MOVING TO WORK
ANNUAL PLAN
2022

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1. INTRODUCTION

In 2001, the Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH) was awarded Moving to Work (MTW) status as part of the federal MTW Demonstration Program. ECC/HANH is one of thirty-nine housing authorities nationwide selected for participation in the MTW Demonstration Program. During ECC/HANH’s MTW term, in lieu of the standard PHA Annual Plan and Five-Year Plan documents, ECC/HANH is required to develop and submit to HUD MTW annual plans and reports that articulate ECC/HANH’s key policies, objectives, strategies, impact and outcomes for administration of its federal housing programs to most effectively address local needs, in accordance with the terms of ECC/HANH’s MTW Agreement.

What Is Moving to Work?

Congress established the MTW Demonstration Program in 1996. The MTW Demonstration Program is a pilot project that provides greater flexibility to HUD and to MTW PHAs to design and test innovative local approaches for housing assistance programs that more effectively address the housing needs of low-income families in our local communities. The purpose of the MTW program, as established by Congress, is to identify innovative local approaches for providing and administering housing assistance that accomplish 3 primary goals:

1. To reduce costs and achieve greater cost effectiveness in federal expenditures.
2. To give incentives to families with children where the head of household is working, is seeking to work, or is preparing to work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
3. To increase housing choice for low income families.

Through the MTW program, MTW agencies may request exemptions or waivers from existing regulations to pursue strategies that may result in more effective operations and services to low-income families, according to local needs and conditions. The MTW program also provides greater budget flexibility, as MTW agencies may pool funding from several HUD programs to allocate resources according to local determinations of the most effective use of funds to address local needs.

The MTW program also provides greater flexibility in planning and reporting. MTW agencies may be exempted from routine program measures, such as HUD’s Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) if these measures do not accurately reflect the agency’s performance. ECC/HANH has elected exemption from PHAS and SEMAP reporting.

ECC/HANH Participation in MTW

ECC/HANH’s MTW program and flexibility includes, and is limited to, the following HUD programs:

- Public Housing Operating Fund
- Public Housing Capital Fund
- Section 8 (HCV) Program

According to the MTW Agreement, ECC/HANH’s MTW program does not include HUD grant funds committed to specific grant purposes, namely:

- ECC/HANH’s HOPE VI grants for Monterey Place
- ECC/HANH’s HOPE VI grants for Quinnipiac Terrace/Riverview

ECC/HANH MTW FY22 Plan July 2021
• Rental Assistance Demonstration (RAD) Grants
• Any future HOPE VI Revitalization grants
• Other competitive grant funds awarded for specific purposes

These grant funded programs committed to specific purposes require ECC/HANH to provide periodic reports to HUD. Although these grant funded programs are not included in ECC/HANH’s MTW program, ECC/HANH has included information, where relevant, regarding these grant funded programs in this MTW Annual Report for FY18.

ECC/HANH’s original MTW Agreement with HUD became effective retroactively on October 1, 2000. The initial seven-year term of ECC/HANH’s MTW status expired on September 30, 2008. HUD proposed a new, revised MTW Agreement that would provide MTW status for 10 years. ECC/HANH executed the Amended and Restated Moving to Work Agreement on May 2, 2008. The Amended and Restated MTW Agreement governs ECC/HANH’s MTW status through 2018. ECC/HANH made the agreement available for public review and comment for a 30-day period and conducted a public hearing at the end of the review period. The public hearing was conducted on February 25, 2008. The ECC/HANH Board of Commissioners approved the Amended and Restated MTW Agreement through Resolution No. 02-22/08-R on February 26, 2008.

ECC/HANH’s redevelopment plans require flexible use of Section 8 and 9 funds to develop affordable housing for families at or below 80% of area median income (AMI); therefore, ECC/HANH has executed the Second Amendment to its Restated and Amended Moving to Work Agreement with HUD that clarifies such authority.

On April 15, 2016 HUD communicated its intention to extend MTW agreements for an additional 10 years beyond the current extension date or until 2028.

On June 16, 2020, ECC/HANH’s Board of Commissioners authorized the Fourth Amendment to Attachment C of the Moving to Work Agreement clarifying updates to sections D.1.f, D.5, D.7.A and D.7.D.

ECC/HANH’s MTW program is the product of an extensive planning process, conducted initially from 1998-2000, to establish long-term plans for improving our agency’s operations and for transforming our public housing stock. During 2006-2007, ECC/HANH engaged in a planning process to update and revitalize our agency’s plans. ECC/HANH developed a Three-Year Strategic Plan from FY07 to FY09. During 2009-2010, ECC/HANH again engaged in a planning process to re-evaluate and provide continuity to the original Three-Year Strategic plan. In 2015 ECC/HANH updated its strategic plan and issued the Strategic Plan for 2015-2018. ECC/HANH developed its updated strategic playbook in 2018 and updates it regularly.

ECC/HANH MTW FY'22 Plan July 2021
**SHORT TERM GOALS**

**DELIVER COST EFFECTIVE SOLUTIONS**
1. Expand the rent simplification model
2. Invest in technology to add additional functionality – e.g., online housing applications; self-service access for applicants, residents and landlords; web-based payments to vendors and landlords
3. Provide services to local public housing agencies
4. Invest in energy efficiency
5. Complete RAD conversion opportunities within housing portfolio
6. Continue to expand streamlined process such as self-certification for HQS inspections

**EXPAND HOUSING CHOICE**
1. Complete revitalization of West Rock community through Rockview and Westville Manor and 34 Level St. redevelopments
2. Increase market-rate homeownership opportunities in West Rock
3. Partner with local government and non-profit entities to increase the supply of affordable housing
4. Complete planning and redevelopment of Farnam Court/Mill River and Westville Manor
5. Continue modernization and capital investment in current housing portfolio
6. Continue progress toward meeting goal of 10% Uniform Federal Accessibility Standards (UFAS) compliant units agency-wide

**HELP FAMILIES REACH SELF-SUFFICIENCY**
1. Fully implement MTW CARES initiative to move families toward self-sufficiency with program evaluation and documentation of impact findings
2. Support residents’ entrepreneurial endeavors
3. Offer cost-effective training programs with increasing resident participation
4. Partner with local school system to support student academic progress and attainment
5. Support families transition to self-sufficiency.
DELIVER COST EFFECTIVE SOLUTIONS

