that conflicts or is inconsistent with any authorization granted in its MTW Agreement, the MTW PHA remains subject to the terms of that requirement. Such requirements include, but are not limited to, the following: Appropriations Acts, competitive HUD notices of funding availability under which the PHA has received an award, state and local laws, Federal statutes other than the 1937 Act, and OMB Circulars and requirements (including regulations promulgated by HUD thereunder in 24 C.F.R. part 85).

- B. **Rental Subsidy Programs.** These parameters apply to all local, non-traditional MTW rental subsidy programs.

- **Hardship policy for rent reform activities.** MTW PHAs must provide a hardship policy for all rent policies that deviate from the regulations in terms of the way

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homeownership regulations at 24 CFR 906.15b and Section 8 homeownership regulations at 24 CFR 982.633a.)

- **Financial capacity requirement.** Eligibility for MTW homeownership programs must be limited to families who are capable of assuming the financial obligations of homeownership, under minimum income standards for affordability, taking into account the unavailability of financial assistance from the PHA. A homeownership program may, however, take account of any available subsidy from other sources. (See public housing homeownership regulations at 24 CFR 906.15c.)

- D. **Housing Development Programs.** These parameters apply to activities that involve the development of local, non-traditional affordable units, including the provision of MTW funds to acquire, renovate and/or build units that are not public housing or Housing Choice Voucher units. Local, non-traditional affordable units are defined as units that will be rented to or sold to families whose incomes are at or below 80% of AMI, but that are not public housing or project-based Housing Choice Voucher units. If a project includes the development of public housing units, these parameters do not apply and the PHA must follow the regulations for public housing development, as provided in 24 CFR 941. These parameters also do not apply to the allowable use of MTW funds to pay for operating costs related to affordable housing.

- **Allowable Uses of MTW Funds for Development**

- 1) MTW funds may be used to acquire, renovate and/or develop local, non-traditional affordable units.
- 2) The local, non-traditional affordable units may be either owned by the PHA, an affiliate or instrumentality of the PHA, or by another public or private entity.
- 3) MTW funds may be spent directly by a PHA to acquire, renovate or build local, non-traditional affordable units, or MTW funds may be granted or loaned by a PHA to another entity which will acquire, renovate or develop and own the local, non-traditional affordable units. Such units are made available in the project, by regulatory and operating agreement, master contract, individual lease, condominium or cooperative agreement, or equity interest.

- **Limitations on the Use of MTW Funds for Development**

- 1) As discussed earlier in this notice, the MTW statute only permits MTW funds to be used to fund affordable units. HUD requires MTW agencies to utilize a pro rata calculation to ensure that the percent of MTW funds contributed to total project cost does not exceed the percentage of affordable units in the project (including public housing, Housing Choice Voucher, and local, non-traditional affordable units). For example, if there are 120 units in a project and 50 are affordable, the amount of MTW funds contributed to the project cannot exceed 42% of the total project cost.

- 2) Projects must be within the HUD Total Development Cost and Housing Cost Cap Limits imposed on the development of affordable units in a project or within a PHA's alternate cost formula for development and redevelopment activities, if approved by HUD. (See also HUD PIH Notice 2010-20, which establishes public housing development cost limits.) All MTW funds being put into the project must be included in the TDC analysis.
 - 3) Projects must comply with the HUD Cost Control and Safe Harbor Standards for Rental Mixed-Finance Development, dated April 2003 (http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_9880.pdf).
 - 4) Any housing not developed as public housing within a PHA's Faircloth limit (i.e., the statutory limit pursuant to Section 9(g)(3)(B) of the United States Housing Act of 1937, which states that PHAs cannot receive funding for units that they construct, acquire or rehabilitate that exceed the number of units the PHA had as of October 1, 1999) will not be included as additional public housing units in future Operating Subsidy or Capital Fund calculations.
- **Time Restrictions on Local, Non-Traditional Affordable Units.** PHAs using MTW funds for acquisition, renovation or construction of local, non-traditional affordable units must ensure that the units remain affordable for a specified amount of time. The time restriction may vary from project to project, given the goals of a PHA, the project economics, market conditions and other factors. The following are minimum guidelines:
 - 1) Local, non-traditional affordable units must remain affordable for a minimum of 30 years, unless otherwise approved by HUD.
 - 2) If there is a loan of MTW funds to the project, the local, non-traditional affordable units must remain affordable for the longer of either the term of the loan or 30 years, unless otherwise approved by HUD. For a shorter term to be considered by HUD, the loan of MTW funds to the property would need to be repaid in full by the conclusion of the shortened term.
 - **Legally Binding Commitments.** PHAs must record a use agreement, covenant, or other document acceptable to HUD on the property where the local, non-traditional affordable units are located, which sets forth the conditions imposed on the units. If there is an existing agreement or covenant recorded on the property related to the local, non-traditional affordable units, with HUD approval, the PHA may rely on this document rather than record its own.
 - **Continuing Requirements.** PHAs developing local, non-traditional affordable units through acquisition, renovation or new construction must comply with the following provisions, which cannot be waived through a PHA's MTW status. PHAs must maintain documentation which verifies compliance with the following:
 - 1) Environmental Review, pursuant to 24 CFR part 58 or part 50, as detailed in Section VII of the FHEO and PIH joint notice on non-discrimination and equal opportunity requirements for PHAs, PIH Notice 2011-31/FHEO Notice 2011-1.

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local, non-traditional activities. PHAs can begin implementation of specific activities upon approval of the activities via the Annual MTW Plan (see below).

- **Inclusion of Local, Non-Traditional Activities in the Annual MTW Plan (HUD Form 50900).** PHAs must include all proposed local, non-traditional activities as Proposed Activities in their Annual MTW Plans. This should include a description of the activity being proposed (including the scope of the activity and the ways in which the activity will comply with applicable HUD requirements), how the activity conforms to at least one of the MTW statutory objectives, and all other required information from HUD-50900.
- **Term of Local, Non-Traditional Authority.** MTW PHAs are only provided approval for the implementation of local, non-traditional MTW activities during the term of the MTW Agreement. At such time as the MTW Agreement expires or is terminated, the PHAs authority to enact such activities is void. If an MTW PHA contemplates a local, non-traditional MTW activity that would require entering into any agreement that extends past the term of the agreement, the PHA should contact the MTW Office to discuss the viability of such an action.

Section V.C. of the MTW Agreement requires MTW PHAs to submit a transition plan to HUD no later than one year prior to the expiration of the MTW Agreement. The termination of all local, non-traditional MTW activities should be articulated in this plan.

7. Reporting Requirements. PHAs must report to HUD on the details of approved local, non-traditional activities through the following mechanisms:

- **Annual MTW Report.** PHAs must include in their Annual MTW Report information on all local, non-traditional activities, including the number of families served and level of assistance provided. For development activities, PHAs must also provide information on each specific property acquired, renovated and/or developed as part of a local non-traditional activity and as included in the PHA's approved MTW Plan. The information should be provided as required in Attachment B of the MTW Agreement (HUD Form 50900). HUD will use information in the Report to verify that the PHA has complied with all HUD requirements.
- **Housing Financial Reports.** All local, non-traditional activities are still subject to the same financial accounting and reporting standards as all other MTW activities, and must follow the same GASB and FASB pronouncements. PHAs must keep project level budgeting and accounting, report financial statements in the Financial Data Schedule (FDS), and abide by project level management reviews and fees. PHAs are authorized but not required to establish separate books of account under enterprise fund accounting rules for each non-traditional activity. Such activities also must be included in the annual A-133 audit required by the Office of Management and Budget.

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- 2) Site and Neighborhood Standards, pursuant to 24 CFR 941.202 or any alternate MTW standards for determining the location of existing, newly constructed, or substantially rehabilitated housing to receive subsidy approved by HUD. Any alternate site and neighborhood standards for the location of existing, newly constructed, or substantially rehabilitated housing to receive subsidy must be in compliance with Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. Please see joint PIH-FHEO notice 2011-31.
- 3) Subsidy Layering Review in relation to the provision of Housing Choice Vouchers and the use of Low Income Housing Tax Credits
- 4) Demolition and disposition requirements pursuant to Section 18 of the 1937 Act and 24 CFR 970, as applicable to an existing public housing property being demolished or disposed.

- E. **Service Provision.** These parameters apply to the provision of HUD-approved self-sufficiency or supportive services that are not permitted under the public housing and Housing Choice Voucher programs, or that are provided to eligible individuals who do not receive either public housing or Housing Choice Voucher assistance from the PHA.
 - General parameters in Section 5.A. of this Notice apply. HUD has not developed additional parameters at this time.

6. HUD Approval Process. PHAs proposing local, non-traditional activities must comply with the following:

- **Authority to Implement Local, Non-Traditional Activities.** PHAs must first receive authority from HUD prior to implementing local, non-traditional MTW activities.

If a PHA does not already have this authorization, the PHA must submit a proposal to HUD describing: a) the proposed local, non-traditional activities, including parameters for implementation, b) how this activity relates to at least one of the three statutory MTW objectives, c) whether more families will be served, d) how the activity will be evaluated e) certifying that the funds will be used to serve families under 80% of AMI, and f) a risk assessment for each non-traditional activity including a cost benefit analysis. The PHA should (to the extent feasible) include in the proposal information on specific properties identified for acquisition, renovation and/or development. Properties identified for development in the future should be reflected in the MTW Plan and/or MTW Report, as indicated below. No additional proposal will be required.

HUD will review the proposal and, if approved, HUD will produce an Amendment to the PHA's MTW Agreement authorizing the PHA to implement local, non-traditional activities. PHAs must then follow the amendment and public hearing requirements outlined in Section V.A. of the MTW Agreement (http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_10240.pdf) prior to executing the Amendment. Once the Amendment is fully executed by HUD, PHAs will have the authorization available in the MTW Agreement to implement

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PHAs are reminded that any approved non-traditional activities are funded with Federal funds, and thus are subject to any and all other Federal requirements outside of the 1937 Act, as well as other 1937 Act requirements not authorized in its MTW Agreement and approved in its Annual MTW Plan.

- **Public and Indian Housing Information Center (PIC).** PHAs must submit HUD-50058 or HUD-50058 MTW (or their replacement forms) data into HUD's Public and Indian Housing Information Center (PIC) system, or its successor, for all households receiving assistance through the use of MTW funds. Instructions on including households served through local, non-traditional activities are forthcoming from HUD.
8. **Paperwork Reduction Act.** The information collection requirements contained in this notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995(22 U.S.C. 3501-3520) and assigned OMB control number 2577-0216. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.
 9. **Further Information.** For further information on the applicability of this notice or questions relating to its requirements, contact Ivan Pour, MTW Program Director at (202) 402-2488. General information regarding the MTW Demonstration can be found at: www.hud.gov/mtw.

/s/

Sandra B. Henriquez, Assistant Secretary for
Public and Indian Housing

CHARLOTTE HA PRESENTATION

**Moving Forward
Self-Reliance
Program**

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Charlotte Housing Authority

Moving Forward
Families Advancing to Self-Reliance

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Presentation Outline

- I. Introduction
- II. Program Description
- III. Goal of Moving Forward Program
- IV. Program Modification
- V. Site Selection
- VI. Work Requirement/Incentive Account
- VII. Challenges
- VIII. Metrics/Outcomes

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Program Description

- The Moving Forward Self-Reliance Program is a CHA Initiative designed to assist families with becoming financially independent of assistance and Self-Reliant.
- All PH programs are site bases and;
- Participation in all of CHA's Self-Reliance programs are voluntary.
- Section 8 participants are also eligible to participate in the program.

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Goals of Moving Forward

Promoting Self-Sufficiency

- Require able-bodied public housing residents (residing in a supportive services community) or voluntary section 8 participant to work in order to reduce the number of households needing housing assistance and increase the number of families moving out of subsidized housing.

Educating the youth

- By providing resources that will improve the education of youth residing in public housing or a household which receives Section 8 assistance with a goal to increase the graduation rate from high school in order to break the cycle of intergenerational poverty.

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FSS Program Modification

- Expanded services to conventional PH communities
 - Phase I (Designated FSS Communities/ Revitalization Site)
 - Phase II (3 New Moving Forward Communities)
- Revised (FSS) Contract of Participation
 - No longer 5-7 yr program timeframe
 - No Expiration Date
 - Does not use baseline figures

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FSS Program Modification- Cont.

- Incentive Credit vs. Escrow Credit
- Youth Supportive Services
- Family Tier System
 - Tier I- High Level of Need
 - Tier II- Moderate Level of Need
 - Tier III- Low Level of Need

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Site Selection

- Reviewed 13 Properties
- Used a 100 point weight system that looked at success factors in each community
- Primary Factors:
 - Wages
 - School Quality
- Secondary Factors:
 - Accessible Community Resources
- Together the weight totaled 100 points.

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Work Requirement

- During the introductory phase residents are not held to the work requirement.
- After the initial 12 months of services, the resident is required to be employed a minimum of **15 hours per week** and willing to enroll in school, and/or job training.
- Each additional adult household member is also required to work and will increase the hours of work required by 5 hours per week per household. For example, 3 adult members would be **15+5+5=25 hours of work per week**

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Work Requirement-Continued

- The next year, **the head of household** is required to be employed for **30-hours or more per week**.
- Additional adult household members are required to be employed **10-hours per week**. For Example **30+10+10=50 hours per week** for a household with 3 adults.

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MF Successful Completion

- Three (3) years have passed since family income reached 40% of AMI (currently \$25,000) the incentive credit no longer accrues or;
- Seventy percent (70%) of the family's monthly adjusted income equals or exceeds the AMI for the family size (whichever comes first).
- The Head of Household certifies that no household member is receiving Federal, state or local welfare assistance.

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Incentive Account

- Residents whose earned wages total \$12,500 or more (including other sources) will earn a monthly incentive credit.
- The credits range from \$25-\$100 monthly depending on the family's income.
- Families who move within the 12 months of completion of the Moving Forward program will receive 100% of their incentive account minus any monies owed to CHA.
- After 12 months the family receives only 80% of the balance earned if the family does not move out of subsidized housing.
- After 2 years or 24 months the family receives only 60% of the total balance earned, and so on, less any money funds due to the authority.
- If the family wish to remain in subsidized housing, the full balance is forfeited back to the authority.

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Improvement Period

- **Improvement Period:** Improvement periods will be for 60 days or 2 months. Moving Forward Program participants may be placed in "non-compliance" status due to the following reasons:
 - ✓ Lack of employment
 - ✓ No HS Diploma/GED and refusal to enroll
 - ✓ Lack of follow through on referrals/resources
 - ✓ Lease violations (including: late rent, unauthorized guest, etc)

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Improvement Period-Continued

- After 2 month Improvement period, if non-compliance is not cured the participant is placed on Probation/Sanction.
- Residents, who have 3 improvement occurrences within a 24 month period, skip probation and go directly to the Moving Forward Program Termination Phase as well as the Non-Compliance Phase of the Work Requirement Policy.
- If the participant fails to cure the non-compliance by the end of the six (6) month period they will continue to pay market rent and move to Termination/Phase III.

