

Holyoke Housing Authority



MOVING TO WORK ANNUAL PLAN

HHA FISCAL YEAR 2022
(JANUARY 1, 2022 TO DECEMBER 31, 2022)

Submitted to HUD
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DRAFT FOR PUBLIC COMMENT

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I. Introduction

The Holyoke Housing Authority (HHA) entered into a Moving to Work (MTW) Agreement with the U.S. Department of Housing and Urban Development (HUD) in September 2013. In April 2016, the term of the MTW Agreement was extended until 2028.

Moving to Work is a demonstration program authorized by Congress that permits participating Public Housing Authorities to combine Public Housing Operating Fund, Capital Fund and Housing Choice Voucher Program funding into a single, agency-wide block grant, and to design and test flexible, locally-tailored approaches to administering low-income housing programs. Subject to HUD approval, MTW agencies are allowed to waive some provisions of the US Housing Act of 1937 to promote one or more of the following MTW statutory objectives:

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

HHA's MTW designation provides an opportunity to develop innovative local solutions to the City of Holyoke's unique local needs and challenges while promoting MTW's statutory objectives. HHA believes that MTW designation provides a critically important set of tools that:

- Help to leverage and increase the positive impact of limited federal funding;
- Promote HHA's long-term objectives to revitalize Holyoke's public housing portfolio and surrounding neighborhoods, including the City's Arts and Innovation District;
- Provide HHA residents with training and other supportive services so that they can obtain good-paying jobs and/or become first-time homebuyers;
- Improve and streamline administration of both the Public Housing and Housing Choice Voucher (HCV) programs; and,
- Increase the range and quality of housing choices for low-income households.

As described in prior Annual Plans, HHA's current MTW funding formula has essentially level-funded HHA's Housing Assistance Payment (HAP) funds since 2013, while leasing costs have increased substantially, HHA will continue to explore opportunities to make each federal dollar go further, as well as continue to work with HUD to resolve this issue and ensure that adequate funds are available to support current and projected leasing.

HHA is required to submit an MTW Annual Plan for HUD approval in advance of each fiscal year. This document, which is organized according to HUD's updated Plan (50900) requirements, describes HHA's planned activities under the MTW Demonstration for Fiscal Year 2022, i.e., the period from January 1, 2022 through December 31, 2022.

Long-Term MTW Goals and Objectives

The following goals and objectives continue to apply to HHA's MTW activities:

Supporting sustainable development and community-wide neighborhood revitalization efforts. HHA will continue to look for opportunities to partner and support the City's ongoing revitalization efforts throughout the community. HHA was designated by the Holyoke Redevelopment Authority as the developer for an affordable homeownership project in South Holyoke, the City's lowest income neighborhood. The current plans for new construction for infill development are a response to community advocacy to restore housing options. The housing project around Carlos Vega Park has been contemplated for decades and was incorporated into Holyoke's 2012 Urban Renewal Plan with the objectives of redeveloping vacant property, adding more density, improving housing options, improving housing stock and increasing home ownership opportunities. HHA secured funding through the Community Scale Housing Initiative, a joint program of MassHousing and DHCD, for Phase I which consists of 12 units of affordable housing. The construction for this Phase is anticipated to be complete in the Fall of 2022.

In addition to the South Holyoke project, HHA has also acquired two vacant lots next to the Falcetti Towers building. Towards this effort, HHA applied for and received funding from the local Community Preservation Act (CPA), invested some of our own dollars and partnered with Habitat for Humanity that will take on the project of completing construction of two single family homes.

HHA will continue to pursue development opportunities that are community driven and address unique local needs, specifically to redevelop vacant lots of land. If MTW flexibility is identified through that process as a vehicle to increase housing choice or give incentives to families to become economically self-sufficient, HHA may propose an activity in the future regarding new housing development.

Increasing Housing Choice for vulnerable populations and increasing the number of HHA residents who are working or actively engaged in educational or job training programs. Through creative partnerships, HHA plans to continue to explore opportunities to expand populations served and further improve the quality of training, education and job placement services provided to HCV and public housing residents. HHA plans to expand this effort to include more vulnerable populations, such as individuals with opioid dependence. HHA continues to conduct research and identify potential programs to address housing and service needs for opioid addicts who frequent the emergency room, resulting in increased health care costs and harmful patterns to themselves and others. HHA is hopeful that in the future, in collaboration with the Holyoke Medical Center, a program targeting this population will help combat this widespread issue in Massachusetts, as recognized by recently passed legislation.

Streamlining and reducing the cost of HHA operations. In light of ongoing and severe restrictions on federal funding, HHA continues to focus on efforts to streamline administration and reduce transaction costs. HHA's MTW vision includes identifying more flexible and cost-effective methods to administer federal housing programs. HHA will continue to explore tools and MTW flexibilities to streamline administration of programs.

Leveraging non-HUD resources to respond to the housing and related service needs of Holyoke's low-income households. HHA's vision for MTW includes ongoing efforts to secure additional non-HUD funding sources to address housing and related service needs. HHA will continue to pursue funding opportunities as well as opportunities to leverage private equity where applicable.

Short-Term MTW Goals and Objectives

HHA plans to implement one new MTW initiative in FY 2022:

HCV Leasing Incentives: Using its MTW flexibility, HHA will establish an HCV Leasing Incentive program to increase voucher utilization and provide additional housing opportunities for voucher-holders. Specifically, HHA will provide leasing incentives to owners to increase their participation in the HCV program. Owners will receive incentive payments for participation in the HCV program for the first time as well as for leasing new HCV units. HHA will allocate \$7,500 in the first year of this activity. However, HHA may revise these allocations in future fiscal years pending the response to these incentives.

In FY 2022, HHA anticipates providing housing assistance to 2,180 households. Additionally, HHA will continue to administer the following activities in FY 2022:

Youth Aging Out of Foster Care: The Youth Aging out of Foster Care (YAFC) activity, through a partnership between HHA with the Holyoke Department of Children and Family Services (DCF), provides stable housing and service programs for youth aging out of foster care. HHA entered into an MOU with DCF and issues up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of 5 years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates 15 vouchers will be leased by the end of FY 2022. HHA will also utilize MTW funds to provide up-front housing assistance to new participants, which may include first and last months' rent and security deposit. DCF will provide program participants with support services to assist in housing stabilization for the first year the participant is in the program.

Holyoke Public Schools Assistance Program: HHA partners with the Holyoke Public Schools (HPS) to implement a housing and service program for families with children in the HPS system whose lack of stable housing is affecting their children's success in school. HHA has begun receiving referrals and issuing vouchers to families referred by a Homeless Educational Coordinator on staff at HPS. HHA may issue up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of 5 years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates that a total of 30 vouchers will be issued and leased in FY 2022.

Modified Project-Based (PB) Voucher Program: HHA continues to operate its Modified PB Voucher Program in connection with HHA's Preservation after Conservation MTW activity. The features of the PB program allow HHA with greater flexibility in project basing properties with an outcome of increasing housing opportunities in HHA's jurisdiction. In FY 2022, HHA will modify this activity to include the following flexibilities to further streamline and enhance the PBV program:

- To define a PBV project as a single building, multiple contiguous or non-contiguous buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner.
- To increase the 20% cap on PB units in HHA's portfolio and use 40% as the cap for budget authority allocated to Project-Based vouchers. Additionally, HHA will remove the requirement to provide advance notice to its HUD field office of its intent to project-base vouchers.

