

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

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

June 8, 2012

Ivan Pour, Team Leader
U.S. Department of Housing and Urban Development
PIH - Office of Public Housing Investments
451 Seventh Street SW, Room 4130
Washington, DC 20410

Re: Moving To Work Annual Plan for Fiscal Year 2013

Attn: Emily Cadik

Dear Mr. Pour and Ms. Cadik:

The Massachusetts Department of Housing and Community Development (DHCD) is pleased to submit the enclosed revised Moving To Work (MTW) Annual Plan for Fiscal Year 2013. This revised document incorporates DHCD's response to HUD's May 14, 2012 comments. As required, electronic copies are being forwarded to HUD Headquarters and the local HUD Field Office. A hard copy has also been forwarded to your office.

Please note the following:

- DHCD has considered HUD's comment regarding the proposed Activity 2013-2. Based on further review, DHCD does not believe it is feasible to measure the impact that this initiative will have on increasing housing choice; therefore, we have modified the "Relationship to MTW Statutory Objectives" section of Activity 2013-2 to remove this reference. The revised Activity 2013-2 will promote administrative efficiency. Associated metrics and benchmarks are included in the Plan.
- Additional narrative has been added to Activity 2011-4 which describes how DHCD utilizes EIV information during the recertification process.
- With respect to HUD's comments on Activity 2012-4, DHCD acknowledges that MTW flexibility may only be applied to Enhanced Vouchers at the time that DHCD elects to roll those units into the MTW Block Grant. DHCD further acknowledges that MTW flexibilities applied to Enhanced Vouchers may not infringe on the protections afforded to EV families while they live in the development or until they are terminated from the program. Specific EV protections that will not be infringed or modified include EV income limits, EV minimum rent, EV payment standards and the prohibition on time limited assistance. Where needed, DHCD has revised the Plan to clarify these issues.
- Following receipt of HUD's comments, DHCD met with the HUD Field Office (Marilyn O'Sullivan) to discuss implementation of Activity 2012-4. It was agreed that an initial survey of tenants in developments with pending conversion actions will be conducted in order to

determine the extent of tenant interest in the Project-Based Voucher option. Results will be forwarded to HUD prior to HUD's designation of DHCD as Enhanced Voucher Administrator. Based on the results of the survey, the HUD Field Office will decide whether to assign EV administration to DHCD or the Local Housing Authority. We believe that HUD's designation of DHCD as EV Administrator should also constitute approval to proceed with the activities and flexibilities described in the revised MTW Annual Plan. As such, DHCD does not believe it is either efficient or necessary to require HUD permission to utilize MTW flexibility at the time of each conversion action.

DHCD looks forward to HUD's approval of the revised Annual Plan. Please do not hesitate to contact me if you require additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. Gornstein", with a stylized flourish at the end.

Aaron Gornstein
Undersecretary

Attachment

cc. Marilyn O'Sullivan, HUD Field Office

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

**Moving To Work Program
Annual Plan for Fiscal Year 2013**

**REVISION SUBMITTED TO HUD
JUNE 8, 2012**

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I. Introduction

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

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

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

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

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

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

¹ DHCD subcontracts with eight regional administering agencies (RAA) and one local housing authority to administer its portfolio of vouchers, assuring that all 351 cities and towns in Massachusetts are served by its HCVP. A list of the RAAs is included in Appendix C. During the Plan year, DHCD intends to re-procure RAA services through a competitive solicitation.

regulatory requirements. This document is DHCD's MTW Annual Plan for Fiscal Year 2013, i.e. the period from July 1, 2012 through June 30, 2013.

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

Prior to submission to HUD, DHCD made the Annual Plan and the proposed MTW Agreement Amendment available for public review and comment. In addition, DHCD conducted public hearings in Boston on March 26, 2012 and in Springfield on March 27, 2012 to allow opportunities for the general public and program participants to provide comments on the proposed Annual Plan. DHCD reviewed and considered written and verbal comments received during the review period. Modifications to the plan were made based on comments received. Copies of public notices, sign-in sheets and written comments are included in Appendix D.

Overview of Annual Goals and Objectives

During Fiscal Year 2013, DHCD intends to undertake a range of MTW-related and other activities to promote the federal MTW statutory objectives and DHCD's overarching goals for the Housing Choice Voucher Program (HCVP): 1) to demonstrate that housing stabilization can be the foundation for economic self-sufficiency for extremely and very low-income households²; and, 2) to demonstrate that administrative costs savings can be redirected to provide meaningful assistance and, potentially, subsidies to additional program participants and owners.

During the Plan year, DHCD will undertake a major effort to re-procure the services of Regional Administering Agencies responsible for administering the MTW and related voucher programs in regions throughout the Commonwealth. This is a significant undertaking, one which – subject to the results of the procurement competition - may result in the transition of existing RAA responsibilities to new agencies.

Other highlights of planned FY 2013 activities are summarized as follows:

- Through its existing network of RAAs, DHCD projects that it will subsidize a total of 19,569 units for eligible households through the HCV program, which represents an approximate 99% utilization rate. Included in the above utilization figures are a total of 1,233 Project Based Voucher (PBV) units projected to be leased, as well as 639 non-MTW vouchers (VASH, 5-Year Mainstream, FUP, Enhanced Vouchers). Of this total, 105 are new PBV units projected to be under contract in Fiscal Year 2013.
- DHCD will continue implementation of the biennial recertification program for all MTW households in its portfolio to further the goal of administrative efficiencies, as well as

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

encouraging economic self-sufficiency by temporarily removing the disincentive to work or increase earnings. This program began in FY 2012, and is in the process of being implemented statewide. For all MTW households, DHCD also implemented self-certification of assets up to \$50,000 and changes to its Utility Allowance payments policy. Additional rent simplification strategies related to payment standards, the earned income disregard, and full-time student income were also implemented. In addition to completing roll-out of these initiatives, in FY 2013, DHCD plans to assess progress and compliance with these new policies via quality control and conduct follow-up training as needed.

- DHCD intends to begin implementation of the affordable housing preservation initiative first approved in the FY 2012 MTW Annual Plan. Under this initiative, in certain defined circumstances DHCD will convert Enhanced Vouchers to Project-Based vouchers, enabling DHCD to preserve affordability of these critically needed housing resources for a period of at least 15 years.
- DHCD will continue implementation of the original MTW pilot program which currently involves 183 families administered in the Boston area by Metropolitan Boston Housing Partnership (MBHP) and in Worcester County by RCAP Solutions, Inc. (RCAP). This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Families exercise considerable decision-making in the utilization of the funds, within some guidelines. Case management and program coordination are provided by designated MTW Advisors at each agency.
- In FY 2012, DHCD conducted working groups to develop policies and procedures related to the approved MTW biennial inspections initiative. Based upon these efforts, DHCD has proposed a number of changes to the initiative in this year's Plan. The modified initiative will further the original goals: creating administrative efficiencies that will continue to ensure HQS compliance, expanding pro-active landlord and tenant training efforts, and improving housing choice for tenants in good quality units.
- DHCD will continue implementation of its previously approved Youth Transition to Success (YTTS) program. This pilot program is designed to extend the current eighteen-month time limit for youth aging out of foster care participating in the Family Unification Program. DHCD and the Department of Children and Families (DCF) have met regularly over the past year to plan and implement this program. DHCD expects to enroll three to eight participants in the pilot program during the upcoming Fiscal Year.
- DHCD will continue implementation of the previously approved MTW Landlord Incentive Fund in Berkshire County. This pilot program is designed to provide incentives to landlords in support of DHCD and Commonwealth goals including: expanding housing opportunities in underserved areas; improving the quality of housing units under lease; and, increasing the number of units accessible to households with disabled members. The Incentive program was successful in its first two years of operation and may be expanded to other agencies during FY 2013.

- DHCD will continue implementation of the previously approved MTW initiative to enhance the Family Self Sufficiency (FSS) program. During FY 2012, DHCD met with RAA senior staff and FSS Coordinators to discuss potential changes to the FSS program and the most effective strategies for implementing those changes. DHCD expects to utilize some or all of these strategies to strengthen the FSS program in the upcoming Fiscal Year.
- To more expeditiously respond to reasonable accommodation requests and expand housing choice options in “low-poverty, high-opportunity” neighborhoods, DHCD will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval.
- For FY 2013, DHCD has proposed a new MTW initiative to modify rent reasonableness policies. The proposed changes will support the goals of administrative efficiency and promoting housing choice, while also ensuring that contract rents are fair and reasonable relative to private, unassisted market units.
- DHCD will continue to meet the income selection requirements for the HCVP by assuring that 75% of all applicants selected for assistance each fiscal year are extremely low income, i.e. have incomes that do not exceed 30% of area median income.

Proposed program changes that require MTW flexibility to implement are more fully described in Chapters V and VI below. Non-MTW changes are summarized in Chapter III below. As appropriate, the proposed changes will be incorporated into a revised HCV Administrative Plan.

II. General Operating Information

A. Housing Stock

DHCD is currently authorized to lease a total of 19,777 HCV vouchers, which includes a February 2012 108-unit Enhanced Voucher allocation for Kings Landing in Brewster. DHCD does not administer a federal public housing program.

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

Table 1: Voucher Inventory as of February 2012

MTW	Voucher Inventory
Housing Choice Vouchers	19,120
MTW Sub-Total	19,120
Non-MTW	
VASH	287
Five Year Mainstream	75
Enhanced Vouchers* †	108
FUP*	187
Non-MTW Sub-Total	657
TOTAL ALL PROGRAMS	19,777

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

†Inventory includes units for which DHCD has received an Annual Contribution Contract from HUD. DHCD has been notified that it will receive 2 additional Enhanced Voucher ACCs in the coming months for the Wilkins Glen and Summerhill Glen developments; however, these units are not reflected in the above-listed inventory count.

Table 2 below provides a summary of new Project Based Voucher (PBV) developments for which DHCD anticipates entering into Housing Assistance Payments Contracts during FY 2013. A total of 105 units in 14 PBV developments are expected to come on-line in the Plan year. This listing is subject to change due to unanticipated changes in development schedules, project financing or other factors. A full listing of all PBV developments projected to be under contract by the end of FY 2013 is found in Table 4.

Table 2: PBV New Units Projected for FY 2013

Description											
RAA	Project	Community	Owner	AHAP Date	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
MBHP	6 Fort Street	Quincy	Asian CDC	11/1/2010			3	5			8
RCAP	Bowers Brook St. Polycarp-Phase II	Harvard	Russo, Inc. Somerville Community Corporation	1/11/2011			4				4
MBHP	16 Butler Drive	Somerville		2/9/2011				8			8
MBHP	Putnam Green 625 Putnam Ave	Cambridge	Homeowners Rehab	2/10/2011				8			8
MBHP	Hearth at Olmstead Green	Boston	Hearth Olmstead LP	3/2/2011			15				15
SSHDC	154-168 Eagle Street Cumber Homes Apts.	Fall River	Community Care Services, Inc.	3/31/2011						8	8
HAP	Cumberland & Dwight	Springfield	Beacon Communities Common Ground Development Corp.	5/4/2011				8			8
SMOC	Old High School Commons Clay Pond(canal Bluffs)	Acton		6/15/2011			1	5			6
HAC	101 Harmony Road	Bourne	HAC & Housing Investment, Inc.	7/8/2011				8			8
BHDC	Rice Silk Mill 55 spring street	Pittsfield	Rees-Larkin Development Neighborhood Housing Services of South Shore	8/5/2011				5			5
MBHP	Winter Gardens 44 Winter Street Groop Townview Apts.	Quincy		8/11/2011			3	3			6
RCAP	16 Prichard Street	Fitchburg	Winn Development Chelsea Neighborhood Developers, Inc.	9/15/2011			8				8
MBHP	Highland Terrace 47-55 Garish St.	Chelsea		9/26/2011			3	5			8
RCAP	KGH Phase 4 Hammond Street	Worcester	Main South CDC	10/1/2011			3	2			5
TOTALS							40	57	0	8	105

B. Leasing Information - Planned

During Fiscal Year 2013, DHCD projects that it will achieve the leasing targets shown in Table 3 below, subject to the award of sufficient HUD funding for calendar years 2012 and 2013.

Table 3: Leasing Projection for FY 2013

MTW	Vouchers Allocated	Projected Leased on 6/30/13	Percentage Leased
Housing Choice Vouchers*	19,120	18,930	99%
Non-MTW			
VASH**	287	278	97%
Five Year Mainstream	75	73	97%
Enhanced Vouchers	108	105	97%
FUP	187	183	98%
Non-MTW Sub-Total	657	639	97%
TOTAL ALL PROGRAMS	19,777	19,569	99%

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

** Assuming adequate veteran referrals from the three participating Veterans Affairs Medical Centers, DHCD's partners for its VASH program.