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Rental Assistance Termination

Phase I

- Participants will lose 50% of their rental assistance for up to six (6) months.
- Fail to correct the non-compliance within six (6) months, process moves to Non-Compliance/Phase II.

Phase II

- Participants will lose 100% of their rental assistance for six (6) months and will be required to pay the established market rent.
- Participants still have the option to cure the non-compliance during the six (6) month period while they are paying market rent.
- If the participant fails to cure the non-compliance by the end of the six (6) month period they will move to Termination/Phase III

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Rental Assistance Termination

- **Termination/Phase III:**
Participants Lease or Voucher will be terminated and their incentive account, if any, is forfeited due to non-compliance.

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Program Challenges

- ❖ Continued Funding after MTW demonstration
- ❖ Site Selection method vs. Application method
- ❖ Expansion to serve additional communities

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Program Metrics-Adult

Adult Measures	CHAS/MTW 1	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16
Decrease minimum renters	5%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
Increase working households	5%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
12 + Mos Job retention	10%	40%	75%	15%	60%	80%	20%	60%	80%	25%	70%	90%	25%	70%	90%	25%	70%
Income progression-Aggregate by site				20%			27%			34%			41%			48%	
Increase positive graduation move-outs by site				12%			15%			18%			23%			30%	
Number participating in positive community activity (workshops) by site				60%			65%			70%			75%			80%	

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Program Metrics – Youth Effective August 2011

Youth Measures	SY* 11-12	SY* 12-13	SY* 13-14	SY* 14-15	SY* 15-16
Percent of CHA students enrolled in CIS will be promoted to next grade level	80%	81%	82%	83%	84%
Percent of CHA students enrolled in CIS will have an average daily attendance of 80% or above	80%	81%	82%	83%	84%
Percent of CHA students enrolled in CIS will graduate with HS diploma by site	85%	85%	85%	85%	85%
Percent of CHA students enrolled in CIS will apply for the CHASF by the deadline	90%	91%	92%	93%	94%
Percent of CHA HS graduates enrolled in CIS who apply to post secondary education (college,univ,military)	80%	82%	84%	86%	88%

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Vendor Performance Snapshot Detail Report

Measure from Program Metrics Chart

Cohort indicates the enrollment year and tells us how long they have been in the program

Tier Level indicates the level of need for each family - Scale of 1 to 4

Increase Working Households

Vendor	Program/Site/Caseload	Cohort Program Year at Site	Tier Levels at Site	Number in Tier/Cohort	Baseline	YTD Actual	Aggregate Goal	% of Goal Attained	Indicator Points
Agency A	Moving Forward/FSS								
	Pilot Group A	2	2	9	8	8	8	100%	
	Enrolled: 29	3	2	15	12	12	14	86%	
	Total Population: 29	3	3	5	4	4	5	80%	
	Overall				24	27	89%		3

YTD Actual is divided by Aggregate Goal to determine the Percent of Goal Attained - which then is given a color and point value

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Program Outcomes FY 11-12 In-House Pilot Site A

Vendor	Program/Site/Caseload	Cohort Program Year at Site	Tier Level at Site	Number in Tier/Cohort	Decrease Minimum Renters		Increase Working Households		Job Retention 12+ Mos		Wage Progression (Aggregate)		Increase Positive Move Outs		Indicator Points	
					Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual		
CHA	Moving Forward/FSS															
	Victoria Square (29)	2	2	9	0	0	100	100	1	1	100	57,071	57,071	54,485	63%	0
	Total Enrolled Qtr End (28)	3	2	15	0	0	100	100	1	1	100	120,303	120,303	124,170	63%	0
	Pilot Group A	2	2	9	0	0	0%	0%	8	7	88%	110,002	109,089	111,133	85%	0
	Enrolled: 29	3	2	15	0	0	100	100	6	7	78%	109,888	111,413	118,826	92%	1
	Total Population: 29	3	3	5	0	0	100	100	4	2	50%	114,033	114,375	116,450	87%	0
	Overall				0	0	100	100	23	20	77%	162,874	165,433	169,000	75%	3

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Program Outcomes FY 11-12 In-House Pilot Site B

Vendor	Program/Site/Caseload	Cohort Program Year at Site	Tier Level at Site	Number in Tier/Cohort	Decrease Minimum Renters		Increase Working Households		Job Retention 12+ Mos		Wage Progression (Aggregate)		Increase Positive Move Outs		Indicator Points	
					Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual		
	Claremont (45)	3	3	1	0	0	100	100	0	0	100	518,700	518,700	522,464	83%	0
	Total Enrolled Qtr End (45)	3	3	1	0	0	100	100	1	1	100	324,120	329,120	334,944	83%	0
	Pilot Group B	3	3	34	3	3	50%	50%	8	5	56%	37,233	37,663	39,211	82%	0
	Enrolled: 45	3	3	1	0	0	100	100	3	3	60%	510,089	514,089	513,448	100%	0
	Total Population: 45	3	3	1	0	0	100	100	3	3	50%	47,278	49,675	50,763	99%	0
	Overall				0	0	100	100	4	3	50%	512,823	516,388	517,180	94%	0

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Program Outcomes FY 11-12 Contracted Site Pilot Site C

Vendor	Program/Site/Caseload	Cohort Program Year at Site	Tier Level at Site	Number in Tier/Cohort	Decrease Minimum Renters		Increase Working Households		Job Retention 12+ Mos		Wage Progression (Aggregate)		Increase Positive Move Outs		Indicator Points	
					Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual	Baseline	YTD Actual		
Children Home Society/TH	Moving Forward/ HOPE VI FSS															
	Roulevard (135/206)	3	3	26	0	0	73%	73%	0	0	100	54,600	54,334	56,176	70%	0
	Total Enrolled Qtr End (135)	3	3	26	0	0	73%	73%	0	0	100	54,808	56,094	56,444	95%	0
	Enrolled: 135	3	3	26	0	0	0%	0%	17	15	50%	58,956	59,222	61,010	77%	0
	Total Population: 135	3	3	26	0	0	0%	0%	28	25	69%	110,441	110,441	110,441	100%	0
	Overall				0	0	73%	73%	0	0	100	110,441	110,441	110,441	100%	0

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Q & A's

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CHARLOTTE HA HANDOUT - ACTION PLAN

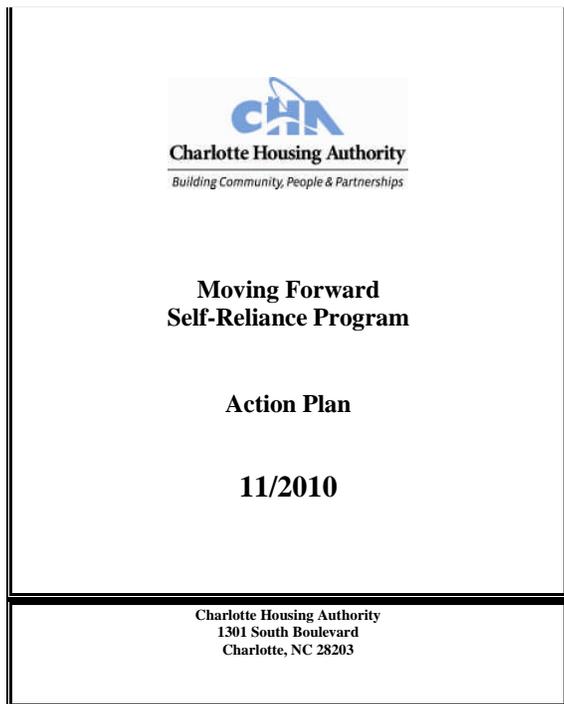


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INTRODUCTION

Founded in 1939, the Charlotte Housing Authority (CHA) is a non-profit public real estate holding company in Charlotte, North Carolina, that provides decent, safe and affordable housing to low and moderate-income families while supporting their efforts to achieve self-reliance. We offer 3,102 apartments at very low rents, 903 affordable apartments and 715 market rate rental units in 51 developments across the city. Twenty-two of the developments are mixed-income properties, 16 are conventional public housing, one is supportive housing and 12 are just for seniors and/or the disabled. In addition, CHA has 4,666 Housing Choice Vouchers. Altogether, we operate or provide rental subsidies to 7,768 units. Counting children and spouses, we manage housing for more than 19,500 seniors, adults and children. In addition, we have a Client Services Department that offers self reliance programs for our families and supportive services to our disabled and elderly residents.

CHA is one of 33 housing authorities across the country participating in HUD's Moving to Work (MTW) demonstration program. MTW has allowed CHA funding flexibility to initiate innovative strategies to promote work and self sufficiency among our residents, expand housing choices, and achieve administrative efficiencies and cost savings.

Using the new latitude provided by MTW, in April of 2009 CHA announced its plans to impose a work requirement for all able bodied, non-elderly family heads of household. The work requirement implementation will begin in early 2011 for the families receiving case management services by requiring all able bodied, non-elderly heads of household to work 15 hours a week, with the minimum work requirement increasing to 30 hours a week within the next 12 months. In December CHA will also begin implementing a simplified rent structure to allow rental calculations similar to a stepped rent system. Rent will remain the same within an established adjusted income band (set at \$2,500). The 30% calculation will be computed at the low end of the band and remain the same until the income band is increased to the next level. As an incentive for families to continue to increase their income from wages, CHA will contribute a graduating flat payment into an individual savings account once household income from earned wages reaches \$12,500 so each household can begin to build assets. We hope the savings will eventually be used as a down payment on a house or a market-rate apartment.

This Action Plan represents an update to our current Action Plan and reflects all changes resulting from our new MTW work requirement and rent reform initiatives. CHA has previously submitted a separate Action Plan for the HOPE VI FSS services (March, 2007) so those services are not covered by this Action Plan.

GOALS AND OBJECTIVES

CHA's Family Self Reliance Services are designed to ensure that subsidized housing is a vehicle for families to obtain the skills and training necessary for entry into the private rental market.

CHA's Client Services Department oversees the agency's efforts to help move residents of subsidized housing into market rate rental housing. The program is now known as the Moving Forward Program (MFP), which includes four key sub-parts. They are:

- a. MFP Services for Public Housing residents of Claremont and Victoria Square, which utilizes both MTW and HUD's PH FSS funding,
- b. MFP Services for Section 8 Voucher Participants, which utilizes funding from Section 8 as well as HUD's HCV FSS grant funding.
- c. MFP Services for the residents of Boulevard Homes. Boulevard Homes was awarded an FY09 HOPE VI Revitalization Grant. These residents will receive MFP Services until they qualify for HOPE VI case management.
- d. MFP Services for Public Housing residents of Leafcrest, Tarlton Hills and Cedar Knoll, set to be launched in the spring of 2011.

I. FAMILY DEMOGRAPHICS

This portion of the Action Plan details the characteristics of CHA's public housing residents and Section 8 participants. The purpose is to provide the reader with a general description of the current population in Section 8 and public housing. Various sources have been used to generate the reports including the agency's on-line data system, YARDI, and HUD's on-line data information center, known as PIC.

A. Age

Age distribution data comes from combining the Yardi data for public housing residents and Section 8 participants with PIC data for residents of ACC units in a privately-managed site. As of this writing, Yardi did not track the resident profile data for families living in a project-based Section 8 unit so that data is imputed from known facts about family size at each relevant development. Data was pulled on March 15, 2010.

CHA Age Distribution for all residents/participants in Conventional, HOPE VI and Section 8 housing	
Age	Number
0-5	2,654
6-17	6,856
18-49	6,331
50-61	2,087
62-80	1,212
80+	231
Total	19,371
Includes ACC & PBS8 units only	
Data Source: Yardi & PIC	

B. Income.

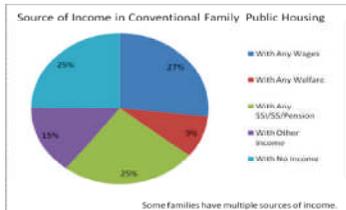
Data on income for public housing residents and Section 8 participants is from Yardi. Data for the HOPE VI sites is from PIC. Data for the families living in a project-based Section 8 unit is not included in this calculation because those units are currently not tracked in PIC or Yardi. Data was pulled on March 15, 2010.

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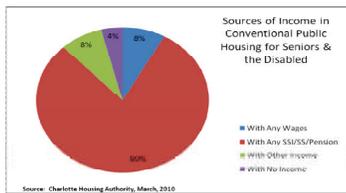
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CHA Resident/Participant Income Statistics		
Family Type and Location	Number of Families	Average Income
Public Housing Family Sites	1,295	\$ 7,491
Public Housing Senior Sites	894	\$ 9,150
HOPE VI Family Sites*	578	\$14,701
HOPE VI Senior Sites*	210	\$10,406
Section 8 Participants	4,390	\$10,475
*ACC units only Data from Yardi and PIC, March 15, 2010		

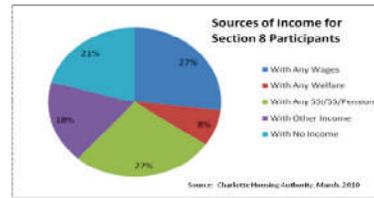
Sources of income for families, seniors/disabled residents and Section 8 participants is displayed in the three following charts.



Source: Charlotte Housing Authority, March, 2010



Source: Charlotte Housing Authority, March, 2010



Source: Charlotte Housing Authority, March, 2010

C. Gender Analysis

Females are the overwhelming majority as head of households in the public housing and Section 8 programs. Males make up approximately 12% of the heads of household for the combined public housing and Section 8 households.

D. Racial Mix of Heads of Household in Public Housing & Section 8 Families

African Americans make up 93.5% of the heads of household in public housing and Section 8, while white families comprise 6% and "other" is less than 1%.

E. Supportive Service Needs

Section 8 Participants

The Center for Applied Research at Central Piedmont Community College (CPC) conducted an assessment of the Section 8 participants in 2008. The purpose of the survey was to assess the ability of Section 8 participants to move towards self-reliance. CPC's survey consisted of a series of 46 questions asking participants about their work situation, children and other family responsibilities, education, health, and other items to assess their ability to become self-sufficient and independent of the need for Section 8 assistance.

At the conclusion of the survey, 3,294 participants had responded to the survey, for a 77.3% response rate. Of the 4,260 participants receiving Section 8 vouchers at that time, researchers found that 525 participants were either elderly or disabled and receive Supplemental Security Income (SSI). All responses were self-reported by the participants and for some questions, the participants were allowed to choose more than one response and thus the percentages may not always total 100%. The results for the participants receiving or not receiving SSI are reported on separately and not included in the results presented below.

The most common barriers to getting or maintaining employment were health problems (28.1%), needing more training (18.1%), and "other" reasons not given as an option in the question such as "just had a baby," "trying to start my own business," "looking," "companies not hiring," and "the economy." Other obstacles to working were no transportation (14.1%) and no child care (12.5%).

