# Commonwealth of Massachusetts Department of Housing & Community Development

# Moving To Work Program Annual Plan for Fiscal Year 2017

Resubmitted to HUD June 29, 2016



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### I. Introduction

The Massachusetts Department of Housing and Community Development (DHCD) is a participant in the Moving To Work (MTW) Demonstration, a program authorized by Congress through which a limited number of Public Housing Authorities are given the flexibility to waive certain provisions of the Housing Act of 1937 and federal 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".

MTW designation provides DHCD with the flexibility to implement new or modified programmatic approaches and to utilize federal Housing Assistance Payment funds in a more flexible manner consistent with the MTW statutory objectives. **Based on the recent extension of MTW Agreements,** DHCD's MTW Agreement with the US Department of Housing and Urban Development (HUD) is effective through 2028.

MTW status applies to all tenant-based Housing Choice Vouchers administered by DHCD with certain exceptions. Those exceptions are special purpose vouchers including Veterans Affairs Supportive Housing (VASH), Five-Year Mainstream, Family Unification Program (FUP), Enhanced Vouchers/Tenant Protection Vouchers and Moderate Rehab programs. MTW operating flexibility may be applied to special purpose vouchers in accordance with HUD's published guidance; however, except for Enhanced/Tenant Protection Vouchers, which are rolled into the MTW Block Grant upon renewal of funds, the other special purpose types are not eligible for MTW Block Grant fungibility. This Annual Plan provides information on the MTW flexibility that DHCD currently implements or intends to implement in the voucher program operations.

DHCD administers its MTW and other rental assistance programs through a statewide network of Regional Administering Agencies (RAA), which are listed in Appendix A.

DHCD is required to prepare an MTW Annual Plan and Annual Report in a format defined by HUD. This Annual Plan, which is subject to HUD approval, reflects the current reporting requirements including use of standard metrics and benchmarks. For purposes of the Annual Plan, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. Conversely, a "non-MTW activity" is any activity that does not require MTW flexibility to implement.

DHCD's FY 2017 MTW Annual Plan summarizes planned activities for the period from July 1, 2016 through June 30, 2017. HUD provides voucher funding on a calendar year basis; thus, the Annual Plan covers parts of two distinct funding periods. As of the date of publication, DHCD

has not received confirmation of its federal funding levels. The Plan assumes continuation of funding in calendar years 2016 and 2017 at approximately 2015 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 makes the Annual Plan available for public review and comment including conducting public hearings. DHCD reviews and considers written and verbal comments that are received during the public review period. Appendix C provides information on the public comment period for this Annual Plan.

### A. Overview of Annual Goals and Objectives

Highlights of planned FY 2017 MTW activities include:

- DHCD projects that rental assistance and related services will be provided to 20,521 MTW households, which represents an overall utilization rate of 98%. Thirteen (13) new Project Based Voucher (PBV) contracts are projected for FY 2017.
- DHCD will continue to encourage participant self-sufficiency through the Family Economic Stability Program (FESP). The Boston based program administered by Metropolitan Boston Housing Partnership (MBHP) will look to achieve its participation goal of 50 participants in FY 2017. The program administered in Worcester County by RCAP Solutions, Inc. (RCAP) no longer accepts new applicants and is anticipated to graduate its last participant in FY 2017. As a result of changes in the rental market, DHCD will look to increase the rental portion of the subsidy provided to participants in the FES Program in FY 2017. Additionally, for the Boston program, DHCD may increase the time limit from five years to seven years to provide participants with enough time to achieve goals and to stabilize their careers and families once those goals have been achieved.
- In FY 2017 DHCD plans to implement the SAFMR/payment standard policy of its rent simplification initiative which includes the application of Small Area Fair Market Rents (SAFMRs). DHCD will review the remaining rent simplification components and may propose changes in a future MTW Plan.
- Use of the MTW simplified Utility Allowance (UA) schedule and allowances, which began in April 2014, will continue. In FY 2017, DHCD plans to implement the flat electricity allowance for households which are responsible for other electricity. This allowance is in addition to the allowance for households which pay for heat.
- In FY 2017, DHCD will establish a pilot program to test the impact of additional cash incentives for completing short term Family Self-Sufficiency (FSS) goals outside of education and training, such as increasing a credit score. It is anticipated that these incentives will provide FSS participants with continued encouragement to work and complete future goals. DHCD will continue to implement MTW activities designed to enhance the FSS Program and promote asset development and savings among HCV

participants. DHCD anticipates that 200 new FSS participants will enroll in the FSS program in FY 2017.

- Nine at-risk housing developments have been preserved to date. DHCD will continue to
  work with HUD, developers, tenant groups and other stakeholders to identify additional
  appropriate sites and enter into long-term project based contracts thereby preserving
  affordability; however, DHCD has no way to anticipate whether or not HUD will offer new
  expiring use sites.
- In FY 2017 DHCD will accept Massachusetts Department of Children and Families (DCF) referrals to the Youth Transition to Success Program (YTTSP) who may not be able to obtain a FUP voucher but who meet all other program requirements. Additionally, DHCD will extend the program to include two additional years to allow YTTSP participants to complete their educational goals. DHCD will continue to enroll participants in its YTTP Program in partnership with DCF.
- DHCD will continue administering the MTW Owner Incentive Fund in Berkshire County. The program provides incentives to landlords in support of DHCD and Commonwealth goals including: expanding housing opportunities in underserved areas; improving the quality of housing units under lease; and, increasing the number of units accessible to households with disabled members. DHCD continues to consider expanding the program to other regions, particularly to encourage new landlords to join the program and to increase access to high opportunity neighborhoods.
- Previously approved MTW activities related to reasonable rent, biennial recertifications and asset self-certification will continue to be implemented. These initiatives are designed to support administrative efficiency while promoting family economic self-sufficiency.

Over the course of the coming year, DHCD will continue to explore new initiatives that will further the MTW statutory objectives and DHCD's long-term MTW goals. DHCD will continue to meet regularly with its network of RAA contractors to discuss ongoing, new and planned MTW initiatives. Ongoing collaborative efforts with the RAAs will continue to focus on enhancing quality control programs, upgrading the skills and qualifications of program staff, and improving customer service for applicants, program participants and property owners.

### **B.** Overview of Long Term Goals

As documented in prior Annual Plans and Reports, DHCD's participation in the MTW program supports a wide range of positive housing and supportive service outcomes for thousands of participating low-income households, including families with children, seniors and people with disabilities. The programmatic flexibility afforded by MTW continues to be an important component of the Commonwealth's overall housing strategy. The extension of the MTW Agreement until 2028 will ensure continuity of this valuable set of program tools and resources.

DHCD's long-term MTW strategy is designed to demonstrate that: 1) Housing stabilization can be the foundation for economic self-sufficiency for extremely and very low-income households;

and, 2) 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 continue to guide DHCD's MTW strategy include:

- MTW activities must relate to one or more of the three 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; preserving and expanding project-based affordable housing; supporting those who have one or more disabilities; and stabilizing neighborhoods. DHCD will also consider the goals of the MTW Annual Plan in the context of the Consolidated Plan and as a resource and tool to Affirmatively Further Fair Housing Opportunities.
- 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 from its RAA contractors, program participants, housing advocates and other stakeholders to inform the design of DHCD's MTW initiatives.

### **II. General Housing Authority Operating Information**

### A. Housing Stock Information

DHCD does not administer a federal public housing program.

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

AMP Name and Number			Bed	room	Size		ı	Total Units	Population Type	Fully Accessible**	Adaptable
	0	1	2	3	4	5	6+		- J.p.c	1100000000000	
N/A	0	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	0	N/A	0	0
Total I	ublic	Housi	ing U	nits to	be A	dded		0			

# of UFAS Units

### Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
N/A	0	N/A
N/A	0	N/A
N/A	0	N/A
Total Number of		

### New Housing Choice Vouchers to be Project-Based During the Fiscal Year

The table below provides a summary of new Project Based Voucher (PBV) developments for which DHCD anticipates entering into Housing Assistance Payments (HAP) Contracts during FY 2017. A total of 87 units in 13 PBV developments are expected to come under HAP contract in the Plan year. This listing is subject to change due to unanticipated changes in development schedules, project financing, newly identified preservation or development opportunities and/or other factors.

Units to be Removed

<sup>\*</sup> Select Population type from: Elderly, disabled, General, Elderly/Disabled, Other

If other, please describe: N/A

Property Name	Anticipated Number of New Vouchers to be Project- Based*
Residences at Stony Brook Phase II	8
Tenny Place Phase I	8
Stable Path Residences	5
Washington Street SRO	6
Oxford Ping On	4
Bridgeview Center	8
189 Broadway Street	8
181 Washington Street	8
Montello Welcome Home	8
Island Creek North	8
Shoe Shop Place	5
Village @ Lincoln Park	3
Cranberry Manor/Carpenters Glen	8

Description of Project				
Family. New construction. Seven				
townhouse style buildings				
Family. New construction. Two new				
buildings				
Family. New construction. Ten buildings,				
2 and 3 BR townhouses.				
Preference for disabled individualsRehab				
of SRO facility. Three story building.				
Disabled. New construction of rental				
housing in multi-story building				
Units reserved for disabled. New				
construction. Mixed use single building.				
Elderly (55 and older). New construction.				
Four stories w/ elevator.				
Family development. New construction.				
Four story mixed use building.				
Supportive housing-homeless preference.				
New construction. 20 unit building of 1				
and 2 BR units				
Elderly (55 and older). New construction.				
One four story building				
Family. Adaptive reuse of an old mill to				
family housing.				
Family. New construction on site of an				
old amusement park.				
Family housing. Refinance and capital				
needs improvements of existing housing.				

Anticipated Total New Vouchers to be Project-Based	87
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Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	3,148**
Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	2,991***

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

### Other Changes to the Housing Stock Anticipated During the Fiscal Year

This section is required by HUD. DHCD has no housing stock and therefore does not anticipate any changes to the housing stock during the fiscal year.

### General Description of All Planned Capital Fund Expenditures During the Plan Year

This section is required by HUD. DHCD has no housing stock and therefore will have no capital fund expenditures during the plan year.

<sup>\*\*</sup> Of the total 3,148 PB vouchers anticipated to be leased by the end of FY 2017, 546 are Expiring Use and 825 are RAD. Number reflects tenant PBV choices pre-2017. Actual leasing will be updated in the MTW report and will reflect tenant PBV choice for new PBVs in FY 2017.

\*\*\*Anticipated number of PBVs depends largely on the point during the year when the units are brought under contract, tenant choice and speed of leasing PBV units.

### **B.** Leasing Information

### Planned Number of Households Served at the End of the Fiscal Year

As required by HUD, the table below provides information only on MTW households that DHCD plans to serve during FY 2017. In total, in FY 2017 DHCD expects to serve 21,130 MTW and Non-MTW households.

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased**
Federal MTW Public Housing Units to be Leased	0	0
Federal MTW Voucher (HCV) Units to be Utilized	20,459	245,508
Number of Units to be Occupied/Leased through Local, Non- Traditional, MTW Funded, Property-Based Assistance Programs***	0	0
Number of Units to be Occupied/Leased through Local, Non- Traditional, MTW Funded, Tenant-Based Assistance Programs***	62	744
Total Households Projected to be Served	20,521	246,252

<sup>\*</sup>Calculated by dividing the planned number of unit months occupied/leased by 12

DHCD is also providing the following table to show Non-MTW vouchers projected to be leased during FY 2017. This table is a DHCD created table and is not a requirement of Attachment B to the Standard MTW Agreement.

Non-MTW Households to be Served Through:	Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
VASH	538	6,456
Mainstream 5	71	852
Total Households Projected to be Served	609	7,308

### **Reporting Compliance with Statutory MTW Requirements**

DHCD is in compliance with its MTW statutory requirements.