A total of 19,569 units are projected to be under lease as of the end of the Plan year. The projected overall leasing rate of 99% of authorized units highlights the success that DHCD has had in effectively managing and maximizing utilization through its network of Regional Administering Agencies.

Utilizing its HCV vouchers, DHCD operates a statewide Project Based Voucher program. Table 4 provides information on PBV developments under lease in FY 2012 and new PBV developments projected to be under lease during FY 2013. In total, DHCD projects that 1,233 PBV units will be leased by the end of FY 2013, of which 105 are anticipated to be newly contracted units. Note that actual PBV inventory fluctuates based on various factors including financing availability, construction schedules and modifications to existing PBV HAP contracts.

Table 4: Project Based Voucher Inventory Projection for FY 2013

								Description			
RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
CTI	Salem Harbor* 48 Franklin & 348	Salem	Salem Harbor CDC		10/1/1997	9/30/2012		4			4
HAP	Chestnut Streets*	Holyoke	Voces de la Esperanza		4/1/1998	3/31/2013		15			15
CTI	Lincoln Hotel*	Salem	Caritas		5/1/1998	4/30/2013		63			63
HAP	52 Franklin Street* 580 South Summer Street*	Holyoke	Voces de la Esperanza		5/1/1998	4/30/2013		9			9
HAP		Holyoke	Eric Warren		6/1/1998	5/31/2013		12			12
HAC	885C State Highway	Eastham	Lower Cape Cod CDC	N/A	9/1/2002	9/30/2012		1			1
HAP	451-459 Main St	Holyoke	Puerta de la Esperanza	N/A	10/7/2002	10/6/2012		12			12
MBHP	32 Kent Street 1129	Somerville	Kent Street housing LP Dudley Terrace	N/A	11/1/2002	10/31/2012	2	6			8
MBHP	Dorchester Ave	Dorchester	LP/DBED Dudley Terrace	N/A	11/19/2002	10/31/2012	6	2			8
MBHP	14 - 24 Roach St	Dorchester	LP/DBED Dudley Terrace	N/A	11/19/2002	10/31/2012		8			8
MBHP	1285 -1291 Mass Ave	Dorchester	LP/DBED Pittsfield YMCA	N/A	11/19/2002	10/31/2012		4			4
BHDC	YMCA	Pittsfield	HousingAss ociates New Orchard Hill, LP	N/A	12/16/2002	12/15/2012	28		2		30
RCAP	220 Orchard Hill Dr. 342-346	Oxford		N/A	1/1/2003	12/31/2012	8	17			25
HAP	Main & 76 Cabot St	Holyoke	Puerta de la Esperanza Caritas Communi- ties	N/A	1/21/2003	1/20/2013		15			15
MBHP	48 Water St 979 Falmouth Rd Founders Court	Wakefield		N/A	4/1/2003	3/31/2013			6		6
HAC		Hyannis	C. Johnson & Co.	N/A	4/18/2003	4/17/2013		2			2
BHDC	140 East St	Great Barrington	Construct, Inc. Manchester Residence Corporation	N/A	5/1/2003	4/30/2013	2				2
CTI	Twelve Summer St 1202	Manchester by the Sea		N/A	5/1/2003	4/30/2013		4			4
MBHP	Common- wealth Ave	Allston	Caritas	N/A	8/1/2003	7/31/2013			6		6
MBHP	430-436 Dudley St	Roxbury	Caritas	N/A	8/1/2003	7/31/2013			3		3
MBHP	28 Mount Pleasant St.	Roxbury	Caritas	N/A	8/1/2003	7/31/2013			2		2

										Description	
RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
HAP	Westfield Hotel	Westfield	Domus, Inc.	9/1/2002	9/1/2003	8/31/2013				5	5
MBHP	82 Green St.	Jamaica Plain	Pine Street Inn	N/A	9/1/2003	8/31/2013			10		10
MBHP	Russell Terrace	Arlington	Caritas	N/A	10/1/2003	9/30/2013			2		2
MBHP	19 Hancock St.	Everett	Caritas	N/A	10/1/2003	9/30/2013			3		3
MBHP	4-6 Ashland St. 1740	Medford	Caritas	N/A	10/1/2003	9/30/2013			3		3
MBHP	Washington St.	Boston	Pine Street Inn	N/A	10/10/2003	9/30/2013			8		8
HAC	32 Old Ann Page Way	Provincetown	Conwell Street LLC Salem Heights Preservation Associates	N/A	11/1/2003	10/31/2013	1	1			2
CTI	Salem Heights (Pope St.)	Salem	Reviviendo Family Housing	N/A	12/1/2003	11/30/2013		72			72
CTI	Reviviendo	Lawrence	Housing Land Trust for Cape Cod	N/A	12/30/2003	11/30/2013			3		3
HAC	40A Nelson Ave	Provincetown	Lower Cape Cod CCDC	N/A	2/2/2005	1/1/2015		3			3
HAC	58 Harry Kemp Way	Provincetown	/ Harry Kemp Way	N/A	4/1/2005	3/31/2015		4			4
HAP	Hillside Village	Ware	Hillside Village	N/A	4/28/2005	4/27/2015		16			16
SMOC	The Preserve Boston YWCA	Walpole	The Preserve	N/A	6/1/2005	5/31/2015		30			30
MBHP	140 Clarendon St	Boston	Boston YWCA Conant Village	N/A	7/14/2005	6/30/2015			20		20
CTI	Conant Village	Danvers	Partners Mishawum Assisted Living	N/A	10/1/2005	9/30/2015		15			15
MBHP	Zelma Lacey Mishawum	Charlestown	Marshall Place Apartments	N/A	11/1/2005	10/31/2015				20	20
MBHP	Marshall Place Apts.	Watertown		N/A	11/17/2005	10/31/2015	8				8
SMOC	Bethany School Apts.	Framingham	Sisters of St Joseph	N/A	12/1/2005	1/30/2015		10			10
SSHDC	Acushnet Commons	New Bedford	Women's Institute Residences at Stonybrook	N/A	12/19/2005	12/18/2015		3			3
CTI	Stonybrook West-hampton Senior	Westford	Westhampton Senior Housing	12/30/2004	1/6/2006	12/31/2016		4			4
HAP		West-hampton		N/A	2/1/2006	1/31/2016	3				3
MBHP	Amory St	Roxbury	Amy Anthony	N/A	2/1/2006	1/31/2016		10			10

									Description		
RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
SSHDC	Westport Village Apts.	Westport	Westport Village Apartments	N/A	2/1/2006	1/31/2016	12				12
MBHP	Pelham House	Newton	Pelham House	N/A	3/1/2006	2/28/2016	3				3
MBHP	Ruggles Assisted Living	Roxbury	New Atlantic Dev Corp	N/A	3/1/2006	2/28/2016				35	35
CTI	Winter Street	Haverhill	Northeast Family YMCA	9/13/2005	9/1/2006	8/31/2016	13				13
HAP	Paradise Pond Apts. Harbor Cove '63	Northampton	Paradise Pond Apartments	N/A	12/8/2006	12/7/2016		8			8
MBHP	Washington Ave.	Chelsea	HarborCOV, Inc.	8/31/2005	12/21/2006	11/30/2016				24	24
HAP	Earle Street	Northampton	HER, Inc.	11/28/2005	1/1/2007	12/31/2017		3		12	15
MBHP	The Moorings Squantum Gardens Cordovan at Haverhill	Quincy	EA Fish & Associates Beacon Communities Corp	12/20/2005	3/7/2007	2/28/2017	39				39
CTI	Station	Haverhill		2/10/2006	3/26/2007	3/25/2017		8			8
CTI	Fina House	Lawrence	Fina House	N/A	4/1/2007	3/31/2017		7			7
	Whipple School Annex		Whipple School Annex (Salem Harbor CDC)								
CTI	Whipple School Annex	Ipswich	(Salem Harbor CDC)	2/6/2006	4/1/2007	3/31/2017	8				8
HAP	Village at Hospital Hill Casa	Northampton	Village at Hospital Hill	N/A	4/13/2007	4/12/2017	8				8
MBHP	Familias Unidas Four	Roxbury	Ricardo Quiroga Housing Corp. of Arlington	6/9/2006	5/14/2007	4/30/2017				8	8
MBHP	Addresses in Arlington Morgan Woods Pennywise	Arlington	Corp. of Arlington	N/A	6/25/2007	5/31/2012		4			4
	Path										
HAC	Path	Edgartown	TCB	6/12/2006	8/1/2007	7/31/2017		6			6
SMOC	Baker St	Foxboro	Foxborough HA	8/16/2006	8/1/2007	7/31/2017		20			20
	Layfayette Housing 'Salem Point Rentals		Salem Harbor CDC (Congress & Prince Streets)								
CTI	Layfayette Housing 'Salem Point Rentals	Salem	(Congress & Prince Streets) Great Bridge Prop.	N/A	8/15/2007	8/14/2017		8			8
SSHDC	Bliss School	Attleboro		N/A	9/1/2007	8/31/2017		8			8
MBHP	Janus Highlands	Chelsea	Chelsea NHS	8/4/2006	11/1/2007	10/31/2017		8			8
BHDC	Pine Woods	Stockbridge	Pine Woods	N/A	2/1/2008	1/31/2013	3	2			5

RAA	Project	Community	Owner	AHAP	HAP	HAP End	Description				
							Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
MBHP	TILL Building	Chelsea	TILL, Inc.	5/26/2006	5/1/2008	4/30/2018		5			5
CTI	St Joseph's Apts.	Lowell	Coalition for a Better Acre	8/1/2007	8/1/2008	7/31/2018		4			4
MBHP	Grand-families	Roxbury	Nuestra CDC	N/A	9/1/2008	8/31/2018				8	8
CTI	Sirk Bld	Lowell	The Caleb Foundation	N/A	11/1/2008	10/31/2018		8			8
HAP	Prospect Hill	Westfield	Domus, Inc.	11/15/2007	1/1/2009	12/31/2019		4			4
RCAP	9 May Street	Worcester	WCG	9/20/2007	1/30/2009	1/29/2024	5	3			8
HAP	46-48 School St	Northampton	Valley CDC	9/14/2007	2/1/2009	1/31/2019		2			2
MBHP	Doe House	Mission Hill	PSI/Parker Hill Av LLC	N/A	2/1/2009	1/31/2019			5		5
RCAP	5 Benefit St Village at Hospital Hill II	Worcester	Main South CDC	N/A	2/10/2009	2/9/2024		4			4
HAP		Northampton	TCB	3/20/2008	2/11/2009	2/10/2019	8				8
CTI	48-64 Middlesex St Salem Point LP	Lowell	CBA	N/A	3/1/2009	2/29/2018		6			6
CTI	(Harbor, Ward, Peabody)	Salem	Salem Harbor CDC	N/A	3/10/2009	3/9/2019		7			7
HAP	Sanford Apts.	Westfield	Domus Inc. Mitchell Properties LLC	1/7/2008	3/10/2009	3/9/2019		2		3	5
MBHP	The Coolidge Barnstable Senior Lombard Farm	Watertown		11/27/2007	3/30/2009	3/29/2019	4				4
HAC	Loring Towers (Loring Ave)	W. Barnstable	HAC	3/12/2008	5/15/2009	5/14/2024	8				8
CTI	Barnstable Family Kimber Woods	Salem	AIMCO	N/A	7/1/2009	6/30/2019		8			8
HAC		W. Barnstable	HAC	3/12/2008	7/1/2009	6/30/2025		7			7
MBHP	Granite St Housing	Quincy	Quincy CAP	7/25/2008	7/1/2009	6/30/2019				5	5
MBHP	St. Polycarp	Somerville	Somerville Com. Corp High Rock Homes Ltd	1/2/2008	7/1/2009	6/30/2019	2	6			8
SMOC	High Rock Homes Kensington Court	Needham	Needham HA Oxford Developme nt LLC	N/A	7/1/2009	6/30/2024		8			8
SSHDC	@ Lakeville	Lakeville		7/30/2007	7/7/2009	7/6/2024		8			8
BHDC	Hillside Avenue	Gt. Barrington	CDC of So. Berkshire	3/18/2008	7/13/2009	7/12/2024	2	3			5

RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Description			Total PBVs
								Family	Homeless Individuals	Supp. Services	
RCAP	470 Main St. Spencer Green	Fitchburg	Twin Cities CDC	1/30/2008	7/24/2009	7/23/2024	2	5			7
MBHP	113 Spencer Ave Residences at Canal Bluff	Chelsea	Chelsea NHS	3/3/2008	7/31/2009	7/30/2019	2	6			8
HAC		Bourne	HAC	6/23/2008	8/3/2009	8/2/2024		3			3
MBHP	109 Gilman St	Somerville	Somerville Com Corp	N/A	10/1/2009	9/30/2019		1			1
MBHP	447 Concord Road	Bedford	S-C Mgmt Beacon Communities Corp	1/7/2008	12/1/2009	11/30/2024		4			4
SMOC	Wilber School	Sharon	Salem Harbor CDC	10/7/2008	3/15/2010	3/14/2025		8			8
CTI	Palmer Cove (Palmer St.)	Salem	Worcester Common Ground	N/A	3/18/2010	3/17/2025	3	1		2	6
RCAP	1-7 Piedmont St.	Worcester	Somerville HA	12/5/2008	5/7/2010	5/6/2025	3				3
MBHP	Capen Court	Somerville	POUA	10/23/2008	6/1/2010	5/31/2025	8				8
CTI	Hayes Building Reed House Annex at 182 Main St	Haverhill	Domus, Inc. Watertown Community Housing	7/1/2009	10/1/2010	9/30/2025	3	1			4
HAP	1060 Belmont Street	Westfield		9/15/2009	11/3/2010	11/2/2025				8	8
MBHP	Main St Ext.-Thankful	Watertown		6/1/2009	11/18/2010	11/17/2025	2	5			7
HAC	Chase Path	Harwich	Lowe Cape CDC Beacon Communities Sacred heart LLC	2/1/2010	12/1/2010	11/30/2025	2	3			5
CTI	Sacred Heart	Lawrence		12/16/2009	1/1/2011	12/31/2026	8				8
SSHDC	Village at 815 Main	Wareham	Conerstone Properties Coalition for a Better Acre	10/19/2008	1/1/2011	12/31/2026		5			5
CTI	Acre High school Apts.	Lowell	Mass Housing Opportunities	2/1/2010	2/7/2011	2/6/2026	3	5			8
RCAP	Tritown Landing I	Lunenburg	Saunders School LLC c/o E.A. Fish	2/5/2010	2/14/2011	2/13/2026		8			8
CTI	Saunders School Apartments Spencer Row	Lawrence	Companies Chelsea Neighborhood Developers	6/15/2010	3/1/2011	2/28/2026				16	16
MBHP	205-221 Spencer Ave	Chelsea	Flores Development	11/23/2009	3/1/2011	2/28/2026	3	5			8
HAP	Villa Borinquent**	Springfield		5/1/2010	3/2/2011	3/1/2026	1	7			8
SMOC	Cutler Heights	Holliston	Cutler Heights LP	1/15/2010	3/15/2011	3/14/2026	3	4			7

								Description			
RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
CTI	Cabot St Homes	Beverly	Beverly Affordable Hsg Coal.	9/21/2009	4/1/2011	3/31/2026	8				8
SSHDC	Ocean Shores	Marshfield	Beacon Communities FWC	2/2/2010	4/1/2011	3/31/2026	8				8
RCAP	Freedom Village	W. Boylston	Affordable Hsg LLC South Worcester Neighborhood	8/7/2008	4/29/2011	4/28/2026	2	4			6
RCAP	Southgate Place	Worcester	Improvement Lynn Home for Young Wom.	3/15/2010	6/17/2011	6/16/2026	3	3			6
LHA	Washington Sq.**	Lynn		2/1/2010	7/15/2011	7/14/2026	2	6			8
CTI	Powderhouse Village**	Ipswich	YMCA of North Shore	6/7/2010	8/10/2011	8/7/2026	8				8
SSHDC	Ingraham Place**	New Bedford	Women's Institute	6/1/2010	9/15/2011	9/16/2026				8	8
HAC	Veterans Park Apts. Schoolhouse Green**	Falmouth	Falmouth Housing Corporation	12/24/2010	10/15/2011	10/14/2026	8				8
HAP	King St**	Northampton	Valley CDC Lawrence Community Works	9/1/2010	10/24/2011	10/23/2026				5	5
CTI	Union Crossing**	Lawrence		7/2/2010	12/1/2011	11/30/2026		8			8
CTI	Firehouse Place 69 Willow Street**	Hamilton	Harborlight Community Partners Neighborhood of Affordable Housing	4/25/2011	12/16/2011	12/15/2026	1	3			4
CTI	Steven's Corner**	North Andover		6/14/2010	12/16/2011	12/15/2026	1	7			8
CTI	478-486 Moody St Unity House**	Lowell	Coalition for a Better Acre	8/2/2010	12/20/2011	12/19/2026		2		6	8
CTI	Holcroft Park Apts. Mill & Grant Street**	Beverly	YMCA of North Shore Hopkinton Housing Authority	3/23/2011	12/21/2011	12/20/2026	4	4			8
SMOC	Mayhew Court**	Hopkinton		10/14/2010	1/27/2012	1/26/2027		12			12
MBHP	6 Fort Street***	Quincy	Asian CDC	11/1/2010			3	5			8
RCAP	Bowers Brook***	Harvard	Russo, Inc.	1/11/2011			4				4
MBHP	St. Polycarp-Phase II 16 Butler Drive***	Somerville	Somerville Community Corporation	2/9/2011				8			8
MBHP	Putnam Green 625 Putnam Ave***	Cambridge	Home-owners Rehab	2/10/2011				8			8

									Description		
RAA	Project	Community	Owner	AHAP	HAP	HAP End	Elderly or Disabled	Family	Homeless Individuals	Supp. Services	Total PBVs
MBHP	Hearth at Olmstead Green***	Boston	Hearth Olmstead LP	3/2/2011			15				15
SSHDC	154-168 Eagle Street***	Fall River	Community Care Services, Inc	3/31/2011						8	8
HAP	Cumber Homes Apts. Cumberland & Dwight***	Springfield	Beacon Communi- ties	5/4/2011				8			8
SMOC	Old High School Commons***	Acton	Common Ground Develop- ment Corp.	6/15/2011			1	5			6
HAC	Clay Pond(Canal Bluffs) 101 Harmony Road***	Bourne	HAC & Housing Investment, Inc.	7/8/2011				8			8
BHDC	Rice Silk Mill 55 Spring Street***	Pittsfield	Rees-Larkin Develop- ment	8/5/2011				5			5
MBHP	Winter Gardens 44 winter street***	Quincy	Neighborho od Housing Services of South Shore	8/11/2011			3	3			6
RCAP	Groop Townview Apts. 16 Prichard Street***	Fitchburg	Winn Develop- ment	9/15/2011			8				8
MBHP	Highland Terrace 47-55 Garish St.***	Chelsea	Chelsea Neighbor- hood Developers, Inc.	9/26/2011			3	5			8
RCAP	KGH Phase 4 Hammond Street***	Worcester	Main South CDC	10/1/2011			3	2			5
TOTALS							301	686	73	173	1,233

*Indicates Project Based Certificate Projects

**Indicates PBV developments put under HAP for the first time in FY2012

***Indicates new PBV developments projected to be under lease during FY 2013

C. Waiting List Information

As of January 2012 there were 103,226 households on the Housing Choice Voucher Program waiting list as summarized in Table 5 below. This reflects an increase of almost 10,000 applicants over last year's waiting list totals. DHCD anticipates that the total number of waiting list households will continue to increase in FY 2013 due in part to statewide and national economic conditions.

As was described in previous Annual Plans, DHCD is in the process of making changes to the waiting list methods used for Project Based Voucher (PBV) developments. The changes will allow PBV owners to maintain their own site-based waiting lists. Some or all PBV waiting lists may be closed during the transition period. DHCD will issue public notices of waiting list openings and closings.

Table 5:
Waiting List Information for DHCD Housing Choice Voucher Program (January 2012)

	# of applicants in 2012	% of total applicants in 2012
Waiting List Total	103,226	
Income (1)		
Extremely low income <30% AMI	94,263	91.3%
Very low income >30% but <50%	6,884	6.7%
Low income >50% but < 80%	643	0.6%
Family Type		
Families with children (2)	65,970	63.9%
Elderly families (3)	5,029	4.9%
Families with disabilities (3)	32,083	31.1%
Race/ethnicity (4)		
White/hispanic	11,935	11.6%
White/non-hispanic	32,740	31.7%
White/no ethnicity specified	4,653	4.5%
Black/African american/hispanic	1,715	1.7%
Black/African american/non-hispanic	18,456	17.9%
Black/African american/no ethnicity specified	4,110	4.0%
American Indian/Alaskan Native/hispanic	241	0.2%
American Indian/Alaskan Native/non-hispanic	1,177	1.1%
American Indian/Alaskan Native/no ethnicity specified	177	0.2%
Asian or Pacific Islander/hispanic	147	0.1%
Asian or Pacific Islander/non-hispanic	1,789	1.7%
Asian or Pacific Islander/no ethnicity specified	510	0.5%
Native Hawaiian/Other Pacific Islander/hispanic	865	0.8%
Native Hawaiian/Other Pacific Islander/non-hispanic	612	0.6%
Native Hawaiian/Other Pacific Islander/no ethnicity specified	124	0.1%
Hispanic, no race specified	21,817	21.1%
Non-hispanic, no race specified	2,856	2.8%
No race or ethnicity specified	1,662	1.6%

(1) Based on HUD income limits effective of 12/1/11.

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

(3) Includes households with only one member

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

III. Non-MTW Information

In Fiscal Year 2013, DHCD will continue to administer the VASH, Enhanced Vouchers and Five Year Mainstream programs, which are not included in the MTW program. Enhanced Vouchers will be moved into the MTW Program after the first year.

Sources and Uses of Non-MTW Funds

Table 6 provides a projection of Non-MTW sources and uses for Fiscal Year 2013. Note that HUD funding is based on projected funding for calendar year 2012. The amounts listed below may change based on HUD's actual funding allocations. Actual figures will be provided in the MTW Annual Report.

Table 6: FY 2013 Non-MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – VASH	\$2,010,600
HUD Subsidy – FUP FY 2008, 2009, and 2010	\$1,980,000
HUD Subsidy – Five Year Mainstream	\$715,000
HUD Subsidy Enhanced Vouchers	\$1,174,344
HUD Administrative	\$733,000
Non-MTW Sources Total	\$6,612,944
Uses	
HAP Payments	\$5,879,944
Administrative	\$733,000
Non-MTW Uses Total	\$6,612,944

Description of Proposed Non-MTW Activities

DHCD currently subcontracts with eight regional administering agencies (RAA) and one local housing authority to administer its portfolio of vouchers; however, the contracts with these current RAAs will expire in FY 2013. Accordingly, DHCD will issue a Request for Responses (RFR) for services associated with the regional administration of the Moving to Work Housing Choice Voucher Program and other related programs in April of 2012. In preparation, DHCD has met regularly to produce the RFR materials and develop criteria for the evaluation process. In FY 2013, DHCD anticipates spending a significant amount of time and resources evaluating responses, awarding contracts, and responding to related issues which may include the need to transition to new administering agencies. DHCD has considered the level of effort associated with the RFR in its Non-MTW and MTW planning for the upcoming Fiscal Year.

Non-MTW activities include special purpose programs not included in the MTW program, i.e. VASH, Enhanced Vouchers, Tenant Protection Vouchers, Mainstream, FUP, as well as any other activity that does not require MTW flexibility to implement. Enhanced Vouchers are classified as Non-MTW during the first year.

The following non-MTW activities are proposed for implementation in FY 2013:

Change in Inspection Attendance Policies - DHCD will limit the number of times a tenant may reschedule an HQS inspection. The tenant will only be allowed to reschedule each HQS inspection once without good cause. Additional requests to reschedule must be accompanied by verification of the cause which dictates rescheduling of the inspection. Failure to provide documentation of good cause for the rescheduled inspection will result in a warning on the first offense and termination subject to DHCD termination policies for additional offenses.

DHCD will also modify the policies related to a tenant's failure to provide access for scheduled HQS inspections. If a tenant does not provide access or arrange for access for the scheduled HQS inspection DHCD will call this an "HQS No-Show" violation. Each RAA will review case history to determine the first action to be taken for a HQS no-show. If a tenant is a no show the RAA may request a conference. On additional no-shows, without good cause, the RAA will propose termination and proceed according to DHCD termination policies. This policy applies to participants with both MTW and Non-MTW vouchers. Exceptions will be reviewed on a case by case basis

IV. Long Term MTW Plan

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

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

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

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

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

V. Proposed MTW Activities

Beginning in FY 2013, DHCD proposes to implement the new MTW activities described below. As required by HUD, the following information is provided:

- Description of MTW activity
- Relationship to MTW statutory objective
- Projected impact
- Baseline, benchmarks and metrics
- Data collection process
- MTW authorization
- Rent reform hardship policies and other information, if applicable

Ongoing, previously approved MTW activities are described in Chapter VI.