Holyoke Horizons Transitional Housing Support: In FY 2022, HHA anticipates assisting thirteen (13) households under the Holyoke Horizons Transitional Housing Support activity. This activity supports successful re-entry into society of persons involved with the criminal justice system. In response to the economic hardship experienced as a result of the COVID-19 pandemic, HHA increased the rental subsidy from \$200/month per participant to \$400/month per participant in FY 2021 in order to support up to thirty (30) formerly incarcerated individuals who are enrolled in the Hampden County Sheriff's Department

(HCSD) Community Housing Earned Safe and Supportive (CHESS) initiative. Participants receive case management and supportive services from the HCSD while receiving an HHA rental subsidy.

Student Housing Initiative: Holyoke Housing Authority will continue to use MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. HHA will continue to work in partnership with Holyoke Community College (HCC) to administer the Student Housing Initiative (SHI) program, which provides time limited housing subsidies and other college related expenses, to income eligible, homeless college students. HHA will provide up to three years of subsidy for 15 eligible students for an initial three year period. HHA will accept referrals from HCC for the 2021-2022 school year and anticipates that 15 vouchers will be issued and leased by the end of FY 2022.

Holyoke Affordable Homeownership Initiative (HAHI): HHA will continue planning for the implementation of the recently approved MTW activity, the Holyoke Affordable Homeownership Initiative (HAHI), to provide affordable homeownership opportunities for households earning up to 80% of Area Median Income. Initially, HAHI will be implemented in the South Holyoke neighborhood, where HHA is working with the City and community partners to develop vacant and distressed parcels into new affordable rental and homeownership units. The HAHI program is intended to provide a flexible set of homeownership financing tools to help ensure the long-term affordability of the units and success of the homebuyers. Construction for Phase II homeownership units is not scheduled to begin until FY 2023.

Administrative Streamlining Activities: HHA will continue to implement the following activities, which provide administrative efficiencies for the Housing Authority:

- Biennial Recertifications;
- Rent Simplification, and,
- MTW Utility Allowances.

Non-MTW Goals and Objectives

Non-MTW activities are defined by HUD as those activities that do not require MTW authority or flexibility to implement. In addition to its planned long- and short-term MTW activities, HHA will continue to implement a broad array of housing management, maintenance and supportive services efforts. HHA will continue to operate Mod Rehab and Mod Rehab SRO programs that are not part of the MTW Demonstration. HHA will also continue to operate state-assisted public housing and leasing programs, subject to continued state funding.

HHA may apply for HUD and other competitive funding opportunities, including HUD Lead Hazard Reduction Grant and Housing-related Hazards Capital Fund Program.

II. General Housing Authority Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

HHA does not plan on adding new public housing units in FY 2022.

Table 1: Planned New Public Housing Units

Asset Management Project (AMP) Name and Number	Bedroom Size						Total Units	Population Type *	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A							0			
Planned Total							0			

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

If the "Population Type" is "Other" please describe

N/A

ii. Planned Public Housing Units to be Removed

Table 2: Planned Public Housing Units to Be Removed

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
N/A	0	N/A
Planned Total		

iii. Planned New Project-Based Vouchers

Table 3: Planned New Project Based Vouchers

HHA does not anticipate adding any new Project Based Voucher contracts in FY 2022.

Property Name	Number of Vouchers to be Project-Based	RAD (Yes/No)	Description of Project
N/A	0	N/A	N/A
Planned Total	0	N/A	N/A

iv. Planned Existing Project-Based Vouchers

Table 4: Planned Existing Project Based Vouchers

HHA anticipates that in FY 2022, there will be 188 PBV units, which will be either leased or committed.

Property Name	Number of Project-Based Vouchers	Planned Status at the End of the Plan Year (Committed/Leased-Issued)	RAD (Yes/No)	Description of Project
Holyoke Towers	100	Leased	No	An elderly high-rise, converted under preservation after conservation
Lyman Terrace	76	Leased	No	PBV Conversion of remaining public housing units.
South Holyoke Homes Phase I	12	Committed	No	Affordable rental project; 1-4 bedrooms
Planned Total	188			

v. Planned Other Changes to MTW Housing Stock

HHA is not planning any other changes to the MTW Housing Stock in FY 2022.

Table 5: Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Site	Planned Change
Toepfert Apartments	HHA will beginning a 12-phase rehabilitation at Toepfert Apartments, tenants will be relocated building by building and units will be held offline while the work is completed in 5-6 month increments. Rehab will be completed in 2 phases which are scheduled for completion in 2022.

vi. General Description of all Planned Capital Expenditures

The following chart provides a summary of planned capital expenditures for HHA’s Federal public housing developments during FY 2022. Actual expenditures may vary.

Table 6: Planned Capital Expenditures

Development	Planned Work Description	Projected Expenditures
Beaudoin Village	Boiler Improvements	\$65,000
	Clean lateral sewer lines with video assistance	\$10,000
	Replace counter tops, hardwood floor maintenance and ceiling repairs	\$25,000

Development	Planned Work Description	Projected Expenditures
Toepfert Apts.	Replace existing flooring, kitchen & bath cabinets and baseboards	\$835,000
	Roof Replacement	\$200,000
Churchill I & II	Smoke/CO2 Replacement	\$25,850
	Replace counter tops and flooring replacements	\$25,000
Coughlin Apts.	Repair any cracks on balconies & bands; seal	\$145,000
	Resurface Parking Lot	\$40,000
Falcetti Towers	Elevator Cab Improvements	\$40,000
Rosary Towers	Resurface Parking Lot	\$35,000
	ADA Showers Improvements	\$50,000
TOTAL		\$1,495,850

B. Leasing Information

i. Planned Number of Households Served

Table 7: Planned Number of Households Served

Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served**
MTW Public Housing Units Leased	9,300	775
MTW HCV Utilized	16,560	1,380
Local, Non-Traditional: Tenant Based^	300	25
Local, Non-Traditional: Property Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Totals	26,160	2,180

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plan to have leased/occupied in each category throughout the full Plan Year.

** “Planned Number of Households to Be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.

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

Table 8: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served*
Tenant-Based	Activity 2018-2: Holyoke Horizons Transitional Housing Support	120	10

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served*
Tenant-Based	Activity 2020-1 Student Housing Initiative	180	15
Property-Based	N/A	N/A	N/A
Homeownership	Activity 2021-1: Holyoke Affordable Homeownership Initiative Program	0	0
Planned Totals		300	25

* The sum of the figures provided should match the total provided for each local, non-traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leased

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	HHA does not anticipate any PH leasing issues in FY 2022.
MTW HCV	HHA does not anticipate any HCV leasing issues in FY 2022.
Local, Non-Traditional	Where Holyoke Horizons Transitional Housing Support participants are offered permanent subsidized housing opportunities by other local PHAs, this may impact the FY 2022 leasing numbers when and if new participants are not leased up to replace the exiting participants.