1. Streamline administrative functions in public housing and HCV program operations through transition to a paperless documentation system and electronic files
2. Continue progress of streamlined administration of HCV program
3. Explore regional provision of housing authority services on a fee-for-service basis
4. Complete disposition and/or conversion of remaining non-performing assets
5. Continue investment in technology to reduce administrative burden and create model wired and wireless communities
6. Continue investment in energy efficiency initiatives

EXPAND HOUSING CHOICE

1. Complete final revitalization effort of ECC/HANH’s public housing stock through revitalization/redevelopment or disposition of remaining poor-performing assets
2. Address housing crisis experienced by marginalized populations
4. Promote housing opportunities in the public housing and HCV program for income-eligible work-able families
5. Use housing choice vouchers to promote development of mixed-income, mixed-finance housing opportunities in non-HANH developments

HELP FAMILIES REACH SELF-SUFFICIENCY

1. Develop transitional models of assistance that move families toward self-sufficiency and away from subsidized housing in progressive steps
2. Expand resident-owned business initiative to increase the number of ECC/HANH contracts executed with business enterprises and support these businesses to successfully compete for other external contracts
3. Expand cost-effective training programs and increase resident participation
4. Expand supportive services program – especially critical for effective management of Elderly/Disabled developments – to support families as they move toward self-sufficiency
5. Partner with local school system to support student academic progress and attainment
### Overview of Initiatives

#### OVERVIEW OF MTW INITIATIVES

<table>
<thead>
<tr>
<th>Label</th>
<th>Description</th>
<th>Cost Effective</th>
<th>Expand Housing Choice</th>
<th>Increase Self-Sufficiency</th>
<th>FY Approved</th>
<th>Status</th>
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<tbody>
<tr>
<td>1.1</td>
<td>Development of Mixed-Use Development of 122 Wilmot Road</td>
<td></td>
<td>✓</td>
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<td>2009</td>
<td>Closed¹</td>
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<td>1.2</td>
<td>Local Total Development Cost (TDC) Limits</td>
<td>✓</td>
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<td>1.3</td>
<td>Fungibility of MTW Funds</td>
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<td>1.4 &amp; 1.10</td>
<td>Defining Income Eligibility for the Project-Based Voucher Programs</td>
<td>✓</td>
<td>✓</td>
<td></td>
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<td>1.5</td>
<td>HCV Preference and Set-Aside for Victims of Foreclosures</td>
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<td>✓</td>
<td></td>
<td>2009</td>
<td>Ongoing</td>
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<td>1.6</td>
<td>Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Programs)</td>
<td></td>
<td>✓</td>
<td></td>
<td>2008</td>
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¹ Project completed
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<th>Start Year</th>
<th>Status Notes</th>
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<td>1.7</td>
<td>Tenant-Based Vouchers for Supportive Housing for the Homeless</td>
<td>✓ ✓</td>
<td>2010</td>
<td>Ongoing</td>
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<td>1.8</td>
<td>Farnam Court Transformation Plan</td>
<td>✓</td>
<td>2011</td>
<td>Ongoing</td>
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<td>1.9</td>
<td>Increase the Allowed Percentage of Project Based Voucher (PBV) Units from 75 Percent to 100 Percent in a Mixed-Finance Development</td>
<td>✓ ✓</td>
<td>2012</td>
<td>Moved²</td>
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<td>1.10</td>
<td>Income Skewing for PBVs in Mixed Finance</td>
<td>✓</td>
<td>2012</td>
<td>Moved³</td>
</tr>
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<td>1.11</td>
<td>Increase the Percentage of Housing Choice Voucher Budget Authority for the Agency that is Permitted to Project-Base from 20 Percent up to 25 Percent</td>
<td>✓</td>
<td>2013</td>
<td>Ongoing</td>
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<td>1.12</td>
<td>Development of Replacement Public Housing</td>
<td>✓</td>
<td>2013</td>
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² Moved to “MTW Initiatives Requiring Funding Flexibility Only”
³ Moved to join Initiative 1.4
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<tr>
<td>1.13</td>
<td>Creation of a Commercial Business Venture at 122 Wilmot Road</td>
<td>✔️</td>
<td>2013</td>
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<td>1.14</td>
<td>Redevelopment of 99 Edgewood Avenue (Dwight Gardens)</td>
<td>✔️</td>
<td>2013</td>
<td>Closed(^5)</td>
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**OVERVIEW OF MTW INITIATIVES (continued)**

<table>
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<th>Increase Self-Sufficiency</th>
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<th>Status</th>
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<tr>
<td>1.15-1.17</td>
<td>RAD Finance Development for Rockview Phase II Rental &amp; Westville Manor Transformation Plan</td>
<td>✔️</td>
<td>2014</td>
<td>Ongoing</td>
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<tr>
<td>1.16</td>
<td>Crawford Manor Transformation Plan</td>
<td>✔️</td>
<td>2014</td>
<td>On Hold</td>
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<td></td>
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<td>2.1</td>
<td>Family Self-Sufficiency Program</td>
<td>✔️</td>
<td>2007</td>
<td>Ongoing</td>
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<td>2.2</td>
<td>Incremental Earned Income Exclusion</td>
<td>✔️</td>
<td>2008</td>
<td>Ongoing</td>
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\(^{4}\) Project completed  
\(^{5}\) Project not being pursued
<table>
<thead>
<tr>
<th></th>
<th>Initiative</th>
<th>Start Year</th>
<th>End Year</th>
<th>Status</th>
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<tbody>
<tr>
<td>2.3</td>
<td>CARES (Caring About Resident Economic Self-Sufficiency)</td>
<td></td>
<td>2012</td>
<td>Ongoing</td>
</tr>
<tr>
<td>2.4</td>
<td>Teacher in Residence</td>
<td></td>
<td>2015</td>
<td>Ongoing</td>
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<tr>
<td>2.5</td>
<td>MTW Initiative 2.5 Redevelopment of McConaughy Terrace 2022</td>
<td></td>
<td>2022</td>
<td>Proposed</td>
</tr>
<tr>
<td>3.1</td>
<td>Rent Simplification</td>
<td></td>
<td>2007</td>
<td>Ongoing</td>
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<td>3.2</td>
<td>UPCS Inspections</td>
<td></td>
<td>2008</td>
<td>Closed⁶</td>
</tr>
<tr>
<td>3.3</td>
<td>Revised HQS Inspection Protocol</td>
<td></td>
<td>2011</td>
<td>Closed⁷</td>
</tr>
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<td>3.4</td>
<td>Mandatory Direct Deposit for Housing Choice Voucher Landlords</td>
<td></td>
<td>FY10</td>
<td>Closed⁶</td>
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<td>3.5</td>
<td>HCV Rent Simplification/ Cost Stabilization Measures</td>
<td></td>
<td>FY14</td>
<td>Ongoing</td>
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</table>