Description of Proposed MTW Activities

Activity 2013-1

Description of MTW Activity: In FY 2013, DHCD plans to eliminate the HUD requirement to redetermine the reasonable rent if there is a 5% decrease in the published Fair Market Rent (FMR) in effect 60 days before the contract anniversary date as compared to the FMR in effect 1 year before the contract anniversary.

Generally, a 5% or greater decrease in the published FMR compared to the FMR in effect 1 year before is not typical in Massachusetts. DHCD conducted an analysis of the year to year change in the published FMRs from 2006 to 2012 by FMR Area. Between 2006 and 2012, there was only one year where the majority of FMR areas experienced a 5% or greater decrease in FMR. Although infrequent, when this does occur, it places a significant administrative burden on RAA staff who must conduct reasonable rent determinations. Staff may also need to renegotiate rents and if negotiations are unsuccessful, tenants will be required to move, which will further increase the administrative burden on staff and place an onerous burden on tenants.

DHCD will continue to complete a reasonable rent determination when a unit is placed under HAP contract for the first time, when an owner requests a contract rent adjustment, and at any other time DHCD deems it necessary. As rent increases will continue to be allowed during the lease-prescribed time periods, DHCD assumes that owners will request a rent increase within market fluctuations as warranted. Therefore, DHCD believes that reasonable rent determinations will continue to be made with regular frequency.

Relationship to MTW Statutory Objective: This activity addresses the statutory objectives to reduce costs and achieve greater cost effectiveness in federal expenditures.

Projected Impact: DHCD anticipates eliminating this requirement will reduce the administrative burden associated with reasonable rent determination and will maintain the administrative efficiencies gained by biennial recertifications. Reducing the number of reasonable rent determinations will save agency staff both time and effort and as markets fluctuate limit the potential burden on tenants who may be forced to move if the owner were not to agree to reduce the rent.

Baseline, Benchmarks and Metrics: DHCD proposes to measure reductions in the amount of time spent by staff performing reasonable rent determinations as a result of a 5% decrease in the FMRs. DHCD estimates that it takes staff approximately 3 hours to complete all processes included in reasonable rent determinations including update of unit features and amenities, data entry, rent review and negotiation, and preparation of forms and letters. Using the 2011-2012 FMR changes as an example, a 5% decrease in the FMR would impact approximately 36% of DHCD units. Therefore, DHCD estimates a time savings of approximately 20,505 hours of labor each time there is a 5% decrease in the published FMR compared to the FMR in effect 1 year before. Assuming a 40 hour work week, this would equate to almost 10 full-time equivalents.

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

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

Activity 2013-2

Description of MTW Activity: In FY 2013, DHCD plans to modify rent reasonableness policies for redetermined rents under the Project Based Voucher (PBV) program. Note that no change is proposed to the existing policy for determining initial rents, i.e. initial PBV rents will continue to be determined in conformance with the provisions of 24 CFR 983.301 through 983.305 as applicable.

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

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

Relationship to MTW Statutory Objective: This activity addresses the statutory objectives of promoting administrative efficiency.

Projected Impact: DHCD anticipates that this policy change will eliminate the unnecessary effort associated with redetermining PBV rents in those instances where FMRs have decreased by five percent or greater, and will also help ensure the long term financial feasibility of PBV projects.

Baseline, Benchmarks and Metrics: DHCD proposes to measure reductions in the amount of time spent by staff performing reasonable rent determinations on PBV units as a result of a 5% decrease in the FMRs. DHCD estimates that it takes staff approximately 3 hours to complete all processes included in reasonable rent determinations including update of unit features and amenities, data entry, rent review and negotiation, and preparation of forms and letters. Using the 2011-2012 FMR changes as an example, a 5% decrease in the FMR would impact approximately 36% of the portfolio of PBV units. Therefore, DHCD estimates a time savings of approximately 1,331 hours of labor each time there is a 5% decrease in the published FMR compared to the FMR in effect 1 year before based in the total portfolio of 1,233 PBV units.

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

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

VI. Ongoing MTW Activities

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

Description of Ongoing MTW Activities

Activity 2000-1

Description/Update of MTW Activity: DHCD's original MTW Agreement and Plan focused on implementation of a small-scale program administered in the Boston area by Metropolitan Boston Housing Partnership (MBHP) and in Worcester County by RCAP Solutions, Inc. (RCAP). This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Families exercise considerable decision-making in the utilization of the funds, within some guidelines. Case management and program coordination is provided by designated MTW Advisors at each agency, MBHP and RCAP, with target caseloads of 61 per advisor. Families may select any housing unit which they deem affordable and appropriate for their needs and which meets the occupancy requirements of the local Board of Health and Massachusetts Lead Laws where applicable. There is no HUD Housing Quality Standards inspection or rent-reasonableness test.

Eligibility is targeted to low-income working families who meet the following criteria:

- 1) Receive, or have received in the past 12 months, public assistance: TAFDC, EA, Supplemental Nutritional Assistance Program (SNAP, formerly known as "foodstamps"), and
- 2) Are committed to maintaining employment and agree to provide information to assess the effectiveness of the program, and
- 3) In the Boston component only, are currently homeless in a shelter, hotel, or motel placement.

Families participating in the south Worcester County component (122 families) receive the following:

- Financial assistance package of \$5,500 per year, of which up to \$250/month can be applied toward the rent and, in some cases security/upfront costs, for the apartment (paid directly to owner), up to \$158/month is available for work-related, utility, or emergency expenses, and \$50/month is set aside in an escrow account that is receivable upon successful program completion.
- Case management support to assist the family in addressing employment, housing, or other issues.
- Financial literacy training and homebuyer preparation workshops.
- Support and resources to assist in home-buying, where desired and appropriate.

Families participating in the Boston component (61 families) receive the following:

- Financial assistance package of \$10,000 per year, of which up to \$700/month can be applied toward the rent and, in some cases, security/upfront costs for the apartment (paid directly to owner), up to \$83/month is available for work-related, utility, or emergency expenses, and \$50/month is set aside in an escrow account that is receivable upon successful program completion. Assistance levels may be slightly higher for very large families.
- Case management support to assist the family in addressing employment, housing, or other issues.
- Financial literacy training.
- Support and resources to assist in home-buying, where desired and appropriate.

Participating families recertify once annually, and participation is limited to three years of stipend assistance, or fewer if a family exceeds the low-income limit for the Boston MSA (80% of area median income), fails to meet ongoing program requirements, or the demonstration is concluded by HUD. In FY 2010, several changes were made to the program: the term of participation was increased from a three-year maximum to an initial three-year term with up to two one-year extensions for a total possible term of five years; as of September 2009, DHCD changed the homeownership incentive structure from a matching funds program to a one-time \$500 grant; and if the contract rent for the unit the family chooses is less than the shallow rent subsidy provided, the family is required to contribute at least 30% of their adjusted income towards the rent, should the participant opt to pay an increased amount for rent, the remaining subsidy amount will be transferred to their escrow account.

DHCD will continue to review the program design, including the number of participating households and the amount of subsidy/stipend levels. At DHCD's option, the design of the program administered in the Worcester and/or Boston area may be modified. In FY 2013, DHCD anticipates modifications to the program administered in the Boston area by MBHP consistent with the parameters of the HUD-approved MTW initiative. Changes under consideration include: increasing the level of case management and participant support; increasing the supports budget to enable participants to access education and training resources more readily; and, increasing the rental subsidy for participants.

DHCD has not yet authorized additional RAAs to implement small scale programs using this program model; however, DHCD may elect to expand the program in future years.

Initial Plan Year: 2000

Proposed Changes to Activity: DHCD may modify or expand eligibility for participation in the program. Currently, the program administered in Boston targets homeless families living in shelters or hotels; however, DHCD may elect to modify or expand eligibility to other eligible target groups based on DHCD's assessment of priority housing needs in the Commonwealth and its regions.

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

MTW Authorization: Prior approval granted by HUD. Authorizations cited include MTW Agreement, Attachment C, paragraph D.1, D.2, D.3, D.4, D.5. The Broader Uses of Authority amendment was retroactively applied to this activity through HUD's letter of January 28, 2010.

Activity 2010-1

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

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

All PBV developments utilizing the new waiting list management methods will be required to modify their tenant selection plans and other documents as needed. DHCD will modify its PBV Administrative Plan as well.

Procedures manuals and training materials will continue to be developed in FY 2013. DHCD intends to finalize the procedures manual and conduct training for management companies and RAA staff in the upcoming Fiscal Year.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

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

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

Activity 2010-2

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

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

In FY 2013, DHCD will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

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

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

Activity 2010-3

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

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

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

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

In the first year of the program, BHDC established an initial cap of five units per owner per year, and a total program cap of seven percent of BHDC's voucher allocation (approximately thirty-eight units). The annual cap for year two of the demonstration was increased to ten units per owner and a total of forty units. The incentive was and remains capped at \$1,700 per unit.

Detailed policies and procedures for this initiative were developed for the initial year of the program and revised for the second year of the program. No further adjustments have been made for the third year of the program; however, DHCD may always adjust the program criteria and payment amounts as needed to respond to local market conditions.

Given the success of the program in Berkshire County, DHCD will assess the feasibility of expanding it to other regions using the same program parameters.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

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

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

Activity 2010-4

Description/Update of MTW Activity: Required HCV program forms will be modified as needed to streamline processing, utilize “plain language”, and address local housing market features. New forms will be rolled out as they are completed. A DHCD-RAA working group will review all existing HUD HCV forms, identify and vet proposed changes, and implement new forms. The forms to be evaluated for modification will include: Voucher, HAP Contract, RFTA and others. As required under the MTW Agreement, any changes to the HAP form will include language noting that funding for the contract is subject to the availability of appropriations.

This activity has not been implemented to date because DHCD has not had an urgent and compelling need to modify the existing HUD forms; however, as DHCD moves forward with several of the other initiatives described in this Plan, the need to modify HUD forms is expected to arise. DHCD may elect to implement this activity in future years.

Initial Plan Year: 2010

Proposed Changes to Activity: No changes are proposed.

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

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

Activity 2011-1

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

For value voucher units, the rent reasonableness determination process will consist of verification of the regulated rent amount, which will always be at or below the Payment Standard. Other HCV program rules may also be waived for these vouchers. The value voucher will make up the difference between the rent and 30% of the tenant’s adjusted income.

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

Participating homeless households must agree to work with a housing stabilization and employment counselor for at least 18 months once housed. Clients of the Massachusetts Departments of Mental Health (DMH) and Developmental Disabilities Services (DDS) will be provided with continuing services and support from these two respective agencies. DHCD’s partnership with MassHousing and certain private management companies will make it possible for the participants to live in good quality housing. DHCD will work with its partner agencies to establish realistic time limits for these vouchers within the time permitted by its MTW Agreement with HUD, currently in effect until June 2018.

Due to the substantial level of activity associated with other MTW initiatives described herein, this program was not implemented in FY 2012. Although DHCD does not anticipate its implementation during FY 2013, DHCD may elect to implement this activity in future years.

Initial Plan Year: 2011

Proposed Changes to Activity: No changes are proposed.

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

MTW authorization: MTW Agreement, Amendment on Broader Uses of Authority; Attachment C, paragraphs B.2, D.1.a, D.2.a, D.2.b, D.4.

Activity 2011-2

Description/Update of MTW Activity: DHCD will establish an “Opportunity Neighborhood” program in one or more selected neighborhoods in different regions throughout the Commonwealth. The majority of academic research and literature indicates that where a person lives determines (to various degrees), the opportunities afforded to them. In 2009, the Kirwan Institute completed an extensive mapping project of the geography of opportunity areas in Massachusetts. They looked at 19 different indicators of opportunity from three different categories of opportunity: educational, economic and neighborhood/housing.

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

During the past Fiscal Year, DHCD has focused on research concerning educational outcomes of school age children. Using this research to identify Opportunity Neighborhoods, DHCD may implement a pilot mobility program. DHCD will continue to review data and may develop specific policies for a potential pilot program in FY 2013. Due to the substantial level of activity associated with the previously mentioned RFR process and follow-up training for other MTW initiatives described herein, DHCD does not anticipate implementation of this pilot program during FY 2013.

Initial Plan Year: 2011

Proposed Changes to Activity: No changes are proposed.

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

MTW authorization: MTW Agreement, Attachment C, paragraphs B.1.iii, D.2.a, D.4; Broader Uses of Authority amendment.