C. Waiting List Information

HHA administers its waiting lists in accordance with the HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable.

i. Waiting List Information Anticipated

Table 9: Waiting List Information

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
HCV	Statewide	213,950	Open	N/A
HCV	Statewide with Holyoke Residency	5,794	Open	N/A
Federal MTW Public Housing	Merged (excluding Churchill Homes)	527	Open	N/A
Federal MTW Public Housing Units	Site-Based (Churchill Homes)	1,564	Open	N/A

Describe any duplication of applicants across waiting lists:

Because Public Housing and HCV maintain separate waiting lists, applicants may apply to both programs and be listed on both waiting lists.
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ii. Planned Changes to Waiting List in the Plan Year

There are no plans changes to the waiting list in FY 2022.

Waiting List Name	Description of Actual Changes to Waiting List
N/A	No changes to waiting list are planned

III. Proposed MTW Activities

Activity 2022-1: HCV Leasing Incentives

Description of MTW Activity

Using its MTW flexibility, HHA will establish an HCV Leasing Incentive program to increase voucher utilization and provide additional housing opportunities for voucher-holders.

Upon approval, HHA will provide leasing incentives to owners to increase their participation in the HCV program. Owners will receive incentive payments for participation in the HCV program for the first time as well as for leasing new HCV units. HHA will allocate \$7,500 in the first year of this activity. However, HHA may revise these allocations in future fiscal years pending the response to these incentives.

HHA will provide the following incentives to owners participating in the HCV program:

- A \$500 one-time incentive for a new HCV program unit. HHA will define a new HCV program unit as a unit which has not been previously leased under the HCV program or was last leased three or more years ago.
- A \$500 incentive to an owner who had not previously leased a unit in HHA's HCV program. "New Owner" refers to an owner who has never previously leased a unit under the HCV program or who had last leased a unit under the HCV program three or more years ago.

Where a unit had previously been leased by an HCV participant and there is a gap in leasing with the HCV program, HHA will not provide a \$500 incentive when and if the unit gets leased by a new HCV participant

Incentive payments will be payable upon execution of the HAP contract.

Statutory Objective

The HHA initiative will advance the MTW statutory objective of increasing housing choice for low-income families by increasing owner participation and housing stock available to participants in the HCV program.

Hardship

Not applicable.

Implementation

Upon HUD approval, HHA will develop policies and procedures for HCV Leasing Incentives. Implementation is anticipated late in FY 2022.

Metrics

The metrics below will be compiled using HHA's housing software, as well as other internal data sources and reports. HHA did not include a reduction in wait list time as a metric as the impact of this activity is not anticipated to make a significant change in time on the waiting list.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase).	0	10		

Cost Implications

In the first year of this activity, HHA assumes an average incentive cost of \$750 with 10 incentives being paid. The result is an annual cost of \$7,500. HHA has budgeted accordingly to cover these costs.

Need/Justification for MTW Flexibility

To provide HCV owners with financial incentives for leasing, HHA will utilize the authorization found at MTW Agreement Attachment C, Section D.2.a, which authorizes the HHA “to adopt and implement any reasonable policy to establish payment standards, rents, or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8 (o)(13)(H)-(I) of the 1937 act. The additional payment provided through the leasing incentives serves to increase the number of housing units available to low income families.

Rent Reform/Term Limit Information

Not applicable.

IV. Approved MTW Activities

A. Implemented Activities

Activity 2013-1: Biennial Recertifications

Plan Year Approved, Implemented, Amended

- Approved: FY 2013
- Implemented FY: 2014
- Amended: FY 2015

Description/Update of MTW Activity

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

In FY 2015, HHA received approval from HUD to modify the biennial recertification initiative and include a limitation on the number of voluntary interim recertifications a family may complete between biennial recertifications to two. Required interim recertifications (i.e. for changes in family composition or otherwise required by HHA) do not count against the limit. Elderly and disabled households are exempt from this provision and will be able to complete an interim recertification at any time. Zero-income households and households on minimum rent will continue to be subject to annual or more frequent recertification requirements.

During declared states of economic/health emergencies as declared by the Governor or his/her designee, HHA will temporarily lift the limit on voluntary interim rent reductions for non-exempt families. HHA will make determinations as to when to re-impose the limit.

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity.

Planned Changes to Metrics/Data Collection

The benchmark for CE #1 has been updated to reflect an increase in the staff hourly rate. Additionally, HHA has removed CE #5: Increase in Agency Rental Revenue as this metric does not apply in the context of the flexibilities provided under this activity.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Recertifications performed in FY 2013: 1,887 Time per recertification: 105 minutes Time spent on recertifications in FY 2013: 3,302 hours Interims performed in FY 2013: 1,321 Time per interim: 45 minutes Time spent on interims in FY 2013: 991 hours Total time spent on interims and recertifications: 4,293 hours Average hourly wage for staff: \$23.87 Total cost in FY 2013: \$102,474	Estimated number of recertifications performed: 1,000 Time per recertification: 85 minutes Anticipated time spent on recertifications: 1,417 hours Estimated number of interims performed: 942 Time per interim: 45 minutes Anticipated time spent on interims: 707 hours Total time spent on interims and recertifications: 2,124 hours Average hourly wage for staff: \$30.35 Total cost after implementation of activity: \$64,463		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

<p>Total time to complete the task in staff hours (decrease).</p>	<p>Recertifications performed in FY 2013: 1,887</p> <p>Time per recertification: 105 minutes</p> <p>Time spent on recertifications in FY 2013: 3,302 hours</p> <p>Interims performed in FY 2013: 1,321</p> <p>Time per interim: 45 minutes</p> <p>Time spent on interims in FY 2013: 991 hours</p> <p>Total time spent on interims and recertifications prior to implementation of activity: 4,293 hours</p>	<p>Estimated number of recertifications performed: 1,000</p> <p>Time per recertification: 85 minutes</p> <p>Anticipated time spent on recertifications: 1,417 hours</p> <p>Estimated number of interims performed: 942</p> <p>Time per interim: 45 minutes</p> <p>Anticipated time spent on interim: 707 hours</p> <p>Total time spent on interims and recertifications: 2,124 hours</p>		
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Activity 2015-1: Rent Simplification
(Combined with 2013-2: Revised Asset Policies)

Plan Year Approved, Implemented, Amended

Rent Simplification

- Approved: FY 2015
- Implemented: FY 2017

Revised Asset Policies

- Approved: FY 2013
- Implemented: FY 2014

Description/Update of MTW Activity

HHA's rent simplification activity includes the components outlined below. With the exception of the Payment Standard provision, all components apply to both the HCV and Public Housing programs.

- **Application of Payment Standards:** Use the Payment Standard in effect at the effective date of the regular recertification regardless of any change in the Payment Standard.
- **Exclusion of all Full-Time Student Income:** Exclusion of all Full-time student income for household members other than the Head, Spouse or Co-Head.
- **Adult Full-Time Student Deduction:** Elimination of the adult full time student deduction
- **Self-Certification of Assets.** Clients are permitted to self-certify asset value and income when the family's combined market asset value is less than or equal to \$50,000. For families whose market value of their assets is greater than \$50,000, asset verification is subject to standard HUD verification requirements. HHA determines asset value using market, rather than cash value.
- **Calculation of Asset Income.** When determining asset income, HHA uses the market value of the combined assets and imputes asset income using HHA's established passbook savings rate.
- **Exclusion of Asset Income.** HHA received approval in FY 17 to revise the asset exclusion policy to reflect exclusion of asset income when total asset value is less than or equal to \$50,000. Prior to that, HHA excluded the first \$500 of asset income.