⁶ Initiative does not require MTW flexibility
⁷ Initiative was revised and relaunched as item 3.5
⁸ Initiative no longer requires MTW flexibility
<table>
<thead>
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<th>Label</th>
<th>Description</th>
<th>Cost Effective</th>
<th>Expand Housing Choice</th>
<th>Increase Self-Sufficiency</th>
<th>FY Approved</th>
<th>Status</th>
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<tbody>
<tr>
<td>4.8</td>
<td>Fulton Park Modernization</td>
<td>✓</td>
<td></td>
<td></td>
<td>FY11</td>
<td>Ongoing</td>
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<tr>
<td>4.9</td>
<td>LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families</td>
<td>✓</td>
<td></td>
<td></td>
<td>FY08</td>
<td>Closed</td>
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<tr>
<td>3.6</td>
<td>Expanded Jurisdiction</td>
<td>✓</td>
<td></td>
<td></td>
<td>FY19</td>
<td>Ongoing</td>
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<tr>
<td>3.7</td>
<td>Non-traditional Supportive Housing Program</td>
<td>✓</td>
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<td>FY19</td>
<td>Ongoing</td>
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<tr>
<td>4.7F</td>
<td>REACH</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>FY19</td>
<td>Ongoing</td>
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</table>

### OVERVIEW OF MTW INITIATIVES REQUIRING FUNDING FLEXIBILITY ONLY

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost Effective</th>
<th>Expand Housing Choice</th>
<th>Increase Self-Sufficiency</th>
<th>FY Approved</th>
<th>Status</th>
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<tbody>
<tr>
<td>Project Modernization – Various Projects</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>Ongoing</td>
</tr>
<tr>
<td>Vacancy Reduction – Various Projects</td>
<td>✓</td>
<td></td>
<td>2008</td>
<td></td>
<td>Ongoing</td>
</tr>
<tr>
<td>Resident-Owned Business Development</td>
<td></td>
<td>✓</td>
<td>2009</td>
<td></td>
<td>Ongoing</td>
</tr>
</tbody>
</table>
| Initiative                                                                 | Year | Status  
|----------------------------------------------------------------------------|------|---------
| SEHOP Capital Improvement Program                                          | 2010 | Ongoing |
| Prison/Community Reentry                                                   | 2009 | Ongoing |
| Resident Services for Elderly/Disabled                                     | 2005 | Ongoing |
| Cap on Project-Based Units in a Project                                   | 2010 | Closed  |
| Creation of New Instrumentality Entities to Support ECC/HANH Goals and Strategic Planning activities | 2019 | Moved   |
| Jumpstart Incentive Program                                                | 2020 | Ongoing |

**II. GENERAL OPERATING INFORMATION**

*(Moved to "MTW Initiatives Requiring Funding Flexibility Only")*
**HOUSING STOCK INFORMATION**

**i. Planned New Public Housing Units**
New public housing units that the MTW PHA anticipates will be added during the Plan Year.

<table>
<thead>
<tr>
<th>ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER</th>
<th>BEDROOM SIZE</th>
<th>TOTAL UNITS</th>
<th>POPULATION TYPE*</th>
<th># of Uniform Federal Accessibility Standards (UFAS) Units</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0/1 2 3 4 5 6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>0 0 0 0 0 0</td>
<td>0</td>
<td>Type (below)</td>
<td>0 0</td>
</tr>
<tr>
<td>N/A</td>
<td>0 0 0 0 0 0</td>
<td>0</td>
<td>Type (below)</td>
<td>0 0</td>
</tr>
</tbody>
</table>

Total Public Housing Units to be Added in the Plan Year

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

If “Population Type” is “Other” please describe:

N/A

**ii. Planned Public Housing Units to be Removed**
Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

<table>
<thead>
<tr>
<th>AMP NAME AND NUMBER</th>
<th>NUMBER OF UNITS TO BE REMOVED</th>
<th>EXPLANATION FOR REMOVAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Total Public Housing Units to be Removed in the Plan Year

<table>
<thead>
<tr>
<th>PROPERTY NAME</th>
<th>NUMBER OF VOUCHERS TO BE PROJECT-BASED</th>
<th>DESCRIPTION OF PROJECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>McConaughy Terrace</td>
<td>201</td>
<td>201 Units of RAD Conversion</td>
</tr>
</tbody>
</table>