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

Housing Program
Tenant-Based Local,
Non-Traditional MTW
Housing Assistance
Program
N/A

Description of Anticipated 1	Leasing Issues and Possible Solutions

Referrals to and enrollment in the FES and YTTSP programs occur throughout the year. As such, planned leasing for the program will not include a full twelve months for each voucher.

N/A

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

<sup>\*\*\*</sup>In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of unit/households to be served, the PHA should estimate the number of households to be served.

N/A	N/A

### C. Wait List Information

### Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s)*	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Program, Federal Non- MTW Housing Choice Voucher Units	Other	103,732	Open	N/A
Tenant-Based Local Non-Traditional MTW Housing Assistance Program	Other	367	Open	N/A
N/A	N/A	0	N/A	N/A

Rows for additional waiting lists may be added, if needed.

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

The waitlist is open to all populations		
	N/A	
	N/A	

### If local, Non-Traditional Housing Program, please describe:

The Family Economic Stability Program provides a fixed annual stipend to eligible families, regardless of future income or
family composition changes. See MTW Activity 2000-1 FES.
N/A
N/A

### If Other Wait List Type, please describe:

DHCD combines site-based and centrally managed wait list features. All of DHCD's Section 8 programs (including MTW and Non-MTW vouchers) use a regional, centrally managed wait list with the exception of certain Project Based developments. There are fifty-nine (59) Project Based developments that have site-based wait lists that each development is responsible for managing. The remaining Project Based developments have centrally managed waitlists maintained by DHCD and each regional administering agency.

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

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

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

The Tenant-Based Local Non-Traditional MTW Housing Assistance Program is the Family Economic Stability Program. The waitlist for this program is managed by the Metropolitan Boston Housing Partnership. Applicants must meet certain requirements such as working at least part-time or participating in a full-time job training program.

### **Organizational Structure of the Waitlist**

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

DHCD does not anticipate any changes to the organizational structure of the waitlist or policy changes regarding the waitlist.

# III. Proposed MTW Activities DHCD does not plan to propose or significantly modify any existing MTW activities in FY 2017.

### IV. Approved MTW Activities

This section of the Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by DHCD. As required, this section also includes summary information on MTW activities that have been not yet been implemented, closed out, or placed on hold by DHCD.

### A. Implemented Activities

### Activity 2000-1: Family Economic Stability Program (FESP)

**Description/Update of MTW Activity**: This MTW activity tests an assistance model which provides a fixed annual stipend to eligible families, regardless of future income or family composition changes. Within certain guidelines, participants exercise considerable decision-making in the utilization of the funds. Case management and program coordination is provided by designated MTW Advisors at each participating agency. Participants may select any housing unit which they deem affordable and appropriate for their needs and which pass a Housing Quality Standards inspection.

Eligibility for the FES Program 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, SNAP; 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, families who are working at least part-time, who are imminently employed, or who are enrolled in a full-time job training program.

FES provides participants with a "flat subsidy" that is not tied to household income. When a participant increases their earned income, as required by the program, their rent subsidy will not decrease. Conversely, if participants lose their jobs, their subsidy will not increase. FES staff and participants will work closely together to manage employment stability to avoid sudden loss of income. Participants will be supported in their housing search and selection to determine the most affordable unit based on family size and counseled to consider the challenges of a flat subsidy when selecting potential housing.

Currently, two RAAs have implemented FES programs: RCAP Solutions in Worcester, MA and Metropolitan Boston Housing Partnership in Boston, MA. The south Worcester County component of FESP no longer accepts applicants to FESP. South Worcester County will continue to serve existing FESP participants through program completion, but will no longer administer the program once all existing participants have completed or exited the program.

Families participating in the south Worcester County component receive the following:

o 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.
- o If the contract rent for the unit is less than the shallow rent subsidy provided, the participant must pay 30% of their adjusted income toward rent. The participant can opt to pay an increased amount for rent and transfer the remaining subsidy amount to their escrow account.
- Case management support to assist the family in addressing employment, housing, or other issues.
- o Financial literacy training and homebuyer preparation workshops.
- Support and resources to assist in home-buying, where desired and appropriate. In FY 2010, the homeownership matching fund program was revised to fund a one-time \$500 first-time homebuyer grant for eligible participants provided DHCD has available funds.

Families participating in the Boston program receive the following:

### **Rent Subsidy**

- Flat subsidy based on family size.
- Time limited five (5) years, no extensions.
- Flexible amount based on family's goals.
- Stability Rent Escrow savings program phased in during Years 4 and 5.

### **Support Account**

• \$1800 a year to support completion of economic stability goals.

### **Escrow Savings Account**

- Each participant is eligible to accrue up to \$800 per year in escrow funds.
- 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. In FY 2010, the homeownership matching fund program was revised to fund a one-time \$500 first-time homebuyer grant for eligible participants provided DHCD has available funds.

### **Case Management and Support: Service and Housing Stability Plans**

Service plans will address immediate and long term goals (5 year) and will be created through a partnership of the participant and FES staff. The plan must take into consideration all the goals of FES, including improved financial literacy skills and financial stability, and career and employment gains. The plan will focus solely on the person enrolled in FES rather than other household members, though goals may certainly include how the development of skills and assets available through participation in FES will benefit other household members directly or indirectly. During the course of the program, Service Plans may be revisited and changes made that reflect evolving interests, opportunities and resources available to the participant.

The development of the Housing Stability Plan is distinct from the Service Plan, and focuses on creating a road map for housing security when the program ends. Discussion of future housing

stability begins at enrollment, and all FES participants will graduate from FES with a housing plan that provides them with the tools and resources necessary to remain stably housed in the future.

DHCD reviews, on an ongoing basis, the amount of subsidy/stipend levels and the number of program participants. Although DHCD has not yet authorized additional RAAs to implement small scale programs using this program model, DHCD may, at its option, expand the program to other areas of the state in subsequent program years. DHCD may also consider increasing the number of participants for the FES program and targeting assistance to homeless applicants. Currently program statistics are tracked by program staff and in DHCD's housing software.

FES's Hardship Policy is designed to off-set the impact of unanticipated, no-fault loss of employment. During participation in the FESP, participants may request a hardship waiver if he/she experiences an unanticipated loss of income that is anticipated to last longer than ninety (90) days. This request must be approved by MTW Program staff prior to submitting it to DHCD for review. If the request is granted, any unused support funds available that year will be available to pay the tenant share of rent. The Hardship Policy does not allow the support account to be used for rent or utility arrearages. If the hardship occurs in years four or five then the rent subsidy can be restored to the higher level as necessary and approved by DHCD.

Currently, FESP has 63 active participants and approximately 14 new applicants are anticipated to lease up by the close of FY 2017. Twenty-seven (27) participants are expected to graduate between the writing of this report and the end of FY 2017. DHCD will maintain enrollment with 50 households in the Boston program. The FES program currently has a waitlist of 367 households.

**Proposed Changes to Activity**: In order to market the FES Program and provide subsidies which allow participants to lease units and maintain self-sufficiency goals, the subsidy provided must be in line with rental market trends. Over the course of the past five years, the Fair Market Rents (FMRs) in the Boston area for one, two and three bedroom units increased on average 9%. As a result of changes in the rental market, DHCD will look to increase the rental portion of the subsidy provided to participants in the FES Program in FY 2017. Additionally, for the Boston program, DHCD may increase the time limit from five years to seven years to provide participants with enough time to achieve goals and to stabilize their careers and families once those goals have been achieved.

**Approval and Implementation**: 2000 - Implementation activities began in FY 2001.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect anticipated program activities in FY 2017. DHCD will report on outcomes in the MTW Annual Report.

CE #4: Increase in Resources Leveraged					
Unit of	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Measurement	Baseline	Benchmark	Outcome		

Amount of funds		\$0.00		
leveraged in		*This metric has		
dollars (increase).		been required by		
,		HUD. DHCD does		
	\$0.00	not leverage funds		
	φυ.υυ	in connection with this activity and		
		does not consider		
		this metric		
		applicable to this		
	CC #1. I.	activity. Acrease in Household	17	
4	55 #1: 17	icrease in Housenoid	ппсоте	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned				
income of				
households	\$18,937	\$24,827		
affected by this	410,507	Ψ= :,Θ=:		
policy in dollars				
(increase).	SS #2 · In	crease in Household	Savinas	
Unit of				Benchmark
Measurement	Baseline	Benchmark	Outcome	Achieved?
Average amount				
of <b>escrow</b> of				
households	\$0.00	\$2,703		
affected by this	·	. ,		
policy in dollars				
(increase).  Average amount				
of <b>savings</b> of				
households				
affected by this	\$0.00	\$957		
policy in dollars				
(increase).				
	SS #3: Increase in I	Positive Outcomes in	Employment Status	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	1 participant	4 participants		
	1% of participants	7 % of		
	P P	participants		
Other - Employed	85 participants	42 participants		
	99% of	82% of		
	participants	participants		
Other -	0 participants	9 participants		
Education/Job	0% of participants	17% of		
Training SS #4. II.		participants		I' (TANT)
Unit of	seholds Removed from	m 1 emporary Assista	nce for Needy Famil	Benchmark
Measurement	Baseline	Benchmark	Outcome	Achieved?

Number of households receiving TANF assistance (decrease).  SS #  Unit of Measurement  Number of households receiving services	4 households in FY 2015  #5: Households Assis  Baseline  0 households	4 households  ted by Services that I  Benchmark  51 households	Increase Self Sufficion	Benchmark Achieved?
aimed to increase self-sufficiency				
(increase).	6. Daduaina Day II.	it Subsidy Costs for F	Partioinatina Uousek	a alds
Unit of		,	articipating Housen	Benchmark
Measurement	Baseline	Benchmark	Outcome	Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	\$450 in FY 2015	\$420		
TT24 - F	SS #7: Incr	ease in Agency Rent	al Revenue	Danakarask
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	\$473 in FY 2015	\$550.00*  *DHCD does not have any rental revenue and has been instructed by HUD to report on Average Tenant Rent to Owner		
	SS #8: Househo	olds Transitioned to S	Self Sufficiency	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0 households	1 household*		
*Self-sufficiency is defined as graduation from the FES program				
	HC #5: 1	Increase in Resident	Mobility	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

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Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	5 households in FY 17		
	HC #6: Increas	se in Homeownership	Opportunities	
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement			O 0.000 0.1110	Achieved?

### **Activity 2010-1: PBV Site Based Waiting Lists**

**Description/Update of MTW Activity**: Under this initiative, DHCD authorizes owner/managers of PBV developments to be responsible for all PBV waiting list intake and management functions for their development. Generally, DHCD intends to require PBV owners to assume and manage these functions; however, exceptions may be made at DHCD's option. Under the new system, applicants contact the owner/manager of a specific development in order to file an application. Applicant files and the waiting list itself are maintained at the development site. Owner/managers are 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.

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

Starting in FY 2013, DHCD authorized new PBV developments to establish and manage their own site based waiting lists. DHCD has continued to authorize owners of new PBV developments to maintain their own waiting lists. Currently, there are a total of 61 owner managed site based waiting lists. In FY 2017, DHCD anticipates all 13 additional PBV developments will have owner managed site-based waiting lists with a total of 74 across the portfolio by year end representing 1,761 PBV units.

**Proposed Changes to Activity**: No changes are proposed.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect the volume of wait list activity in FY 2017. DHCD will report on outcomes in the MTW Annual Report.

**Approval and Implementation**: 2010 – Implementation activities began in FY 2013.

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$5,142	\$4,514			
	CE	#2: Staff Time Savii	ngs		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	283 hours	248 hours			

### **Activity 2010-2: Payment Standard Exceptions**

**Description/Update of MTW Activity**: Under this MTW initiative, DHCD is authorized to 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.