Activity 2011-3

Description/Update of MTW Activity: DHCD will modify its inspection policies and procedures to: 1) allow biennial inspections of units that are "A" and "B" grade, subject to a review of tenant and owner history, and, 2) allow for owner/tenant self-certification of routine repairs in lieu of a re-inspection. Units inspected biennially will be subject to quality control audits, and owners and tenants may elect to have annual inspections upon request. Self-certification of low-risk or in-progress repairs will be allowed at the discretion of the inspector, and the self-certification form must be signed by both the owner and the tenant. Further verification that repairs were completed will be done at the next scheduled annual or biennial inspection. In tandem with these initiatives, DHCD intends to expand the use of inspectors to provide tenant and landlord training related to HQS standards, unit upkeep, and other related maintenance matters. A key driver for this initiative is to more firmly establish DHCD's statewide inspection staff as a valuable and accessible resource to property owners in their respective regions that will result in new owner participation and a continued listing of quality housing for program participants.

In the FY 2012 Annual Plan, DHCD proposed to remove the owner self-certification requirement in order to encourage further time-savings.

DHCD has not yet implemented this activity. During the past year, DHCD convened working groups to conduct further analysis of unit inspection results and develop specific policies and procedures related to biennial inspections. Upon further discussion and review of the results, DHCD proposes a number of changes to the activity outlined below.

DHCD intends to implement this initiative in FY 2013 or FY 2014. DHCD may conduct a pilot initiative before fully implementing this initiative at all the RAAs.

Initial Plan Year: 2011

Proposed Changes to Activity: DHCD proposes to remove the grading distinction as the trigger for biennial HQS inspections. DHCD proposes to establish a biennial HQS inspection frequency based upon inspection results. This policy will provide owners with incentive to maintain their units in compliance with Housing Quality Standards. If a unit passes the annual inspection the first time the inspector conducts the HQS inspection, the unit will be placed on a biennial HQS inspection frequency. If a unit does not pass HQS on the first attempt at the annual inspection, the unit will remain on an annual HQS inspection frequency until the next annual inspection. At the next annual HQS inspection, if the unit passes during the first inspection attempt, the unit will then move to a biennial inspection frequency. The severity of the repair will also be considered when establishing inspection frequency. DHCD reserves the right to change any HQS unit inspection frequency based upon management discretion. For example, if a unit is in a building with roof leaks (and capital repairs are not scheduled for another six months), DHCD may inspect more frequently than annually. Another example is where a unit fails inspection because the dumpster is overflowing and the garbage is strewn about. DHCD may still allow the owner to retain the biennial inspection frequency because the violation was as a result of a non-compliant tenant moving out. The owner and tenant cannot opt to remain on an annual HQS

inspection frequency; however, either party may request a complaint inspection. Units belonging to new HCV landlords will be retained on an annual HQS inspection frequency until the unit passes the annual HQS inspection on the first inspection attempt.

DHCD will conduct biennial HQS inspections on all PB units. DHCD will track the percentage of units that do not pass HQS inspection at each site and adjust inspection frequency accordingly. The severity of repairs may be taken into account when considering a change to inspection frequency. DHCD reserves the right to change any HQS unit inspection frequency based upon management discretion.

DHCD will retain the portion of this HQS initiative to expand the use of inspectors to provide tenant and landlord training related to HQS standards, unit upkeep, and other related maintenance matters.

As previously proposed in the FY 2012 Plan, DHCD will remove the owner self-certification requirement for confirmation of repairs. DHCD will maintain its existing policy on HQS enforcement.

DHCD may elect to further modify this initiative as needed to meet the original goals: creating administrative efficiencies that will continue to ensure HQS compliance; expanding pro-active landlord and tenant training efforts; and, improving housing choice for tenants in good quality units

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

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

Activity 2011-4

Description/Update of MTW Activity: DHCD initially planned to apply the biennial recertification policy to households on fixed income only; however, DHCD subsequently modified the initiative in the FY 2012 Annual Plan. The modified initiative includes the following recertification policies:

- Allow biennial recertifications for all MTW households;
- Limit the number of voluntary interim recertifications that a MTW family may complete between biennial recertifications to one every six months. Required interim recertifications (i.e., for changes in family composition or otherwise required by the agency) will not count against the limit. Elderly and disabled households will be exempt from this provision and will be able to complete an interim recertification at any time; and
- Allow household self-certification of assets valued up to \$50,000 and the exclusion of the income from these assets. When assets are valued at over \$50,000, verification will be required. For assets with market/face value in excess of \$50,000, DHCD will calculate asset income by taking the market/face value and multiplying that value by the HUD passbook savings rate. At the present time, less than .001% of DHCD's current participants report assets at greater than \$50,000.

Any household that believes they would benefit by an annual recertification may request an annual income recertification.

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

Draft policies, procedures and forms were developed in FY 2011 and training was conducted in FY 2012. The revised recertification policies were implemented beginning in January 2012. In FY 2013, DHCD will continue implementation of this initiative. DHCD also plans to assess progress and compliance with these new policies through ongoing quality control and to conduct follow-up training as needed.

Initial Plan Year: 2011

Proposed Changes to Activity: DHCD proposes to modify the limit on voluntary interim recertifications. DHCD proposes to limit MTW households to two voluntary interim recertifications between regular recertifications. Elderly and disabled households would continue to be exempt from this provision, and would have no limitation on the number of interim recertifications. Additionally to respond to hardships which are beyond the tenant's control (no-fault hardships), MTW households who have exceeded the limit on interim reexaminations may request an emergency interim reexamination if the loss of income is greater than thirty percent (30%). This modified initiative would further the original goal of maintaining administrative efficiencies gained by completing biennial recertifications while providing households with more flexibility as to when they can request an interim.

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

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

Activity 2011-5

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

DHCD, through its MTW program intends to design and implement a time-limited pilot program to provide continued support to and build upon the successes of youth currently participating in its Family Unification Program Aging Out of Foster care program that are facing the current 18 month expiration date. Designed similarly to the current stipend program DHCD currently administers in MBHP and RCAP's region, this initiative will provide a shallow short-term and time-limited subsidy, supportive services funds for education, training and employment related expenses, an escrow account and case management. Up to 25 current participants facing the expiration date for the Family Unification Program Aging Out of Foster care program will be eligible to participate in the extension. Eligible participants for the extension must be in good standing and be making progress toward their education and employment goals.

During the previous year, DHCD and the Department of Children and Families (DCF) met regularly to plan this program, the Youth Transition to Success Program (YTTSP). DHCD staff completed the administrative elements of the YTTSP Program: an administrative Plan was written; a model lease and HAP Contract were drafted and approved by DHCD's legal department; and a Memorandum of Understanding between DHCD and DCF was drafted.

The three-year YTTSP Program will provide participants with:

- A flat rental subsidy that steps down annually by 15%;
- A matched savings account; and
- An annual support budget of \$500 for expenses related to sustaining employment and meeting educational goals.

In FY 2013, DHCD will launch the program and begin assisting targeted youth. In its first year, DHCD expects to enroll between three and eight participants in the pilot program. Together, DCF and DHCD will work to ensure participants transition smoothly from the 18 month voucher to the new three year YTTSP Program.

Initial Plan Year: 2011

Proposed Changes to Activity: No changes are proposed.

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

MTW authorization: MTW Agreement, Attachment C, paragraphs D.1.a, D.1.b, D.1.c, D.2.d, D.3.b, D.4; Broader Uses of Authority amendment.

Activity 2012-1

Description/Update of MTW Activity: DHCD will implement a simplified Utility Allowance schedule and cease Utility Assistance Payments of \$25 or less.

While the revised Utility Allowance schedules are still under development, DHCD expects that any changes to the Utility Allowance schedule will simplify the existing schedule. This may be done by removing multiple building types and fuel type categories. In the model DHCD is currently exploring, the revised tables would identify households as responsible for "All Utilities," "Some Utilities, Including Heat," and "Some Utilities, Not Including Heat."

Regardless of the final model, the goal of these revised schedules will be twofold: in addition to simplifying the designation for staff and reducing Utility Allowance calculation (and potentially rent calculation) errors, a simplified Utility Allowance Schedule will enable clients to better understand the rent calculation process and seek an appropriately priced unit at lease-up.

DHCD has found that clients receiving UAPs for very small amounts are less likely to deposit or cash the checks that they receive. This results in bookkeeping issues for the finance staff at the RAA and DHCD level which demand time and resources out of proportion to the relatively small amounts of money. By terminating the issuance of UAPs of \$25 or less, DHCD intends to reduce the incidence of outstanding checks, and alleviate the need for finance staff to spend time and resources reconciling these accounts.

The facet of this initiative that ceases Utility Assistance Payments of \$25 or less was implemented in FY 2012. In FY 2013, DHCD will focus its efforts on assessing compliance with this facet of the initiative along with the other new recertification policies and rent simplification strategies via quality control. Follow-up training will be conducted as needed. DHCD does not expect the implementation of a Simplified Utility Allowance Schedule in FY 2013; however, additional planning and analysis will be conducted.

Initial Plan Year: 2012

Proposed Changes: No changes are proposed.

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

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

Activity 2012-2

Description/Update of MTW Activity: DHCD will implement the following Rent Simplification strategies:

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

In FY 2012, procedures and forms were developed, and extensive training was conducted to prepare RAA staff for implementation of this initiative. Statewide implementation began in January 2012, and will continue to be rolled out over the coming year. DHCD will focus its efforts on assessing compliance with these new policies via quality control in the upcoming Fiscal Year. Follow-up training will be conducted as needed.

As required for rent reform initiatives, DHCD will conduct an annual evaluation of this initiative in FY 2013.

Initial Plan Year: 2012

Proposed Changes: No changes are proposed.

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

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

Activity 2012-3

Description/Update of MTW Activity: DHCD will modify the Project Based Voucher program guidelines to establish reasonable limits on discretionary moves. DHCD believes that this policy will promote efficiency in the operation of the PBV program, while also ensuring that tenant-based vouchers continue to be available to eligible households on the waiting list. Except as noted below, PBV households will be able to terminate the assisted lease and receive priority for an available tenant-based voucher only after the second year of occupancy provided that they remain in good standing with their lease and HCV program responsibilities. In addition, for each RAA, DHCD will establish an annual target number of vouchers available to PBV households who have requested a tenant-based voucher. The annual target number will be equal to the total number of turnover vouchers from the prior year for each RAA multiplied by the percentage of PBV units managed by the RAA. For example, CTI administers 2,205 regular vouchers, of which 217 (or 10%) are PBVs. CTI had approximately 135 turnover vouchers for the most recent one year period. Thus, for this RAA, DHCD will establish a target number of 13 vouchers for PBV tenants who wish to move with a tenant-based voucher during the current year. If demand exceeds supply over the course of the year, those additional PBV participants who wish to move will remain at the top of the waiting list until the following year.

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

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

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

In FY 2012, DHCD began implementation of the new policies establishing reasonable limits on discretionary moves. In FY 2013, DHCD plans to continue to implement the new policies and to assess compliance with the through ongoing quality control. DHCD will also conduct follow-up training if needed in FY 2013.

Initial Plan Year: 2012

Proposed Changes: No changes are proposed.

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

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

Activity 2012-4

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

The Community Economic Development Assistance Corporation (CEDAC) and the Preservation Advisory Committee (PAC) have both requested that DHCD make use of its MTW authority to address the expiring use problem facing the Commonwealth. CEDAC indicates that within the next 10 years, 13,200 units in 110 projects will be eligible to convert to market rate with no other affordability restrictions.³ By converting these units to Project-Based units, DHCD would be ensuring the affordability of this housing stock for at least the 15 year term of the Project-Based contract.

Projects would only be eligible for this initiative if they meet the following criteria:

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

DHCD may modify the selection criteria listed above at its discretion, and may place limitations on the number, types and/or characteristics of units to be supported under this initiative. In addition, tenants of the development who are eligible to receive vouchers will be given the option to receive an Enhanced Voucher or to have their unit converted to a Project-Based voucher. DHCD anticipates significant participation from Project developers and community

¹ "The 40 Year Problem in Massachusetts—Analysis of the First Wave of Housing Projects." Authored by Bill Brauner, Housing Preservation Program Manager, CEDAC.

stakeholders in order to ensure that tenants are well-educated about the choice they have and what the impact will be on their families. The only Enhanced Voucher provision which will apply to tenants selecting the Project-Based option will be the initial income eligibility requirements. Otherwise, all DHCD PBV policies will apply upon the conversion action.

In order to encourage the feasibility of this initiative for a larger number of projects, DHCD will waive the limitation on the number of units per project generally applied to PBV developments and allow up to 100% of units in all types of developments to be Project-Based.

Over the past year, DHCD has continued to plan for this initiative. Discussions have occurred with the HUD Boston office, local communities and developers. In FY 2013, DHCD anticipates that it will begin implementation at one or more Enhanced Voucher sites provided that it can obtain concurrence of key stakeholders at the proposed development sites.