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The most common employment barriers were health problems, transportation and child care issues as well as a lack of work experience and education.

Other reported needs included:

- 62.1% of respondents wanted computer training
- 46.3% of respondents wanted job training
- 55.2% of respondents wanted help to attend college
- 49.1% of respondents wanted help finding a job or a different job
- 30.2% of respondents wanted help getting their GED
- 10.1% of respondents wanted help learning to read

When the Section 8 non-SSI participants were asked about their level of education, 27.6% responded that they had completed some college or vocational school. Another 9.3% stated they had an Associate's, Bachelors or vocational degree. The number of participants who did not complete high school or obtain a GED was 845 or 32% of the total non-SSI respondents. Almost 31% of the respondents had a high school diploma or GED.

Public Housing Residents

As with Section 8 participants, the Center for Applied Research at CPC conducted an assessment of the public housing residents in 2007, using an 87-question survey. A total of 2,272 heads of household responded, for a response rate of 81%. Looking at the non-elderly/disabled heads of household in 2007, the study found that:

- 34% of the heads of household were working full time,
- 24% were working part time,
- 29% were job hunting,
- 10% were not looking for work, and
- 3% had a different answer to the question.

As to barriers to employment, 8% cited a criminal record, 13% cited a disability or health issue of a family member and another 15% cited their own disability/health issue; 38% cited transportation, 31% cited child care and 25% cited no job experience.

Other barriers to employment among public housing residents included a drug or alcohol problem (1%) and language barriers (3%). In addition, the study found that

- 35% of respondents had a GED or high school diploma,
- 6% had either attended or completed vocational school,
- 27% had attended some college classes
- 2% had an associate degree,
- 2% had a Bachelor's degree or higher, and
- 28% did not have a GED or a high school diploma.

In addition to the CPC needs assessment, CHA did an assessment of needs of the Boulevard Homes families in 2008 and 2009 and found that their needs are similar to the ones reflected in the CPC study.

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II. ESTIMATE OF PARTICIPATING FAMILIES

A. **Section 8 Participants:** The minimum program size for Section 8 FSS was established at 150 participants and 80 of those original participants have graduated over the past decade. CHA currently provides case management or case coordination to 209 HCV participants.

B. **Public Housing:** The minimum program size for Public Housing was established at 82 participants. We are currently providing case management to more than 500 households each year, thus exceeding the minimum requirement.

III. ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS.

CHA is including all of its self-reliance programs in this Action Plan, save for the services covered by a separate HOPE VI Action Plan.

IV. FAMILY SELECTION PROCEDURES AND ELIGIBILITY CRITERIA

Participation in all of CHA's self-reliance programs is voluntary. The public housing programs are all site-based. In general, residents self-select to participate in one of these programs when they apply to live at an identified MFP site.¹ Any Section 8 participant interested in receiving assistance to become self-reliant is eligible to participate in the Section 8 MFP program.

CHA residents interested in receiving self-reliance services will be referred to the waiting lists at one of the five sites selected to receive case management (Claremont, Victoria Square, Leafcrest, Cedar Knoll and Tarlton Hills). The site based property management staff will conduct a preliminary screening session for determination of eligibility for housing. Case Management staff will then complete an intake interview and/or assessment to determine eligibility for the MFP.

Section 8 participants interested in participating in a self-reliance program call the Client Services Department to complete an application, and determine eligibility by completing an intake interview and/or assessment. If determined eligible, participants are placed on a waiting list if not slots are currently available. When a slot becomes available, they are contacted by a case manager and begin the process to execute a MFP contract.

A. Selection and Eligibility Criteria for Moving Forward Communities

1. Resident Selection for Moving Forward Communities

¹ Early in 2011 CHA will expand the number of conventional public housing sites receiving MFP case management by three (148 households). Those families currently living at these three sites, Leafcrest, Tarlton Hills and Cedar Knoll, will not be given the option to opt out of case management services.

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Selection for the Moving Forward communities will focus on the following target groups in order of preference:

- Existing Public Housing Residents and Section 8 Voucher participants
- Families on the waiting list for public housing or Section 8
- The general public is eligible to apply, if they meet the minimum program requirements with the understanding that current residents receive priority.

If all things are equal, bedroom size, date, time of application will be the deciding factor.

2. Eligibility

Moving Forward communities and Section 8 Self Reliance programs require that applicants meet the following eligibility criteria:

- During the first year (12 months), family members who begin participating in the program are required to either be employed a minimum of 15 hours per week and willing to enroll in school, and/or job training. During the introductory phase of the program, no residents will be sanctioned for failure to comply with the work requirement policy.
- Participation is anticipated to last an average of 5 to 7 years. Additional time may be necessary for Tier 1 and 2 families with extensive barriers, illness, involuntary loss of employment, loss of a family member, or other good cause. A minimum of four (4) workshops per year will be mandatory for all adult family members. The workshops will be aimed at preparing participants for transition to the private sector. Workshops will occur at the most convenient time for all participants. Reasons for non-participation will be handled on a case-by-case basis.
- Homeownership preparation and training will be an option provided to the families via homeownership education and counseling providers within the community. This training is designed to help all families understand the obligations of homeownership and provide them with access to affordable housing, down payment assistance and mortgage opportunities.

B. Selection and Eligibility for Section 8 MFP

Selection for the Section 8 MFP will focus on the following target group:

- Current Section 8 HCV participants who meet the same eligibility requirements at described above for public housing residents.

By reference herein, CHA adopts into its Action Plan all the rules and regulations governing FSS selection procedures outlined in 24 CFR 984.203.

V. INCENTIVES TO ENCOURAGE PARTICIPATION

Moving Forward Program participants will receive several benefits and incentives for participating in the program. These include, but are not limited to the following:

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- PHA before interest is distributed
- The amount of interest earned on the account during the year
- The total in the account at the end of the reporting period

c. Interim Withdrawals

Families can access their Incentive Accounts for any reason, once they leave subsidized housing. While they remain in subsidized housing; however, account access will be limited to amounts needed to help families overcome specific verifiable barriers to work. An example: Paying for repairs of a car needed to get to work.

d. End of the Incentives Period

Families do not build any additional escrow once one of two scenarios occurs:

1. Adjusted income, including wages, reaches 70% of AMI (currently \$45,000) or
2. Three years have passed since family income reached 40% of AMI (currently \$25,000)

However, a family may continue to live in subsidized housing until they are ready to move on. Families will be encouraged to move upon completion of the escrow period or when 40% of the AMI is attained.

E. Loss of Incentives Account

If families move within 12 months of MFP completion they will be entitled to the full account balance, less any funds due the Housing Authority. After 12 months of program completion, the incentive account begins to decrease in dollar value the longer the family remains in subsidized housing. After 12 months the family receives only 80% of the balance earned. After 2 years or 24 months the family receives only 60% of the total balance earned, and so on, less any funds due the authority.

By reference herein, CHA adopts into its Action Plan all the rules and regulations governing incentive accounting outlined in 24 CFR 984.305.

VI. OUTREACH EFFORTS

The Client Services Department works closely with Property Management and Section 8 staff to ensure that program information is periodically sent out via monthly newsletters to all Public Housing and Section 8 residents. Because the focus of the services in conventional public housing is site-based, the applicants for housing at those sites will be made aware of the MFP benefits and requirements when they visit the site to place their name on the waiting list.

In addition, the MFP managers are responsible for getting out program information within the greater Charlotte community so that both minority and non-minority groups are informed about each of the self-reliance programs. The Client Services Department is

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1. Educational Assistance. Youth: High school completion support and college scholarship opportunities. Adults: Educational classes, tutoring, and mentoring. Services provided through agency partnerships.
2. Job Counseling and Training. Youth: Mentoring, vocational development, and post-graduate development programs. Adults: All adult members of the households will have access to employment counseling, job search strategies, and training related to acquiring a job, (i.e. computer, vocational, building maintenance and construction, etc). Services provided through agency partnerships.
3. Case Management. A Case Manager will be assigned to each participating household to assist with goal setting, career planning, social skills, debt reduction, financial planning, and other barriers participants may need to overcome in becoming socially and economically independent. The case manager is responsible for coordinating services and documenting the progress of each participating household.
4. Child Care and Transportation. Childcare and transportation referrals to agency partners will be available for families that are in need of such assistance. Limited financial assistance will be available to those participating households who qualify.
5. Incentive Accounts. Under our new MTW rent reform initiative, all families (not just those participating in a self-reliance program) living in a Section 8 or Section 9 unit who have increased rent due to increased earnings will be able to place a portion of that increased rental payment into an incentive/escrow accounts when their income reaches \$12,500 with some earned wages.

To begin, the resident must report earnings from work which are higher than \$12,500 total annual income. This is the incentive point.

a. Development of Incentive Account and Subsequent Deposits

CHA receives funds to deposit into the account directly from the family's rent paid to CHA in the Public Housing Program. In the Section 8 program, these funds come from the reduced HAP amounts, which are transferred to the escrow account. Participants will not receive escrow credit for rent amounts not paid. A resident may receive partial credit for escrow on a pro-rated rent, usually paid as the final month's rent.

b. Incentive Statements

The CHA will provide a report annually, to each family on the status of the family's escrow account. The report will include:

- The balance at the beginning of the reporting period
- The amount of the family's rent payment that was credited to the account during the reporting period
- Any deductions made from the account for amounts due the

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involved in several community collaborative partnerships such as the Homeless Services Network, and Charlotte- Mecklenburg Community Relations Committee. Upon request, presentations and or information sessions can be held within the community.

Additionally, interested parties can visit the Client Services Department at 316 Benjamin St, Charlotte NC, 28203 for additional program information.

VII. FSS ACTIVITIES AND SUPPORTIVE SERVICES

As a Moving to Work agency, CHA's Moving Forward program entails a work requirement component. CHA believes it is essential to create a clear expectation that all adult residents who are non-elderly and non-disabled should work. As part of CHA's Moving Forward initiative, the Client Services Department reinstated the Gateway to Self-Sufficiency program now called the Moving Forward Program (MFP), in a gradual phased-in approach. When proven successful, it is the goal of the CHA to serve all of Section 8 and Section 9 residents with this program.

MFP is currently in operation at Claremont and Victoria Square, and for a small group of HCV participants. Boulevard Homes families will participate in the MFP program during the relocation phase of their transition and will move to HOPE VI FSS as they become eligible. We plan to expand our case management services to three additional conventional public housing sites in the spring of 2011 (Leafcrest, Cedar Knoll and Tarlton Hills).

This program is available to assist residents not only in meeting the work requirement but also provide them with additional opportunities to acquire necessary skills needed to obtain and maintain employment, increase their incomes and achieve movement towards self-reliance.

The Moving Forward Program will provide wrap-around case management services provided by both CHA staff and contracted case management staff with the end goals for all participating household's being focused on employment and high school completion. Case managers will conduct home visits, office appointments, attend employer visitations, attend school meetings, conferences, or any type of supportive activity to ensure the success of participating households.

The program is divided into four tiers or levels of need. Tiers are determined by completing an interview assessment with the family. The interview will be completed during the enrollment process to determine the family's level of need(s) and baseline, then again every six months to track and monitor their progress. Those residents enrolled in the Moving Forward Program are referred to as "participants".

The Moving Forward Program defines Tier 1 participants as having the highest levels of need. Tier 2 participants have moderate or average levels of need. Tier 3 participants have the lowest levels of need. Tier 4 participants are individuals who would not be appropriate for program participation either due to their age or confirmed disability. Although there is not a specified time limit for program participation, it is encouraged

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and anticipated that program completion will take between five (5) and seven (7) years to complete on average, given the family has moderate levels of need at time of enrollment into the program.

Tier 1 – Gateway Building Block Level:

Participants in this category will require more intensive services as they have the more severe and complex problems. The residents in this category will need long term services, and intensive counseling and/or training to assist them in achieving employment.

Prerequisite: Motivation to become employed and obtain employment while working towards completion of High School Diploma/ GED or Trade School program.

Tier 2- Voyager 1 Career Development Level:

Participants in this category will need assistance in obtaining and maintaining employment. Life skills training, career mentoring, financial literacy, and increased education/training will be key to support the participants in this tier as they work towards becoming self-sufficient.

Prerequisite: 15-hrs of continuous employment for at least 12-months with motivation towards a career track.

Tier 3 Voyager 2 Asset Building Level:

Participants in this category will only need minimal services to keep them informed of job opportunities, trainings, and ongoing information. There is a low need for life skills training for this group to become self-sufficient. Focus should be on a career track, maintaining employment, and increasing their income.

Prerequisite: Continuous employment for a minimum of 30-hours a week for at least 12-months.

Tier 4- Older Adult/Disabled Level:

Participants in this category continue to need support and may be beyond the ability to live completely self-sufficient. Residents who are assessed in this category are not required to participate in the Moving Forward Program. Relocation to more appropriate housing may be considered.

Delivery of Services. A case manager, either CHA staff or contracted staff, will be assigned a caseload which is based on the number of units within a housing community. The case manager is responsible for assessing the household, coordinating the delivery of wrap-around case management services and monitoring program progress which are aligned with the adult and youth service delivery models. The case management team will confer with other case managers in seeking the necessary services and resources to fill any and all gaps in services already available to assist program participants in reaching their goals of social and economic independence.

Case managers will make referrals to other agencies as needed to assist the families depending on the identified levels of need from the interview assessment. The case manager will monitor the results of the referrals. Because developing a sense of responsibility is critical to becoming self-reliant, the participants are expected to make their own appointments once the referral has been made. This includes referrals for childcare and transportation. No matter the assessed Tier level, the case manager will assist the participants in finding the needed resources. However, it will be up to the participant to make the contact

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CHA recognizes that many participants will need supportive services. While CHA does not have funding to provide these services directly, CHA and the Moving Forward Program are committed to actively pursuing partnerships with other agencies to help ensure that participants have access to services that can help meet their needs.

Partnerships are the key to the success of the Moving Forward Program and need to be able to offer a wide array of resources sufficient enough to meet the needs of CHA families as they work toward self-sufficiency and economic independence. The service provider and referral resource listing will be updated on an annual and “as needed” basis to ensure resources are as accurate as possible for case management staff. It is important to note that approved partners will be those who have goals and missions which align with CHA’s agency mission, initiatives and objectives.