DHCD will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval. DHCD anticipates approving 6 payment standard exceptions during the fiscal year.

**Proposed Changes to Activity**: No changes are proposed for this activity.

The metric below includes only requests that were granted as a reasonable accommodation.

**Approval and Implementation**: 2010 – Implementation activities began in FY 2010.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect anticipated payment standard exceptions in FY 2017. DHCD will report on outcomes in the MTW Annual Report.

**Metrics**: DHCD has updated the benchmark to reflect anticipated activity in FY 2017.

HC #5: Increase in Resident Mobility					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	6 households			

	CE	#1: Agency Cost Sav	ings	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Time to process request: 1.5 hours	Time to process request: .75 hours		
()	FY 2011 Requests: 3	FY 2017 Requests: 6		
	Staff hourly rate: \$18.17	Staff hourly rate: \$18.24		
	Total cost of time prior to	Total cost of time after		
	implementation: \$82.00	implementation: \$82.08		
	CI	E #2: Staff Time Savii	ngs	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours	Time to process request: 1.5 hours	Time to process request: .75 hours		
(decrease).	FY 2011 Requests: 3	FY 2017 Requests: 6		
	Total time prior to implementation: 4.5 hours	Total time after implementation: 4.5 hours		

### **Activity 2010-3: Owner Incentive Fund**

**Description/Update of MTW Activity**: Beginning in January 2010, an Owner Incentive Fund pilot initiative was established to promote upgrades to the housing stock in areas of the state with a large percentage of older, deteriorated housing stock. DHCD's 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 has been piloted by the Berkshire Housing Development Corporation (BHDC) since inception. Participating owners are eligible for a flat fee financial incentive (initially established at \$900 or \$1,200) payable in 4 quarterly installments over the first year of the HAP contract. At the end of the first year under HAP contract, owners are eligible for an additional one-time payment (initially established at \$500) if one or more of the following applied: the owner was not previously part of the HCV program; the unit was not previously 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. In the first year of the pilot, BHDC waived the requirement that the tenant remains in occupancy, or that the owner has agreed to lease to another HCVP referral from the RAA to receive the \$500 bonus payment in order to attract a higher level of interest. In the second year of the pilot, starting January 1, 2011, this requirement was implemented due to the strong response from owners in the first 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 is signed certifying that the incentive payments are not part of the monthly rent to owner. BHDC has established caps on the overall number of units and the number of units per 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 to the program.

DHCD has the flexibility to adjust the program criteria and payment amounts as needed to respond to local market conditions, particularly when planning an expansion of this program to additional RAAs. DHCD may assess the feasibility of expanding the program to other regions using the same program parameters, with a focus on increasing the number of new landlords participating in the program, and increasing the number of units available in high opportunity communities.

**Proposed Changes to Activity**: No changes are proposed.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect the anticipated number of households who will move to better units/neighborhoods in FY 2017. DHCD will report on outcomes in the MTW Annual Report.

**Approval and Implementation**: 2010 – Implementation activities began in FY 2010.

HC #5: Increase in Resident Mobility					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	20 households			

### **Activity 2010-4: Development of Local Forms**

**Description/Update of MTW Activity**: Under this initiative, DHCD will develop local versions of forms, as needed, to streamline processing, utilize "plain language", address MTW policies and address local housing market features. New forms are rolled out to RAA contractors as they are completed. As required under the MTW Agreement, any changes to the HAP form will include language noting that funding for the contract is subject to the availability of appropriations.

To date, DHCD has developed local versions of the PBV HAP and AHAP forms to incorporate relevant MTW provisions. The revised forms have been implemented at all new expiring use projects. DHCD will use MTW authority to develop a local version of the PB Tenancy Addendum to reflect DHCD MTW policies. Additionally, in FY 2017 DHCD will develop a local version of the Authorization for Release of Information to reflect the biennial frequency of reexaminations. Use of the revised Release Form will eliminate the need to execute a new Release Form at interim recertifications. DHCD will continue to utilize this authority as needed.

**Proposed Changes to Activity**: No changes are proposed.

**Approval and Implementation**: 2010 – Implementation activities began in FY 2013.

**Changes to Baseline, Benchmarks & Metrics**: The benchmarks have been updated to reflect the leasing projections for FY 2017. DHCD will report on outcomes in the MTW Annual Report.

### **Metrics**:

	CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task	<b>HAP Contracts</b>	Expected HAP			
in dollars	executed in FY 13:	Contracts			
(decrease).	11	executed in FY			
		<b>2017</b> : 13			
	Time to Prepare				
	HAP contract prior	Time to Prepare			
	to implementation: 2	HAP contract			
	hours	after			
		implementation:			
	Average hourly	.25 hours			
	wage: \$18.17				
		Average hourly			
	Total cost prior to	wage: \$18.24			
	implementation:\$400				
		Total cost after			
		implementation:			
		\$59			

CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	HAP Contracts executed in FY 13: 11	Expected HAP Contracts executed in FY 2017: 13		
	Time to Prepare HAP contract prior to implementation: 2 hours	Time to Prepare HAP contract after implementation: .25 hours		
	Total staff time required prior to implementation: 22 hours	Total staff time required after implementation: 3.25 hours		

### **Activity 2011-4: Biennial Recertification Process**

**Description/Update of MTW Activity**: Under this initiative, the recertification process has been modified from an annual to a biennial process. 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 regular biennial recertifications to two (2). Required interim recertifications do not count against the limit, i.e., interims required for changes in family composition or otherwise required by DHCD. A hardship policy has been adopted to allow households whose loss of income is greater than 30% and beyond the household's control to request an exemption from the limit on interims. Elderly and disabled households, as well as households who live in an Expiring Use project on the conversion date and select a PBV, are exempt from this provision and are able to complete an interim recertification at any time;
- Any household that believes they would benefit by an annual recertification may request an annual income recertification. If a household has requested and is approved for an annual recertification frequency, DHCD will allow one voluntary interim recertification between annual recertifications.

DHCD continues to utilize the Enterprise Income Verification (EIV) system for screening of applicants and new household members 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 Social Security, 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 regular basis.

This initiative is fully implemented. In FY 2017, DHCD plans to continue the biennial recertification process. DHCD continues to benefit from the reduction in staff time for processing recertifications.

**Proposed Changes to Activity:** No changes are proposed.

**Approval and Implementation:** 2011 – Implementation activities began in FY 2012.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars	Number of	Anticipated Number of			
(decrease).	vouchers: 20,298	Recertifications:			
(decrease).	Time per Recertification:	10,230			
	2.5 hours	Time per Recertification:			
	Average Hourly Staff Rate: \$18.17	2.25 hours			
	Total Cost of	Average Hourly Staff Rate: \$18.24			
	Activity Prior to	Stair Nate: \$10.24			
	Implementation:	Anticipated Total			
	\$922,037	Cost of Activity in FY 2016:			
		\$419,848*			
		*Accounts for cost savings from			
		Biennial			
		Recertifications and Rent			
		Simplification.			

CE #2: Staff Time Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	Number of vouchers: 20,298  Time per Recertification: 2.5 hours  Total Time Spent on Activity Prior to Implementation: 50,745 hours	Anticipated Number of Recertifications: 10,230  Time per Recertification: 2.25 hours  Anticipated Total Time Spent on Activity in FY 2016: 23,018 hours  *Accounts for time savings from Biennial Recertifications			
		and Rent Simplification.			
	SS #1: In	crease in Household	Income		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average earned income of households affected by this policy in dollars (increase).	\$19,058*  *DHCD modified this baseline in FY 2016 based on revised calculation methods applied to FY 2012 figures.	\$22,428			
SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
(6) Other - Employed	5,019 households in FY 2011	5,489 households			
	54% of work-able households	61% of work-able households			

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households receiving TANF assistance (decrease).	2,920 households in FY 2011	2,218 households			
SS #8: Households Transitioned to Self Sufficiency					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households		57 households*			
transitioned to self-sufficiency	0 households*	* The benchmark includes			
(increase).	*This data was not previously	households anticipated to			
	tracked	transition to self- sufficiency in FY 2017			

### **Activity 2011-5: Youth Transitions to Success**

**Description/Update of MTW Activity**: DHCD has designed and implemented 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'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.

DHCD and the Department of Children and Families (DCF) meet regularly to administer the Youth Transition to Success Program (YTTSP). DHCD staff completed the administrative elements of the YTTS 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 will provide participants with:

- A flat rental subsidy that steps down annually by 15%;
- A matched savings account; and
- An annual support budget of \$750 for expenses related to sustaining employment and meeting educational goals.

It has been three years since the YTTSP was fully implemented. Since inception and through FY 2017, 18 participants will have graduated. During FY 2017, DHCD anticipates 15 new referrals. The participants who graduated or who are currently enrolled in the program have all maintained employment, enhanced their education, and increased their asset base through savings.

In FY 2017, DHCD will continue to explore ways to expand the referral pool for YTTSP, finding new partners who can offer the case management and supportive services similar to the ones provided by DCF.

**Proposed Changes to Activity:** FY 2017, DHCD will accept referrals from DCF who might not be able to obtain a FUP voucher but who meet all other YTTSP eligibility requirements. These individuals will be entitled to the same three year term as the DCF referrals who completed the FUP AOP term. In FY 2017, DHCD will review the changes in the rental market and may increase the flat rental subsidy for the YTTSP. The subsidy change may be regionally based to reflect market rents in the areas served under the YTTS program. Finally, in FY 2017 DHCD will extend the program to include two additional optional years to allow YTTSP participants time to complete their educational goals and to bring the YTTSP's timeframe into alignment with HUD's FUP AOP FSS program.

**Approval and Implementation:** 2011 – Implementation activities began in FY 2013.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

CE #4: Increase in Resources Leveraged					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Amount of funds leveraged in dollars (increase).	\$0.00	\$218,750			
	SS #1: In	crease in Household	d Income		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average earned income of households affected by this policy in dollars (increase).	\$9,492 for current YTTSP participants at time of enrollment	\$10,069			
	SS #2: In	crease in Household	l Savings		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$1,549			
	SS #3: Increase in F	Positive Outcomes in	Employment Status		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Enrolled in an Educational Program	7 participants 100% of participants	25 participants 100 % of participants		1201101011	
Unemployed	0 participants 0% of participants	4 participants 16 % of participants			
Other – Employed	7 participants 100% of participants	21 participants 84 % of participants	was for NL-F	Eng (TANE)	
55 #4: Hou	seholds Removed from	n 1emporary Assista	ince for Needy Fami	ues (IANF)	

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	0 households	4 Households		
SS #	#5: Households Assis	sted by Services that I	Increase Self Sufficie	ency
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0 households	25 households		
	SS #8: Househo	olds Transitioned to S	Self Sufficiency	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). Self-sufficiency is defined as graduation from the YTTS program.	0 households	3 households		

### **Activity 2012-1: MTW Utility Allowances**

**Description/Update of MTW Activity:** Under this initiative, DHCD established a simplified Utility Allowance (UA) schedule and eliminated Utility Allowance Payments under \$25. 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. This policy was implemented in 2012 and is ongoing.

In FY 2014, DHCD designed a UA model that eliminated all utility allowances except for heat. DHCD completed impact analyses, developed hardship criteria, prepared software modifications and provided training to staff on the simplified UA model. DHCD utilizes a utility allowance schedule, regardless of fuel type, geographical area and building type, for tenant-paid heat only. The utility allowance schedule includes the utility allowance for heat by the smaller of the voucher size or bedroom size. Utility allowances for any other tenant paid utilities, other than heat, will not be provided. During an interim recertification, DHCD will apply the utility allowance used at the last regular recertification.