Initial Plan Year: 2012

Proposed Changes: Pursuant to HUD's guidance on the use of special purpose vouchers, DHCD may apply MTW operating flexibilities to Enhanced Vouchers one year after the voucher is issued (i.e. at the time that DHCD elects to roll the funds into the MTW Block Grant) provided that these do not infringe on the protections applied to Enhanced Voucher households pursuant to HUD regulations and notices. Operating flexibilities that may be applied to Enhanced Vouchers include, but are not limited to, biennial recertifications, biennial inspections, rent simplification (provided that it does not infringe on EV protections), and utility allowances. Enhanced vouchers will be offered to families targeted by HUD for assistance and will be considered special admissions. Until the Enhanced Voucher household either moves from the unit or is terminated from the program, they will continue to be subject to the Enhanced Voucher minimum rent policies, including the applicable provisions related to income decreases. Enhanced Voucher income limits and payment standards will also continue to apply to these households. Time limited assistance provisions will not be applied to Enhanced Voucher households in the event that such policies are ever adopted. (Note that DHCD has not proposed to implement time limited assistance for the voucher program.) For existing tenants on the conversion date who elect to receive a Project-Based Voucher and who are considered overhoused, DHCD may waive the subsidy standard policy, provided that there must be at least one household member for each bedroom in the apartment. In addition, tenants may request a reasonable accommodation if applicable.

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

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

Activity 2012-5

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

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

During FY 2012, DHCD met with RAA senior staff and FSS Coordinators to discuss potential changes to the FSS program and the most effective strategies for implementing those changes. In FY 2013, DHCD expects to begin utilizing some or all of these strategies to strengthen the FSS program by improving the retention rate, increasing participants ability to access employment and or educational opportunities by providing “gap” funding to address financial barriers to employment, and increasing participants’ long-term economic capacity by providing incentives to encourage participants complete education and training programs before entering the workforce.

Initial Plan Year: 2012

Proposed Changes: No changes are proposed.

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

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

VII. Sources and Uses of Funding

DHCD's operates an MTW program that involves only Housing Choice Vouchers. Table 7 below provides a projection of sources and uses for the MTW program for Fiscal Year 2013. Note that no state or local funds are utilized. Note also that HCV funding is allocated on a calendar year (CY) basis. As of the drafting of this Plan, DHCD has not been notified of either its CY 2012 or CY 2013 funding; thus, the amounts listed below are likely to change based on actual funding levels. DHCD will provide information on actual source and use amounts as part of the MTW Annual Report.

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

Table 7: FY 2013 MTW Sources and Uses

Sources	Estimated Amount
HUD Subsidy – MTW Housing Choice Voucher *	\$207,607,000
Administrative	\$15,586,000
MTW Sources Total	\$223,193,000
Uses	
HAP Payments	\$203,300,000
Administrative	\$19,073,786
MTW Local Initiatives**	\$1,450,000
MTW Uses Total	\$223,823,786

**Includes all PBV units*

*** The MTW Local Initiatives estimated amount includes the cost of MTW Activity 2000-1 and the Owner Incentive Fund at the pilot sites.*

VIII. Appendices

- Appendix A is the required signed Resolution adopting the FY 2013 MTW Annual Plan Certification of Compliance.
- Appendix B provides a description of DHCD's planned and ongoing MTW evaluation efforts.
- Attachment C provides a listing of each DHCD regional administering agency.
- Attachment D includes the public hearing notice, sign-in sheets, and written testimony received as part of the MTW Annual Plan public hearing process.

Appendix A: Resolution Adopting Certification of Compliance

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 July 1, 2012, 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 Agency 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 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.
4. 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.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. 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.
7. 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.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. 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.
10. 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. 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.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. 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.).

17. 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.

18. 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.

Mass. Dept. of Housing and Community Development

MA901

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)

Aaron Gornstein

Undersecretary

Name of Authorized Official

Title



Signature

4/6/12

Date

Appendix B: Evaluation

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

Appendix C: Listing of Regional Administering Agencies

Regional Administering Agencies

Berkshire Housing Development Corp.

One Fenn Street
Pittsfield, MA 01201
413.499.4887

Community Teamwork Inc.

155 Merrimack Street
Lowell, MA 01852
978.459.0551

Housing Assistance Corp.

460 West Main Street
Hyannis, MA 02601
508.771.5400

HAP Inc.

322 Main Street
Springfield, MA 01105
413.233.1500

Lynn Housing Authority

10 Court Street
Lynn, MA 01902
781.592.1966

Metropolitan Boston Housing Partnership

125 Lincoln Street
Boston, MA 02111
617.859.0400

RCAP Solutions

205 School Street
Gardner, MA 01440
978.630.6600

South Middlesex Opportunity Council

300 Howard Street
Framingham, MA 01702
508.620.2336

South Shore Housing Development Corp.

169 Summer Street
Kingston, MA 02364
781.422.4200

Appendix D: Public Hearing/Public Comment Materials

Massachusetts Department of Housing and Community Development (DHCD)

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

**NOTICE OF PUBLIC HEARING
REGARDING DHCD'S HOUSING CHOICE VOUCHER PROGRAM (HCVP) DRAFT MOVING
TO WORK (MTW) PROGRAM ANNUAL PLAN FOR FY 2010**

MARCH 23 AND MARCH 24, 2009 AT 10:30 A.M.

MARCH 23RD AT HAP HOUSING, 322 MAIN STREET, SPRINGFIELD, MA. 01105

**MARCH 24TH AT DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
100 CAMBRIDGE STREET
BOSTON, MASSACHUSETTS 02114**

On June 19, 2008, DHCD entered into an Amended and Restated MTW Agreement with the U.S. Department of Housing and Urban Development (HUD) to expand its current 183 unit MTW initiative to include over 18,000 units of its HCVP portfolio over the next several years. In accordance with its MTW Agreement, DHCD will hold a public hearing prior to finalizing its FY 2010 Moving to Work Annual Plan. This plan provides details about DHCD's proposed MTW activities that will commence beginning July 1, 2009.

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

DHCD will accept written comments through Tuesday, March 31, 2009. Written comments should be addressed to:

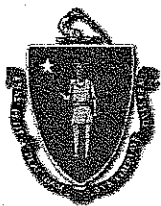
**Bureau of Rental Assistance
Massachusetts Department of Housing and Community Development
100 Cambridge Street - Suite 300
Boston, MA 02114
Attention: MTW Annual Plan Comments
FAX: (617) 573-1345**

If you plan to attend the hearing in Springfield on March 23rd, please call 413-233-1670 to confirm your attendance.

If you plan to attend the hearing in Boston on March 24th, please call 617-573-1206 to provide your name, which will be forwarded to the building's security staff. Please bring photo I.D. Failure to list your name in advance could delay your attendance at the hearing.

If you require an accommodation (materials in Braille/large print, sign language interpreters, etc.), please contact DHCD at 617-573-1206 no later than March 16, 2009.





Commonwealth of Massachusetts
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

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

SIGN-IN SHEET

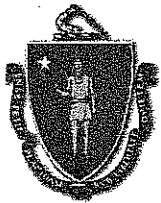
PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE: March 26, 2012

LOCATION: 100 Cambridge St., Boston MA 02115

NAME	REPRESENTING
John W. Park	Edgemoor
Bob Cohen	DHCD
JUDITH LIBEN	MLR/
Joanne McKenna	DHCD
Courtenay Loisel	RCAP
Michele Dubois	RCAP
Cindi Maulc	Housing Assistance Corp.
MARCIA FRANKLIN	CTJ
SUE NOWI	MBHP
Chris Harris	MBHP



Commonwealth of Massachusetts
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

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

SIGN-IN SHEET

PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE: March 27, 2012

LOCATION: 322 Main St. Springfield MA 01105

NAME	REPRESENTING
Pat Ryan	Regional Housing Network
Helen Blunt	HAP Housing
Charlene W. H. H. H.	HAP Housing
Nancy Rivera	HAP Housing
Chris Montemayor	HAP Housing
Percy Pennick	HAP Housing
Cileen T. O'Sullivan	HAP Housing
Logan Patrick	HAP Housing
Christopher Zabo	Dept. of Mental Health
Peter Gagliardi	HAP Housing
Elen Hatzaki	HAP housing
Xinda Morley	HAP Housing



HAPHousing's Comments on
Department of Housing and Community Development
Moving To Work Program Annual Plan for FY 2013

By

Nancy E. Rivera, Associate Executive Director

Submitted on March 27, 2012

On behalf of HAPHousing, we want thank you for the opportunity to submit comments regarding the Massachusetts Department of Housing and Community Development (DHCD)'s Moving to Work (MTW) Program Annual Plan for Fiscal Year 2013.

HAPHousing is a regional non-profit agency serving primarily Hampden and Hampshire Counties in Western Massachusetts. We administer a wide range of programs for low income families and individuals. Our customer base includes people who are homeless or at risk of becoming homeless, disabled veterans, elders struggling to maintain their independence, homeowners who are facing foreclosure, and young families who are trying to make ends meet with minimum wage jobs. Under contract with DHCD, we administer a variety of rental assistance programs including the Section 8 Housing Choice Voucher Program. We provide rental assistance to approximately 4500 households in our region, and work with 2400 property owners who receive rental payments from HAPHousing on behalf of program participants.

HAPHousing supports this plan and appreciates the Department's continued effort to expand its Moving to Work program and its careful approach to implementation. We believe that the increased flexibility available through the statutory and regulatory relief proposed in this document will help agencies across the Commonwealth assist more families achieve greater economic self sufficiency, increase housing choice for low income families, and strengthen DHCD's commitment to support the statutory objectives under the MTW program.

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

We believe that the Department's continued efforts to transition their HCV program to a Moving to Work program is consistent with our mission. We appreciate the work that the department has done and the opportunity to participate in the planning and implementation process of the various changes undertaken during FY'12.

322 Main Street, Suite 1, Springfield, MA 01105-2403 / 413-233-1500 / 800-332-9667

Fax: 413-731-8723 / TDD: 413-233-1699 / Rental Assistance Fax: 413-787-1797

20 Hampton Avenue, Northampton, MA 01060 / 413-584-8495 / 800-851-8495 / Fax: 413-586-3571

www.haphousing.org



HOUSING COUNSELING • RENTAL ASSISTANCE • HOUSING DEVELOPMENT • PROPERTY MANAGEMENT • HOMEOWNERSHIP • EMERGENCY AND TRANSITIONAL HOUSING

HAPHousing™ is a trademark of HAP, Inc., a private 501c3 nonprofit organization serving all of Hampden and Hampshire counties.

HAPHousing supports the new initiatives and the ongoing activities that are outlined in the FY 2013 MTW Annual Plan. We look forward to continuing to work closely with the Department and other stakeholders on implementation of these changes now and in the future.

Proposed Non-MTW changes:

HAP supports the proposed changes to the Inspection Attendance Policies. However, we would like to recommend a change to the proposed wording in the MTW Plan that would provide DHCD and the administering agencies more flexibility to begin the termination proceedings based on a participant's history of no-shows, if warranted. This change will eliminate wasted inspections and the associated costs.

DHCD current language in the plan is:

"DHCD will request a conference with the tenant and require signature on an HQS non-compliance warning letter for the first "HQS No-Show" violation."

HAPHousing's Proposed change:

"DHCD will review case history to determine the action to be taken for a HQS no-show. After review DHCD may request a conference or propose termination according to DHCD's termination policies".

Proposed and On-Going MTW Activities

Activity 2013-1: We support the Department's plans to eliminate HUD's requirement to redetermine the reasonable rent if there is 5% decrease in the HUD published Fair Market Rents. Although HAPHousing has been affected by a decrease only once in the past several years, this requirement will have a huge impact on agency resources, program participants and owners should it occur again. Significant staff time and resources are needed to meet the administrative requirements of this policy. Beyond that, some program participants will be forced to move when their landlords are unwilling to accept the lower rent. It may also cause some landlords to question their continued participation in the program.

Activity 2013-2: HAPHousing also supports the modified rent reasonableness requirements for redetermined rent policy under the Project Based Voucher (PBV) Program. This change will allow us to continue to work with PBV owners to ensure the long term viability and affordability of these PBV developments and promote better housing opportunities to our clients.

Activity 2012-1: Over the past several years, HAPHousing has appreciated the opportunity to participate in the discussions regarding the activities that would give PBV owners and managers the responsibility for the intake and waiting list management. HAPHousing currently administers 107 of PBV Projects and expects an increase of 32 units that have been approved to come on line over the next 12-15 months. We are concerned that with the increased number of projects with special designations and selection criteria that the current Section 8 Project Based waitlist will hinder our ability and that of the project owner/managers to quickly and efficiently fill these vacancies. We strongly urge the Department to make this a priority for FY'13 and work

on implementation issues with the administering agencies to ensure a smooth transition of these functions to PBV property owners and managers.