The activity allows for a much more streamlined process and results in time savings for HHA staff.

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA has removed the following metrics:

- CE #1: Agency Cost Savings - Cost savings are not the intended outcome of this activity. Though this activity simplifies tasks associated with recertification, this staff time is reallocated to perform other core functions.

- CE #3: Decrease in Error Rate of Task Execution - HHA does not track errors specifically related to asset income, full-time student income and deduction.
- CE #5: Increase in Agency Rental Revenue – The flexibilities provided under this activity are not intended to increase tenant rent share.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>CE #2: Staff Time Savings: Full-Time Student</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Number of households with full-time student in FY 2014: 66 Approximate time to verify full-time student income and status: 15 minutes Total time spent on activity: 16.5 hours	Number of households with full-time student: 66 Approximate time to verify full-time student income and status: 5 minutes Total time spent on activity: 5.5 hours		
<i>CE #2: Staff Time Saving: Assets</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	HCV households with assets: 229 PH households with assets: 411 Time per asset verification: 20 minutes Total time spent verifying assets: 213 hours	HCV households with assets over \$50,000: 1 PH households with assets over \$50,000: 1 Time per asset verification: 20 minutes Total time spent after implementation of activity: 40 minutes		

Activity 2015-4: Preservation after Conservation

Plan Year Approved, Implemented, Amended

- Approved: FY 2015
- Implemented: FY 2015
- Modified: FY 2018

Description/Update of MTW Activity

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

The activity also provides the following flexibilities:

- For tenants that are over-housed as of the conversion date and elect to receive a Project-Based Voucher, HHA may waive the subsidy policy provided there is at least one household member per bedroom. Tenants may also request a reasonable accommodation if applicable.
- HHA may waive 24 CFR 983.56 in its entirety including the 25% per building/project, which will allow for every eligible household in a preservation-eligible project to elect to receive a Project-Based Voucher. Additionally, should a household that elects to receive an Enhanced or Tenant Protection voucher move from the property, HHA may add the unit to the Project-Based HAP contract at any time during the term of the HAP contract.
- Consistent with PIH Notice 2012-32, HHA 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).

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity. HHA does not project any expiring use preservation conversions in FY 2022.

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics or data collection.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>HC #2: Units of Housing Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 units	130 units		

Activity 2016-1: Modified Project-Based Voucher Program
(combined with Activity 2015-3 PBV Rent Reasonableness, which was closed out in the FY 2019 Report)

Approval and Implementation

- Approved: FY 2016
- Implemented: FY 2016
- Amended: FY 2018

Description/Update of MTW Activity

Preserving affordable housing and expanding the supply of units continues to be a major objective of HHA. In connection with HHA's Preservation after Conservation MTW Activity and other PBV activities undertaken by HHA, HHA has implemented the following activities:

- HHA may elect to unit-base 100 percent (100%) of the dwelling units in any PBV project or development, provided that the development meets the applicable MTW Site and Neighborhood Standards.
- HHA will not provide a mobile tenant-based voucher to PBV participants except when the participant has requested and been granted a reasonable accommodation transfer; or, has requested and been determined to be eligible for a VAWA transfer; or, has requested and been determined to be eligible for an emergency transfer. HHA will not permit a family member to be added to a PBV household if the new member would result in the family being under-housed except in the case of birth, court-ordered custody, marriage or live-in aides.
- HHA will allow for units to be added to a PBV HAP Contract at any time during the term of the HAP Contract if HHA determines that such addition will support the goals of promoting neighborhood revitalization, avoiding tenant displacement and/or ensuring long-term affordability. The anniversary and expiration dates of the HAP Contract term for the PBV units originally placed under contract and the new units added to the contract will remain consistent. HHA envisions that this flexibility will be applied infrequently and only as necessary to support the above-listed goals. HHA will follow any applicable non-MTW provisions related to subsidy layering, Field Office approval or other applicable HUD requirements.
- HHA may select its own units to receive project-based assistance without a competitive process. Such units will be subject to subsidy layering requirements. HHA may project-base assistance at properties other than public housing properties owned directly or indirectly by HHA, including those owned by HHA affiliates or instrumentalities. HHA acknowledges the guidance provided by HUD in PIH Notice 2015-15 and will continue to adhere to the requirements set forth in the Notice unless or until HHA receives HUD approval to waive said requirements.
- In FY 2018 HHA amended the activity to permit owners to prepare and submit written requests to operate owner-managed PBV site-base waiting lists (SBWLs). As part of the SBWL request, owners must submit their proposed Tenant Selection Plan. HHA will review all requests and provide a written response regarding the outcome of their request to operate a PBV SBWL. HHA will monitor owner compliance with regulatory and agency requirements.

- Re-determined rents to owners of PBV units, *except for certain tax credit units as defined in 983.501(c)*, shall not exceed the lowest of the reasonable rent or the rent requested by owner. This policy change eliminated consideration of the then-current Fair Market Rent (FMR) limits when re-determining PBV rents.
- HHA will inspect PBV units at least once every 24 months. HHA will not conduct turn-over inspections before providing assistance to a new family in a unit under contract.
- Increase income eligibility for PBV units up to 80% of AMI, except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd party funding sources, i.e. units that also have low income housing tax credits.
- HHA will waive the independent entity requirements for HHA owned units.

Planned Non-Significant Changes

Upon approval, HHA will implement the following non-significant changes to the Modified Project-Based Voucher Program:

- HHA will define a PBV project as a single building, multiple contiguous or non-contiguous buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single family building is a building with no more than four dwelling units. PHA may elect to combine units that cumulatively meet the definition of a UBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contracts, into a single HAP Contract. For such scattered site projects, HHA will implement an alternative method to determine rent reasonableness whereby HHA bases the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one-bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.
- HHA will waive the 20% cap on PB units in HHA’s portfolio and replace that with a 40% cap and will waive the requirement to provide advance notice to its HUD field office of its intent to project-base vouchers.
- As approved in HHA’s 2016 MTW Plan, HHA allows for units to be added to a PBV HAP Contract at any time during the term of the HAP Contract if HHA determines that such addition will support the goals of promoting neighborhood revitalization, avoiding tenant displacement and/or ensuring long-term affordability. Pursuant to this provision of HHA’s Modified PBV Program, when HHA adds additional units to an existing PBV HAP contract, during the term of the HAP contract, eligible families residing in the added units on the date the units are added to the PBV HAP contract will be considered “in-place families.” To protect eligible families from displacement, HHA will add “in-place families” to the waiting list and assign an absolute selection preference once they have been determined eligible.

In FY 2022, HHA may also add additional units to the existing PBV HAP contract for Holyoke Towers, using the flexibilities previously approved under this activity.