In developing the UA schedule for heat, in addition to basing the heat utility allowance on typical cost and consumption, DHCD used a weighted average of the two highest fuel types by bedroom size. Where applicable, DHCD will use the Department of Energy's (DOE) residential energy consumption survey data to determine the utility allowance for households with approved reasonable accommodations for electricity. DHCD will determine reasonable accommodations for other utilities on a case by case basis.

The goal of these revised schedules is twofold: in addition to simplifying the utility allowance designation and calculation process, the simplified UA schedule will also result in significant cost savings. These cost savings were needed to respond to the deep funding cuts experienced by DHCD. Additionally, the savings allow DHCD to assist the same number of families without having to terminate or recall vouchers. Implementation of the simplified utility allowance schedule began in December 2013 and was fully implemented in May 2014.

In response to concerns about rising electricity costs, DHCD will revise the UA model to include a utility allowance for other electricity. The two largest electric utilities in Massachusetts implemented 37% and 29% rate increases in CY 2015. Additionally, according to the Institute on Energy Research, the monthly bill for the average household served increased by \$28/month over the past two years. DHCD may use the DOE's residential energy consumption survey data or other reliable data to determine the utility allowance. The "other electric" UA schedule will be the same across DHCD jurisdictions and will not vary by geographical area and/or building type. The utility allowance schedule will include the utility allowance for heat and other electricity by the smaller of the unit size or voucher size. Utility allowances for any other tenant paid utilities, other than heat and other electricity, will not be provided. For example, if a household is responsible for paying for electric heat, DHCD will provide a UA for heat only; however, if that same household is responsible for paying for electric heat and other electricity, DHCD will provide a UA for heat and a UA for other electricity. During the time that DHCD did not provide a UA for

other electricity, households may have applied and received a reasonable accommodation utility allowance for other electricity. For these households, at their next regular reexamination, DHCD will review and adjust the utility allowance for consistency with their approved accommodations and the new electricity UA schedule. DHCD will determine reasonable accommodations for other utilities on a case by case basis. DHCD will continue to monitor the cost of all utilities and may further modify this initiative for consistency with market and economic conditions.

**Proposed Changes:** No changes are proposed.

**Approval and Implementation:** 2012 – Implementation of the policy applicable to UAPs of \$25 or less began in FY 2012. Implementation of the simplified UA schedule began in FY 2014. Implementation of the additional other electricity UA will take place before the close of FY 2017.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$31,476,912	\$19,587,864			
(decrease).	CE	#2: Staff Time Savin	igs		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	Time required to calculate UA: 8 minutes  Number of UA calculated in FY 13: 16,919  Total staff time prior to implementation: 2,256 hours	Time required to calculate UA: 4 minutes  Anticipated number of UA in FY 17: 15,068  Anticipated total staff time after implementation: 1,004 hours			
	CE #3: Decrea	se in Error Rate of To	ask Execution		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average error rate in completing a task as a percentage (decrease).	10%	4%			

CE #5: Increase in Agency Rental Revenue					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average Tenant	\$382 per	\$331 per			
Rent Share	household in FY	household			
(increase).	2014	*DHCD does not			
		have any rental			
		revenue and has			
		been instructed by			
		HUD to report on			
		Average Tenant			
		Rent to Owner			

### **Activity 2012-3: Project Based Voucher Discretionary Moves**

**Description/Update of MTW Activity**: Beginning in FY 2012, DHCD modified its Project Based Voucher (PBV) 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 participant households in good standing are able to terminate the assisted lease and receive priority for an available tenant-based voucher only after the second year of occupancy. In addition, for each RAA, DHCD established an annual target number of vouchers available to PBV households who have requested a tenant-based voucher. The annual target number is equal to the total number of turnover vouchers from the prior year for each RAA multiplied by the percentage of PBV units managed by the RAA. If demand exceeds supply over the course of the year, those additional PBV participants who wish to move will remain at the top of the waiting list until the following year.

The PBV guidelines do <u>not</u> 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 a 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;
- Households that can document the need to move in order to obtain or maintain employment; and
- Households that can document that a household member has been accepted into an institution of higher education 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 2014, DHCD clarified that families living in Expiring Use Preservation Initiative projects on the conversion date who select a PBV, as well as families living in units converted to PBV through the RAD program, will be permitted to request a discretionary move after the <u>first</u> year of assisted tenancy following conversion. Additionally, families converting TBVs to PBVs through the RAD program may request discretionary moves prior to the end of the first year of assisted tenancy following conversion.

DHCD anticipates that the number of PB Opt-Outs will increase in FY 2017 as the RAAs work to increase lease-up.

Proposed Changes: No changes are proposed

**Approval and Implementation:** 2012 – Implementation activities began in FY 2012.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings*							
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?			
Total cost of task in dollars	Number of TBV issued: 33	Anticipated number of TBV					
(decrease).	C4 - 66 4	issued in FY					
	Staff time per transfer: 3 hours	<b>2017</b> : 90					
	C. ee	Staff time per					
	Staff cost per hour: \$18.17	transfer: 3 hours					
		Staff cost per					
	Total cost before implementation:	hour: \$18.24					
	\$1,799	Total cost after					
		implementation: \$4,925					
	CE	<u> </u>	CE #2: Staff Time Savings*				
		211195	55				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?			
Measurement Total time to	Baseline Number of TBV	Benchmark Anticipated					
Measurement  Total time to complete the task	Baseline	Benchmark  Anticipated number of TBV					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33	Benchmark  Anticipated number of TBV issued in FY					
Measurement  Total time to complete the task	Baseline Number of TBV	Benchmark  Anticipated number of TBV					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per	Benchmark  Anticipated number of TBV issued in FY 2017: 90  Staff time per					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per	Benchmark  Anticipated number of TBV issued in FY 2017: 90					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per transfer: 3 hours Total time spent before	Benchmark  Anticipated number of TBV issued in FY 2017: 90  Staff time per					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per transfer: 3 hours Total time spent before implementation:	Benchmark  Anticipated number of TBV issued in FY 2017: 90  Staff time per transfer: 3 hours  Total time spent					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per transfer: 3 hours Total time spent before	Benchmark  Anticipated number of TBV issued in FY 2017: 90  Staff time per transfer: 3 hours  Total time spent after					
Measurement  Total time to complete the task in staff hours	Baseline Number of TBV issued: 33 Staff time per transfer: 3 hours Total time spent before implementation:	Benchmark  Anticipated number of TBV issued in FY 2017: 90  Staff time per transfer: 3 hours  Total time spent					

<sup>\*</sup>The above metrics are required by HUD. DHCD maintains that the above metrics do not accurately represent the impact of this initiative as the number of TBV issued to PBV tenants fluctuates each year depending on request and number of all HCV's issued.

### **Activity 2012-4: Expiring Use Preservation Initiative**

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

DHCD may consider the following criteria when determining eligibility of projects for conversion (except where prohibited for certain projects by PIH Notice 2012-32):

- 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;
- DHCD will make a determination on the level of resident interest prior to pursuing administration of the Enhanced and PB vouchers.
- 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. As part of the conversion process, DHCD will provide residents, who are eligible to receive a voucher, with the option to receive an Enhanced Voucher or to have their unit converted to Project Based assistance. As part of the determination process, DHCD will provide detailed information to residents so that an informed choice can be made.

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

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

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

In FY 2014, DHCD modified the components of its Project-Based Voucher Program in order to streamline administration of the Expiring Use Preservation Initiative and maximize the number of units benefitting from these efficiencies. These changes have been implemented and have resulted in streamlined efficiency of the conversion process.

- Consistent with PIH Notice 2012-32, DHCD may apply MTW flexibilities to units converted to PBV under the Rental Assistance Demonstration to the extent that said flexibilities are not in conflict with RAD provisions specified in HUD's Notice(s).
- DHCD may revise standards for acceptable income verification documents for clients at
  the time of conversion. Specifically, when completing initial certifications at the time of a
  RAD or Expiring Use conversion, DHCD may waive the HUD requirement regarding the
  age of documents at the time of effective date. Authorized in Attachment C Section D of
  DHCD's MTW Agreement.
- Notwithstanding proposed changes to PBV regulations, DHCD will continue to define "existing housing" as "Housing units that already exist on the proposal selection date and that substantially comply with the HQS on that date." Authorized in Attachment C Section D of DHCD's MTW Agreement.
- DHCD may institute other changes, on a case by case basis, as long as such changes are consistent with the MTW authorizations granted herein.

In FY 2015, DHCD modified the income eligibility requirements for tenants who occupy units at the time of a RAD conversion to the PBV program. For only those existing tenants, annual income must not exceed the moderate income limit for the area which is 80% of AMI, except for elderly and disabled households whose incomes may not exceed 95% of AMI.

DHCD currently has 9 expiring use contracts with a total of 546 units forecasted to be under HAP contract by the close of FY 2016. Additionally, DHCD has completed 8 Rental Assistance

Demonstration (RAD) conversion projects and currently provides a subsidy for 825 units under this program. As of 2014, there were approximately 34 developments remaining in the state with use restrictions expiring between 2015 and 2020 (CEDAC Report 8-14). As the pool of developments decreases it is difficult to forecast whether or not HUD will offer DHCD any additional Expiring Use or RAD contracts in 2017. As such, DHCD has not forecasted any new expiring use or RAD units in FY 2017.

**Proposed Changes:** No changes are proposed.

**Approval and Implementation:** 2012 – Implementation activities began in FY 2013.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

HC #2: Units of Housing Preserved				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 housing units	1,371 housing units*		

<sup>\*</sup>Previously DHCD has included only Expiring Use units when setting benchmarks and determining outcomes for this metric. This figure includes all RAD and Expiring Use units and DHCD will continue to use this methodology going forward.

### **Activity 2012-5: Family Self Sufficiency Program Enhancements**

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

- o 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 selfsufficiency than immediate entry into the work force;
- Establish goal-specific incentive payments to be awarded when a family attains an established goal (i.e., completion of a GED, successful completion of a semester of college courses, etc.).

DHCD and RAA senior staff and FSS Coordinators met and discussed potential changes to the FSS program and the most effective strategies for implementing those changes. In November of 2013, DHCD began utilizing some of the revised 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 to complete education and training programs before entering the workforce.

In January 2014, DHCD implemented the revisions to the enhanced FSS program including:

- Placement of an absolute cap on the amount of escrow regardless of prior FSS participation at any of DHCD's RAAs statewide. The cap, which may be periodically reviewed and updated at DHCD's discretion, will be set at \$25,000 per household;
- o Modification to the requirement that an FSS applicant must have an interim or annual recertification within 120 days prior to FSS enrollment;
- o Modification of the extension policy to allow for six month extensions for up to two years with revised extension eligibility requirements;
- o Modification of the FSS re-enrollment eligibility criteria to require that re-applicants demonstrate consistent progress since prior FSS participation ended. DHCD will provide an exception when the participant loses a job due to no fault of their own;
- Addition of a post-secondary education incentive up to \$1,450 and a job training incentive up \$750;
- Modification to the escrow calculation methodology by calculating FSS credits using the same method for all participants regardless of income level. The method used for very low income households will apply to all participants; and,
- Establishment of an incentive payment for FSS graduates who purchase a home and choose to withdraw from the HCV program within 2 years of completion of the FSS program. The initial incentive payment amount, which may be periodically reviewed and updated at DHCD's discretion, will be set at \$5,000 per household. To qualify for the homebuyer

purchase bonus, the FSS homebuyer must complete a CHAPA-approved Homebuyer Education course. The \$5,000 bonus may be used for a down payment or for post-purchase expenses

To encourage the goal of homeownership for applicable households in the FSS program, DHCD obtained approval to modify its current FSS program to allow certain households to define a path to homeownership by utilizing individualized homeownership education, financial coaching and a modified savings/escrow component. To be eligible for the FSS Homeownership Track, households must be current HCV participants, have a goal of obtaining homeownership and have income above an established percentage of the Area Median Income. Participating FSS households will be required to save at least \$1,000 per year in a savings account. DHCD will match the participating household's savings in a 4:1 ratio up to \$4,000 per year for a maximum of three years. Matched savings earned by these households will only be available for home purchases. Up to \$5,000 of the matched savings may be used for a reserve account for future home repairs and maintenance.