iii. Planned New Project Based Vouchers
Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).
iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.
<table>
<thead>
<tr>
<th>PROPERTY NAME</th>
<th>NUMBER OF PROJECT-BASED VOUCHERS</th>
<th>PLANNED STATUS AT END OF PLAN YEAR*</th>
<th>RAD?</th>
<th>DESCRIPTION OF PROJECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expanded Jurisdiction (PBV)</td>
<td>19</td>
<td>Committed</td>
<td>No</td>
<td>New Initiative Expanded Jurisdiction FY19 Plan</td>
</tr>
<tr>
<td>PBV Fellowship I</td>
<td>18</td>
<td>Leased</td>
<td>No</td>
<td>New PBV units</td>
</tr>
<tr>
<td>PBV Fellowship II</td>
<td>5</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td>PBV Also Cornerstone (Continuum of Care)</td>
<td>4</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing units</td>
</tr>
<tr>
<td>PBV Norton Court (Continuum of Care)</td>
<td>12</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td>PBV Cedar Hill</td>
<td>4</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td>PBV West Village</td>
<td>15</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td>PBV QT Phase 1</td>
<td>23</td>
<td>Leased</td>
<td>No</td>
<td>100% Supportive Housing Single Room Occupancy</td>
</tr>
<tr>
<td>PBV QT Phase 2</td>
<td>23</td>
<td>Leased</td>
<td>No</td>
<td>81 LIHTC PBV units</td>
</tr>
<tr>
<td>PBV QT Phase 3</td>
<td>16</td>
<td>Leased</td>
<td>No</td>
<td>79 LIHTC PBV units</td>
</tr>
<tr>
<td>PBV Eastview Phase I</td>
<td>49</td>
<td>Leased</td>
<td>No</td>
<td>33 LIHTC PBV units</td>
</tr>
<tr>
<td>Chatham/Eastview</td>
<td>2</td>
<td>Leased</td>
<td>Yes</td>
<td>102 RAD/PBV units</td>
</tr>
<tr>
<td>PBV Brookside Phase 1 Rental</td>
<td>51</td>
<td>Leased</td>
<td>No</td>
<td>2 RAD/PBV units</td>
</tr>
<tr>
<td>PBV Brookside Phase 2 Rental</td>
<td>51</td>
<td>Leased</td>
<td>No</td>
<td>LIHTC PBV units</td>
</tr>
<tr>
<td>PBV Rockview Phase 1 Rental</td>
<td>47</td>
<td>Leased</td>
<td>No</td>
<td>LIHTC PBV units</td>
</tr>
<tr>
<td>PBV New Rowe Building</td>
<td>32</td>
<td>Leased</td>
<td>No</td>
<td>LIHTC PBV units</td>
</tr>
<tr>
<td>PBV 122 Wilmot Road</td>
<td>13</td>
<td>Leased</td>
<td>No</td>
<td>LIHTC PBV units</td>
</tr>
<tr>
<td>PBV Park Ridge</td>
<td>60</td>
<td>Leased</td>
<td>No</td>
<td>LIHTC PBV units</td>
</tr>
<tr>
<td>PBV Frank Nasti Existing</td>
<td>11</td>
<td>Leased</td>
<td>No</td>
<td>Elderly/Disabled Housing</td>
</tr>
</tbody>
</table>

Commented [LN2]: Farnam 9% Phase IIb 66 units 52 RAD
<table>
<thead>
<tr>
<th>PBV CUHO Existing</th>
<th>24</th>
<th>Leased</th>
<th>No</th>
<th>Scattered Site PBV families</th>
</tr>
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<tbody>
<tr>
<td>PBV CUHO New Construction</td>
<td>5</td>
<td>Leased</td>
<td>No</td>
<td>Scattered Sites PBV units families</td>
</tr>
<tr>
<td>PBV Shartenburg</td>
<td>20</td>
<td>Leased</td>
<td>No</td>
<td>Scattered Sites PBV units Families</td>
</tr>
<tr>
<td>Mutual Housing Association New Construction</td>
<td>20</td>
<td>Leased</td>
<td>No</td>
<td>20 PBV units for the City initiative 360 State-Families</td>
</tr>
<tr>
<td>PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)</td>
<td>9</td>
<td>Leased</td>
<td>No</td>
<td>8 rehabilitation / 12 new construction affordable housing - 45.5% of units are PBV</td>
</tr>
<tr>
<td>PBV Mutual Housing Existing</td>
<td>15</td>
<td>Leased</td>
<td>No</td>
<td>9 MHA PBV units</td>
</tr>
<tr>
<td>PBV Casa Otonal</td>
<td>12</td>
<td>Leased</td>
<td>No</td>
<td>PBV units</td>
</tr>
<tr>
<td>PBV Christian Community Action</td>
<td>17</td>
<td>Committed</td>
<td>No</td>
<td>Elderly/Disabled</td>
</tr>
<tr>
<td>New Haven Coliseum (previously Live Learn Play)</td>
<td>19</td>
<td>Committed</td>
<td>No</td>
<td>PBV units</td>
</tr>
<tr>
<td>Residences at Ninth Square</td>
<td>55</td>
<td>Committed</td>
<td>No</td>
<td>PBV for Neighborhood Revitalization</td>
</tr>
<tr>
<td>RAD 122 Wilmot Road</td>
<td>34</td>
<td>Leased</td>
<td>Yes</td>
<td>PBVs outside of the New Haven Area</td>
</tr>
<tr>
<td>RAD Eastview Phase I</td>
<td>53</td>
<td>Leased</td>
<td>Yes</td>
<td>Support the redevelopment of the 9th sq.</td>
</tr>
<tr>
<td>RAD Ribicoff (Twin Brook)–9%</td>
<td>44</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD/PBV</td>
</tr>
<tr>
<td>Charles T. McQueeny</td>
<td>149</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD/PBV</td>
</tr>
<tr>
<td>Property Name</td>
<td>Units</td>
<td>Leased</td>
<td>Conversion Status</td>
<td>Details</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>-------</td>
<td>--------</td>
<td>------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Winslow Celentano</td>
<td>64</td>
<td>Yes</td>
<td>RAD/PBV</td>
<td></td>
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<tr>
<td>Howe Street Single Room Occupancy</td>
<td>80</td>
<td>Yes</td>
<td>RAD/PBV</td>
<td></td>
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<tr>
<td>RAD Ribicoff (Twin Brook) - 4%</td>
<td>51</td>
<td>Yes</td>
<td>102 units – 48% of units are PBV; remaining 53 ACC units converted to RAD PBV</td>
<td></td>
</tr>
<tr>
<td>RAD Fair Haven/ Farnam</td>
<td>55</td>
<td>Yes</td>
<td>44 units of RAD converted ACC units – 80% PBV</td>
<td></td>
</tr>
<tr>
<td>RAD Monterey Place- Edith B Johnson</td>
<td>95</td>
<td>Yes</td>
<td>51 units of RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Monterey Place- William Griffin</td>
<td>4</td>
<td>Yes</td>
<td>55 units of RAD converted ACC units and 2 PBVs</td>
<td></td>
</tr>
<tr>
<td>Project Name</td>
<td>Units</td>
<td>Status</td>
<td>Leased</td>
<td>RAD Converted ACC Units</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-------</td>
<td>--------------</td>
<td>--------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>RAD Monterey Place 1</td>
<td>42</td>
<td>Leased</td>
<td>Yes</td>
<td>95 units of RAD converted ACC units</td>
</tr>
<tr>
<td>RAD Monterey Place 2</td>
<td>7</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
</tr>
<tr>
<td>RAD Monterey Place 3</td>
<td>45</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
</tr>
<tr>
<td>RAD Monterey Place 4</td>
<td>42</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
</tr>
<tr>
<td>RAD Monterey Place 5</td>
<td>17</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
</tr>
<tr>
<td>RAD Monterey Place 2R</td>
<td>28</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
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<tr>
<td>RAD Prescott Bush</td>
<td>56</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD Converted ACC units</td>
</tr>
<tr>
<td>RAD Waverly Townhouses</td>
<td>51</td>
<td>Partial Leased/Partial Committed</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
</tr>
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</table>
### Planned/Actual Total Existing Project-Based Vouchers