Moving Forward Program Requirements

- **Employment and Training Requirements (Work Requirement Policy)**
 - During the first year (12 months), family members who begin participating in the program are required to either be employed a minimum of 15 hours per week and willing to enroll in school, and/or job training. During the introductory phase of the program, no residents will be sanctioned for failure to comply with the work requirement policy.
 - After the introductory phase, Head of Households will be expected to exhibit a good-faith effort to find work for a minimum of 15 hours per week and/or participate in other work participation activities, if determined to be appropriate by the case manager. Each additional adult Household member will increase the hours of work required by 5 hours per week. (i.e.3 Adult members would be 15 +5+5=25 hours per week required)
 - At the beginning of the final phase of the work requirement, CHA will begin requiring the Head of Household to work full time (at least 30 hours per week). Each additional adult household member will increase their required work hours to 10 hours per week. (i.e.3 Adult members would be 30 +10+10 = 50 hours per week required).
 - Participants who are still in approved job readiness activities such as life skills, educational courses or job training, or are still looking for work, after the end of the one-year introductory period, will be able to continue those alternate work participation activities.
- **Enrollment Term and Extensions**

The Moving Forward Contract of Participation has no specific date of expiration. The participant will remain in good standing under the terms of the contract, as long as continued forward progress towards work plan goals is achieved.
- **Life Skills Training**

A minimum of 4 workshops per year will be mandatory for all adult family members. The workshops will be aimed at preparing participants for transition to the private sector. Workshops will occur at the most convenient time for all

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and final arrangements. Follow-up contact will be made to assess the participant’s skills in making and keeping the referral. The results of this follow-up will be used in further counseling with the participant regarding their skills at accessing services that they need.

The case manager will have face to face contact with program participants at least once a month based on the household’s level of needs, until such time as monthly face to face contact is no longer necessary. It is expected that Tier 1 participants may require more than the minimum monthly contact, dependent upon the needs identified. Decreased contact is verified through the participant’s ability to resolve conflict or crisis situations by accessing appropriate community resources without assistance, sustaining consistent employment, and adequately providing all needed resources to maintain the household without assistance which includes but not limited to food, housing, clothing, etc. Case manager schedules will be flexible too accommodate for unforeseen circumstances of the caseload, which cannot wait until a regularly scheduled meeting. It is the responsibility of the program participant to schedule appointments and meet with their case manager. Goal setting, conflict resolution, and decision making will be important. Monthly workshops will be mandatory for Tier 1 participants and four workshops per year will be mandatory for Tier 2-3 participants. Families who are not working will be encouraged to volunteer in their community each month which is a part of the revised work requirement policy while also fostering Section 3 initiative opportunities.

Case managers will help participants regularly evaluate their strategies and progress and make the necessary adjustments in order for them to achieve their goals through services provided at CHA and other referral agencies. Participants will be held accountable for their program participation which includes abiding by the CHA’s work requirement and truancy policies.

Activities and Supportive Services. Activities and supportive services coordinated in the Moving Forward Program will depend upon the needs of the participants. Some of the needs will be unique to each individual, while others, such as childcare and transportation, may be shared by several participants. Because some of the families are housed in a single community, they will be able to support and nurture one another in their efforts to become self-reliant.

Since the program encourages all family members of the household to participate, it is anticipated that more than one person in the household may require employment assistance and high school completion support. Focus of the activities and supportive services provided will revolve around employment attainment services, and high school completion initiatives. Other services may be required in preparation for school completion and employment such as adult learning and remedial education, GED classes, educational and financial support, financial counseling and budgeting, emergency financial needs, child care assistance, transportation, mental and substance abuse counseling and treatment, leadership training, and home ownership preparation and maintenance.

Specific needs such as domestic violence and child abuse/neglect services will be detected and addressed as case manager’s work with their assigned families. Because of the diverse level of needs within each household and caseload, supportive service providers will also have to be diverse and able to meet the needs of the population. Partnerships will be the key to offering the participant opportunities given their level(s) of need.

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participants. Reasons for non-participation will be handled on a case-by-case basis.

- **Family Participation**

All children or dependents in the MFP household are required to participate in age appropriate programming including but not limited to enrollment, attendance, and adequate progress in school, if applicable.
- **Home ownership preparation and training**

Home-ownership prep and training will be an option provided to the families via homeownership education and counseling providers within the community. This training is designed to help all families understand the obligations of home ownership and provide them with access to affordable housing, down payment assistance and mortgage opportunities

Community Partners. A wide array of resources in the community will be utilized to meet the needs of families as they work toward self-sufficiency and economic independence. The Family Resources Toolkit is a directory of family services in Charlotte-Mecklenburg, edited by the Community Relations Committee. The directory lists and describes family services available in Charlotte-Mecklenburg including, child care, community involvement, computers and technology, crisis support, education and literacy, employment, health & wellness, legal services, mental health and behavioral counseling and mentoring. This directory will be utilized when connecting the participating families to community resources.

Specific agencies that CHA partners with in the community include:

Jacob’s Ladder Job Center, Inc	Crisis Assistance Ministries
Bethlehem Center	Head Start
Child Care Resources, Inc.	Habitat for Humanity
JobLink Centers (One Stop Shops)	Consumer Credit Counseling
Urban League of Central Carolinas, Inc.	YWCA
The Housing Partnership, Inc.	Mecklenburg County DSS (WorkFirst)
Charlotte Area Fund	Legal Services of the Southern Piedmont
Right Moves for Youth	Communities in Schools
Big Brothers/Big Sisters	Bridge/JOBS Program
Self-Help Credit Union	United Family Services
Community Link	McLeod Center (substance abuse services)
Central Piedmont Community College	Goodwill Industries of the Southern Piedmont

Successful Program completion - Moving Forward Program. The Contract of Participation is considered to be completed, and a family’s participation is considered to be concluded when any one of the following occurs:

1. The MFP family has fulfilled all of its obligations under the Contract of Participation once three years have passed since family income reached 40% of AMI (currently \$25,000) on or;
2. Seventy percent (70%) of the family’s monthly adjusted income equals or exceeds the AMI for the family size.

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3. The Head of Household certifies that no household member is receiving Federal, state or local welfare assistance.

Individual and Program Monitoring. Case managers will be responsible for maintaining a detailed client case record for each program participant assigned to them. The case records will include, but not be limited to, the following information:

- dates of each contact and a description of the services provided, including referrals made;
- any follow-up contact with other agencies on behalf of the participant and other pertinent information;
- Dates when each milestone is to be achieved, any modifications to the milestones that are made with consensus from the case manager and the participant, and the actual achievement date.

The case manager must be able to measure the success and progress of each participant with regard to his or her contract and Work Plan. Progress information should include educational attainments, training received, employment records, income changes, rent payment history, and other relevant information.

VIII. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS

Case Managers in the Moving Forward Program will perform a thorough bio-psycho-social interview assessment of all participants before work plans are developed and contracts of participation are signed. The emphasis will be on establishing a comprehensive picture of the strengths, needs and aspirations of each adult member of the household and identifying barriers to self-sufficiency. The assessment interview will determine:

- Emotional needs and family support system
- Independent living skills and needs
- Nutrition issues and concerns
- Social activity and recreation
- Health and wellness needs
- Educational needs
- Job training/placement and vocational needs
- Child care needs
- Budgeting skills and needs
- Financial independence and dependence
- Transportation needs
- Substance abuse, domestic violence, or other barriers to achievement of goals

Once the interview is completed for the family, a work plan is developed that describes short and long term goals, in addition to milestones to be reached along the way. The work plan and the Contract of Participation will be reviewed and signed with the adult family member identified as the Head of Household and will serve as the tool by which progress is measured. During participation in the program the assessment interview will be completed every six

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6. Participant has failed to respond to correspondence from the Moving Forward Program.
7. After 2 month Improvement period, if non-compliance is not cured the participant is placed on Probation*. Residents, who have 3 improvement occurrences within a 24 month period, skip probation and go directly to the Moving Forward Program Termination Phase as well as the Non-Compliance Phase of the Work Requirement Policy. See the Work Requirement Policy for details.

*-Participants may be granted extensions who are in compliance with their approved written improvement plans.

Probation Period: Probation periods will be for 3 months. This gives the participant another 3 months to cure the non-compliance. If after the 3 month period efforts to cure the non-compliance are not adequately provided, the participant is terminated from the Moving Forward Program.

Moving Forward Program Termination: A termination letter will be sent to the participant and property manager, as well as hand delivered to the place of residence by the case manager. As stated before, termination from the Moving Forward Program does not mean relocation into another community, it means supportive services will be terminated and case management services are no longer provided to the family.

Informal Grievance Hearing:

All Moving Forward Program participants are entitled to an Informal Grievance Hearing upon being notified of their program termination, if he or she disputes the cause for the termination. A participant must submit a request *in writing* for an Informal Grievance Hearing within ten (10) business days from the date of the termination notice. The request for the hearing must be submitted to the participant's assigned CHA or subcontracted case manager.

The Moving Forward Program case manager, or his or her designee, will schedule the hearing. The participant will be mailed a letter confirming the date, time, and location of the hearing including the participant's rights and responsibilities during the hearing. The Informal Grievance Hearing Committee's decision will be final. All Residents receiving subsidy through the Charlotte Housing Authority retain the rights to grieve a hardship.

Below is an excerpt from the lease of which explains the sanction process which is monitored by property management, so as not to confuse it with the Moving Forward Program improvement and termination policies.

Rental Assistance Termination: Residents who fail to comply with the terms of the Work Requirement policy may be sanctioned. The sanctions will increase in magnitude the longer a resident is in non-compliance. Sanctions shall be applied in phases as follows:

1. Improvement Period: Participant will have a 60 day or 2 month grace period to cure non-compliance, if not cured in 60 days or 2 months, process moves to Probation/Phase I.

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months to track and monitor progress of the entire household. The documents can be modified upon mutual consent of the case manager and program participant(s).

IX. PROGRAM COMPLETION OR TERMINATION

Successful Completion of MFP². The Moving Forward Contract of Participation has no specific date of expiration. The participant will remain in good standing under the terms of the contract, as long as continued forward progress towards work plan goals is achieved.

This applies to all active program participants in the Moving Forward Program. It should be noted, Sanctions are given through property management and Improvement/Probation periods are given through case management. It is entirely possible that a participant can be placed on an Improvement/Probation period by their case manager and Sanctioned by their property manager simultaneously.

Note: Termination from the Moving Forward Program does not allow the participant to relocate into another community. It means supportive services will be terminated and case management services are no longer are provided to the family. However, the family is still responsible for abiding by the CHA work requirement and truancy policies which are explained in the lease.

When a case manager starts the Improvement process, a lack of contact/participation letter will be mailed to the family in question. If no contact or change is made in the specified time frame, the Improvement Period will begin.

Improvement Period: Improvement periods will be for 60 days or 2 months. Moving Forward Program participants may be placed in "non-compliance" status due to the following reasons:

1. Participant does not have employment and refuses to attend an employment support program.
2. Participant does not have GED/HSD and refuses to attend an educational/vocational program.
3. Participant is out of compliance with the Charlotte Housing Authority's work policy.
4. Participant does not follow through on referral contacts and/ or not making progress with work plan.
5. Participant has a lease violation incident(s) with property management or landlord and is sanctioned. (Includes, but not limited to truancy issues, truancy issues, unauthorized guests, late rent, housekeeping, work requirement issues)

² Please Note: Some CHA residents/participants are currently under an existing FSS contract, which differs slightly from the new MFP contract. Those existing contracts will be honored but all new participants will have an MFP contract described in this document.

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2. Probation/ Phase I: Participants will lose 50% of their rental assistance for up to six (6) months. If they fail to correct the non-compliance within six (6) months, process moves to Non-Compliance/Phase II.
3. Non-Compliance/Phase II: Participants will lose 100% of their rental assistance for six (6) months and will be required to pay the established market rent. Participants still have the option to cure the non-compliance during the six (6) month period while they are paying market rent. If the participant fails to cure the non-compliance by the end of the six (6) month period they will continue to pay market rent and move to Termination/Phase III.
4. Termination/Phase III: Participants Lease or Voucher will be terminated and their incentive account, if any, is forfeited due to non-compliance.

When a participant requests to no longer participate in the Moving Forward Program and has not fulfilled their contract of participation or their Section 8 voucher is terminated, or the participant is evicted from their public housing unit, they will move directly to Non-Compliance/Phase II of the sanctions.

X. ASSURANCES OF NON-INTERFERENCE

A family's election not to participate in one of CHA's MFP programs will not affect the family's admission to public housing or the family's right to occupancy in accordance with its lease, with exception to residents residing in participating Moving To Work (MTW) Communities. At those communities, willingness to participate in the self-reliance program is a condition of tenancy. Should a resident not wish to participate, he/she will be directed to apply for housing at other public housing communities.

XI. TIMETABLE FOR PROGRAM IMPLEMENTATION

Activities at Claremont, Victoria Square and Boulevard Homes are underway now, under the previous Action Plan. CHA will implement the new Work Policy in those communities receiving case management in the spring of 2011. CHA will begin to implement the new MTW Rent Reform on December 1, 2010.

-continued-

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XII. CERTIFICATION OF COORDINATION

Acting on behalf of the Charlotte Housing Authority as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding CHA Family Self reliance programs:

I certify that:

- (1) Development of the services and activities under the Self Reliance Programs have been coordinated with all relevant employment, child care, transportation, and training and education programs in the area.
- (2) Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

Signed by:

Signature: _____
Charles Woodyard, President and CEO

Date: _____

families enrolled in this program with the primary responsibility of service coordination and referral. From December, 2008-December, 2009 this one staff person has:

- enrolled 46 participants in a GED or job training program,
- made more than 200 referrals to employment services, and
- made more than 50 referrals to consumer credit counseling services.

Outcomes:

From December, 2008-December, 2009, 22 participants found a full-time job and 16 participants obtained a part-time job.

B. Transitional Family Programs (TFP)

Transitional Family Programs incorporated both Housing Choice Voucher FSS as well as FSS efforts at Victoria Square, Claremont and First Ward Place.

In 2009, the Transitional Family Program served 261 families.

Total exited to homeownership	7
Total exited to market rate housing	8
Total exited Family Self Sufficiency program	42
Percent exited to homeownership or market rate housing	36%
Total enrolled in educational program	94
Total Full-time employed	153
Total Part-time employed	60
Average number escrowing	75
Average annual income for year	\$14,374 (Section 8)
Average annual income for year	\$13,942 (Public Housing)

C. The Resident Opportunities and Self Sufficiency (ROSS) Program

In the past CHA has received two separate grants from HUD to fund the ROSS Program for families: PH FSS Coordinator and ROSS Family and Homeownership. From 1999-2009, 985 heads of household have participated in the ROSS Family Program, which is open to all Section 9 (public housing) heads of household. This program is designed to assist families in achieving their goal of becoming economically self reliant. The only entrance requirement is for the customer to be motivated to progress towards becoming economically independent. Program participants are encouraged to complete their high school training or receive their GED, enroll in post-secondary training and enroll in job/vocational training programs, while receiving financial assistance with child care and/or transportation. Participants also receive on-site workshop programming that address life skills, barriers to employment, and budgeting/money management concepts.