At which time DHCD implements rent simplification, DHCD may modify the escrow calculation to reflect use of the Tiered Rent Table (no UAs) in place of the TTP. DHCD will continue to apply the \$25,000 cap to family escrow.

In FY 2017 DCHD will continue to implement the previously approved goal specific incentive payments as well implement the matched savings homeownership incentive. In FY 2017, DHCD anticipates that 200 new participants will join the FSS program.

**Proposed Changes:** DHCD will modify the Contract of Participation and Individual Training and Service Plan for consistency with MTW FSS program requirements and incentives.

**Approval and Implementation:** 2012 – Implementation activities began in FY 2013.

**Changes to Baseline, Benchmarks & Metrics:** The benchmarks have been updated to reflect changes anticipated for FY 2017. DHCD will report on outcomes in the MTW Annual Report.

SS #1: Increase in Household Income					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Average earned income of households affected by this policy in dollars (increase).	\$20,554	\$23,450			
	SS #2: In	ncrease in Household	l Savings		

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average amount of <b>escrow</b> of households affected by this policy in dollars (increase).	\$0.00	\$4.062				
	SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Unemployed	501 participants	358 participants				
	57% of	40% of				
	participants	participants				
Other - Employed	372 participants	538 participants				
	43% of	60% of				
	participants	participants				
SS #4: Hous	seholds Removed fro	m Temporary Assista	ince for Needy Fami	lies (TANF)		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Number of households receiving TANF assistance (decrease).	162 households	125 households				
SS #	6: Reducing Per Uni	it Subsidy Costs for F	Participating Househ	olds		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	\$931 in FY 2014	\$901				
	SS #7: Incr	ease in Agency Rent	al Revenue	<u> </u>		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average Tenant Rent Share (increase).	\$388 FY 2014	\$434  olds Transitioned to S				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of	0 households	107 households		
households				
transitioned to				
self-sufficiency				
(increase).				

### **Activity 2013-1: Rent Reasonableness**

**Description of MTW Activity:** In FY 2013, DHCD eliminated the requirement to re-determine 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 one 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. This initiative is fully implemented and is anticipated to continue through FY 2017.

**Proposed Changes:** No changes are proposed.

**Approval and Implementation:** 2013 – Implementation activities began in FY 2013.

**Changes to Baseline, Benchmarks & Metrics:** There are no changes anticipated to the baselines or benchmarks. DHCD will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	\$364,345	\$0.00			
	CE	#2: Staff Time Savii	ngs		
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	20,052 hours	0 hours			

### Activity 2013-2: PBV Rent Reasonableness

**Description of MTW Activity**: In FY 2013, DHCD modified the requirement for conducting rent reasonableness for re-determined 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, re-determined rents to owners of PBV units, except for certain tax credit units as defined in 983.501(c), shall not exceed the lowest of the reasonable rent or the rent requested by owner. This policy change eliminates consideration of the then current Fair Market Rent (FMR) limits when re-determining PBV rents. DHCD also eliminated the requirement at 983.303(b) to re-determine the reasonable rents for PBV units whenever there is a five percent or greater decrease in the published FMR in effect sixty days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary.

Affordable housing developers use the PBV commitment to secure project funding and project lenders assume rent trending when underwriting projects; therefore, this policy change will help to ensure the long-term viability and affordability of PBV developments while also promoting housing choice. This initiative is fully implemented and is anticipated to continue through FY 2017.

**Proposed Changes:** No changes are proposed.

**Changes to Baseline, Benchmarks & Metrics:** There are no changes anticipated to the baselines or benchmarks. DHCD will report on outcomes in the MTW Annual Report.

**Approval and Implementation:** 2013 – Implementation activities began in FY 2013.

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$34,014	\$0.00		
	CE	: #2: Staff Time Savii	ngs	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	1,872 hours	0 hours		

### Activity 2015-1: Rent Simplification(Changes to Activity 2012-2)

**Description of MTW Activity**: **Description/Update of MTW Activity**: In FY 2012 HUD approved DHCD's Rent Simplification activity. In FY 2016, DHCD received HUD approval on changes to the Rent Simplification activity. Under the revised Rent Simplification activity DHCD proposed the following:

- **Tiered Rent:** DHCD will replace the standard rent calculation method with a model in which families TTP will be equal to 30% of the low-end of \$3000 income bands.
- **Application of Payment Standards:** DHCD will apply Payment Standards based on the PD&R's Hypothetical Small Area FMRs (SAFMR). SAFMRs are neighborhood specific and are designed to be in line with localized rents in the area. Where the SAFMR exceeds the large area FMR (LAFMR), the payment standard will be equal to 100% of the SAFMR. Where the SAFMR is less than the LAFMR, DHCD will apply the payment standard equal to 110% of the SAFMR. If a local housing authority has been authorized to an apply Exception Payment Standard (EPS) by HUD within a particular geographic area, DHCD will apply the HUD approved EPS if a DHCD voucher holder leases a unit within that same geographic area. DHCD may adjust these percentages to support leasing in nonimpacted areas and/or in response to market conditions. DHCD will not impose a limit, at the outset, on the number of exception payment standards; however, DHCD may impose a limit when and if budgetary issues arise. Generally, DHCD will cap payment standard exceptions at 125% of the applicable SAFMR; however, DHCD may review and revise this cap for consistency with budgetary limitations and/or housing choice. DHCD will apply the Payment Standard in effect on the effective date of the recertification, regardless of any change in the Payment Standard from year to year. During an interim recertification, DHCD will apply the Payment Standard used at the last regular recertification.
- **Minimum Rent:** DHCD will retain the minimum rent at \$50. This rent will be factored into the rent tables.
- Streamlined Deductions and Exclusions: As part of DHCD's revisions to the standard rent calculation method, DHCD will streamline deductions and exclusions as outlined below. DHCD may review and modify deductions and exclusions from time to time based on the results of impact analyses and economic conditions.
  - Working Family Deduction: DHCD will apply a \$750 working family deduction to families where at least one adult is working. Only one deduction will be applied per household. The deduction does not apply to families where the only working individual is a full-time student other than the head of household, co-head or spouse.
  - Elimination of Earned Income Disregard (EID): DHCD will phase out the MTW EID activity. Participants who currently receive the EID will be exempt from this policy for the duration of their EID term; however, no additional EIDs will be granted.

- Exclusion of Full-Time Student Income: DHCD will exclude all full-time student income.
- Streamlined Childcare Expense Deduction: DHCD will apply unreimbursed childcare expense deductions based on the tiered deduction table below. Eligibility for the childcare expense deduction is limited to households where unreimbursed childcare expenses allow a household member to work or to further his/her education. The childcare expense deduction may not exceed the amount earned by the household member or the amount which is determined to be reasonable to get to and from school and attend classes.

<b>Childcare Expense</b>	Deduction
Up to \$2,499	No Deduction
\$2,500 & Over	Full deduction *

<sup>\*</sup>Subject to eligibility for the deduction, deduction limitations & verification

o **Streamlined Medical Expense Deduction:** DHCD will apply unreimbursed medical expense deductions based on the tiered deduction table below. DHCD will allow the full medical expense deduction when unreimbursed medical expenses total \$2,000 or more (3% of gross income will NOT be deducted). Elderly/disabled households are eligible for deduction of unreimbursed medical expenses.

Medical & Disability Expense	Deduction
Up to \$1,999	No Deduction
\$2,000 & Over	Full deduction *

<sup>\*</sup>Subject to eligibility for the deduction, deduction limitations and verification

- Dependent/Elderly/Disabled Deductions: DHCD will retain the \$480 dependent deduction and will increase the elderly/disabled household deduction to \$800 per family.
- **Mixed Families:** Under rent simplification, mixed families will pay an additional 10% of the table rent regardless of the number of family members without citizenship or eligible immigration status. For example, if the table rent for a family of 4 is \$250 dollars and the family has three members without citizenship or eligible immigration status, instead of paying \$250, the family will pay \$275.
- Streamlined Asset Verification and Calculation: As part of DHCD's revisions to asset income calculations, DHCD will streamline the verification and calculation of assets as outlined below:
  - o Self-certification of asset value up to \$50,000. When the market/face value of assets is over \$50,000, regulatory HUD verification requirements will be required.
  - o Exclusion of income from assets where the asset value is up to \$50,000.

 For assets with market/face value in excess of \$50,000, calculate asset income by taking the market/face value and multiplying that value by the established passbook savings rate.

The following activities which were in effect prior to the revisions to Rent Simplification will remain in effect and include:

- Minimum Rent of \$50
- Exclusion of all Full-Time Student Income
- Streamlined Earned Income Disregard
- Streamlined Asset Verification and Calculation

**Proposed Changes to Activity**: In FY 2017 DHCD will begin a phased-in implementation of the new components of rent simplification, the first of which will be the application of the SAFMR/payment standards policy. DHCD completed an impact analysis to determine the financial impact to tenants using the existing rent simplification activities and adding only the SAFMR/payment standard portion of rent simplification outlined below. With the application of SAFMR/payment standard policy below and existing rent simplification policies, current households will not experience an increase in rent. One percent (1%) of households will experience a decrease in rent.

DHCD continues to model the impact of this rent simplification activity for effects of disparate impact regarding race, ethnicity and/or disability.

DHCD will apply the SAFMR to all households with the following exceptions:

- Where a PHA has an approved exception payment standard (EPS) DHCD will apply the EPS;
- Where a family is currently assisted on the effective date of the change in payment standard policy and where the SAFMR is less than the current payment standard, DHCD will apply the current approved payment standard. New admissions and currently assisted families who move on or after the effective date of this policy will have the applicable SAFMR applied. In year two and in subsequent years, DHCD will review the SAFMR and approved payment standards to determine the impact of the policy for households who were current participants on the date of the policy change. DHCD will make determinations whether to apply the SAFMR or continue to apply the current approved payment standard consistent with funding levels and tenant impact.

**Approval and Implementation**: Implementation of the first phase of Rent Simplification began in FY 2012. Implementation of the SAFMR/Payment Standard portion of rent simplification is anticipated in the third quarter of FY 2017. DHCD may pilot this change in two of its jurisdictions before rolling it out to all regions. DHCD will review the remaining components of rent simplification and determine whether or not to implement or revise these components. Proposed revisions will be included in a subsequent MTW Plan.

**Changes to Baseline, Benchmarks & Metrics:** The baselines and benchmarks for SS #3 have been updated to reflect numbers and percentages of work-able households. The baseline for SS #8 was added and represents the FY 2015 to date figures. The benchmarks have been updated to reflect FY 2017 projections for this activity. DHCD will report on outcomes in the MTW Annual Report.