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Units</th>
<th>Status</th>
<th>Leased</th>
<th>Planned Status</th>
<th>Anticipated Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>RAD CB Motley</td>
<td>45</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Newhall Gardens</td>
<td>26</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Katherine Harvey Terrace</td>
<td>17</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Fulton Park</td>
<td>12</td>
<td>Partial Leased/Partial</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Fulton Park</td>
<td>12</td>
<td>Committed</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Chamberlain Court (Justice Landing)</td>
<td>7</td>
<td>Committed</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>RAD Farnam Onsite I</td>
<td>86</td>
<td>Leased</td>
<td>Yes</td>
<td>RAD converted ACC units</td>
<td></td>
</tr>
<tr>
<td>Portsea Place</td>
<td>8</td>
<td>Leased</td>
<td>No</td>
<td>Supportive Housing for homeless young adults</td>
<td></td>
</tr>
</tbody>
</table>

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

**v. Planned Other**

**vi. Changes to MTW Housing Stock Anticipated During the Plan Year**

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.
General Description of Planned Capital Expenditures

The following plan for MTW FY 22 includes receipt of CFP 2021 funds. ECC/HANH’s goal through its MTW status is to provide Housing of Choice in the most cost-effective method possible. Given the funding limitations, our plan is to address the most urgent operational needs within the LIPH portfolio remaining post-RAD conversion. Our ongoing objectives remain:

- Remediate Life-Health, Safety, Security and Code non-compliance property conditions
- Provide Project results which will save on Operational support- or provide energy savings
- Improve Accessibility
- Reduce vacancies
- Provide best use of CFP funds in coordination with ECC/HANH Operations and The Glendower Group, ECC/HANH’s development entity.

During FY 22, ECC/HANH will continue to execute projects that support these goals and improve the remaining portfolio. Properties that are planned for future redevelopment efforts are not prioritized for CFP projects; however, if there is a Life, Health and Safety challenge, we have considered the needs across the entire portfolio. Several work items in the FY22 MTW Plan are continuation/implementation of MTW FY21 Plan projects that were not fully completed by the end of FY 21. In the past year, COVID safety concerns impacted work scheduling. In FY 22, work is planned at Crawford Manor, Essex Townhouses, Robert T. Wolfe, Scattered Sites-Multifamily, West, and East. Funds have also been earmarked for Agency wide services and obligations. During FY 21, ECC/HANH solicited proposals to perform Physical Needs Assessments Agency wide. Reports generated through these assessments will assist in planning for future capital activities.

1. **Crawford Manor Upgrades-Fire Alarm System, Health-Safety, Interiors**
   - In FY 21, ECC/HANH performed work to bring the vestibule-entryway into ADA compliance and replaced the fire pump. The existing fire alarm system is also at the
end of its useful life. The codes for the fire alarm system now require inclusion of addressing features for smoke alarms. This equipment needs to be replaced to ensure safety for residents in the 15-story apartment tower. ECC/HANH is proceeding with fire alarm replacement and interior repairs that had been deferred until it was deemed safe for contractors to enter occupied units. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings; appliances; windows, lighting, etc. Renovations will proceed based on targeted priorities and continue in FY 22.

2. Wolfe: Health and Safety Repairs
   - ECC/HANH identified life, health and safety needs at Robert T. Wolfe to be addressed pending development of future major redevelopment plans for this location. COVID safety concerns impacted work scheduling. Phase 1 initiated in FY 21 includes repairs to building entrance and common areas that do not require entry into occupied residential units. Phase 2 includes interior repairs-- asbestos flooring replacement, asbestos wall repairs, electrical, plumbing and some domestic hot water heater replacements and will continue into FY 22.

3. Essex Interior/Building/Site Upgrades
   - Non-RAD conversion development. Due to COVID, ECC/HANH began with rear patio fence separations and basement abatement in FY 21, activities that did not require entrance into occupied apartments. Moving forward ECC/HANH is addressing the exterior building envelope to replace roofs, gutters, siding, windows and AC sleeves. The units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors, plumbing, electrical repairs, etc. Work will continue into FY 22.

4. McConaughy Interior/Building/Site Upgrades (RAD Conversion Development)
   - In FY 21, ECC/HANH’s Glendower Development Group applied for and received 9% tax credit (and 4%) approval for major redevelopment at McConaughy. This 201-unit family housing development is now converting to RAD and will undergo major revitalization through a combination of renovation of existing structures and new construction. Interim health safety work to be addressed when needed prior to RAD conversion.
5. Scattered Sites Interior/Building/Site Upgrades
   - **Scattered Sites West Interior Building/ Site Upgrades**
     i. Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings, floors appliances; fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Backlog of unfunded needs.
   - **Scattered Sites East Interior/Building/Site Upgrades**
     i. Non-RAD conversion development. Units need kitchen and bathroom upgrade; interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Backlog of unfunded needs.
   - **Scattered Sites Multifamily Interior/Building/Site Upgrades**
     ii. Non-RAD conversion development. Units need kitchen and bathroom upgrades; interior doors, walls, ceilings floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Backlog of unfunded needs.

6. Lead Paint Abatement—McConaughy, Essex, SS West, SS East
   - ECC/HANH received a HUD Lead Based Paint grant for McConaughy, Essex, Scattered Sites West and Scattered Sites East. Inspections-risk assessments initiated in FY’19 and abatement plans developed in FY’20. COVID safety concerns impacted work scheduling. ECC performed interim controls on building exteriors that did not necessitate entry into occupied apartments and solicited contractors in nine groupings for abatement work that required access to unit interiors. Abatement contract work began in FY 21 and is expected to continue into FY 22. Lead paint grant funds insufficient to complete all abatement; supplementing with non-lead grant CFP funds

The following are agency wide funding projects:

7. Agency Wide Vacancy Reduction
   - Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 22.

8. Agency Wide Physical Needs Assessments
In FY 21, ECC/HANH contracted for services to perform physical needs assessments, reports and e-tools. Work is expected to continue into FY 22.