Data & Outcomes:

Over the past three years (2006-2009), the ROSS grant paid for tuition and/or child care for 179 people to attend school (postsecondary, job/vocational training) and 48 have graduated, while 12 participants are still in school and/or training programs. Ten (10) people are still enrolled in the GED preparation class. Forty-nine (49) participants have delayed their education until they have dependable child care and/or transportation. Thirty-two (32) of those graduates or 66% have found jobs in their chosen field and one

XIII. SOUNDNESS OF APPROACH

CHA began providing ongoing services aimed at moving residents towards self-sufficiency in 1989, four years before Congress required local housing authorities to develop and implement these programs. Today, our Client Services Department provides or manages high quality case management services to more than 1,300 family heads of household every year, including those families receiving HOPE VI case management (covered by a separate Action Plan). All case management staff are either Nan McKay Certified as Family Self Sufficiency Specialists or are working towards certification. The outcomes referenced below indicate the soundness of our approach in providing FSS services.

A. Services to Section 8 Voucher Participants

In FY09 CHA operated two programs for HCV participants. Those programs have been combined in FY10.

1. The Housing Choice Voucher FSS program is open to all Housing Choice Voucher holders. This program is designed to assist families in achieving the goal of becoming self reliant. The only entrance requirement is for the applicant to be motivated to become economically self-sufficient. Program participants are encouraged to complete their high school training or receive their GED. Participating clients are required to be either in school, job training, and seeking employment or employed within the first three months of their enrollment in the program. Enrollment is limited to five years.

While in the program, families are provided assistance with money management, counseling, and other supportive services to address multiple barriers while also allowing them to enhance their job skills and increase their income to a level that will allow them to become economically self-sufficient. As a participant of the program, they will be entitled to start an escrow account. When the participant's rent increases, as a result of an increase in earned income, part of the rental increase is put into the escrow account each month. Participants may receive this money upon the successful completion of the program. Escrow monies can also be utilized to assist participants in achieving other written goals.

Data: As of March, 2010, there were 75 participants in the HCV FSS program. This data is also included in the totals for the Transitional Families Program discussed below.

Outcomes: Outcomes for the HCV FSS program are included with the Transitional Families Program reported below.

2) The Welfare to Work program is open to families currently receiving TANF assistance. All referrals for this program come from the Department of Social Services. Services include case coordination and referrals to community resources.

Data:

As of March, 2010, there were 134 families enrolled in the Welfare to Work FSS program. There is currently one staff position assigned to provide services to all 134

has purchased a home. The remaining 60 program participants have not responded to follow-up requests after several attempts to reach them by telephone and/or mail correspondence. During the same period, 284 individuals have completed at least one workshop.

From 2009-2010, 106 participants were enrolled in the ROSS program. Fifteen participants enrolled in GED program and four received their diplomas. Two enrolled in postsecondary training and are still enrolled. Five participants enrolled in healthcare training programs, while 18 received their healthcare certificates. Nine people completed the budgeting/money management programs, more than 100 people participated in on-site life skills programming, and 17 people became employed. All participants were connected to necessary services. Six participants received funding for short term child care while enrolled in school or the first 3-months of employment and more than 50 received bus passes while enrolled in school, searching for work or employed.

Current Status. CHA has closed out its ROSS Family and Homeownership grant. We are still receiving the PH FSS grant and that funds one staff position working to provide self reliance services at one of the MFP sites.

CHARLOTTE HA HANDOUT - MOVING FORWARD CONTRACT

Moving Forward CONTRACT OF PARTICIPATION

This Contract of Participation for the Moving Forward (MF) program is between the Housing Authority of the City of Charlotte, Housing Agency (HA) and any affiliated contracted partner agency the HA deems fit, and (Resident's Name): _____, head of the Moving Forward family. The MF family includes everyone in the household, and is referred to in the contract as "family".

Type of Program: The family is participating in a (*please circle*- Housing Choice Voucher (HCV), Public Housing) MF program.

Purpose of Contract: The purpose of this contract is to state the rights and responsibilities of the family and the HA, the resources and supportive services to be provided to the family, and the activities to be completed by the family.

Terms of Contract: This contract is effective (date): _____ and will expire when satisfactory progress in the areas of employment, education, and self-sufficiency have been met, and 3 years after reaching 40% of the adjusted median income (AMI), or the family reaches 70% of the AMI and has completed the 12-month graduation period, or the family is subject to negative or voluntary termination from the program, property eviction, or discontinued voucher assistance, whichever comes first.

Resources and Supportive Services: During the term of the contract, the HA will try to provide the resources and services listed in the work plans. If the resources and services are not available, the HA will try to substitute other resources and services. However, the HA has no liability to the family if the resources and services are not provided.

Incentives Account: Resident rent is determined by income band charts which are set up in \$2500 bands. Rent is calculated after all deductions are given, at the 30% of the low end of the income band. To begin the incentive account, CHA will begin setting aside incentive (savings) funds when the families' adjusted income, including some wages reaches the \$12,500 income band. This is the "incentive point". Incentives will range from \$25 to \$100 monthly depending on the families current income band. There is no time limit during the families' movement through the income bands until the income reaches 40% AMI.

Three-Year Incentives Period: Incentives end when the adjusted income including wages reaches 70% of AMI or 3 years after reaching 40% AMI.

Disbursing Incentive Accounts: A family can access its Incentive Accounts, for any reason whenever the family leaves subsidized housing. While they remain in subsidized housing, however, account access will be limited to amounts needed to help families overcome specific verifiable barriers to self-reliance. An example: Paying for repairs of a car that is needed to get to work.

End of the Incentives Period: Once the three-year period is over, families do not build any additional escrow. However, they may continue to live in subsidized housing until they are ready to move on. Families will be encouraged to move during the graduation period which lasts for 12 months. If families move within 12 months of completion of their Program, they will be entitled to receive their entire account balance. However, if the family moves between month 13-24 months after completion of their Program, the family will be entitled to receive no more than only 80% of the account balance. And if the family moves between 25-36 months, only 60% of the account balance will be available to the family, and so on. In all instances, any funds owed to the HA will first be deducted from the account balance, and the family receives the net balance in the account.

Loss of Incentives Account: The family will not receive the funds in the Incentives Account if:

The contract of participation is terminated; or

The contract of participation is declared null and void; or

The family has not met its family responsibilities within the time frames specified in the work plan; or

The family is evicted by property management or the Housing Choice Voucher is terminated.

Family Responsibilities: All family members must comply with the terms of the Lease. The head of the Moving Forward family is responsible for all actions of both household members and guests. The family must be actively working on tasks assigned from the identified work plan. Referrals provided to the family by the MF staff member based on needs identified in the work plan must then be followed through by the family, unless otherwise documented by the staff member. The family is responsible for understanding the items listed on the Agreement Statement which further outlines expectations and responsibilities of the family. The head of the MF family is responsible for ensuring that all school-aged children listed on the Lease attend school, as required by state law by the Charlotte-Mecklenburg Schools, and by the Authority. The family must comply with the work requirement policy of the HA in order to continue receiving rental subsidy assistance and supportive services. Families who fail to comply with the terms of the work policy may be sanctioned. The sanctions will increase in magnitude the longer a family is in non-compliance. Refer to Lease document, Part G. Both the Lease and the program termination may occur if a participant fails to participate in a community service program as directed by the HA, or if the participant fails to participate in a self-sufficiency program as directed by the HA, in cases where a participant is not exempt from such .

HA Responsibilities: The HA must attempt to obtain commitments from public and private sources for supportive services for families. The HA will establish an escrow Incentives Account for the family, invest the escrow account funds, and give the family a report on the amount in the escrow account on a annual basis. The HA will determine which, if any, interim goals must be completed before any Incentive Account funds will be paid to the family; and pay a portion of the Incentives Account to the family if the HA determines that the family has met these specific interim goals and needs the funds from the Incentive Account to complete the contract. The HA will determine if the family has completed the contract. The HA will pay the family the amount in its Incentives Account, if the family has completed the contract and has met the above-mentioned requirements, and if the head of the family has provided written certification that no member of the family is receiving welfare assistance over the previous 12 months.

Termination of the Contract of Participation: The HA may terminate the contract if:

- (1) The family and the HA agree to terminate the contract;
- (2) The HA determines that the family has not fulfilled its responsibilities under this contract;
- (3) The family voluntarily withdraws from the Moving Forward program;
- (4) An act occurs that is inconsistent with the purpose of the Moving Forward program; or
- (5) The HA is permitted in accordance with HUD requirements.

The HA may declare this contract null and void if the resources and services necessary to complete the contract are not available.

The HA must give a notice of termination or nullification to the head of the family. The notice must state the reasons for the HA decision to terminate or nullify the contract. If the contract is terminated or declared null and void, the family has no right to receive funds from the family’s escrow Incentives Account. The HA must close the family’s Incentive Account and may use the funds for purposes in accordance with HUD requirements. If the family is participating in the HCV program, the HA will terminate the contract if the family moves outside the HA’s jurisdiction under portability procedures. If the family is participating in the HCV program, this contract is automatically terminated if the family’s assistance is terminated in accordance with HUD requirements.

Conflict with the Public or Indian Housing Lease: If part of this contract conflicts with the Public or Indian Housing Lease, the Lease will prevail.

Compliance with HUD Regulations and Requirements: The contract of participation must be interpreted and administered in accordance with HUD regulations and requirements. Terms and figures, such as the income and rent amount on page 1, are subject to corrections by the HA for compliance with HUD regulations and requirements. The HA must notify the family in writing of any adjustments made to the contract.

Signatures:

Resident's Name:

Family - Head of Household (Print)

E-Signature of head of family

Charlotte Housing Authority
Housing Agency

E-Signature of staff member

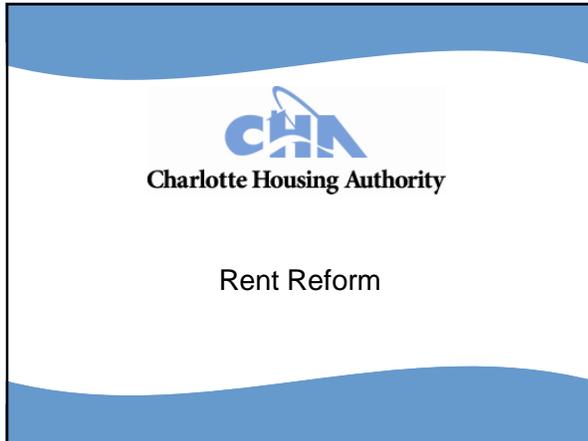
Official Title

Date Signed

Incentive Point Achievement Date

Program Exit Date

Note: Terms in the Contract may be subject to change depending on how CHA modifies the program or program policies while in the pilot phase. All participants will be notified of any changes and an updated Contract will be signed, which does not extend program participation.



When will rent reform begin

- Effective December 1, 2010, CHA rent reform will begin
- Notices will be sent to residents, landlords and participants at least 30 days prior to the rent changing



The slide has a white background with blue wavy borders at the top and bottom. The title 'When will rent reform begin' is centered at the top in a blue font. Below the title, there are two bullet points in black text. The CHA logo is located in the bottom right corner.

What are the pieces of rent reform?

- Alternate recertification schedule
- Zero Income/Minimum rent adjustment schedule
- Rent simplification
- Incentive program



The slide has a white background with blue wavy borders at the top and bottom. The title 'What are the pieces of rent reform?' is centered at the top in a blue font. Below the title, there are four bullet points in black text. The CHA logo is located in the bottom right corner.

Alternate Recertification Schedule

- Applies to those who can claim the Elderly and/or Disability allowance
- Even month = Even year (EX: 12/2010)
- Odd month = Odd year (EX: 01/2011)
- Section 8 participants will receive an interim in the off year to adjust payment standards and utility allowances



The slide has a white background with blue wavy borders at the top and bottom. The title 'Alternate Recertification Schedule' is centered at the top in a blue font. Below the title, there are four bullet points in black text. The CHA logo is located in the bottom right corner.

Zero Income Household

- All Adult household members (18-61) must meet with CHA staff every 90 days to report unemployment status
- Resident/Participant will report steps taken to gain employment



The slide has a white background with blue wavy borders at the top and bottom. The title 'Zero Income Household' is centered at the top in a blue font. Below the title, there are two bullet points in black text. The CHA logo is located in the bottom right corner.

Minimum Rent Adjustment Schedule

- Originally minimum = \$25
- Next adjustment December 2010 = \$75
- Next adjustment December 2011 = \$100



The slide has a white background with blue wavy borders at the top and bottom. The title 'Minimum Rent Adjustment Schedule' is centered at the top in a blue font. Below the title, there are three bullet points in black text. The CHA logo is located in the bottom right corner.

Rent simplification

- Income based stepped rent
- Income bands - \$2,500 range
- Rent is set at 30% of the range low end of income band

Income Band	30% of Low end Of band	Total Tenant Payment	Incentive Account Deposit
\$12,500 - \$14,999	\$313	\$313	\$25



Rent simplification

- Assets exclusions
 - Households with assets that total less than \$5,000 can earn interest without counting towards rent calculation
- Earned income disallowance is going away – but you can request a hardship



Rent simplification

- Deductions will be figured using the following chart

Medical Expenses	Medical Deduction	Childcare Expense	Childcare Deduction
\$0 - \$2,499	\$0	\$0 - \$2,499	\$0
\$2,500 - \$4,999	\$2,500	\$2,500 - \$4,999	\$2,500
\$5,000 - \$7,499	\$5,000	\$5,000 - \$7,499	\$5,000
\$7,500 +	\$7,500	\$7,500 +	\$7,500



Rent simplification

- Households will begin incentive account deposits when adjusted income including wages reaches \$12,500
- When household income reaches 40% Area Median Income (currently \$25,000) – your household is nearing self reliance
- 3 years later or when 70% Area Median Income (currently \$45,000) is reached the household is ready to move forward and enters the graduation period



Rent simplification

- Flat rent has been eliminated (PH Only)
 - Ceiling Rent (PH Only) established at Fair Market Rents per bedroom size – subject to change annually based on HUD fair market rent schedule
- 2010 Fair Market Rents/Payment Standards

0 bedroom	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom
\$670	\$726	\$806	\$1,016	\$1,182	\$1,359



Rent simplification example

- \$750 monthly income (\$750 x 12 months = \$9,000 annual income - \$400 elderly allowance = \$8,600 adjusted annual income)

Current Total Tenant Payment = \$215

MTW Total Tenant Payment = \$188

Savings of \$27 per month

or \$324 annually

Approximately 1 ½ months of rent



Example of new calculation

1 Bedroom example

Income Band	Minimum Rent	30% of low end of band	Total Tenant Payment	Incentive Account Deposit
\$0	\$2,499	\$0	\$75	\$0
\$2,500	\$4,999	\$63	\$75	\$0
\$5,000	\$7,499	\$125	\$125	\$0
\$7,500	\$9,999	\$188	\$188	\$0
\$10,000	\$12,499	\$250	\$250	\$0
\$12,500	\$14,999	\$313	\$313	\$25
\$15,000	\$17,499	\$375	\$375	\$40
\$17,500	\$19,999	\$438	\$438	\$55
\$20,000	\$22,499	\$500	\$500	\$70
\$22,500	\$24,999	\$563	\$563	\$85
\$25,000	\$27,499	\$625	\$625	\$100
\$27,500	\$29,999	\$688	\$688	\$100
\$30,000	\$32,499	\$750	\$725	\$100
\$32,500	\$34,999	\$813	\$725	\$100
\$35,000	\$37,499	\$875	\$725	\$100
\$37,500	\$39,999	\$938	\$725	\$100

- ### Incentive Program
- CHA will begin setting aside incentive (savings) funds when adjusted income including wages reaches \$12,500
 - Depending on adjusted income - incentives will range from \$25 to \$100 monthly depending on income band
-

- ### End of Incentive Program
- Incentives end when adjusted income including wages:
 - reaches 70% of Area Median Income (currently \$45,000)
 - OR**
 - 3 years after reaching 40% (currently \$25,000) of Area Median Income
-

- ### Loss of Incentive Program
- Incentives may be lost if participation goes beyond the 12 month graduation period
 - If assistance is lost – the incentives will be lost as well
-

- ### Hardship Policy
- Lost or awaiting eligibility determination for assistance such as SSI
 - Minimum Rent
 - Loss of employment or change in household composition
 - Significant increase in eligible expenses
 - A death in the family causing a financial hardship
 - Significant rent change due to rent reform
-

CHA HANDOUT - RENT REFORM

**CHARLOTTE HOUSING AUTHORITY'S
RENT REFORM FREQUENTLY ASKED QUESTIONS**

When will my rent change?
Your rent will change effective December 1, 2010.