### **Metrics:**

CE #1: Agency Cost Savings				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?
Total cost of task	Number of	Anticipated		
in dollars	vouchers: 20,298	Number of		
(decrease).	Time per	Recertifications:		
	Recertification:	10,230		
	2.5 hours	Time per		
		Recertification:		
	Average Hourly	2.25 hours		
	<b>Staff Rate:</b> \$18.17			
	T-4-1 C4 -6	Average Hourly		
	Total Cost of	<b>Staff Rate</b> : \$18.24		
	Activity Prior to	<b>Anticipated Total</b>		
	Implementation: \$922,037	Cost of Activity		
	\$922,037	in FY 2016:		
	Baseline	\$419,848*		
	represents the	*Accounts for cost		
	metrics used when	savings from		
	this activity was	Biennial		
	initially proposed.	Recertifications		
	minumy proposed.	and Rent		
		Simplification.		
		#2: Staff Time Savin	905	
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement	Dascinc	Denemiark	Outcome	Achieved?
Total amount of	Number of	Anticipated		Acmeveu.
staff time	vouchers: 20,298	Number of		
dedicated to the	, ouchers, 20,290	Recertifications:		
task prior to	Time per	10,230		
implementation of	Recertification:			
the activity (in	2.5 hours	Time per		
hours).		Recertification:		
	<b>Total Time Spent</b>	2.25 hours		
	on Activity Prior	<b>Anticipated Total</b>		
	to	Time Spent on		
	Implementation:	Activity in FY		
	50,745 hours	<b>2016</b> : 23,018		
		hours		
	Baseline	*Accounts for		
		time savings from		
	metrics used when	Biennial		
	represents the metrics used when	time savings from		

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this activity was initially proposed  Recertifications and Rent Simplification.  CE #3: Decrease in Error Rate of Task Execution  Unit of Baseline Benchmark Outcome Benchmark  Measurement Achieved?					
Simplification.  CE #3: Decrease in Error Rate of Task Execution  Unit of Baseline Benchmark Outcome Benchmark		<u> </u>			
CE #3: Decrease in Error Rate of Task Execution Unit of Baseline Benchmark Outcome Benchmark		initially proposed			
Unit of Baseline Benchmark Outcome Benchmark		CE #2. Dagge	•	al Francisco	
				sk Execution	
Measurement Achieved?		Baseline	Benchmark	Outcome	
	Measurement				Achieved?
Average error rate 21% 19%	_		19%		
in completing a Average error rate		_			
task as a for income and					
percentage rent errors (decrease)		rent errors			
CE #5: Increase in Agency Rental Revenue*	(cerease)	CE #5: Incre	ease in Agency Rental	Revenue*	
Unit of Baseline Benchmark Outcome Benchmark	nit of				Renchmark
Measurement Baseline Benefitial R Outcome Benefitial R Achieved?		Dascinic	Denemia k	Outcome	
Increase in agency \$382 \$331		\$382	\$331		1101110 / 000
rental revenue in		4502	φυσι		
dollars (increase)  DHCD does not			DHCD does not		
have any rental	` ,		have any rental		
revenue and has			revenue and has		
been instructed by			been instructed by		
HUD to report on			HUD to report on		
average tenant rent			~		
to owner.		,			
*This benchmark reflects the average tenant rent to owner upon implementation of rent simplification. This benchmark does not reflect the addition of the other electricity utility allowance.		f the other electricity utilit	y allowance.		This benchmark does
HC #5: Increase in Resident Mobility		HC #5: I	ncrease in Resident M	lobility	
Unit of Measurement Baseline Benchmark Outcome Benchmark Achieved?		Baseline	Benchmark	Outcome	
Number of 0 50	umber of	0	50		
households able to	ouseholds able to				
move to a better					
unit and/or					
neighborhood of	•				
opportunity as a					
result of the					
activity (increase).  SS #1: Increase in Household Income *	morease).	SS #1 · Inc	rease in Household In	ncome *	
		55 #1. 110	rease in Household H	<u>icome</u>	Dll-
Unit of MeasurementBaselineBenchmarkOutcomeBenchmark Achieved?		Baseline	Benchmark	Outcome	
Average earned \$19,058 \$22,428*		\$19,058	\$22,428*		
households *Represents			*Represents		
affected by this workable			•		
policy in dollars households	-				
(increase).	-				

	SS #3: Increase in Positive Outcomes in Employment Status *			
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(5) Unemployed	3,850	3,562		
	Households*	Households*		
	*Represents work- able households	*Represents work- able households		
	43% of	39% of		
	Households	Households		
(6) Other -	5,164	5,489		
Employed	Households*	Households*		
	*Represents work- able households	*Represents work- able households		
	57% of	61% of		
	Households	Households		

\*HUD is requiring the use of this metric; however, DHCD does not believe it is applicable in this context of this MTW activity. DHCD will establish a benchmark of maintaining this level going forward,

## SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)\*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	2,316 Households on TANF in FY 2015	2,218 Households		

\*HUD is requiring the use of this metric; however, DHCD does not believe it is applicable in this context of this MTW activity. DHCD will establish a benchmark of maintaining this level going forward,

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

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	913 Households  Total Number of FSS participants	915 Households		

\*HUD is requiring the use of this metric; however, DHCD does not believe it is applicable in this context of this MTW activity. DHCD will establish a benchmark of maintaining this level going forward,

# SS #6: Reducing Per Unit Subsidy Costs for Participating Households \*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	\$870 FY 2015	\$900*  *Includes application of the UA for electricity		

*HUD is requiring the u	se of this metric; however	l , DHCD does not believe i intaining this level going fo	t is applicable in this con	text of this MTW
activity. DHCD will esta	ablish a benchmark of mai	intaining this level going fo	orward,	

SS #7: Increase in Agency Rental Revenue *						
Unit of Baseline Baseline		Benchmark	Outcome	Benchmark Achieved?		
PHA rental revenue in dollars	\$382*	\$331*				
(increase).	*Baseline	*DHCD does not				
	represents average tenant rent to	have any rental revenue and has				
	owner at the time this metric was	been instructed by HUD to report on				
	initially required.	average tenant				
		rent to owner.				

<sup>\*</sup>This benchmark reflects the average tenant rent to owner upon implementation of rent simplification. This benchmark does not reflect the addition of the other electricity utility allowance.

SS #8: Households Transitioned to Self Sufficiency * **					
Unit of Measurement	Baseline	Outcome	Benchmark Achieved?		
Number of	57*	57*			
households					
transitioned to	*Households who	*Households who			
self-sufficiency	were EOPd at zero	were EOPd at zero			
(increase).	HAP	HAP			

<sup>\*</sup>DHCD has indicated that DHCD does not believe the Self-Sufficiency metrics are applicable to this activity. However, HUD has required their use.

<sup>\*\*</sup> HUD is requiring the use of this metric; however, DHCD does not believe it is applicable in this context of this MTW activity. DHCD will attempt to identify the current baseline as part of the FY 15 Annual Report and then establish a benchmark of maintaining this level going forward.

### **B.** Not Yet Implemented Activities

### **Activity 2011-1: Value Vouchers**

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

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

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

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

**Update on Implementation:** Due to the substantial level of activity associated with development and implementation of the MTW utility allowance initiative and ongoing implementation of the rent simplification activity described herein, implementation of this initiative has not begun. DHCD is also considering working with a broader range of potential partners than those state agencies noted above.

**Timeline for Implementation:** See the *Update on Implementation* above. In FY 2017, DHCD may begin implementation of this activity pending the outcome of discussions among affordable housing advocates and other state agencies.

**Proposed Changes to Activity:** As a clarification, DHCD may work with a broader range of potential partners than those state agencies noted above.

### **Activity 2011-2: Opportunity Neighborhoods**

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

The purpose of DHCD's "Opportunity Neighborhoods" 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. DHCD may consider targeting groups of individuals to move to a single opportunity neighborhood to provide peer support for one another. Studies indicate that the peer support can improve the success of the mobility program.

In prior fiscal years, DHCD worked with local graduate students to review data and develop the design of the "Opportunity Neighborhoods" Program. In its current form, the program may offer revised payment standards, longer housing search periods, security deposit assistance, and more assistance to support moves to communities with high quality schools, low poverty rates and low violent crime rates.

In FY 2017 DHCD will review the feasibility of using a third party provider to manage the Opportunity Neighborhoods activity. DHCD will develop a scope of work and targeted outcomes to guide the provider on the goals and objectives for the program.

**Proposed Changes to Activity:** No changes are proposed.

**Approval and Implementation**: This activity was approved in 2011 and has not been implemented. In FY 2017 DHCD may identify a third party provider to assist in the development and implementation of the finalized program design.

**Changes to Baseline, Benchmarks & Metrics:** The baseline, benchmarks and metrics have not changed. DHCD will report on outcomes in the MTW Annual Report.

### C. Closed out

# **Activity 2011-3: Biennial Inspections**

**Description of MTW Activity**: DHCD had begun implementation of biennial inspections in FY 13.

**Reason for Closing Out Activity:** Biennial Inspections were approved by HUD as a DHCD MTW activity in FY 2011. In FY 15, DHCD closed out this activity as an MTW initiative due to the 2014 Appropriations Act which allows DHCD to transition to a biennial inspection schedule without MTW authority.

# V. Sources and Uses of Funding

DHCD's operates an MTW program that involves only Housing Choice Vouchers. The table below provides a projection of sources and uses for the MTW program for Fiscal Year 2016. 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 posting of this Plan, DHCD has not been notified of total renewal funding for CY 2016; thus, the amounts listed below may change based on actual funding levels. DHCD will provide information on actual source and use amounts as part of the MTW Annual Report.

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

### A. Estimates Sources of MTW Funding for the Fiscal Year

Sources					
FDS Line Item	FDS Line Item Name	Dollar Amount			
70500 (70300+70400)	Total Tenant Revenue	0			
70600	HUD PHA Operating Grants	\$258,786,206			
70610	Capital Grants	0			
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0			
71100+72000	Interest Income	5,000			
71600	Gain or Loss on Sale of Capital Assets	0			
71200+71300+71310+71400+71500	Other Income	0			
70000	Total Revenue	\$258,791,206			

# **B.** Estimated Uses of MTW Funding for the Fiscal Year

Uses				
FDS Line Item	FDS Line Item Name	Dollar Amount		
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	\$3,641,515		
91300+91310+92000	Management Fee Expense	17,510,103		
91810	Allocated Overhead	275,000		
92500(92100+92200+92300+92400)	Total Tenant Services	725,000		
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	0		
93500+93700	Labor	0		
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	0		
95000 (95100+95200+95300+95500)	Total Protective Services	0		
96100 (96110+96120+96130+96140)	Total Insurance Premiums	0		
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	0		
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	0		
97100+97200	Total Extraordinary Maintenance	0		
97300+97350	Housing Assistance Payments + HAP Portability-In	236,639,588		
97400	Depreciation Expense	0		
97500+97600+97700+97800	All Other Expenses	0		
90000	Total Expenses	\$258,791,206		

### **C.** MTW Single Fund Flexibility

Under the MTW Program, DHCD is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are described below:

- Education Partnership: DHCD will use single fund flexibility on education activities which target elementary through high school members of DHCD voucher households. The education activities will offer afterschool programing for students that exposes participants, through hands on learning activities, to science, technology, engineering, and mathematics, music, arts and improved academic performance. The purpose of this education initiative is to provide participating students with the support needed to ensure positive education outcomes and an expanded opportunity to gain exposure to career and post-graduation education options. DHCD's RAAs will identify high quality education programs/activities in place in their regions and then look to establish partnerships with these agencies. DHCD will address the barriers to access and may provide funding for an education program initiative for HCV youth in the impacted area. The education partnership activity includes a financial incentive for a college saving account contribution upon program completion.
- Supportive Housing Initiative: DHCD intends to use approximately \$300,000 per year in MTW Block Grant funds to partially fund intensive supportive services for eligible formerly homeless households at DHCD-funded Project Based Voucher developments. Supportive service funding will be provided to eligible non-profit PBV owners, and generally shall not exceed \$2,000 per household per year. DHCD will establish a competitive process to award these funds. Eligible supportive services may include case management and other services designed to help participants increase household income and improve economic self-sufficiency. No additional MTW waivers are required to implement this activity.
- VASH Leasing: On average, DHCD intends to operate the VASH program within the approved VASH budget and authorized unit count. However, recognizing the overriding importance of providing affordable housing to VASH-eligible veterans, DHCD may, on a limited basis, utilize MTW Block Grant funds to temporarily support higher leasing and/or HAP expenditure levels. DHCD projects that approximately \$225,000 in MTW funds will be utilized in FY 2017 for this purpose. No additional MTW waivers are required.
- Expanding FSS Partnerships: DHCD intends to use single fund flexibility to expand FSS programming including, but not limited to, programs to enhance occupational skills training in career areas with reasonable growth potential, access to computer technology for academic enrichment, and courses on credit and money management to enable residents to improve and maintain financial health. Additionally, DHCD may use single fund flexibility to develop and implement health and wellness programming for FSS participants.