9. Two (2) types of contracts form the backbone of our Planning & Modernization and Glendower Design team. These services provide us a quicker procurement time as projects unfold, as well as the ability to continually select the best, most cost-effective design solution.
   - **Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services**
   - **IQC Environmental Consulting Services**

10. **Administration Salaries & Benefits (CFP only)**
   - Staff salaries and benefits in support of CFP FY 22 activities.

11. **CFFP Bond Debt**
   - ECC/HANH leveraged CFP funds for development of Brookside Phase 1 Rental. Bond Debt is paid from Capital Fund allocations in accordance with HUD repayment schedule.

**ECC/HANH’s Reference to most Recent HUD-approved Five-Year Plan:** Form 50075.2, FY2020-2024 HUD-approved in HUD EPIC portal 3-11-20. Updated rolling five-year plan for FY2021-2025 submitted in EPIC 3-25-21.

**Long-term outcomes** of the planned FY 22 work will reflect the MTW Short Term Strategic plan goals to make further increases in Housing of Choice and Accessibility, to ensure Organizational Sustainability with development of housing through the Glendower Group, Inc. and to ensure Cost Effectiveness through reducing Total Development Costs and replacement of obsolete building systems.
<table>
<thead>
<tr>
<th>Description</th>
<th>MTW Goal or Initiative</th>
<th>Capital Expenditures Planned FY 2022</th>
<th>M T W Total</th>
<th>Other Total (CARE S)</th>
<th>Total Estimated Project Cost</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crawford Interior &amp; Exterior Upgrade, including Health &amp; Safety Work Items</td>
<td>Continue modernization and capital investment in current housing portfolio</td>
<td>$450,000</td>
<td>$400,000</td>
<td>$0</td>
<td>$1,500,000</td>
<td>Continuation of projects initiated in prior MTW years to further ADA access by upgrading vestibule and common areas; replace fire pump at end of useful life. Fire alarm system requires including addressing features for smoke alarms—expected to start in FY 2021. In FY 2021, ECC undertaking building assessment to set health &amp; safety priorities for implementation in FY 2022. COVID safety protocol impacted implementation of repairs inside resident units.</td>
</tr>
<tr>
<td>Wolfe Health-Safety Work: Interior-Exterior Upgrade</td>
<td>Continue modernization and capital investment in current housing portfolio</td>
<td>$450,000</td>
<td>$400,000</td>
<td>$0</td>
<td>$2,000,000</td>
<td>Began with health &amp; safety work and common areas upgrade only in FY 2021 due to COVID. Moving forward with interior building repairs as Phase 2 continuing into FY 2022.</td>
</tr>
<tr>
<td>Essex Health-Safety Work: Interior/Exterior Upgrade</td>
<td>Continue modernization and capital investment in current housing portfolio</td>
<td>$250,000</td>
<td>$200,000</td>
<td>$0</td>
<td>$2,600,000</td>
<td>Due to COVID, began with rear patio fence separations &amp; basement asbestos abatement in FY 2021. Moving forward with exterior envelope (roof, gutters, siding, windows, AC sleeves) &amp; interior building repairs. Work to continue into FY 2022.</td>
</tr>
<tr>
<td>McConaughy Health-Safety Interior/Exterior Building Upgrades</td>
<td>Maintain health and safety until forthcoming RAD conversion upgrade</td>
<td>$100,000</td>
<td>$100,000</td>
<td>0</td>
<td>$100,000</td>
<td>In FY 2021, Glendower Group awarded 9% (&amp; 4%) tax credits for major redevelopment at McConaughy. Funding for health-safety work that may be needed prior to RAD conversion.</td>
</tr>
<tr>
<td>Area</td>
<td>Vacancy Reduction-Expand housing choice; Continue modernization and capital investment in current housing portfolio</td>
<td>2021</td>
<td>2022</td>
<td>2023</td>
<td>Total</td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>--------</td>
<td></td>
</tr>
<tr>
<td><strong>Scattered Sites West</strong></td>
<td>$200,000</td>
<td>0</td>
<td>0</td>
<td>$2,000,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Scattered Sites East</strong></td>
<td>$200,000</td>
<td>0</td>
<td>0</td>
<td>$3,000,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Scattered Sites</strong></td>
<td>$200,000</td>
<td>0</td>
<td>0</td>
<td>$5,000,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Continuation of Lead-Based Paint Abatement at McConaughy, Essex, SS West, SS East (CFP &amp; LBP Grant)</strong></td>
<td>$300,000</td>
<td>0</td>
<td>0</td>
<td>$1,000,000</td>
<td></td>
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</tr>
<tr>
<td><strong>Agency Wide Vacancy Reduction/Unit Abatement</strong></td>
<td>$150,000</td>
<td>0</td>
<td>0</td>
<td>$200,000</td>
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<td></td>
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<tr>
<td><strong>Physical Needs Assessment</strong></td>
<td>$200,000</td>
<td>0</td>
<td>0</td>
<td>$650,000</td>
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<td></td>
</tr>
</tbody>
</table>

Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs.

Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs.

Non-RAD conversion development. Units need kitchen & bathroom upgrade; interior doors, walls, ceilings, appliances, fences, sidewalks, lighting, bldg. exterior repairs, etc. Backlog of unfunded needs.

Continue lead paint abatement and related repairs where identified by inspection-risk assessments. Work initiated in FY 2021 & expected to continue into FY 2022. Abatement costs anticipated to exceed lead paint grant award and be funded through non-lead CFP.

Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 2022.

Continue agency wide physical needs assessments initiated in FY 2021.
### IQC A&E

Continue modernization and capital investment in current housing portfolio

<table>
<thead>
<tr>
<th></th>
<th>Budget</th>
<th>Actual</th>
<th>Variance</th>
<th>FY22 Plan</th>
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<td>$200,000</td>
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<td>$0</td>
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</tbody>
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A&E consultant firms assist with design & construction management needs agency wide.

### IQC Environmental

Continue modernization and capital investment in current housing portfolio

<table>
<thead>
<tr>
<th></th>
<th>Budget</th>
<th>Actual</th>
<th>Variance</th>
<th>FY22 Plan</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>$200,000</td>
<td>$200,000</td>
<td>0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Environmental consultant firms assist with potential hazardous materials testing, preparation of scopes and abatement monitoring needs agency wide.