- What are the pieces to Rent Reform?**
1. Alternate recertification schedule
 2. Zero Income/Minimum rent adjustment schedule
 3. Rent Simplification
 4. Incentive Program

How were the pieces of Rent Reform Chosen?
Charlotte Housing Authority (CHA) staff talked with other Moving to Work Housing Authorities across the country to see what pieces of Rent Reform they had tried. We then designed a rent reform program to simplify the calculations and encourage families to move to self reliance.

How is CHA's Rent Reform different?
CHA is the first Housing Authority to implement an incentive savings account with the income based stepped rent.

1. ALTERNATE RECERTIFICATION SCHEDULE

- a. What is the Alternate Recertification Schedule?**
If your recertification falls in an even month (i.e., February, April, June, August, October, December), you will certify in an even year. Or if your recertification falls in an odd month (January, March, May, July, September, November), you will certify in an odd year. Recertification begins December 2010.
- b. Who is affected by the Alternate Recertification Schedule?**
This schedule applies to those who can claim the elderly or disability allowance.
- c. (Section 8 only) If I recertify every two years, will I keep the same payment standard for two years?**
No, an interim adjustment will be completed in place of an annual recertification in the off year to update payment standards and utility allowances.

2. ZERO INCOME/MINIMUM RENT ADJUSTMENT SCHEDULE

- a. If my household has zero income, how does rent reform affect me?**
All adult household members must meet with CHA staff every 90 days to discuss unemployment. You will also be asked to report the steps taken to gain employment.

4-Bedroom Household Example: Under the current calculation method, your income is \$17,750 annually, with a \$400 disability allowance. The household has 3 children which means each child receives \$480 allowance (totaling \$1440). The adjusted income with the allowances is \$15,920, which makes the current Total Tenant Payment \$398. Under Rent Reform you would be in the \$15,000-\$17,499 income band, making your Total Tenant Payment \$375. This is a savings to you in the amount of \$23 per month or \$276 annually and is enough money to cover almost one month's rent!

- e. How will rent reform change allowances?**
Households will continue to be given the HUD elderly/disabled and dependent allowances as applicable.

- f. How will rent reform change expense adjustments?**
Traditional Medical and Childcare deductions are eliminated. Participants need only to verify enough unreimbursed expenses to meet the requested deduction band.

Medical/ Childcare Expense Range	Expense Deduction
\$0 - \$2,499	\$0
\$2,500 - \$4,999	\$2,500
\$5,000 - \$7,499	\$5,000
\$7,500 - \$50,000	\$7,500

- g. Is there a time limit connected with rent reform?**
You are considered self-reliant and stable when your income reaches 70% of Area Median Income or three years after reaching 40% of Area Median Income, whichever comes first. Although you are not required to move, you may not be eligible to receive your full incentive account, if earned.
- h. What happens if I had an earned income disallowance?**
Earned income disallowances no longer apply.

4. INCENTIVE PROGRAM

- a. What is an Incentive Account?** Once you reach \$12,500 in adjusted annual income including wages, CHA will deposit a portion of the rent into an interest bearing savings account on your behalf.
- b. When do I begin earning incentive savings account funds?**
A recertification will be completed to adjust your rent and begin deposits into your Incentive Account, as long as your household income includes working wages and is \$12,500 or greater. If your income falls within the \$12,500 band, Total Tenant Payment is still the same but if working wages are not included, no incentive funds will be set aside until work wages begin.
- c. How much of my rent payment will be set aside for my incentive savings account?**
If you have working wages, and your household's adjusted annual income is \$12,500 or more, the CHA will set aside \$25 to \$100 per month depending on your current income band.

- b. What is the Minimum Rent Adjustment Schedule?**
The current minimum rent is set at \$50. The next scheduled increase to \$75 will begin December 2010, and increase to \$100 in December 2011. The increases will occur no sooner than 12 months from the prior rent increase. Residents will receive a 30-day notice.

3. RENT SIMPLIFICATION

- a. Will my rent change due to rent simplification?**
Rent simplification is a new way your rent will be calculated that includes income bands. This will change the way rent is calculated for CHA residents or participants. The income bands are in \$2500 increments. Rent is based on 30% of the low end of the income band.

Sample Two Bedroom Income Band Chart

Income Range	30% of low end	TTP	Incentive Account Deposit
\$0 - \$2,499	\$0	\$75	\$0
\$2,500 - \$4,999	\$63	\$75	\$0
\$5,000 - \$7,499	\$125	\$125	\$0
\$7,500 - \$9,999	\$188	\$188	\$0
\$10,000 - \$12,499	\$250	\$250	\$0
\$12,500 - \$14,999	\$313	\$313	\$25
\$15,000 - \$17,499	\$375	\$375	\$40
\$17,500 - \$19,999	\$438	\$438	\$55
\$20,000 - \$22,499	\$500	\$500	\$70
\$22,500 - \$24,999	\$563	\$563	\$85
\$25,000 - \$27,499	\$625	\$625	\$100
\$27,500 - \$29,999	\$688	\$688	\$100
\$30,000 - \$32,499	\$750	\$750	\$100
\$32,500 - \$34,999	\$813	\$806	\$100
\$35,000 - \$37,499	\$875	\$806	\$100
\$37,500 - \$39,999	\$938	\$806	\$100
\$40,000 - \$42,499	\$1,000	\$806	\$100
\$42,500 - \$44,999	\$1,063	\$806	\$100
\$45,000 - \$47,499	\$1,125	\$806	\$0

b. What is an income band?
An income band is the range in which your adjusted gross income falls, which helps determine your Total Tenant Payment, and is set up in \$2500 bands.

c. (Public Housing - S9 Only) What happened to flat rents?
Flat rents no longer exist. Straight income bands are used instead. Rent is capped through the use of ceiling rents, which will be established at HUD Fair Market Rent by bedroom size.

d. (Public Housing - S9 Only) What do ceiling rents mean to me?
Ceiling rents are subject to change annually, as determined by the size of your unit and the HUD Fair Market Rent Schedule.

Elderly/Disabled Example: Under the current calculation method, if your income is \$750 a month, with a \$400 disability allowance and the yearly income equals \$9000. The adjusted income with the allowance is \$8600, which makes the Total Tenant Payment \$215. Under Rent Reform you would be in the \$7500-\$9,999 income band, making your Total Tenant Payment \$188. This is a savings to you in the amount of \$27 per month or \$324 annually and is enough money to cover one and a half months of your rent!

- d. When will I have access to my Incentive Savings Account funds?**
You can access your Incentive Savings Account for any reason once you leave the PH or Section 8 program. While you continue to receive assistance, account access will be limited to amounts needed to help you overcome specific verifiable barriers to work.

- e. What happens to my Incentive Savings Account if I lose assistance?**
Incentive funds can be lost any time assistance ends (termination/eviction) or if you continue to participate in the PH or Section 8 program beyond the 12-month graduation period.

- f. What happens if my income is at or above 40% AMI when rent reform begins?**
If you have earned wages you automatically begin the three year time period for receiving deposits into the incentive savings account.

- g. What happens if, after I reach the 40% AMI level, I lose my job?**
Your rent will be adjusted based on the interim recertification process. However, the three year incentive period will run continuously, so it will be important to regain employment as soon as possible to continue deposits to your Incentive Savings Account.

- h. What is the graduation period?**
Graduation is achieved once you have completed the three year incentive savings period or your income has reached 70% of Area Median Income. The graduation period is a 12-month period in which CHA no longer contributes to the Incentive Savings Account and you prepare to move, if you so chose, into a Tax Credit Unit, Fair Market Unit, or Home Ownership.

- i. Am I required to move after the graduation period?**
You are not required to move after the graduation period, however the incentive savings account will begin to diminish by 20% annually.

- j. Can I qualify for a hardship?**
CHA has a Hardship Policy to help households experiencing significant, unexpected drops in income or increases in unreimbursed childcare or medical expenses expected to last longer than 30 days. A full policy is available in the Housing Occupancy Plan, Appendix P.

- k. If I request a hardship, what rent do I pay until the committee meets?**
You continue to pay the previous rent until the committee makes a decision on the rent in question. Once the committee has made a determination, it will be effective on the original effective date and participants will be responsible for the difference. Payment arrangements will be made in accordance with the Housing Occupancy Plan for any additional rent owed.

HOME FORWARD PRESENTATION



ALTERNATE RENT POLICES aka
"RENT REFORM"

Presented by
Peter Beyer, Controller

September 20, 2011



PANEL DISCUSSION



TWO PHASES



- Design Phase
 - Began March 2009, finalized December 2010
- Implementation phase
 - Began Feb 2011, still in process

MAIN OBJECTIVES



- Focus on MTW statutory objectives
 - Increasing self-sufficiency
 - Increasing efficiency
- Focus on designing a system that is equitable and less intrusive for participants
- Consistent rules for Section 8 and Public Housing residents

KEY DESIGN ASPECTS



- Households assigned to one of two groups:
 - Elderly/Disabled – defined as age 55 or older
 - Career Focused
- Deductions eliminated and rent calculated using lower percentage of income
- Public housing replaces ceiling rent with payment standards
- Phase in cap for first year of implementation and a hardship policy for ongoing years
- Mixed family fee of \$100

GROUP COMPARISON



	Elderly/Disabled	Career Focused
Rent calculation	27.5% of gross income for all years	Year 1&2 = 27.5% of gross income Year 3&4 = 29% of gross income Year 5+ = 31% of gross income
Recertifications	Triennial	Biennial
Minimum rent	\$0 for all years	Year 1&2 = \$0 Year 3&4 = \$100 Year 5+ = \$200

Phase In and Hardship Policies



- Phase In – Only for households who meet following criteria:
 - \$2,000 or more in medical expenses
 - \$2,000 or more in childcare costs
 - 4 or more children
 - Rent increase capped at \$10/Elderly/Disabled; \$25/Career Focused
- Additional first year rent increase cap of \$100 for those who do not qualify for phase in
- Hardship policy – only for households whose rents exceed 50% in shelter burden and in a unit where rent does not exceed the payment standard

CONTACT INFORMATION



For additional questions on Rent Reform, please feel free to contact me at:

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Housing Authority of the County of San Mateo (HACSM)

Informing and Empowering our MTW Participants

The Tiered *Subsidy* Table (TST)

Panel: Alternate Rent Policies to Encourage Self-Sufficiency

TST Example (see p.4)

The Tiered Subsidy Table – A Multi-Faceted Approach

Strengthening the Self-Sufficiency of Participants

- “Knowledge is power” - Provide participants with HACSM’s total subsidy contribution at voucher issuance.
- “Shop smart” - Encourage and educate participants to take personal responsibility in their housing decisions.
- “Savings potential” - Encourage savings and increase income potential by structuring each tier with a \$3,000 income range. As participants move from the lower to higher income end of each tier, the percentage of their monthly adjusted income allocated to their rent decreases, therefore allowing them to save money or address other self-sufficiency hurdles.

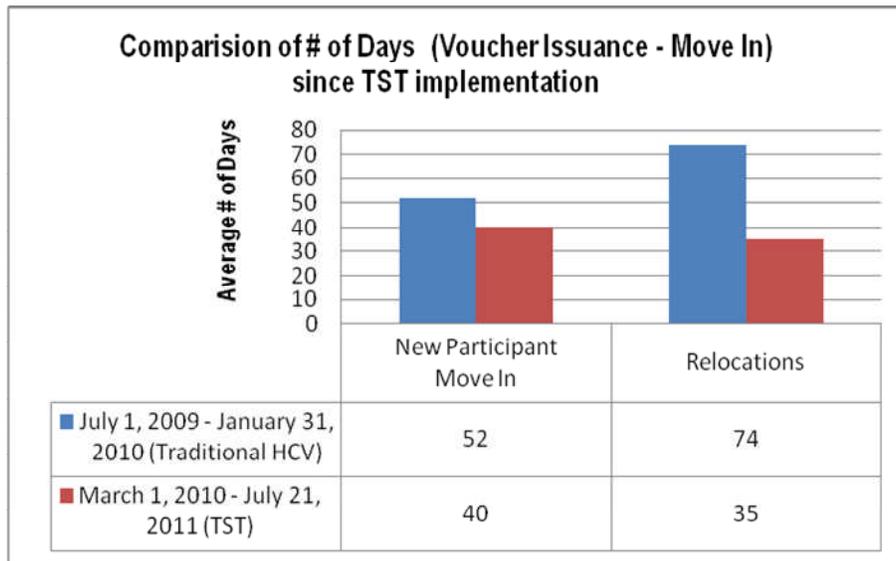
Expanding the Housing Opportunities by Streamlining Processes

- By including utility assistance in the tiered subsidy amounts, HACSM was able to eliminate the Utility Allowance schedule, as well as Utility Assistance Payments.
- By using a percentage of the Fair Market Rents to determine the subsidy amounts, HACSM was able to eliminate Payment Standards.
- By removing the 40% tenant affordability cap at initial move in and creating alternative affordability determination tools, HACSM was able to further assist participants in securing rental units.
- Before the TST was implemented, the average time required from briefing to move in was almost three months. Now, it’s less than two months.