Activity 2011-3: HAPHousing supports the proposed changes in the determination of units to be placed on biennial inspections. HAPHousing is committed to working closely with DHCD on implementation issues. We urge the department to consider implementation of this initiative as soon as possible, but hopefully no later than January 1, 2013. The expected decrease in administrative costs with fewer annual inspections will allow HAPHousing to redeploy staff to work on providing increased education, training and customer service to property owners, which is essential to the success of our program.

In addition, we would like to recommend that the department consider a change in the proposed activity to allow only owners with a history of compliance to be placed on a biennial cycle following a passed first move-in inspection. Owners with whom we have no prior experience should be allowed a biennial inspection only after a unit has passed an annual inspection on the first inspection. The current language in the proposed activity would afford unknown owner/agents the same stature as an established owner/agency with the program. The agency will be taking a risk with owners that have no prior history with the program.

Activity 2011-4: HAPHousing fully implemented the biennial examination for all eligible households as of January 1, 2012. We support the change in the voluntary interim policy that would allow two voluntary interims between regular examinations instead of limiting them to one every six months. This would allow greater flexibility to the participating households. However, we would like the department to consider allowing further voluntary interim re-examinations should the household experience a loss of income of at least 30-50%. We anticipate this would happen infrequently, but it would avoid hardship in those few instances of significant change.

Activity 2012-4: We support this initiative, and see it as a potentially valuable tool in addressing the problem of maintaining affordability in expiring use properties. However, we think it needs some further thought. In particular, we think further thought should be given to whether this initiative should be limited to projects in neighborhoods which offer economic and educational opportunities and relatively low concentrations of poverty. In some communities, particularly the so-called Gateway Cities, this criterion may exclude the majority of projects. Further, unless statutorily required, we question whether providing tenants the option of an Enhanced or a Project-based Voucher will only undermine the success of this effort. We anticipate that most tenants would choose the voucher which provides them the most options in the future – the Enhanced Voucher.

Thank you for this opportunity to comments on the plan. HAPHousing looks forward to our continued partnership with the Department of Housing and Community Development, the other Regional Administering Agencies and other stakeholders as we move ahead with implementation and expansion of the MTW program.



125 LINCOLN STREET, 5TH FLOOR, BOSTON, MA 02111-2503

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www.mbhp.org

**Metropolitan Boston Housing Partnership's Comments
Department of Housing and Community Development
Moving To Work Program Annual Plan for FY 2013
by
Susan Nohl, Director of Leased Housing**

March 26, 2012

On behalf of Metropolitan Boston Housing Partnership (MBHP), thank you for the opportunity to present comments regarding the Department of Housing and Community Development's Moving to Work Program Annual Plan for FY 2013.

MBHP is a regional nonprofit housing agency. We administer a wide range of programs to low-income populations in Boston and 29 surrounding communities. Our customers include a cross-section of the local population: people who are homeless and disabled veterans; elders struggling to maintain their independence and families trying their best to make ends meet with minimum wage jobs. We provide rental assistance to 7,600 households, work with 4,300 property owners, and respond to more than 12,000 housing inquires each year. We are one of eleven agencies comprising the Regional Housing Network serving as a vital link in the Commonwealth's housing delivery system. Our largest program is administering the Section 8 Housing Choice Voucher program on behalf of the Department of Housing and Community Development (DHCD). MBHP currently administers more than 5,700 Section 8 Housing Choice Vouchers.

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

The department's plan for their Moving to Work (MTW) program is consistent with MBHP's mission. We look forward to continuing to work with the department in creating changes to the program that not only meet the three statutory objectives of the MTW program but also continue to allow us to use our largest program to meet our mission.

MBHP supports the new initiatives and the ongoing activities of the program that are part of the FY 2013 MTW Plan. We respect the work that the department has done during the initial three years of MTW implementation and have appreciated the opportunity to actively participate in planning many of these changes.

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Non-MTW Activity

MBHP appreciates DHCD's willingness to amend the Administrative Plan to provide the administering agencies additional support in enforcing the requirement that a participant be present for and allow access to the subsidized unit for the Housing Quality Standards (HQS) inspection. However, MBHP requests that DHCD change the language from "will" to "may" to allow the agencies some flexibility in making the determinations of when we will issue warnings and/or commence termination. Without this flexibility, the administration of this policy could result in additional administrative responsibilities.

Activity 2013-1 and 2013-2

MBHP supports DHCD's proposal to eliminate the requirement to complete rent reasonableness when there is a 5% decrease in the Fair Market Rent (FMR). Although MBHP has only been affected by this requirement once in the past several years, when it does happen it has a major impact on the program. Not only is there significant staff time and resources involved in meeting the administrative requirement of this policy, it also puts the program participants and the owners who rent to them in very difficult positions. Our experience was that the participants either needed to relocate, which was not always desirable or easy for them to do, or the owners had to accept a lower rent, which often compromised the tenant/landlord relationship and caused owners to have concerns about continued participation in the program.

We also support the modified rent reasonableness policies for the Project Based Voucher (PBV) program. We currently administer over 360 PBV units and these modified policies will allow us to continue to work with owners who are committed to keeping these units affordable for program participants.

Activity 2000-1

As one of two of the original administrators of the MTW program, MBHP supports the proposed changes to the program design for the small scale MTW program administered in Boston. We look forward to working with DHCD in making positive changes that allow participants in this program to improve their chances of reaching self-sufficiency during the limited time that they are allowed to participate and are excited to have the flexibility to increase both the financial resources and the supportive services available to them.

Activity 2010-1

MBHP appreciates that during FY '10, FY '11 and FY '12 we were part of discussions that would give Section 8 PBV property owners and managers the responsibility for the waiting list intake and management functions. Given the significant number of PBVs that MBHP currently

administers, 363 PBVs in 42 developments, and with several more projects that have been approved and are in process, we know that the current Section 8 PBV waiting lists hinder the ability of both MBHP and the individual properties to quickly and efficiently fill vacant units. We ask the department to prioritize this activity for implementation in FY '13 and we commit to working with DHCD and the other administering agencies to do whatever it takes to complete this process.

Activity 2011-3

During both FY '11 and FY '12, MBHP participated in several planning meetings as it relates to the design and implementation of the biennial inspection process. MBHP supports the proposed changes and the flexibility to modify the policy as necessary once it is implemented. MBHP is committed to working with the department and other Regional Administering Agencies to implement this activity as soon as possible, and no later than January 1, 2013. MBHP recommends a change to the plan indicating this initiative will be implemented in FY 2013. The anticipated reduction in staff time and administrative costs with fewer annual inspections to complete is significant. MBHP anticipates using the time savings to redeploy staff to work with our Property Owner Outreach team, allowing additional resources for outreach, training, and customer service for the property owners that are vital to the success of our program and/or to achieve savings to off-set administrative fee reductions.

Activity 2011-4

MBHP fully implemented the biennial reexaminations for all MTW households on January 1, 2012. MBHP is committed to continuing to work with DHCD in assessing the impact of this policy. We also support the change in the voluntary interim policy that would allow two voluntary interim reexaminations between regular reexaminations instead of limiting them to one every 6 months.

Activity 2011-5

MBHP enthusiastically supports the development of the Youth Transition to Success Program (YTTSP) which will allow us to continue to assist current participants of the Family Unification Program – Adolescent Outreach Program (FUP-AOP) once they have successfully completed that 18-month program. We are committed to continuing to work with DHCD and the Department of Children and Families to support the youth aging out of foster care that participate in both of these programs.

Activity 2012-1

In January 2012, MBHP implemented the policy that ceases Utility Assistance Payments (UAP) of \$25 or less. We anticipate cost savings as well as program efficiencies from this policy when we review the impact of this activity. In addition, although the department has indicated that there will be no implementation of a simplified utility allowance schedule during FY '13, we encourage the department to continue analyzing this option and meeting with the administrators of the program to see if the creation and implementation of a simplified utility allowance is feasible. MBHP believes that a simplified utility allowance schedule will make it easier for program participants who are searching for housing to find housing within an acceptable rent range. The current utility allowance schedule is quite cumbersome and is confusing to both participants and prospective owners. A simplified utility allowance will also improve the integrity of the program by minimizing calculation errors that are made with the current, more complex schedule.

Activity 2012-4

DHCD's plan to implement an initiative to maintain long-term affordability of expiring use is ambitious and MBHP commends DHCD for their continued commitment to affordable housing. We look forward to working with the department as this initiative is implemented.

Activity 2012-5

MBHP is excited to work with DHCD to implement some or all of the new changes proposed to the Family Self-Sufficiency (FSS) Program. We have identified a population of current HCVP participants who chose not to participate in FSS because they will not benefit from the current escrow component of the program. Although the escrow account is a key component of the program, MBHP knows that there are other, equally important components of the FSS program, including the case management support and access to resources that these participants would benefit from if there was a financial incentive for them to enroll. These changes would allow us to potentially assist more families in reaching self-sufficiency.

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



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Phone: (617) 859-0400 | Toll Free: (800) 272-0990 (MA Only)

www.mbhp.org

**Metropolitan Boston Housing Partnership's Additional Comments
Department of Housing and Community Development
Moving To Work Program Annual Plan for FY 2013**

by

Susan Nohl, Director of Leased Housing

April 6, 2012

Metropolitan Boston Housing Partnership, (MBHP) would like to revise one of the comments submitted on March 26, 2012 as it relates to the MTW Plan for FY 2013.

Activity 2012-4

As previously stated, MBHP supports DHCD's ambitious plan to implement an initiative to maintain long-term affordability of expiring use and MBHP commends DHCD for their continued commitment to affordable housing. We look forward to working with the department as this initiative is implemented. While the details of this initiative have yet to be finalized, MBHP would request that DHCD work with HUD to allow Moving To Work flexibility to apply to the administration of any Enhanced Vouchers or Tenant Protections Vouchers after the initial year in order to maintain consistency in the administration of the program as well as to ensure optimum program administration efficiencies.

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99 CHAUNCY STREET 617.357.0700 PHONE
SUITE 500 617.357.0777 FAX
BOSTON, MA 02111 WWW.MLRI.ORG

April 6, 2012

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

Re: Comments on DHCD's Draft FY 13 MTW Annual Plan

Dear Sir/Madam:

We are submitting these comments on DHCD's Draft FY13 Moving to Work (MTW) Annual Plan, based on our many years of experience representing low income tenants of, and applicants to, the Section 8 programs operated by the various regional non-profits under contract with DHCD.

1. General Comments Applicable to All Plan Activities

As several of the undersigned attorneys noted in their comments to the Draft FY 12 MTW Annual Plan, it is not possible to intelligently comment on current and proposed MTW activities in the Draft Annual Plan without the benefit of reviewing critical operational details that flesh out the broad descriptions in the Draft Plan. Although the details of proposed policies from last year's Annual Plan should have been included in DHCD's Administrative Plans as required by HUD regulations at 24 CFR 982.54, DHCD has yet to issue the revised Administrative Plan for the Housing Choice Voucher Program or the Project Based Assistance Program.¹ And even those policies that are not required to be included in the Administrative Plan should then be spelled out in more detail (in the Annual Plan) so the public can understand what DHCD has in mind. To the best of our knowledge, DHCD, in administering the MTW program has not received a waiver of the requirement for an Administrative Plan, yet it has not drafted or published this critical document.

Without a clearer picture of DHCD's current or proposed policies, our comments are necessarily incomplete. We have been told that the Administrative Plan will be issued shortly. When that Plan is published, we will be able to comment in greater detail and we hope those comments will be considered and forwarded to HUD along with these. Meanwhile, we do appreciate DHCD's supplying us with the lengthy power point which appears to be MTW training for RAAs given on some unknown date in 2011. That power point lists the activities that will go into effect in January 2012, even *before* this current opportunity to comment on the Annual Plan (and before

¹ In 2011, DHCD indicated that when it finalized its draft Section 8 Administrative Plan(s), it would allow Legal Services to submit comments on the Plan and consider those comments. We have sent periodic inquiries as to the status of the Plan but have been told that the Plan is still in draft form. Nonetheless, DHCD started implementing far reaching rent changes in January 2012, with the only publicly available description of the range of rent changes set forth in Draft Annual Plan for FY13.

the promised consideration of our comments on the Administrative Plan). Those activities include changes relating to conversion from a project based voucher to a tenant based and the following rent-related policies:

1. Interim reporting requirements
2. Zero income verification and recertification frequency
3. Fraud prevention policies
4. Reexamination frequency from annually to biennially
5. Application of payment standard in effect at regular and interim reexaminations
6. Application of utility allowances at regular and interim reexaminations
7. Elimination of utility reimbursements of \$25 or less
8. Exclusion of all income for adult full time students (Other than the head of household, Co-Head and Spouse)
9. Exclusion of asset income for assets with net value of \$50,000 or less
10. Self-Certification of asset income
11. Use of imputed asset income when net value of assets is greater than \$50,000
12. Change to the Earned Income Disallowance Policy
13. Increase in Minimum Rent from \$25 to \$50

We urge DHCD to consider that informed feedback and comments from the public is not just a formulaic exercise. There is often an inherent tension between MTW policies that stress administrative efficiency and cost-saving versus those that expand opportunities and protect the interests of participants. Thus, although the Draft Plan notes that DHCD conferred often with its own regional administrators, it sought less input from those representing participants and applicants who may have presented differing views on obtaining the right balance between efficiencies and opportunities.