### Administration Salaries-Benefits (CFP only)

Continue modernization and capital investment in current housing portfolio

<table>
<thead>
<tr>
<th></th>
<th>Budget</th>
<th>Actual</th>
<th>Variance</th>
<th>FY22 Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$350,000</td>
<td>$350,000</td>
<td>0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Covers portion of 3 staff salaries & benefits to support CFP activities.

### CFFP Bond Debt

Expand housing choice

<table>
<thead>
<tr>
<th></th>
<th>Budget</th>
<th>Actual</th>
<th>Variance</th>
<th>FY22 Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$355,362.50</td>
<td>$355,362.50</td>
<td>0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Post defeasance bond debt FY 2022 in accordance with HUD repayment schedule. Payments are made in March and September.

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>$3,605,363</th>
<th>$3,455,363</th>
<th>$150,000</th>
<th>$19,755,363</th>
</tr>
</thead>
</table>

### A. LEASING INFORMATION

#### i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

<table>
<thead>
<tr>
<th>PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:</th>
<th>PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED</th>
<th>PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTW Public Housing Units Leased</td>
<td>13,200</td>
<td>1,100</td>
</tr>
<tr>
<td>MTW Housing Choice Vouchers (HCV) Utilized</td>
<td>79,200</td>
<td>6,600</td>
</tr>
<tr>
<td>Local, Non-Traditional: Tenant-Based^</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Local, Non-Traditional: Property-Based^</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Local, Non-Traditional: Homeownership^</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
The planned number of units for LIPH is based on the number of units ECC/HANH expects to have at the beginning of the fiscal year based on:

- expected completion of development projects
- 95% to 98% occupancy rate
- historical average number of new admissions
- historical average number end of participations

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans 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 several units/households to be served, the MTW PHA should estimate the number of households to be served.

<table>
<thead>
<tr>
<th>LOCAL, NON-TRADITIONAL CATEGORY</th>
<th>MTW ACTIVITY NAME/NUMBER</th>
<th>PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*</th>
<th>PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant-Based</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Property-Based</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Homeownership</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

* The sum of the figures provided should match the totals 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 Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

<table>
<thead>
<tr>
<th>HOUSING PROGRAM</th>
<th>DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTW Public Housing</td>
<td>Most of the units that have been vacant in excess of 180 days are units that are connected to a RAD or Modernization project which is</td>
</tr>
</tbody>
</table>
B. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

<table>
<thead>
<tr>
<th>WAITING LIST NAME</th>
<th>DESCRIPTION</th>
<th>NUMBER OF HOUSEHOLD S ON WAITING LIST</th>
<th>WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED</th>
<th>PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIPH</td>
<td>Site based. Not population specific.</td>
<td>3,540</td>
<td>Open/Partially</td>
<td>No</td>
</tr>
<tr>
<td>HCV</td>
<td>Program specific. Not population specific.</td>
<td>72,000</td>
<td>Closed</td>
<td>No</td>
</tr>
</tbody>
</table>

ECC/HANH Purged waitlists during late 2019 into 2020. The current numbers reflect the remaining number of applicants on the waitlists. ECC/HANH has reopened the HCV waitlists during FY22. ECC/HANH has recently purged its HCV waitlists and has transitioned to an online portal. As the applicants being contacted are those with more current applications and due to the improved process of online applications, we expect delays in lease up to be minimized.

MTW Housing Choice Voucher

LIPH

Site based. Not population specific.

Planning to open between June 2020 and October 2020. The following schedule will highlight proposed closing dates and dwelling unit impacts for RAD/Modernization projects through 2020. Please note the vacant units identified in the conversions will not re-occupied prior to the closing. Additionally, many units are readied for occupancy in order to be used for relocation for the residents in development undergoing RAD conversions. As such, our team readies a unit and transfers a resident into that unit. The unit that becomes vacated then shows as vacant even though it is scheduled for disposition. This artificially inflates the vacancy number as well.

MTW Housing Choice Voucher

Local, Non-Traditional

N/A
Please describe any duplication of applicants across waiting lists:

Applicants can apply for more than one program within ECC/HANH. Numbers provided for each waitlist are not duplicated.

### ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

<table>
<thead>
<tr>
<th>WAITING LIST NAME</th>
<th>DESCRIPTION OF PLANNED CHANGES TO WAITING LIST</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIPH</td>
<td>No anticipated changes during the plan year.</td>
</tr>
<tr>
<td>HCV</td>
<td>No anticipated changes during the plan year.</td>
</tr>
</tbody>
</table>
Who We Serve

ECC/HANH serves 5,643 families through its low-income public housing and housing choice voucher programs. During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current numbers reflect an increase of approximately 776 families or 16%, indicating that MTW status has continuously allowed ECC/HANH to increase the number of families being served.

The vast majority of these families fall in the Extremely Low-Income category with 85% of LIPH and 78% of HCV families in this income category. 31% percent of LIPH families and 36% of HCV families earn wages. The percentage of families reporting no income are 9% of LIPH and 4% of HCV families in this status.

81% of households in LIPH range from 1 person to 3 person families and 81% of households in HCV, range from 1 person to 3 person families. The following table summarizes the population demographics.