The table below summarizes the activities that utilize Block Grant single fund flexibility

Program	Program Description	Target Population	Funding Source	Number of Residents
Education Partnership	On-site after-school enrichment program to enhance knowledge and understanding of science, technology, engineering, math, music, arts programming and improved academic performance. Also includes a financial incentive for a college saving account contribution upon program completion.	Youth 6-18	MTW	300
Supportive Housing Initiative	Partial funding intensive supportive services for eligible formerly homeless households at DHCD-funded Project Based Voucher developments.	Formerly Homeless Individuals	MTW	150
VASH Leasing	On a limited basis, utilization of MTW Block Grant funds to temporarily support higher leasing and/or HAP expenditure levels.	VASH Voucher Holders	MTW	TBD
Expanded FSS Programming	Expand FSS programming to include programming for career enhancement, technology and financial health.	FSS participants	MTW	915

# D. Local Asset Management Plan

DHCD does not operate a Federal Public Housing Program; therefore, the asset management regulations do not apply. HUD requires DHCD include the following table in the Plan:

Is the PHA allocating costs within statute?	Yes
Is the PHA implementing a local asset management plan (LAMP)?	No
Has the PHA provided a LAMP in the appendix?	No

### VI. Administrative

### A. Resolution

The required signed MTW Annual Plan Certifications of Compliance with Regulations is attached in Appendix B.

### **B.** Public Review Process

DHCD provided public notice of the draft Annual Plan. The public comment period extended from March 11, 2016 through April 11, 2016. Open public hearings were conducted on March 22, 2016 in Boston, MA (4 in attendance) and March 24, 2016 in Springfield, MA (9 in attendance). Copies of public notices, written comments, and sign-in sheets are attached in Appendix C.

### C. Evaluations

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. In 2012 graduate students from Harvard's Kennedy School completed research and program design on "Promoting Housing Choice in High Opportunity Neighborhoods." DHCD reviewed the outcomes of the research and will utilize many elements of the program design to launch its Opportunity Neighborhoods initiative.

### D. Annual Statement/Performance and Evaluation Report

DHCD does not operate a Federal Public Housing Program; therefore, the Performance and Evaluation Report are not applicable.

# **Appendix A: Listing of 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 & Neighborhood Development 10 Church Street Lynn, MA 01902 781.592.1966

Metropolitan Boston Housing Partnership 125 Lincoln Street Boston, MA 02111 617.859.0400

RCAP Solutions 12 E. Worcester Street Worcester, MA 01604 978.630.6600

South Middlesex Opportunity Council 7 Bishop Street Framingham, MA 01702 508.620.2336

Housing Solutions for Southeastern Mass.(formerly South Shore Housing Development Corp.) 169 Summer Street Kingston, MA 02364 781.422.4200

# **Appendix B: Certifications of Compliance**

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

### Attachment B

### Certifications 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, 2016, 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:

- 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
  conducted a public hearing to discuss the Plan and invited public comment.
- The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) 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.
- The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
- The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- 5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- 6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- 7. The PHA will affirmatively further fair housing by examining its 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.
- The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 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.
- 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.
- The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- 12. 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.

OMB Control Number: 2577-0216 Expiration Date: 5/31/2016

- 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.
- The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR
   105(a).
- 15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- 16. 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.
- The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- 19. 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).
- 20. 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.
- 21. 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.

Massachusetts Department of Housing and Community

Development

PHA Name

MA901

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)

Chrystal Kornegay

Name of Authorized Official

Undersecretary

Title

Signature

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

Attachment B

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## **Appendix C: Public Notice, Comments/Responses & Public Hearing Sign-in Sheets**

Massachusetts Department of Housing and Community Development (DHCD)

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

NOTICE OF PUBLIC HEARINGS REGARDING DHCD'S HOUSING CHOICE VOUCHER PROGRAM (HCVP) DRAFT MOVING TO WORK (MTW) PROGRAM ANNUAL PLAN FOR FY 2017

### MARCH 22 AND MARCH 24, 2016

MARCH 22<sup>nd</sup> AT DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
100 CAMBRIDGE STREET
BOSTON, MASSACHUSETTS 02114
1:00 PM - 3:00 PM, conf. B, 2<sup>nd</sup> fl.
MARCH 24th AT HAP HOUSING, 322 MAIN STREET, SPRINGFIELD, MA. 01105
1:00 PM - 3:00 PM

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 2017 Moving to Work Annual Plan. This plan provides details about DHCD's proposed MTW activities that will commence beginning July 1, 2016.

DHCD's draft MTW Annual Plan is available on DHCD's Website at: <a href="www.mass.gov/dbcd/">www.mass.gov/dbcd/</a>. 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 Monday, April 11, 2016. 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 Boston on March 22<sup>nd</sup>, please call 617-573-1206 to provide your name, which will be forwarded to the building's security staff. Please bring photo LD. Failure to list your name in advance could delay your attendance at the hearing.

If you plan to attend the hearing in Springfield on March 24th, please call 413-233-1670 to confirm your attendance.

If you require an accommodation (materials in Braille/large print, sign language interpreters, etc.), please contact DHCD at 617-573-1206 no later than March 18, 2016.



No.	Comment	DHCD Response
	Greater Boston Legal Servic	•
1.	<ul> <li>Rent Simplification</li> <li>We would urge DHCD to use CHA's exception payment standard.</li> </ul>	DHCD will use CHA's exception payment standard for anyone living in Cambridge. Even though CHA is a Moving to Work Agency, their policies still require HUD approval. CHA payment standard policies have been approved by HUD and as such, these payment standards are equivalent to exception payment standards as approved by HUD.
2.	<ul> <li>GBLS urges DHCD not to wait to implement the addition of the other electricity utility allowance.</li> </ul>	DHCD plans to implement the other electricity UA before the close of FY 2017.
3.	GBLS urges DHCD to implement the revised MTW rent calculation for mixed families.	<ul> <li>Of the approximate 20,000 households served, 47 households or less than one half percent are mixed families.</li> <li>The change to the rent formula requires software programming changes which require development and testing.</li> <li>As the number of households impacted by such a change is relatively small, DHCD may not focus manpower and cost toward this effort until after other more impactful changes are made.</li> </ul>
4.	<ul> <li>GBLS opposes the use of Site Based Waiting Lists (SBWL). It is difficult for applicants to apply at many different places across the state which is more burdensome to applicants.</li> <li>Will DHCD consider the Cambridge model where they will implement SBWL for their PB developments; however, the application process could occur at a centrally at CHA headquarters and applicants to select any number of PBV development waiting lists. Management of all of the SBWLs is handled at the central CHA office</li> </ul>	DHCD will explore all options before moving to full implementation of SBWLs. Currently, DHCD will use SBWLs for all new PB developments which come on line.
5.	Can you define what the good standing requirement refers to?	<ul> <li>DHCD may add the following to the Admin Plan to define the good standing requirement:</li> <li>The PHA refers to good standing requirements throughout this plan. Where not otherwise expressed, in order to be</li> </ul>

No.	Comment	DHCD Response
		determined in "good standing", the household must:  Have been current on rent without an unpaid balance at any time within the past 12 months  Be compliant under a repayment agreement.  Have been current on utility payments to the utility supplier for the past 12 months  Have been compliant with program requirements and not had any pretermination notices within the past 12 months;
6.	DHCD refers to graduation under different self-sufficiency programs. What does graduation mean?	<ul> <li>Under the MTW program, HUD requires that PHAs capture metrics which relate to obtaining self-sufficiency. Further HUD requires that PHAs define self-sufficiency.</li> <li>The various programs dictate differing definitions of self-sufficiency and graduation. For example, under the FES, FSS and YTTS programs self-sufficiency is assumed upon graduation from the program; while under the biennial recertification initiative, self-sufficiency is assumed when a person leaves the program as a result of having income high enough to result in zero subsidy. Please note that as a condition of graduation from some of these programs, a participant must be free of welfare assistance.</li> </ul>
Metr	opolitan Boston Housing Partnership – Sue Nohl	
7.	Activity 2015-1 Rent Simplification MBHP supports rent simplification and recommends that RAAs be included in the dialogue and meetings when MTW activities are being designed both in terms of administrative and procedural changes but especially when software changes are involved.	When developing and implementing MTW activities, DHCD has and will continue to work with the RAAs to develop the most effective and practical policies and procedures. DHCD encourages RAA's to reach out to DHCD with suggestions and comments on new and existing MTW activities.
8.	Activity 2000-1 Family Economic Stability Program (FES) MBHP supports proposed FES program changes and thanks DHCD for their support in the implementation phase of this program. MBPH anticipates reaching its goal of 50 participants	• N/A

No.	Comment	DHCD Response
	within the next few months and will continue	2es nesponse
	to work with DHCD to monitor and evaluate the	
	goals of the program.	
9.	Activity 2010-1 Project Based Site Based Waiting Lists (SBWL) MBHP requests that DHCD develop a process by which older projects can convert to managing their own wait list. This will create	Currently, DHCD is working with two existing PBV developments to assist in the conversion to site-based waiting lists.     Where feasible, DHCD will continue to work with existing owners to convert
	administrative efficiencies and allow developments to fill vacant units more quickly.	<ul> <li>developments to site-based waiting lists.</li> <li>DHCD supports the use of site-based waiting lists as they facilitate timely turnover of vacant units.</li> </ul>
10.	2011-5 Youth Transition to Success Program (YTSS) MBHP thanks DHCD for its support of this underserved population and for proposing programmatic changes that will enhance opportunities for youth to successfully complete the program. MBHP supports the change to review existing subsidies and to increase program time by two years.	• N/A
11.	2012-5 Family Self Sufficiency MBHP supports DHCD's proposed changes of considering an incentive pilot program to provide incentives for goal-related milestones.	• N/A
12.	Single Fund Flexibilities  MBHP supports DHCD's efforts to increase the number of subsidies for homeless veterans.	• N/A
13.	Additional Resources for PB projects MBHP supports DHCD efforts to provide additional resources for PB projects and encourages DHCD to work with non-profit providers in the area to design an evaluation of the services provided and a cost benefit analysis. MBHP believes that small investments in supportive services will lead to positive outcomes related to stable and longer term tenancies	• N/A
Mass	Law Reform Institute – Judith Liben, Esq. *	
14.	MTW activities focus more on administrative cost-cutting and effectiveness side of the MTW program rather than the incentives for broader housing choice and improving life chances of residents. We understand that during sequestration this would have been tough;	DHCD has a number of activities which also focus on mobility and self-sufficiency such as the FES program, YTTSP and FSS program enhancements. Planned activities which support mobility and self-sufficiency include Opportunity Neighborhoods, use of