Nevertheless, even given these limitations on the information provided to us, we will comment on several specific activities as best as we can under these circumstances and will do so again when we see the forthcoming Administrative Plan(s).

2. Comments on Selected Activities in FY 2013 Draft Plan

Activity 2000-1: Continuation of MTW Small-Scale Program (page 22):

- Under current DHCD public housing and MRVP admissions regulations at 760 CMR 5, participants in this time-limited "little" MTW program, all of whom in the Boston area had been homeless before entering the program, are no longer eligible for a homeless admissions priority. This means, barring some significant increase in income, these parents and their children will go to the bottom of the waiting lists once their fixed MTW rental subsidies expire or once they can no longer afford the rents, even with the subsidy. We believe that denying the priority to these families thwarts the Commonwealth's homelessness policies that purportedly strive to find permanent housing for these families. Further, denying admissions priorities to these families contravenes explicit legislative directions to DHCD in the FY 12 budget requiring the agency to promulgate

regulations that ensures these families, with temporary rental subsidies, will maintain their admissions priorities.

- Therefore, we urge DHCD to immediately change its public housing admissions regulations to allow these MTW families to maintain their homeless priorities for public housing and state-funded vouchers.
- As to changes in this activity, those listed on page 23 appear to be productive and may improve the impact of this portion of the MTW program. We would, however, suggest that in order to have a real effect, the financial assistance package, including the rental subsidy, be increased beyond the recommendations in the Draft Plan.

Activity 2010-1: Site-based waiting lists in Project Based Voucher developments (page 25).

- Although the Plan implies that this policy has not yet been finalized, it is our understanding that it is already in place in some areas. Nevertheless, the actual operational details have not been spelled out in an Administrative Plan although DHCD says on page 25 that it intends to modify its PBV Administrative Plan to cover this policy.
- Before this significant policy is put in place, we would first ask DHCD to explain what is the problem with the current system and what is the need for change? That would undoubtedly help us to comment more productively.
- This policy should undergo careful scrutiny and input from the public and specifically those who work with voucher and PBV applicants. As a general matter it is ironic that just at the moment when DHCD is considering regionalizing many functions of the public housing program, it is going in the opposite direction here by leaving waiting list and admissions to scores of different developments each of which may exercise their own admissions discretion.
- As the PBV program has grown and continues to expand, this policy will mean that applicants, instead of applying centrally, will have to figure out how to apply at each development. This is a fragmented approach that makes it difficult for most households to navigate the system, especially given that there are about 135 separate PBV developments as per the list on pages 9 through 14 of the draft Annual Plan for FY13.
- And current practices at many developments are problematic. For example, multifamily developments often employ a "first come first served" application process (discriminating against people with disabilities), residency preferences, overly strict credit criteria, etc.

We urge you not to go any further with this activity until the revised PBV Administrative Plan can be reviewed. With the conversion of expiring use developments to PBVs there may be existing waiting lists and a need for exceptions so that tenants already on the waitlist are not penalized.

Activity 2010-4: Modifying Program Forms (page 29)

Although DHCD indicates that it has not implemented this activity, it may elect to do so in future years. When DHCD does decide to implement this activity and convene a DHCD-RAA working group it should include members of the Legal Services community and other interested persons as part of the form review working group. Again, obtaining input from different stakeholders will often result in a better product. At least some of the forms (e.g. HAP contract) may have important consequences for the operation of the program for voucher holders and participants. Further, any review or modification of forms should include appropriate translation in accordance with DHCD Language Access Policy.

Activity 2011-2: Opportunity Neighborhoods Program (page 31)

Although the Plan says that DHCD does not anticipate implementing this pilot program during FY 2013, we urge you to start the process now. This pilot program could serve as one of the most important steps forward in DHCD's stated intention to do all that it can to shape all its programs to affirmatively further fair housing goals.

Activity 2011-3: Inspection Policies (page 32)

Although in general, based on the information provided in the draft Annual Plan, we support the changes in the inspection policies, we would request that DHCD keep the provision which allows a tenant to elect annual inspections rather than be limited to "complaint" inspections. We have had clients who are fearful of jeopardizing their tenancy by reporting code violations to their landlord and, instead rely upon the housing agency's inspection to provide notice and obtain repairs.

Activity 2011-4: Rent Recertification Policies (page 34)

Once more, legal services advocates had specifically requested DHCD not to implement "rent simplification" policies until various "stakeholders" had a chance to review the details and make recommendations.² Nevertheless, early in 2012 we were contacted by several participants in the HCV program telling us that a new rent recertification policy was in place. That policy, as described on page 34, allows voluntary recertifications only once every 6 months (3 times during the two year biennial recertifications for all households) without any hardship waiver or exemption. Thus, for example, a participant who reported a substantial income decrease in January of a given year and then lost her job in May could not report that income loss for income and rent redetermination. Similarly, in a household with several working adults, one could lose his or her job in January and another in May, but under the existing policy would not be allowed to have a second rent decrease. And, again without issuing an Administrative Plan, DHCD proposes to even decrease the availability of interim recertifications from three to two (although it will eliminate the 6 month provision).

² Again, few operational details were contained in the Annual Plan for FY 12 (pages 17 and 34) and none are contained in the only publicly available Section 8 Administrative Plan (last revised in 2009).

To the extent that we know the details of DHCD's new rent policies (mostly from its power point training materials), we have the following comments:

- DHCD should retain the tenant's automatic right to 3 interim decreases in the two year period. It is critical that a tenant's ability to pay rent be based on income. If the rent is unaffordable, tenants will be evicted (and not eligible for Emergency Assistance shelters or the HomeBase program) and landlords will be less likely to participate in the Section 8 program in the future.
- DHCD should also exempt tenants in PBV units from the limit on voluntary interim re-examinations. (In other words, treat PBV tenants the same as households where the head of household or spouse is elderly or disabled or where the household is a FSS participant). PBV units are a fraction (about 6%) of DHCD's overall resources, so this would not result in much increase in administrative work. PBV units are often located in buildings owned by non-profits, who are dependent on tenant rent and have little cushion where tenants are unable to pay the rent when their income decreases and the rent does not decrease. PBV tenants' mobility is limited (and proposed to be limited further) so if they are unable to pay the rent, and are evicted, they lose both the apartment and the subsidy. (As an aside, Cambridge Housing Authority exempts PBV units from its "rent simplification" policies under MTW).
- DHCD must develop a hardship policy for those tenants unable to pay the rent under its limited recertification policies (i.e. those who used up their right to three automatic decreases in a two year period). DHCD's Amended and Restated Moving to Work Agreement with HUD specifically provides that it "must adopt a policy for addressing hardship cases" when it develops its reasonable rent policy. (Page 5). There is no such policy described in the training materials made available to us.
- DHCD's rent policies should include a provision for mixed immigrant families such that their total tenant payment (TTP) would be no more than 10% more than it would be for a non-mixed immigrant family (similar to Cambridge Housing Authority's policy). In other words, if there was a 10% surcharge and if 30% of income is \$100, then the TTP would be \$110 (10% of \$100) and if \$50 is the minimum rent, then the TTP would be \$55 for a mixed immigrant family. This results in affordable rent and a fair local policy.

We may have comments on other policies (e.g. taking into account periods of seasonal income and no income³ and the provision that the income decrease must be expected to last more than

³ While we support using income which takes into account the seasonal nature of certain jobs, this could impose a hardship depending on the recertification date. There are a lot of households in our service area who work for schools and colleges and, as a result, do not have income in the summer or December-January when school is not in session. If, for example, the family's biennial recertification date was between May and September, they would not have had time, in the winter months, to save up money to pay the rent during the periods of no income.

60 days⁴) but need to see the actual Administrative Plan in order to provide a meaningful response.

Activity 2012-1: Utility Allowances (page 36)

DHCD started implementation of part of this in FY 12 without an Administrative Plan. This is troubling given the possible ramifications and we cannot comment without full knowledge of the plan. However, we urge DHCD not to terminate the UAP of \$25 or less because it makes a significant difference for someone on very low income.

As to the simplified utility allowance schedules, DHCD definitely should not implement this policy until everyone has an opportunity to study carefully and consult with utility experts such as those at the National Consumer Law Center. Given the disparity in gas, oil, and electric heating costs (and our usually long and cold winters), we urge caution in simplifying the utility allowance schedule in any way that does not take this into account.

Activity 2012-2: Rent Simplification (Page 37)

Once more, DHCD has already begun implementation of this policy without a publicly available Administrative Plan and opportunity for review and comment before this hearing and comment period. For this reason, we ask DHCD to hold off implementing this activity until the details are made public.

We support the exclusion of all income of full time students (except for heads of household, co-heads, and spouses) in rent-setting (as this will save significant time verifying wages which are already excluded up to \$480, a relatively small amount). We do not have enough detail about the new Earned Income Disregard to comment. We are concerned about the freezing of payment standards and utility allowances for two years, where, as with scheduling of rent certification, there appears to be no allowance for hardship or flexibility if FMRs, payment standards, or utility costs increase significantly during that biennial period. From the information provided, we are unsure whether household changes (affecting payment standards) would be taken into account. DHCD should ensure that both hardship and reasonable accommodation policies are explicitly included.

And again, we urge DHCD not to implement this policy further until all facets (and the hardship policy) are made public and we have the opportunity to comment.

Activity 2012-3: Mobility in PBV units.

In order to facilitate preservation of affordability in expiring use developments, it is important that tenants who volunteer to convert their mobile enhanced voucher to a project-based subsidy

⁴ There are times where a wage earner is on unpaid medical or family leave for less than 60 days, leaving the family with no means of paying rent for the 1-2 months affected. Under DHCD's policy, the family would not be entitled to a rent decrease. However, this might be addressed in any hardship policy that DHCD develops so we are reserving comment here.

are able to retain more mobility and not be locked in for two years. Therefore, we recommend adding to the list of exemptions from the new PBV guidelines:

- Households who had an enhanced voucher and elected to convert it to a project-based voucher.

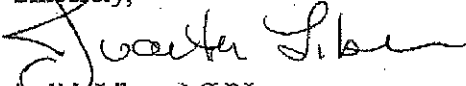
Activity 2012-4 Project-Based Vouchers in Expiring Use properties

Inclusion of criteria that includes developments located in higher opportunity neighborhoods is very useful. However, we do not believe that there is a need for "substantial community and tenant support" criteria, because tenants consent already is required for each conversion to a project-based unit, and community support could be negated in areas where there is resistance to affordable housing.

3. Conclusion

We thank you for consideration of our comments and hope that we will soon have the opportunity to review and comment on the revised Section 8 Administrative Plans for the HCV and the PBV programs. In this and future MTW Annual Plans, we urge DHCD to commit to a process for obtaining input from all stakeholders (and not just RAAs) in the upcoming fiscal year where the Annual Plan, by necessity, contains little operational details of a proposed MTW activity.

Sincerely,



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Ann Jochnick, GBLS



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Domus Inc has reviewed the FY13 Moving to Work Draft Plan in regards to transferring the waiting list to the owners would be beneficial when there are other criteria that need to be met. Some of the projects have multiple layers of funding that require that certain conditions for the funding be fulfilled.

We currently have two units that are available and the list is being supervised by HAP but we have to meet the homeless requirement for these studio units. There is no way to know whether or not the applicants meet those criteria, because this information is not always provided by the applicant when filling out the application. If the waiting list is managed by the owners, we would know who the applicant is going on the list and what they really need for housing. We would be able to have them also fill out an application for the unit they are applying for along with the Pre Application for Project Base Section 8. That way they are not just checking every box on the back of the Pre Application form and going on lists that they do not qualify for.

We think it would be beneficially to both HAP and the owner if the owners were responsible for the waiting list.

Ann Lentini
Executive Director

Connie Maryea
Tenant Selector