Planned Changes to Metrics/Data Collection

HHA has removed the following metrics:

- CE #1: Agency Cost Savings – The flexibilities provided under this activity are not anticipated to result in cost savings.
- CE #2: Staff Time Savings – HHA does not expect that this activity will result in time savings.
- HC #4: Displacement Prevention - This activity is not designed to prevent displacement, rather it will create new housing opportunities for low-income families.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<i>HC #1: Additional Units of Housing Made Available*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 units	188 units		
<i>* HHA is incorporating this standard metric as a local metric.</i>				

Activity 2018-1: MTW Utility Allowances

Plan Year Approved, Implemented, Amended

- Approved: FY 2018
- Implemented: FY 2019

Description/Update of MTW Activity

HHA adopted a streamlined Utility Allowance (UA) model that eliminates all utility allowances except for heat and other electricity for both MTW tenant-based and project-based program households. The streamlined UA model establishes one UA table for heat and another UA table for other electricity. The streamlined UA is independent of fuel type or building type. HHA will continue to select the UA for the smaller of the unit size or voucher size.

Implementation began in FY 2018 and full implementation was completed in FY 2019. All households, regardless of the change in tenant rent, received 180 days advance notice of any increase as a result of the change to the MTW UA schedule. For households receiving reasonable accommodations for heat and/or electricity at implementation, HHA applied the higher of the table UA and the previously approved reasonable accommodation UA. HHA will continue to determine reasonable accommodations for utilities on a case-by-case basis.

HHA periodically, at its discretion, reviews HCV utility allowance schedules to determine if adjustments are required. Annual updates would not be required. HHA will use the rates provided by the local provider, Holyoke Gas & Electric (HG&E) to determine if the average five-year rate change is greater than 10%. When and if the average five-year rate change is greater than 10%, HHA will update its UA schedules accordingly. As the effective utility allowance schedule was established in FY 2017, HHA will conduct a rate change review in FY 2022 to determine if the five-year rate change is greater than 10%.

Planned Non-Significant Changes

Instead of using the U. S. Energy Information Administration's rate summaries for heat and electricity to inform rate changes for heat and electricity, HHA will use the rates provided by the local provider, Holyoke Gas & Electric (HG&E) to determine if the average five-year rate change is greater than 10%. Using the local provider rates yields results which are more consistent with the utility rates experienced by HHA participants.

Planned Changes to Metrics/Data Collection

HHA has removed CE #2: Staff Time Savings. As steps to calculate utility allowances are automated, the flexibilities provided under this activity do not result in time savings.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$80,471	\$60,000		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	10%	8%		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Tenant Rent Share (increase).	\$332	\$345		

Activity 2018-2: Holyoke Horizons Transitional Housing Support

Plan Year Approved, Implemented, Amended

- Approved: FY 2018
- Implemented: 2018

Description/Update of MTW Activity

In support of the Sheriff's Department's efforts to reduce recidivism and enhance community safety, HHA has set aside MTW funds to support the Community Housing Earned Safe and Supportive (CHESS) initiative of the HCSD. CHESS is a sponsor-based transitional housing program that is designed to promote the successful community re-entry of persons formerly in the custody of the Hampden County House of Correction. HCSD, through the Mental Health Association (MHA), leases three-bedroom apartments in the community that will house non-related former offenders participating in the CHESS program. Program participants are required to pay 40% of their income or a minimum of \$400/month towards rent to MHA and also participate in a supportive services program. This activity supports otherwise eligible low-income participants who do not earn sufficient income to pay the \$400/month rent minimum.

Currently, HHA provides up to 30 rental subsidies to the HCSD, who will then disburse funds to the landlords through MHA. Dependent on unit availability, up to three participants unable to meet the monthly rent minimum of \$400 may be housed in one unit, which would result in a \$1,200 subsidy for that particular unit. Should an assisted participant leave the program within the fiscal year, the subsidy will remain with the program and may be used to support another eligible low-income participant.

In FY 2021, in response to economic conditions resulting from the COVID 19 pandemic, HHA increased the subsidy per participant from \$200 to \$400 per month. HHA may further adjust the subsidy level for this activity in response to declared states of economic and/or health emergencies as authorized by the Governor or his/her designee and/or other economic factors which dictate the need for a subsidy change.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

HHA has removed the following metrics from this activity:

- HC #5: Increase in Resident Mobility – Increasing the number of households who are able to move is not an intended outcome of this activity, as the housing provided under this activity is temporary.
- HC #7: Households Assisted by Services that Increase Housing Choice – Similar to HC #5, increasing housing choice is not an intended outcome of this activity.
- Local Metric: Number of Households Served per Voucher – HHA removed this metric as it was not applicable in the context of this activity.

Please note that the number of participants served in the metrics table below includes all Holyoke Horizons Transitional Housing Program participants regardless of length of time in the transitional housing unit as opposed to the leasing table where unit months under lease used to determine utilization numbers.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Amount of funds leveraged in dollars (increase).	\$0	\$7,000		
<i>SS #5: Households Assisted by Services that Increase Self-Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households receiving services aimed to increase self-sufficiency.	0 households	13 households		
<i>SS #8: Households Transitioned to Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of households transitioned to self-sufficiency (increase).*	0 households	5 households		
<i>*Self-sufficiency will be defined as voluntary termination of assistance due to an income increase great enough so that HHA subsidy is not required for the CHESS unit.</i>				

Activity 2019-1: Youth Aging out of Foster Care (YAFC)

Plan Year Approved, Implemented, Amended

- Approved: FY 2019
- Implemented: FY 2019

Description/Update of MTW Activity

HHA partners with the local public child welfare agency (LPCWA) to provide a stable housing and service program for youth aging out of foster care (YAFC). Hundreds of youth “age out” of the foster care system each year in Massachusetts, meaning they reach the age threshold required to receive services, including housing. Some are adopted by their foster care family, others are reunited with their biological parents, but many have no support network.

In support of many other initiatives and programs to assist youth aging out of foster care, HHA has entered into an MOU with the Holyoke Department of Children and Families (Holyoke DCF Office) on the YAFC Activity. HHA will designate up to 15 tenant based Housing Choice Vouchers, annually, to eligible YAFC referred by a LPCWA for a period of 36-months. DCF will refer eligible participants, defined as individuals who have been in foster care within the last six months or will be leaving foster care within 90 days, are 18 years of age or older and are homeless or at risk of homelessness, as defined by DCF. HHA will then screen referrals, calculate income, rent and subsidy in accordance with HHA’s Admin Plan and MTW policies.

As participants are not likely to have accrued finances available for initial housing costs, HHA will also utilize MTW funds, through its Single Fund Flexibility, to offer up-front housing assistance to new participants of the Youth Aging out of Foster Care Program. Up-front housing assistance may include first and last months’ rent and security deposit. Each component of the up-front housing assistance will not exceed the applicable payment standard. Participants will only be eligible for up-front housing assistance once, upon initial lease up with an HHA issued voucher. Up-front housing assistance payments will only be made directly to owners on behalf of participants. Through an HHA lease addendum, security deposits made on behalf of program participants will be returned to HHA upon termination of a participant’s lease, except for in cases where owners need funds from a participant’s security deposit to address damage to their unit.

Local youth aging out of foster care, who wish to receive ongoing support, contact and work with their local DCF Office. As the Holyoke DCF Office will be responsible for directly referring participants, participants will have signed up for continued services at minimum upon initial lease up. Continued eligibility will not be subject to the receipt of supportive services. The Holyoke DCF Office will provide program participants with support services to assist in housing stabilization for the first year the participant is in the program. In addition to stabilization services, the Holyoke DCF Office will also provide appropriate referrals to employment and education providers to program participants.