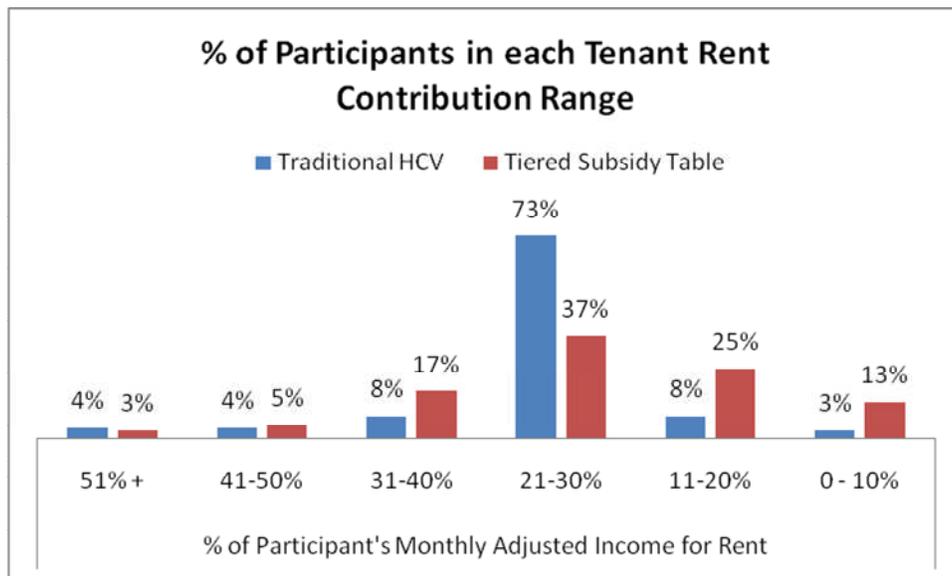
Increasing Administrative Efficiencies

- HACSM staff work with participant’s AAI (eliminating the additional calculations of 30% MAI, Payment Standards and Utility Allowances).
- HACSM experiences fewer errors in calculations with the elimination of Payment Standards and Utility Allowances.

The Tiered Subsidy Table – Results



As seen in the above chart, since the implementation of the TST on March 1, 2010, New Participants have experienced, on average, a 23% decrease in the number of days from the day they receive their voucher and when they move into their new home. Current Participants who relocated have experienced, on average, a 53% decrease in the number of days from relocation briefing to move in. This decrease not only benefits the participant, but also the housing authority’s voucher utilization!



As seen in the above chart, participants on the TST are showing much greater self-determination regarding their housing options, choosing the rental units that most match their personal priorities such as proximity to transportation, or a specific school district, increasing savings, etc.

HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO

How to figure out your rent portion

SAMPLE VOUCHER (completed by Housing Authority)

Please read entire document before completing form. Fill in all blanks below. Type or print clearly.	Voucher Number --- SAMPLE --- (for informational use only)	
	1. Unit Size 2	
1. Insert unit size in number of bedrooms. (This is the number of bedrooms for which the Family qualifies, and is used in determining the amount of assistance to be paid on behalf of the Family to the owner.)		
2. Subsidy Amount: a) Maximum subsidy based on voucher size listed in box 1. b) Maximum subsidy if unit rented is a bedroom size smaller than the voucher size in box 1.	2a \$1,000	2b \$825

Example #1: (2 Bedroom unit) Housing Authority maximum subsidy: \$1,000

The Contract Rent = \$1400
(the rent that the owner is requesting)

To figure out your rent,

$$\begin{array}{r} \$1400 \text{ (Contract Rent)} \\ - \$1000 \text{ (HA Maximum Subsidy for 2Bdrm)} \\ \hline \$400 \text{ (Your portion)} \end{array}$$

In this example:
 Your Portion = \$400
 Housing Authority Portion = \$1000

Example #2: (2 Bedroom unit) Housing Authority maximum subsidy: \$1,000

The Contract Rent = \$935

To figure out your rent,

$$\begin{array}{r} \$935 \text{ (Contract Rent)} \\ - \$1000 \text{ (HA Maximum Subsidy for 2Bdrm)} \\ \hline (-) \$65 \end{array}$$
 ← Because the Contract Rent is *less than* the Maximum subsidy from the HA, then you would be responsible to pay the \$50 minimum rent.

In this example:
 Your Portion = \$50
 Housing Authority Portion = \$885

Example #3: (1 Bedroom unit) Housing Authority maximum subsidy: \$825

The Contract Rent = \$850

To figure out your rent,

$$\begin{array}{r} \$850 \text{ (Contract Rent)} \\ - \$825 \text{ (HA Maximum Subsidy for 1Bdrm)} \\ \hline \$ 25 \end{array}$$
 ← Because the difference between the contract rent and the HA maximum subsidy is *less than* \$50, you would be responsible to pay the \$50 minimum rent.

In this example:
 Your Portion = \$50
 Housing Authority Portion = \$800

(3/1/2010)

HOME FORWARD PRESENTATION



ALTERNATE RENT POLICIES aka
"RENT REFORM" CONTINUED

Presented by
Peter Beyer, Controller

September 20, 2011



ADDITIONAL TOPICS homeforward

1. Process flow comparison
2. Rent Reform implementation project plan – see additional handout
3. Metrics
4. Things to think about – see additional handout



CRM IMPLEMENTATION PROJECT PLAN SUMMARY

TASK IAME	BASELINE START	BASELINE FINISH	REVISED START	ACTUAL/EXPECTED FINISH
RENT REFORM	2/1/2011	12/30/2012	2/1/2011	IN PROGRESS
CONSULTANT	2/1/2011	3/2/2011	2/1/2011	3/2/2011
POLICIES	3/15/2011	7/20/2011	3/15/2011	9/20/2011
Admin plan & ACOP Changes	4/20/2011	7/19/2011	4/20/2011	9/19/2011
SUB COMMITTEE WORK	3/9/2011	5/9/2011	3/9/2011	5/9/2011
Implementation Approach	3/9/2011	5/9/2011	3/9/2011	93% complete
Hardship Policy	3/14/2011	4/29/2011	3/14/2011	4/29/2011
Ports	3/16/2011	3/16/2011	3/16/2011	3/16/2011
FSS	3/16/2011	3/16/2011	3/16/2011	3/16/2011
Communication Plan	4/11/2011	5/5/2011	4/11/2011	5/5/2011
Tax credits	3/16/2011	6/8/2011	3/16/2011	6/9/2011
PROCEDURES	7/1/2011	8/15/2011	7/1/2011	25% complete
Public Housing Operating Procedures	7/1/2011	8/15/2011	7/1/2011	25% complete
Section 8 Operating Procedures	7/1/2011	8/15/2011	7/1/2011	25% complete
Finance and Accounting	7/1/2011	8/15/2011	7/1/2011	25% complete
TECHNOLOGY	2/15/2011	8/15/2011	2/15/2011	73% complete
Software upgrade w/out Rent Reform testing	2/15/2011	5/31/2011	2/15/2011	5/31/2011
Software Rent Reform Customizations	2/15/2011	5/31/2011	2/15/2011	95% complete
HAP IT Rent Reform Customizations	6/1/2011	7/29/2011	6/1/2011	0% complete
Rent Reform Software User Acceptance Testing	5/16/2011	8/15/2011	5/16/2011	80% complete
Other Technology	4/15/2011	8/15/2011	4/15/2011	73% complete
TRAINING	3/28/2011	8/31/2011	3/28/2011	8/31/2011
Develop Training Strategy	3/28/2011	6/10/2011	3/28/2011	5/31/2011
PH Group training	8/16/2011	8/31/2011	8/21/2011	50% complete
SCB Group Training	8/16/2011	8/31/2011	8/21/2011	50% complete
Finance and Accounting Training	8/1/2011	8/31/2011	8/25/2011	50% complete
COMMUNICATION	3/3/2011	12/30/2011	3/3/2011	12/30/2011
Residents – General	6/15/2011	10/3/2011	9/25/2011	0% complete
Resident Advisory Council (RAC)	6/1/2011	7/29/2011	5/24/2011	5/24/2011
Executive Sponsor Updates	3/21/2011	12/30/2011	3/21/2011	12/31/2011
Employee updates	6/20/2011	12/30/2011	6/20/2011	12/30/2011
Other stakeholders	7/1/2011	9/30/2011	8/1/2011	8/25/2011
Implementation Team	3/3/2011	3/16/2011	3/3/2011	3/16/2011
ANALYSIS – Pre launch	3/21/2011	8/31/2011	3/21/2011	71% complete
GO LIVE MILESTONE	9/1/2011	9/1/2011	9/21/2011	9/21/2011
INTERIM CERTIFICATION ENTRY	9/1/2011	10/31/2011	9/21/2011	11/1/2011
ANALYSIS – Post Launch	9/1/2011	12/30/2012	11/1/2011	12/30/2012

RENT REFORM IMPLEMENTATION “THINGS TO THINK ABOUT”

- What are the structural changes to the rent calculation?
- Who will be on the implementation team?
- What is the financial impact to the residents and to the agency?
- Does your software require substantial programming changes?
- How will you communicate your overall plan to residents and employees?
- Are there other stakeholders that require communication?
- How often will payment standards and utility allowances be updated?
- If choosing multiyear recertifications, how will you treat COLAs?
- What is the timing to roll out rent reform? Phase in vs. all at once?
- How does the roll out impact future work flow?
- How will a hardship policy be structured?
- What will be the impact on Port vouchers?
- If participants fall into subcategories (such as elderly/disabled vs career focused) how will you handle transitions between programs?
- What impact will rent reform have on participants in self-sufficiency programs (FSS vs agency designed program)
- Are there non-rent reform changes needed for the Section 8 Admin Plan and Public Housing Admission and Continued Occupancy Policy (ACOP)?
- What metrics will you track and how will you capture baseline data?
- How much time do you have to complete the implementation? What will you do if the timing slips?

CONTACT INFORMATION

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Housing Authority of the County of San Mateo (HACSM)

The Tiered *Subsidy* Table (TST)

Group Discussion: Alternate Rent Policies

The Tiered Subsidy Table – Methodology

- 1) Participants' Housing Costs
 - The TST represents HACSM's contribution to participant's total housing costs (rent and utilities)
 - HACSM is monitoring whether or not participants are choosing energy efficient units due to the inclusion of all utility assistance in the TST amounts
- 2) Voucher Bedroom Size
 - Determine by HACSM's subsidy standards
- 3) Annual Adjusted Income
 - Determined through the rent calculation process
- 4) The Maximum Subsidy paid by HACSM is based on the lesser of the eligible voucher size or unit size rented
 - See the "Simplification of the HAP Calculation Process" on page 2.
 - HACSM has developed a new voucher that informs the participant of the subsidy amounts for their voucher size as well as the subsidy for the next smaller unit.
 - At the briefing, HACSM staff review the new voucher and the method for participants to determine their rent portion in a variety of rental situations.
- 5) The participant's rent portion is the difference between the negotiated CR and the maximum subsidy, as determined by the TST.
 - Since the participants know exactly how much HACSM will pay in subsidy when they receive their voucher (initial and relocation), they are armed with the information they need to search for a new home.
- 6) All Participants pay at least \$50 toward their rent.
- 7) All subsidized units must meet HQS prior to move in.
- 8) All subsidized units must be determined rent reasonable as well as "affordable" for the participant.
 - HACSM has developed a new tool to determine affordability for the participant's rent portion.
 - Through this tool HACSM is able to include excluded income sources, such as the income of Full Time Students and Foster Care payments, to determine affordability on a more specific, case by case basis.

Tenant Rent Calculation and Subsidy (HAP) Determination Process

HACSM's Tiered Subsidy Table (TST) Process		
Step 1	Step 2	Step 3
Factors included in Annual Adjusted Income Calculation	2 Factors to Determine Tiered Subsidy	Factors to Determine Tenant Rent Portion and HAP
Employment Income Asset Income Excluded Income Child Care Exp Medical or Disability Exp Deduction for Eld/Dis Household Deduction for Minor/Dependents	Annual Adjusted Income Voucher Bedroom Size Maximum Tiered Subsidy	Contract Rent (minus) Tiered Subsidy Tenant Rent Portion
Annual Adjusted Income	<div style="border: 1px solid black; padding: 5px;"> <p><u>Note:</u></p> <ul style="list-style-type: none"> ♦ For Mixed Family Households, the "Maximum Tiered Subsidy" amount is prorated based on the ratio of eligible to ineligible household members. ♦ All families are required to pay at least \$50 towards their rent. Based on this policy, in Step 3, if the Tenant Rent Portion is less than \$50, their rent is automatically set to \$50 and the HAP is adjusted accordingly. </div>	

Traditional HCV Process		
Step 1	Step 2	Step 3
Factors included in Annual Adjusted Income and TTP Calc	7 Potential Factors to determine HAP	Factors to determine Tenant Rent Portion
Employment Income Asset Income Excluded Income Child Care Expenses Medical or Disability Expenses Deduction for Minor/Dependent Deduction for Eld/Dis Household Annual Adjusted Income (AAI) AAI divided by 12 (Monthly Adj Income) Monthly Adjusted Income x 30%	Negotiated Contract Rent (including 40% affordability test) Mixed Family Proration * Payment Standards * Voucher Bedroom Size (Based on HA subsidy standards) * Unit Size to be rented * Utility Allowance Tenant TTP (30% of AAI) HAP	Contract Rent (minus) HAP Tenant Rent Portion
Total Tenant Payment (TTP)	<div style="border: 1px solid black; padding: 5px;"> <p>* <u>Note:</u> These areas/items are noted for being confusing, error prone, and oftentimes responsible for delays in the lease up process.</p> </div>	

Housing Authority of the County of San Mateo

Initial Cost Analysis: Tenant Rent Burden vs. HA Affordability

Family	Elderly Allow	Voucher Size	Unit Size Rented	Current AAI	New Utility Deduction	New AAI	Tier Subsidy	Contract Rent	PS	Current T Rent	New T Rent	Change in T Rent	HAP	Change in HAP	Current UA
A	0	2	1	22,920	100	22,820	1,062.00	1,300	1,751	538	238	-300	762	300	35
B	400	2	2	22,139	100	22,039	1,062.00	1,300	1,751	512	238	-274	788	274	42
C	400	2	2	22,961	100	22,861	1,062.00	1,350	1,751	536	288	-248	814	248	38
D	0	2	2	22,880	100	22,780	1,062.00	1,362	1,751	530	300	-230	832	230	42
E	0	2	2	22,284	100	22,184	1,062.00	1,325	1,751	456	263	-193	869	193	101
F	0	2	2	22,284	100	22,184	1,062.00	1,400	1,751	519	338	-181	881	181	38
G	0	2	2	22,440	100	22,340	1,062.00	1,420	1,751	523	358	-165	897	165	38
H	400	2	2	22,124	100	22,024	1,062.00	1,475	1,751	543	413	-130	932	130	10
I	0	2	2	22,700	100	22,600	1,062.00	1,475	1,751	526	413	-113	949	113	42
J	400	2	2	22,592	100	22,492	1,062.00	1,400	1,751	397	338	-59	1,003	59	168
K	400	2	2	22,448	100	22,348	1,062.00	1,575	1,751	519	513	-6	1,056	6	42
L	0	2	2	22,920	100	22,820	1,062.00	1,600	1,751	531	538	7	1,069	-7	42
M	400	2	2	22,652	100	22,552	1,062.00	1,600	1,751	524	538	14	1,076	-14	42
N	0	2	3	22,488	100	22,388	1,062.00	1,600	1,751	510	538	28	1,090	-28	52
O	0	2	2	22,920	100	22,820	1,062.00	1,800	1,751	684	738	54	1,116	-54	117
P	0	2	2	22,459	100	22,359	1,062.00	1,645	1,751	516	583	67	1,129	-67	46
Q	0	2	2	22,795	100	22,695	1,062.00	1,600	1,751	465	538	73	1,135	-73	105
R	400	2	2	22,436	100	22,336	1,062.00	1,550	1,751	407	488	81	1,143	-81	154
S	0	2	2	22,440	100	22,340	1,062.00	1,600	1,751	447	538	91	1,153	-91	114
T	0	2	2	22,440	100	22,340	1,062.00	1,700	1,751	546	638	92	1,154	-92	15
U	0	2	2	22,920	100	22,820	1,062.00	1,675	1,751	515	613	98	1,160	-98	58
V	0	2	2	22,713	100	22,613	1,062.00	1,850	1,751	667	788	121	1,183	-121	38
W	0	2	2	22,193	100	22,093	1,062.00	1,700	1,751	513	638	125	1,187	-125	42
X	0	2	3	22,525	100	22,425	1,062.00	1,650	1,751	462	588	126	1,188	-126	201
Y	0	2	3	22,232	100	22,132	1,062.00	1,850	1,751	655	788	133	1,195	-133	183
Z	0	2	2	22,181	100	22,081	1,062.00	1,630	1,751	433	568	135	1,197	-135	154
												-654			654

Housing Authority of the County of San Mateo

MTW Rent Reform Initiatives - Hardship Exemption Determination TST Only

Note: Review income and deductions first to ensure the annual adjusted income was calculated correctly.