No.	Comment	DHCD Response	
	however, now the budget may not be as	the SAFMRs and enhancements using single	
	tough and the balance can shift.	fund budget flexibility.	
15.	<ul> <li>Can you define some of the terms used in the plan so that the public can get a better understanding of the impact of the metrics tables?</li> </ul>	DHCD will take this under advisement and may include a section in the next MTW Plan to explain the purpose for the MTW Plan as well as what is behind the metrics for each activity.	
16.	<ul> <li>DHCD's website is easy to use. Could you enrich the website and include more about the MTW program including the activities and impact of the activities.</li> <li>Here are some examples:         <ul> <li>Provide a report on the progress, plans, issues and obstacles and improvement strategies of the enhanced FSS program.</li> <li>The Plan does not contain a list of PB developments. There needs to be an online resource where individuals can identify the list of Project Based developments.</li> </ul> </li> </ul>	DHCD will take this under advisement and determine how best to communicate program information.	
17.	<ul> <li>It would be helpful to start to address the issue of affirmatively furthering fair housing and the upcoming rules on this topic.         Specifically to understand where participants with tenant-based and project based vouchers are living. Are there cluster of participants in certain areas?     </li> <li>Can DHCD complete some mapping of some of the basic elements of the program?</li> </ul>	DHCD will follow all required dictates of the final rule on Affirmatively Furthering Fair Housing	
18.	<ul> <li>Why has DHCD limited the opportunities for payment standard exceptions to reasonable accommodations (RA)?</li> <li>DHCD has forecasted only 6 reasonable accommodation payment standard exceptions for FY 2017.</li> <li>What plans does DHCD have to exception payment standards for opportunity purposes?</li> </ul>	<ul> <li>DHCD has not limited payment standard exceptions to reasonable accommodations. DHCD has a payment standard exception under its proposed Opportunity Neighborhoods activity.</li> <li>DHCD's forecast for payment standards exceptions based on RA is based on historical data. All RAAs are aware of this option and where applicable, notify participants. This exception is needed most often where fully accessible units are required.</li> <li>DHCD is still in the planning phase of the Opportunity Neighborhood activity and will</li> </ul>	

No.	Comment	DHCD Response
1101	Comment	continue to work to develop and ultimately
		implement this activity.
19.	<ul> <li>The increase in mobility to opportunity areas appears to be limited.</li> <li>Is DHCD's opportunity neighborhood activity under way?         What is an opportunity move?</li> </ul>	<ul> <li>DHCD has proposed an MTW Activity entitled Opportunity Neighborhoods.</li> <li>The purpose of DHCD's "Opportunity Neighborhoods" 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.</li> <li>DHCD is still in the planning phase of the Opportunity Neighborhood activity and will continue to work to develop and ultimately implement this activity.</li> <li>An opportunity move is a move to an area 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.</li> </ul>
20.	Why doesn't DHCD try to roll out the Owner Incentive Fund to increase mobility?	<ul> <li>The Owner Incentive Fund was established as a way for DHCD 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.</li> <li>DHCD continues to consider expanding the program to other regions, particularly to encourage new landlords to join the program and to increase access to high opportunity neighborhoods.</li> </ul>
21.	<ul> <li>MLRI is opposed to owner managed wait lists for PBV units.</li> <li>Clients will have to go to every project to apply for housing and spread across the state this could be onerous to low-income families. The potential for fair housing</li> </ul>	DHCD continues to consider alternate approaches to managing the PB waiting lists, including development of a state-wide site based waiting list and combining owner waiting lists.

No.	Comment	DHCD Response
	issues is greater with owner managed waiting lists SBWLs.  If the PBV developments are in better areas, are they equally accessible to all.	<ul> <li>As previously stated, allowing applicants to apply centrally to all PB development waiting lists results in a high no-show screening rate. As such, vacant units remain vacant for longer periods of time.</li> <li>Where expiring use PB developments are concerned, DHCD does not select these developments; rather HUD makes that determination.</li> </ul>
22.	<ul> <li>The approved plan says DHCD will conduct a regular impact analysis on various issues. Where childcare, medical, dependent and elderly deductions are concerned, we strongly urge impact analyses be conducted.</li> <li>What is the methodology for the impact analysis?</li> <li>Please put impact analyses on the website.</li> </ul>	<ul> <li>DHCD has conducted impact analyses on the various components of rent simplification including impacts on families regarding childcare, medical, dependent and elderly deductions and households with earned income disregards.</li> <li>DHCD uses each household's current income, expenses and deductions and applies the proposed policies to determine the impact on each household. The impacts help to guide DHCD on the selection of income and rent policies which support the goals and objectives of the MTW program.</li> <li>Generally the impact analyses are completed at the time of program design and program implementation. Additionally, DHCD can review impacts after implementation and compare income and rent changes. Thereafter, DHCD may propose modifications to the activity in support of program goals and objectives.</li> <li>DHCD will meet all regulatory obligations regarding review and public comment requirements.</li> </ul>
23.	<ul> <li>What has been accomplished through the FES program?</li> <li>What is different in this model that the regular model and is it working?</li> </ul>	<ul> <li>The FES program is a five year program that provides participants with a flat subsidy not tied to household income. The program includes case management support to assist family in address employment, housing and/or training needs. The program includes a support account for completion of economic stability goals, a rent escrow savings program and a time limited participation.</li> <li>The traditional HCV program model ties the tenant rent to the tenant income.</li> </ul>

No.	Comment	DHCD Response
Regio	onal Housing Network	Some of the participant outcomes in the FES program include the following:
24.	Activity 2015-1 Rent Simplification	When developing and implementing MTW
	<ul> <li>RHN completely supports the Department's plan to expand the Rent Simplification activity which should streamline the rent determination process as well as promote self-sufficiency for program participants. It is extremely important that as changes are being created, the Rental Assistance Committee of the Network be included particularly with any software changes that will require adequate lead time for testing and implementation statewide.</li> </ul>	activities, DHCD has and will continue to work with the RAAs to develop the most effective and practical policies and procedures. DHCD encourages RAA's to reach out to DHCD with suggestions and comments on new and existing MTW activities.
25.	<ul> <li>Activity 2010-1 Project Based Site Based Waiting Lists (SBWL)</li> <li>RHN applauds the Department's plan to continue to have all new project based voucher developments assume the responsibility for establishing and maintaining their own waiting lists. RHN requests that the Department create a plan to convert older projects where the responsibility is still with the member agency to one that mimics the new process of having the waiting list established and maintained by the development entity or its property management company.</li> </ul>	<ul> <li>Currently, DHCD is working with two existing PBV developments to assist in the conversion to site-based waiting lists.         Where feasible, DHCD will continue to work with existing owners to convert developments to site-based waiting lists.</li> <li>DHCD supports the use of site-based waiting lists as they facilitate timely turnover of vacant units.</li> </ul>
26.	2011-5 Youth Transition to Success	• N/A
27	Program  RHN thanks the Department for continuing to support this underserved population and for exploring programmatic changes that might enhance their opportunity for successful completion of this program. RHN supports all of the proposed changes.	. N/A
27.	<ul> <li>2012-5 Family Self Sufficiency</li> <li>RHN believes that the proposed change to the Family Self Sufficiency program that encourages homeownership is very forward</li> </ul>	• N/A

No.	Comment DHCD Response		
	thinking and will go a long way in providing		
	an important tool for those clients wishing		
	to purchase their first homes. RHN		
	supports the Department's proposal to		
	consider a pilot incentive program that		
	allows families who are enrolled in the		
	program to earn an incentive for meeting		
20	goal-related milestones.		
28.	Single Fund Flexibilities	• N/A	
	In our capacity as the trade association for		
	the regional housing agencies, we have		
	been able to observe the positive impact		
	that the Veterans Affairs Supportive		
	Housing (VASH) program has had on so many deserving veterans in all the cities		
	and towns in the Commonwealth. RHN		
	fully supports the Department's plan to		
	utilize MTW funds to do so. These service		
	men and women <i>and</i> their families deserve		
	every opportunity to get on with their lives		
	and transition from the stresses of serving		
	in war zones.		
29.	RHN continues to support the	While DHCD does not have a plan to	
	Department's activity of providing	conducting such an analysis, DHCD may	
	additional service resources for Project	consider such an analysis in the future.	
	Based Voucher projects and asks that the		
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		activities.	
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	procedural changes but especially in the		
	software changes that will need to happen		
	in order to implement this.		
<b>HAP</b> 30.	additional service resources for Project Based Voucher projects and asks that the Department work with non-profit service providers, housing management professionals and other staff at Network member agencies on the design and implementation of an evaluation of services provided along with a cost benefit analysis.  Housing  Activity 2015-1 Rent Simplification HAPHousing supports DHCD's plan to expand the Rent Simplification activity which we agree will streamline and simplify the rent determination processes while also promoting self-sufficiency for participants. HAPHousing encourages DHCD to pilot this initiative and include key RAA staff when the program changes are being designed, both in terms of administrative and procedural changes but especially in the software changes that will need to happen	When developing and implementing MT activities, DHCD has and will continue to work with the RAAs to develop the most effective and practical policies and procedures. DHCD encourages RAA's to reach out to DHCD with suggestions and comments on new and existing MTW	

No.	Comment	DHCD Response
31.	<ul> <li>Activity 2010-1 Project Based Site Based Waiting Lists (SBWL)</li> <li>HAPHousing appreciate DHCD's plan to continue to have all new project based voucher developments establish and maintain their own waiting lists.         HAPHousing is requesting that the Department consider developing a process by which older PBV projects where HAPHousing managed wait lists would be able to convert to PBV owners managing their own wait lists not only to create administrative efficiencies for HAPHousing, but to allow developments to more quickly in filling vacant units.</li> </ul>	<ul> <li>Currently, DHCD is working with two existing PBV developments to assist in the conversion to site-based waiting lists.         Where feasible, DHCD will continue to work with existing owners to convert developments to site-based waiting lists.</li> <li>DHCD supports the use of site-based waiting lists as they facilitate timely turnover of vacant units.</li> </ul>
32.	<ul> <li>2011-5 Youth Transition to Success Program</li> <li>HAPHousing thanks the Department for recognizing this underserved population and appreciate the opportunity to participate in this program. HAPHousing supports the proposed changes to accept referrals from the Department of Children and Families (DCF) and extend the program to include two additional optional years which will allow the YTTS participants to complete their educational goals.</li> </ul>	• N/A
33.	<ul> <li>2012-5 Family Self Sufficiency</li> <li>HAPHousing appreciates the work that DHCD has done during the year regarding the changes to the Family Self-Sufficiency (FSS) Program. We strongly support the proposed changes to pilot a program to provide participants additional cash incentives for accomplishing meaningful short-term goals that are outside of the existing FSS incentives. We look forward to working with the department in the implementation and analysis of these changes</li> </ul>	• N/A
34.	<ul> <li>Single Fund Flexibilities</li> <li>HAPHousing looks forward to working with DHCD and VA partners to increase the number of VASH subsidies available for</li> </ul>	While DHCD does not have a plan to conducting such an analysis, DHCD may consider such an analysis in the future.

No.	Comment	DHCD Response
	homeless veterans and fully support the	
	plan to utilize MTW funds to do so.	
	<ul> <li>HAPHousing has been one of the</li> </ul>	
	administrators of the MRVP funded	
	Supported Housing Initiative (SHI) and we	
	look forward to working with DHCD and	
	others to implement the MTW SHI.	
	HAPHousing would like to encourage the	
	department to work with non-profit service	
	providers and the RAA's to design an	
	evaluation of the services provided and a	
	cost benefit analysis.	



# Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT Deval L. Patrick, Governor • • Aaron Gornstein, Undersecretary

# **SIGN-IN SHEET**

PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE:	22	16		
LOCATION: _	100	Comprede	St. Boston	
		X	32 1	

NAME	REPRESENTING
SUENONI	MBHP
Susan Hegel	CASLS
Susan Hegel JUDITH LIBEN	MLRI
Ann Verrille	CHATA



# Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT Deval L. Patrick, Governor • • Aaron Gornstein, Undersecretary

# **SIGN-IN SHEET**

PUBLIC HEARING FOR

MTW ANNUAL PLAN

DATE: 3/24/16
LOCATION: HAP Housing 322 Main Street Spring 2 d LAM

NAME	REPRESENTING
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Pary Penyps	U
allen Skomas	71
Julean Toscols	16
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