After 36-months in the program, if in compliance with HHA continued occupancy policies as identified in the Administrative Plan, YAFC voucher holders will be allowed an extension of an additional 24-months resulting in a total housing assistance period of 60-months or five years. HHA may issue up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of 5 years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates five vouchers will be leased by the end of FY 2022, in addition to the ten vouchers under lease at the start of the fiscal year.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

HHA has removed the following metrics:

- HC #1: Additional Units of Housing Made Available – Through this activity, HHA makes vouchers available to YAFC participants; new housing units are not made available.
- HC #2: Units of Housing Preserved – The preservation of housing units for low-income households is not an intended outcome of this activity.
- HC #3: Decrease in Wait List Time – HHA screens applicants referred to YAFC program to determine their eligibility and issues a voucher immediately upon referral.
- HC #6: Increase in Homeownership Opportunities – Homeownership is not an intended outcome of this activity.
- HC #7: Households Assisted by Services that Increase Housing Choice – HHA does not provide services to increase housing choice to YAFC participants.

Additionally, benchmarks for HC #4, HC #5, and SS #5 have been adjusted to align with the anticipated leasing in FY 2022.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that in this box.	0	15		
<i>HC #5: Increase in Resident Mobility</i>				
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.	0	15		
<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	0	\$123,840		

SS #5: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency.	0	15		
SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).*	0	0		
<i>*Self-sufficiency will be defined as HHs who have ended participation in the program due to end of voucher term, not termination or early departure.</i>				

Activity 2019-2: Holyoke Public School (HPS) Assistance Program

(Activity number changed from 2019-3 to 2019-2 to reflect corrected numbering sequence)

Plan Year Approved, Implemented, Amended

- Approved: FY 2019
- Implemented: FY 2019

Description/Update of MTW Activity

Since being placed in receivership, the city of Holyoke, school administrators and stakeholders have spent significant time and efforts in improving instruction and services offered in the Holyoke Public Schools (HPS). Additionally, HPS has established a number of resources for families with children in the school system, which provides supportive services and case management. One such resource is the Family and Community Engagement Department (FCED). FCED staffs each school with a point person who assists families in identifying and accessing resources. FCED is also staffed with a Homeless Educational Coordinator, who provides various types of support for students experiencing homelessness.

Research has shown that instability in housing has a negative impact on a child's educational attainment. To address the needs of families who are experience unstable housing, HHA will allocate up to 15 Housing Choice Vouchers, annually, to eligible families referred by HPS. Eligibility will be defined as families with at least one school-aged child enrolled in HPS, whose lack of stable and affordable housing is affecting their children's attendance and success at school. Referred families will be screened and issued vouchers consistent with HHA's Administrative Plan and MTW policies.

Families who receive a voucher will be required to enter into and sign a contract of participation (COP). The COP will require families to commit to supporting their children's education in ways such as getting them to school on time each day and engaging in parent teacher conferences when requested. HPS will be responsible for ensuring participant compliance with school enrollment and COP requirements, as well as providing additional support services to participating families. HHA will terminate vouchers, and may deny extension requests, for HPS families, who do not comply with the COP. If families are consistently engaged and in compliance with both the COP and continued occupancy policies in the voucher program at the conclusion of their first 36-months post enrollment, and still have at least one school-aged child enrolled in HPS, they may be granted an extension of up to 24-months, which will result in a total housing assistance period of 60-months or 5 years. Families will receive notice 12 months in advance of their final rental assistance payment and HPS and HHA staff will work closely with families to establish a transition plan to better prepare them once they transition from the voucher assistance.

HHA may issue up to 15 vouchers annually, with a maximum of 75 vouchers allocated over the course of five (5) years. HHA may explore future expansion of the program based on need and staff capacity. HHA anticipates an additional 15 vouchers will be issued and leased in FY 2022, bringing the total number of vouchers to 30.

Planned Non-Significant Changes

There are no non-significant changes proposed for this activity.

Planned Changes to Metrics/Data Collection

HHA has removed the following metrics from this activity:

- HC #1: Additional Units of Housing Made Available - Through this activity, HHA makes vouchers available to participants; new housing units are not made available.
- HC #2: Units of Housing Preserved – This activity is not intended to preserve housing.
- HC #3: Decrease in Wait Time - HHA screens applicants referred by HPS to determine their eligibility and issues a voucher immediately upon referral.
- HC #4: Displacement Prevention – This activity is not intended prevent displacement.
- HC #6: Increase in Homeownership Opportunities - Homeownership is not an intended outcome of this activity.

Planned Significant Changes

There are no significant changes proposed for this activity.

Metrics

<i>HC #5: Increase in Resident Mobility</i>				
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.	0	30		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice.	0	30		

Activity 2020-1: Student Housing Initiative

Plan Year Approved, Implemented, Amended

- Approval: FY 2020
- Implemented: FY 2020

Description/Update of MTW Activity

Holyoke Housing Authority utilizes MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. Working in partnership with Holyoke Community College (HCC) HHA will provide time limited housing subsidies, to income eligible, homeless college students.

HHA provides up to three years of subsidy for 15 eligible students for an initial three year period. Where a student becomes part of the SHI program after they are already enrolled at HCC, HHA will adjust the participation period in the program to reflect the remaining portion of the three year cap plus an additional six month post-graduation period. HHA entered into an MOU with HCC, which sets forth roles and responsibilities for determining initial and continued eligibility and reporting requirements. Upon review of program outcomes and financial considerations, HHA and HCC will determine program viability and make any necessary changes to the program.

HCC is responsible for identifying eligible participants, defined as fully matriculated, full-time, low income students, who meet HUD's definition of Unaccompanied Homeless Youth or who have recently aged out of foster care and meet HUD's criteria of an independent student. HHA will verify and calculate income to determine income eligibility. HCC is responsible for ensuring that participants meet HUD's criteria of an independent student. HCC is also responsible for providing HHA with quarterly academic progress reports to ensure participants continue to be in compliance with continued occupancy and SHI program requirements.

The SHI subsidy operates as follows:

- HHA provides SHI participants with a subsidy up to the current voucher payment standard for the family size or the contract rent whichever is lower and SHI participants will pay the remaining portion of rent;
- In the event the gross rent exceeds the applicable payment standard, an SHI participant will pay an additional family share; however, HHA will cap the family share at 40% of the family's adjusted monthly income;
- HHA conducts reasonable rent determinations prior to unit approval;
- HHA provides utility allowances to students where the cost of utilities is not included in the rent;
- The SHI voucher has a term limit of three years, which may be adjusted downward for students who begin participation in SHI subsequent to beginning their education at HCC; and,
- Where applicable, security deposit assistance may be provided up to one month's subsidy.

The subsidy is limited to housing assistance, in the form of rent in privately owned housing, and is paid directly to the housing provider. While identified housing is subject to HUD's HQS requirements, participants are permitted to reside in shared housing. HHA conducts the HQS inspections or partners with another regional housing provider to conduct the HQS inspections.