Name:

1. Was the participant admitted to the program on or prior to March 1, 2010?
2. Has the participant not relocated since March 1, 2010?
3. Was the prior rent calculation based on the traditional HCV rules?

Yes	Voucher Size	0
Yes	Unit Size	0
Yes	Payment Standard	1138

PS
0 1138
1 1399
2 1751
3 2337
4 2471
5 2841
6 3212

Proceed if all answers to the above questions are "yes"
Consult with your supervisor if one of the answers is "no"

Annual adjusted income from calculation tape

TTP

Contract rent

Current utility allowance

HCV HAP before proration

Is this a mixed family?

Total no. in family (an entry is required for all family type)

Total no. of eligible in family (an entry is required for all family type)

HCV HAP

HCV Tenant Rent

TST Tenant Rent (from current NOC)

<input style="width: 95%;" type="text" value="50"/>
<input style="width: 95%;" type="text" value="42321"/>
<input style="width: 95%;" type="text"/>
<input style="width: 95%;" type="text" value="1088"/>
<input style="width: 95%;" type="text"/>
<input style="width: 95%;" type="text"/>
<input style="width: 95%;" type="text" value="#DIV/0!"/>
<input style="width: 95%;" type="text" value="#DIV/0!"/>

Difference

#DIV/0!

HACSM uses this spreadsheet to determine whether or not a participant is eligible for hardship relief from the TST or if their rental increase is due to other factors such as new household members with income, or an increase in income period, etc.

All requests require supervisor review prior to processing.

HACSM staff complete all the blue boxes and the spreadsheet determines the calculation.

HOS:

Date:

Supervisor Signature: _____

Date: _____

Approved

Housing Authority of the County of San Mateo

Tiered *Subsidy* Table Model

The Model is based on three factors:

- Fair Market Rent
- Voucher Bedroom Size
- Annual Adjusted Income (includes: the tier structure, rent calculation process, and tenant portion)

Potential Variations:

- Adjustments to the FMR
 - ◊ HACSM chose to use 100% FMR for all voucher sizes, but the model could be set at any rate, 95%, 98%, 110% ... the options are endless
 - ◊ HACSM considered higher percentage rates for 2 and 3 Bedroom vouchers
- Adjustments to the range of each Tier (w/100% FMR)
 - ◊ If the range of each tier is \$2,000 then the subsidy for each successive tier is (-\$50)
 - ◊ If the range of each tier is \$3,000 then the subsidy for each successive tier is (-\$75)
 - ◊ If the range of each tier is \$4,000 then the subsidy for each successive tier is (-\$100)
- Adjustments to Tenant contribution
 - ◊ HACSM chose to use 1/3 monthly adjusted income (0.333), instead of "30%" (0.30)
- Adjustments to the calculation of Annual Adjusted Income (AAI)
 - ◊ HACSM chose to leave traditional calculation in place instead of using standard deductions for medical, disability, child care allowances
 - ◊ The impact of changing the calculation method of AAI is more challenging to predict
 - ◊ Utility Allowance vs. Utility Deduction

To establish the subsidy amount of each tier:

- Tier One
FMR of each Voucher Bedroom Size *minus* \$50
- Tier Two and beyond
Average annual adjusted income (AAI) for each tier
Monthly adjusted income (AAI/12)
33.3% Monthly Adjusted income (MAI * 0.333)
Subtract 33.3% MAI from FMR = Tiered Subsidy amount

Analysis

Rent burden for Participant vs. Affordability for Housing Authority

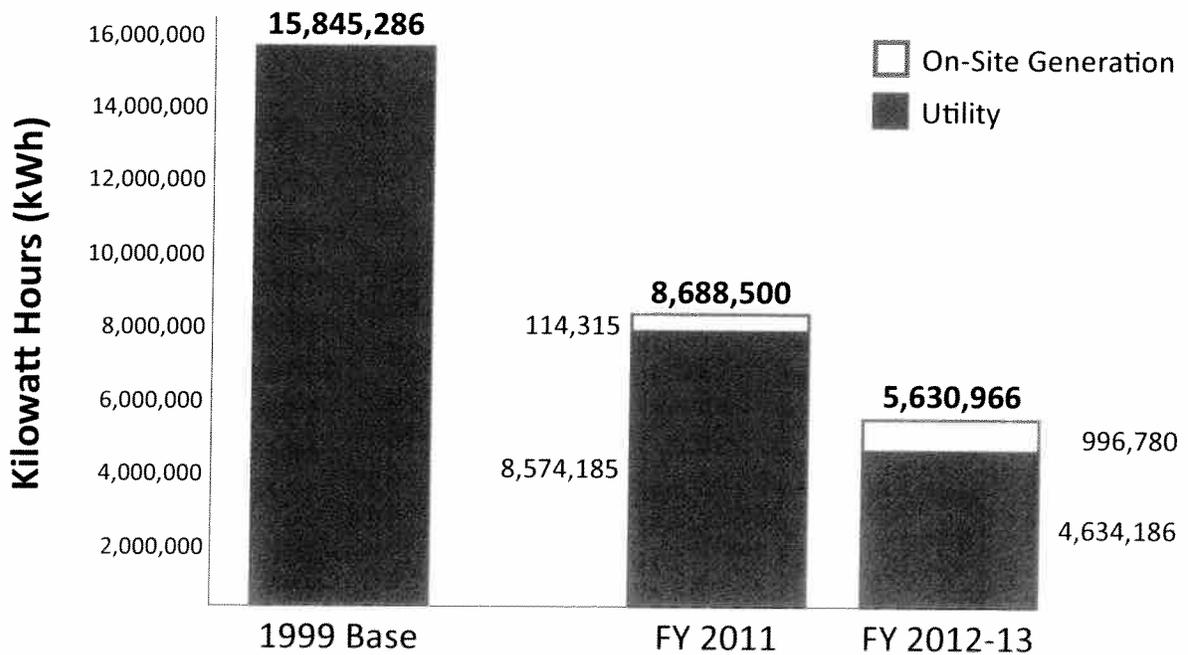
For additional information, contact:

☉ Jennifer Rainwater, MTW Project Manager
(650) 802-3358
jrainwater@smchousing.org

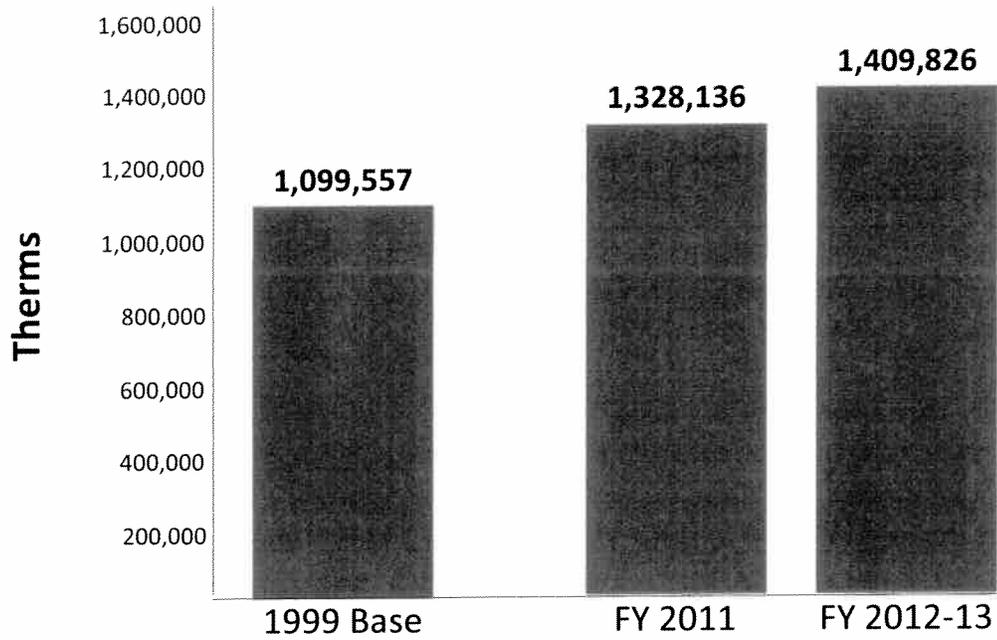
CAMBRIDGE HOUSING AUTHORITY

Frozen Rolling Base For Energy Efficiency Improvements

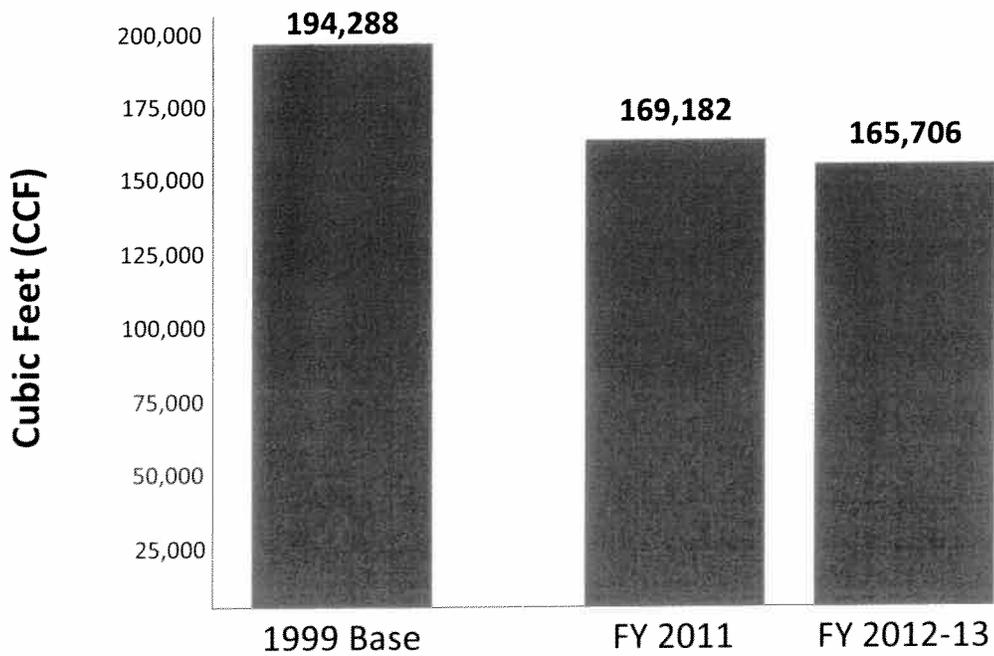
Consumption Profile: Electricity

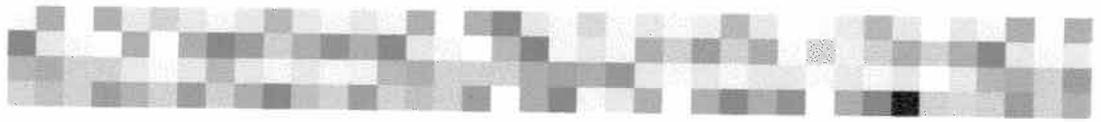


Consumption Profile: Gas



Consumption Profile: Water





How Did We Get Here?

Energy Performance Contracts

Third-Party (Ameresco)

Self-Esco

Weatherization Program Funding

Over \$1,500,000 of full-funding for:

- Light Upgrades
- Appliance Replacement
- Heating Plant Replacements

Utility Partnerships

Working with utility has saved over \$700,000 through rebates in current construction

On-Site Generation

- First solar PV installed on Washington Elms in 2008 as a power purchase agreement – the first PPA in our region.
- As of FY 2013, 17% of CHA's electricity use will be generated at the properties.

Sample Reporting

Month-over-Month Summary Report for a Single Property

LIPH FY11 Electricity Consumption vs. Three-Year Rolling Base

ELECTRICITY			
	May 09	May 10	May 11
Electric Use (kWh)	164,100	152,940	154,830
Total Electric Charges	\$21,565	\$22,866	\$22,555
Electric Consumption Budget Base	197,455	190,550	165,780
Electric Cost Budget Base	\$32,435	\$27,061	\$23,361
Adj. Electric Use (kWh/Housing Unit)	999	1,143	865
Electric Cost/Housing Unit	\$120	\$127	\$125
Weather Data			
	May 09	May 10	May 11
Typical Boston HDD	233	233	233
HDD	193	133	230
Typical Boston CDD	32	32	32
CDD	26	67	52
Additional Information			
	May 09	May 10	May 11
Total Cost/Housing Units	\$126	\$131	\$131
Total # Units	180	180	180

GAS			
	May 09	May 10	May 11
Gas Use Therm	1,722	1,533	1,437
Total Gas Charges	\$1,128	\$796	\$1,033
Gas Consumption Budget Base	1,204	1,089	1,317
Gas Cost Budget Base	\$1,421	\$1,044	\$905
Gas Use (Therms/Housing Unit)	10	9	8
Gas Cost/Housing Unit	\$6	\$4	\$6
Account Information			
	May 09	May 10	May 11
Number of Accounts	2	2	2
Number of Estimated Accounts	0	0	0
Number of Problem Accounts	0	0	0

LIPH FY11 Electricity Consumption vs. Three-Year Rolling Base