Participants must continue to remain enrolled full-time and maintain passing grades in order to be eligible for subsidy renewal each year. Students receiving assistance are expected to maintain continuous

enrollment with the goal of earning degrees and/or certificates of value. Every student is required to utilize academic support services and counseling services available at the college. If the student does not remain compliant with program terms, the subsidy may be terminated.

The clients served under this activity are not participants in the Housing Choice Voucher Program or residents of federal public housing. HHA anticipates that all 15 vouchers will be issued and leased in FY 2022.

Hardship

In the event that a student needs to take an extended leave from his or her academic program, the subsidy will be discontinued; however, the student may reapply to the SHI as long as the program continues to operate. For leaves which do not exceed two months in duration, and which have been reviewed and approved by HHA and HCC, the subsidy will continue.

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity.

Planned Changes to Metrics/Data Collection

HHA has modified SS #3: Increase in Positive Outcomes in Employment Status, removing the sub-metrics related to employment as they are not intended outcomes of the activity during the family’s participation in the program. The goal of the activity is to keep students enrolled in college.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0.00	\$32,352		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Enrolled in an Educational Program or Job Training	0 households	15 households		
	0%	100%		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	15 households		

*SS #8: Households Transitioned to Self Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0	0 households		
<i>*Self-sufficiency is defined as graduation from college.</i>				

Activity 2021-1: Holyoke Affordable Homeownership Initiative

Plan Year Approved, Implemented, Amended

- Approval: FY 2021
- Implementation Planned: FY 2023

Description/Update of MTW Activity

HHA's Holyoke Affordable Homeownership Initiative (HAHI) provides affordable homeownership opportunities for households earning up to 80% of Area Median Income. HHA was designated by the Holyoke Redevelopment Authority as the developer for an affordable homeownership project in South Holyoke, the City's lowest income neighborhood. The current plans for new construction for infill development are a response to community advocacy to restore housing options, and HHA may utilize MTW funds for initial development costs and construction for this project.

Initially, HAHI will be implemented in the South Holyoke neighborhood, where HHA is working with the City and community partners to develop vacant and distressed parcels into new affordable rental and homeownership units. The South Holyoke neighborhood has historically been the center of a strong working class neighborhood predominantly consisting of tenement style housing with some single and two family houses. Many of the residents would walk to their place of employment in the nearby and thriving mill district. As the mills closed and jobs declined, the area became challenged with disinvestment, poverty, and blight. Although a core of quality housing remains, some residents have departed because of the lack of homeownership opportunities.

As part of the overall South Holyoke neighborhood revitalization strategy, HHA is moving forward with a five-phase rental and homeownership development consisting of approximately 85 total units. The first rental phase of 12 units will involve state and local funding, and it is anticipated that the third phase will incorporate private equity from Low Income Housing Tax Credits. For Phase 1, HHA will use HUD-held reserves for our equity and to bridge a HOME grant from the City of Holyoke. HHA will provide a long-term Project Based Voucher Housing Assistance Payments contract to support the first phase.

The second phase will include approximately 20 affordable, new construction homeownership units for families to be built on currently vacant lots. Financing is anticipated to involve a combination of state, local and MTW Block Grant funding. Prior to closing, all prospective homeowners will be required to participate in homebuyer counseling sessions, working with qualified HHA partners to understand the responsibilities of homeownership, repair credit, save for a down payment and secure financing. HHA will work with lenders with whom it has partnerships to facilitate the goals of the program. The fourth and fifth phases will involve the development of additional homeownership units, including one- and two-family infill units throughout the South Holyoke neighborhood and townhouses in the area surrounding Carlos Vega Park.

The HAHI program provides a flexible set of homeownership financing tools to help ensure the long-term affordability of the units and success of the homebuyers. As such, the HAHI program is like a "toolkit" of resources that will be customized and tailored as needed to meet the needs of individual homebuyer households. Major features of the proposed HAHI program include:

Eligibility:

- Open to low-income households, including HHA public housing residents and HCV participants who are in good standing with their lease and program requirements.

- Participants must:
 - Be a first time homebuyer.
 - Complete HHA-approved homeownership counseling and financial literacy courses.
 - Agree to participate in post-purchase follow-up review on an annual basis for three years from the point of closing.
- The home must be used as the household’s principal residence. Homeownership assistance may only be provided while the household resides in the unit.

Target Sales Price

- Based on preliminary market analysis, HHA anticipates that prices for the homeownership units will be in the range of \$125,000 to \$195,000. Prices will be dependent on income and bedroom size and are subject to change. HHA will firm up pricing when the construction phase begins.

Program Components

Prospective homebuyers will work with existing HHA Resident Services staff and may be referred to a local partner agency identified by HHA to review their financial status, credit standing and household goals. HHA will review choice of purchase options with families to enable families to make informed decisions on the assistance provided. Financing options available to program participants will include:

- **Monthly voucher assistance:** Households may receive monthly homeownership assistance for up to 15 years. Generally, this assistance will cover the difference between up to 30% of adjusted household income and the projected monthly homeownership costs, subject to a cap equal to HHA’s HCV voucher payment standard. Household income will be reviewed on a biennial basis to ensure continued eligibility and redetermine monthly subsidy amounts. Similar to the HCV program, monthly homeownership assistance will be ended 180 days after a household subsidy equals \$50 or less.
- **Financing Options:** The four financing options below were based on HHA estimates of gap financing needed along with prior experience with first-time homebuyers as well as experience with administration of down-payment assistance programs.
 - **Down payment assistance:** In lieu of receiving monthly voucher assistance, HAHF participants will be eligible for one-time down payment assistance up to a maximum of \$10,000 per household. HHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default that is not cured, HHA will recoup the down payment assistance amount, which will decrease 5% annually over the 20 year term.
 - **Soft second mortgage option:** Up to a maximum of \$20,000 per household may be provided as a soft second mortgage, provided that the household is not receiving any other HAHF homeownership assistance. As with the down payment assistance option, HHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default that is not cured, HHA will recoup the soft second mortgage amount, which will decrease 5% annually over the 20 year term.
 - **Lease to purchase option:** HHA may implement a lease to purchase option in situations where the household is not appropriate and/or eligible for immediate homeownership. In these cases, HHA will provide a monthly rental subsidy to the household for a fixed period of up to 15 years. The amount of rental subsidy, and the methodology used to calculate the subsidy, will be comparable to that used in the HCV program. During the lease to purchase period, ownership of the unit will be held by an HHA subsidiary/affiliate. A portion of the rent will be escrowed during the lease to purchase period and then applied

to the down payment at the time of purchase. Household income will be reviewed on a biennial basis to ensure continued eligibility and redetermine monthly subsidy amounts.

- **Unit Equity:** All purchasers will be required to sign a deed rider which restricts resale for a given number of years, includes a maximum resale price and terms on net proceeds.

For the down payment assistance and soft second options, HHA will authorize only up to the minimum amount needed to close the affordability gap based on individual household circumstances. HHA will calculate the maximum mortgage payment allowed at 35% of adjusted monthly income, and total housing expenses at 38% of adjusted monthly income. HHA program staff will work to maximize household eligibility for any other non-HHA down-payment and/or closing cost assistance programs.

HHA will budget approximately \$500,000 in MTW Block Grant funds yearly to support the program. The initial program will be limited in size to twenty (20) participants. However, HHA may elect to expand the program beyond the South Holyoke project based on funding availability. If demand exceeds available budget, HHA will establish a wait list based on date and time of application.

HHA anticipates that construction of Phase II homeownership units will commence in FY 2023. During FY 2022, HHA will begin implementation planning for this initiative, developing a homebuyer counseling program and establishing relationships with partners who will support participants in preparing for homeownership.

Planned Non-Significant Changes

There are no non-significant changes proposed to the activity.

Planned Changes to Metrics/Data Collection

The benchmarks for HC #2, HC #5, HC #6 and HC #7 have been adjusted to zero for FY 2022, as HHA anticipates that construction of new homeownership units will not begin until FY 2023.

Planned Significant Changes

There are no significant changes proposed to the activity.

Metrics

<i>HC #2 Housing Units Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	0		
<i>HC #5 Increase in Resident Mobility</i>				
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	0		
<i>HC #6 Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase).	0	0		
<i>HC #7 Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0	0		

B. Not Yet Implemented Activities

There are no approved activities which are not yet implemented.

C. Activities on Hold

There are no approved activities which are on hold.

D. Closed Out Activities

Activity	Year Approved	Year Implemented	Year Closed Out	Reason for Closing Out
Activity 2013-5: Biennial HQS Inspections	FY 2013	NA	FY 2014	HHA closed out this activity as an MTW initiative due to the 2014 Appropriations Act, which allows HHA to transition to a biennial inspection schedule without MTW authority.
Activity 2013-3: Career Advancement Program	FY 2013	FY 2015	FY 2018	This activity was closed out because there was a general lack of interest in the CAP program amongst HHA participants. Furthermore, HHA invested substantial time and commitment to this program, yet efforts did not yield the type of response anticipated.
2015-2 Rent Reasonableness	FY 2015	FY 2015	FY 2018	Under HOTMA, the trigger for reasonable rent redeterminations increased from a 5% decrease to a 10% decrease in FMR from one year to the next. HHA determined that a 10% decrease in FMR was such that a reasonable rent redetermination would be warranted to ensure that subsidies paid are in line with market rents.
2015-3 PBV Rent Reasonableness	FY 2015	FY 2015	FY 2019	This activity was closed out as it was modified and combined with the previously HUD approved Modified Project Based Voucher Program activity. Please note that the portion of this activity related to re-determining reasonable rent when the FMR decreases by 5% or more will no longer be applied. HUD increased this threshold, under the regulations, to 10%. All other aspects of this activity remain in effect in Activity 2016-1.
Activity #2013-4: Neighborhood Revitalization	FY 2013	N/A	FY 2020	HHA closed out this activity as extensive program marketing and solicitation did not elicit interest from potential stakeholders in the Arts and Innovation District. The City of Holyoke has no immediate plans to expand the footprint for the Arts and Innovation District.

V. Planned Application of MTW Funds

A. Planned Application of MTW Funds

Tables 10 and 11 below provide estimated sources and uses of MTW funds for FY 2022.

i. Estimated Sources of MTW Funds

Table 10: Estimated Sources of MTW Funds

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	2,225,750
70600	HUD PHA Operating Grants	19,550,600
70610	Capital Grants	1,665,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	2,175,400
71100+72000	Interest Income	17,250
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	350,000
70000	Total Revenue	25,984,000

ii. Estimated Application of MTW Funds

Table 11: Estimated Uses of MTW Funds

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	4,100,675
91300+91310+92000	Management Fee Expense	2,175,400
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	175,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	1,100,000
93500+93700	Labor	1,665,500
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	940,500
95000 (95100+95200+95300+95500)	Total Protective Services	25,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	375,250

FDS Line Item	FDS Line Item Name	Dollar Amount
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	290,100
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	188,300
97100+97200	Total Extraordinary Maintenance	150,000
97300+97350	Housing Assistance Payments + HAP Portability-In	12,800,000
97400	Depreciation Expense	0
97500+97600+97700+97800	All Other Expenses	0
90000	Total Expenses	23,985,725

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

The difference between revenue and expenses of \$1,998,275 will be used for the following:

- \$1,665,000 in capital grant funds will be used for improvements of HHA's federal developments
- \$333,275 will be used for development projects

iii. Description of Planned Application of MTW Funding Flexibility

Activities that utilize single fund flexibility are summarized below:

- HHA may utilize single fund flexibility for predevelopment and construction activity of vacant land to build homeownership and rental units, as HHA continues to explore new affordable housing development opportunities.
- Utilizing single fund flexibility, HHA will continue to support the operation of satellite units at the Public Housing family developments for use by the Boys and Girls Club of Greater Holyoke as well as explore different opportunities for further resident service and engagement.

B. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning FY – Unspent Balances	Planned Application of Unspent Funds during FY
HCV HAP	\$ 4,570,400	\$ 3,900,000
HCV Admin Fee	\$ 2,000,000	\$ 0
PH Operating Subsidy	\$ 0	\$ 0
Total	\$ 6,570,400	\$ 3,900,000

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

In FY 2022, HHA plans to utilize \$3.9 million in unspent HCV HAP funds toward pre-development and construction activities.

C. Local Asset Management 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

D. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

The conversion of public housing units to project-based assistance under the RAD program is of critical importance to housing preservation and expansion. Under RAD, HHA is able to access private equity and other funds to invest in existing HHA developments. Table 12 includes RAD conversions which have closed or are projected to close prior to FY 2022. HHA does not anticipate any RAD conversions for FY 2022.

Table 12: RAD Conversions Closed or Projected to Close Prior to FY 2022

Property Name	No. of Units Converted to PBV	RAD Conversion Type	Dated Closed or Projected to Close
Lyman Terrace Phase I	88	Conversion of Existing Public Housing	12/31/2016

i. Has the MTW PHA submitted a RAD Significant Amendment in the Appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

ii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

VI. Administrative

A. Board Resolution and Certifications of Compliance

The MTW Plan Certification of Compliance, the Resolution approving the FY 2022 MTW Annual Plan, and Certification of Consistency with the Consolidated Plan are included in Appendix A.

B. Documentation of Public Process

This MTW Plan was made available for public comment from September 1, 2021 through September 30, 2021. The public hearing was held, using a video conferencing format, on September 21, 2021 at 3:00 PM. Documentation of the public process and the public hearing participation are included in Appendix B.

C. Planned and Ongoing Evaluations

There are no planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities for FY 2022.

D. Lobbying Disclosures

HHA does not have any lobbying activities to disclose. HHA has included the Lobbying Activities (SF-LLL) form in Appendix C and Certification of Payments (HUD-50071) form in Appendix D.

Appendix A: Board Resolution and Certificate of Compliance

Board Resolution Extract

Certification of Consistency with the Consolidated Plan

Appendix B: Documentation of Public Process

Legal Notice

Public Hearing Participation

The public hearing was held, using Zoom video conferencing software, on September 21, 2021 at 3:00 PM. Number (##) participants attended via video conference or telephone.

Comments on MTW Plan

Appendix C: Disclosure of Lobbying Activities (SF-LLL)

Appendix D: Certification of Payments (HUD-50071)