Low Income Public Housing

ECC/HANH is starting FY22 with a housing stock of 1229 units and plans to end with 1121 public housing units. This includes 7392 site-based family units: 3079 Elderly/Disabled units, and 171 Scattered Site units. This reduction in LIPH units is offset by the conversion of 102 units to RAD, and 6 home ownership opportunities. At the start of ECC/HANH’s MTW status, ECC/HANH’s LIPH housing stock included 2,965 total units. Since then, several LIPH units have converted to RAD/PBV and PBV units.
<table>
<thead>
<tr>
<th>Development Name</th>
<th>Development Type</th>
<th>Units beginning FY22</th>
<th>Planned Units to Add</th>
<th>Planned Units to Remove</th>
<th>Planned units at the end of FY22</th>
</tr>
</thead>
<tbody>
<tr>
<td>Val Macri</td>
<td>Elderly/Disabled</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>Crawford Manor</td>
<td>Elderly/Disabled</td>
<td>109</td>
<td>0</td>
<td>0</td>
<td>109</td>
</tr>
<tr>
<td>RT Wolfe</td>
<td>Elderly/Disabled</td>
<td>93</td>
<td>0</td>
<td>0</td>
<td>93</td>
</tr>
<tr>
<td>Ruoppolo Manor</td>
<td>Elderly/Disabled</td>
<td>105</td>
<td>0</td>
<td>0</td>
<td>105</td>
</tr>
<tr>
<td>Valley Townhouses</td>
<td>Family</td>
<td>40</td>
<td>0</td>
<td>40</td>
<td>0</td>
</tr>
<tr>
<td>Westville Manor</td>
<td>Family</td>
<td>151</td>
<td>0</td>
<td>62</td>
<td>89</td>
</tr>
<tr>
<td>McConaughy Terrace</td>
<td>Family</td>
<td>201</td>
<td>0</td>
<td>201</td>
<td>0</td>
</tr>
<tr>
<td>Quinnipiac Terrace I</td>
<td>Family</td>
<td>58</td>
<td>0</td>
<td>0</td>
<td>58</td>
</tr>
<tr>
<td>Quinnipiac Terrace 2</td>
<td>Family</td>
<td>56</td>
<td>0</td>
<td>0</td>
<td>56</td>
</tr>
<tr>
<td>Quinnipiac Terrace 3</td>
<td>Family</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>Essex Townhouses</td>
<td>Family</td>
<td>35</td>
<td>0</td>
<td>0</td>
<td>35</td>
</tr>
<tr>
<td>New Rowe</td>
<td>Family</td>
<td>46</td>
<td>0</td>
<td>0</td>
<td>46</td>
</tr>
<tr>
<td>Brookside Phase 1</td>
<td>Family</td>
<td>50</td>
<td>0</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Brookside Phase II</td>
<td>Family</td>
<td>50</td>
<td>0</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Rockview Phase 1 Rental</td>
<td>Family</td>
<td>30</td>
<td>0</td>
<td>0</td>
<td>30</td>
</tr>
<tr>
<td>Scattered Site - Multi Family</td>
<td>Scattered Sites</td>
<td>96</td>
<td>0</td>
<td>0</td>
<td>96</td>
</tr>
<tr>
<td>Scattered Site - West</td>
<td>Scattered Sites</td>
<td>23</td>
<td>0</td>
<td>0</td>
<td>23</td>
</tr>
<tr>
<td>Scattered Site - East</td>
<td>Scattered Sites</td>
<td>52</td>
<td>0</td>
<td>6</td>
<td>46</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1229</strong></td>
<td><strong>0</strong></td>
<td><strong>108</strong></td>
<td><strong>1121</strong></td>
</tr>
</tbody>
</table>
Housing Choice Voucher Program

ECC/HANH plans to start FY22 with a total of 5,672 vouchers allocated and expects to have a total of 5,752 vouchers allocated by end of the FY22 including 4,520 MTW Vouchers, 1,425 RAD vouchers, 85 VASH vouchers and 80 Single Room Occupancy vouchers. Part of this count includes an increase of 255 RAD conversions bringing the total expected RAD conversion count to 1,072 by end of FY22. The first section of the table below summarizes the voucher count. The remaining sections of the table show the allocation of vouchers by voucher type. All numbers in the table sum up to the summary table.

### ECC/HANH MTW VOUCHER TABLE

<table>
<thead>
<tr>
<th>Description</th>
<th>2022 Voucher Baseline</th>
<th>Planned Units to be Removed</th>
<th>Planned Units to be Added</th>
<th>*Planned Units at end of FY 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>*MTW Tenant Based Voucher</td>
<td>Portable tenant-based assistance</td>
<td>4,437</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>*Expanding Housing Choice</td>
<td>Support mobility and homeownership opportunities for residents</td>
<td>219</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

---

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ECC/HANH MTW FY22 Plan
<table>
<thead>
<tr>
<th>Tenant Protection Vouchers for Church St. South</th>
<th>270 vouchers for CSS dislocated residents</th>
<th>241</th>
<th>0</th>
<th>0</th>
<th>241</th>
</tr>
</thead>
<tbody>
<tr>
<td>*PBV Efforts to End Homelessness</td>
<td>Allocation to homeless providers</td>
<td>58</td>
<td>0</td>
<td>0</td>
<td>58</td>
</tr>
<tr>
<td>*PBV Housing Development</td>
<td>Project Based Voucher Assistance for redevelopment projects</td>
<td>593</td>
<td>0</td>
<td>0</td>
<td>593</td>
</tr>
<tr>
<td>*RAD</td>
<td>Conversion of LIPH Units to RAD Platform</td>
<td>1070</td>
<td>0</td>
<td>80</td>
<td>1,150</td>
</tr>
<tr>
<td>*TBV Supportive Housing Efforts</td>
<td>Subsidies for supportive housing efforts</td>
<td>171</td>
<td>0</td>
<td>0</td>
<td>171</td>
</tr>
<tr>
<td>Description</td>
<td>Units</td>
<td>Vouchers Set Aside</td>
<td>Vouchers Authorized</td>
<td>Vouchers Authorized</td>
<td>Vouchers Authorized</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>-------</td>
<td>--------------------</td>
<td>---------------------</td>
<td>--------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td><strong>Mod Rehab-Single Room Occupancy (RAD)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>80 SRO units</td>
<td>80</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>80</td>
</tr>
<tr>
<td><strong>HUD VASH</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>85 Veterans Supportive Housing</td>
<td>85</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>85</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Tenant Based Voucher Subtotal (Not assigned to Special Use)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant Based Voucher Subtotal</td>
<td>3,155</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3155</td>
</tr>
<tr>
<td><strong>Expanding Housing Choice</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Home Ownership Vouchers</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CARES (SEHOP)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 Vouchers set aside for CARES participants</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Section Eight Home Ownership Program (SEHOP)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50 Vouchers set aside for LIPH &amp; HCV Homeownership Program</td>
<td>50</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Relocation &amp; Tenant Protection Vouchers</td>
<td>Support</td>
<td>70</td>
<td>0</td>
<td>0</td>
<td>70</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>---------</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>------</td>
</tr>
<tr>
<td>RAD IIA Relocation Voucher</td>
<td></td>
<td>70</td>
<td>0</td>
<td>0</td>
<td>70</td>
</tr>
<tr>
<td>Support relocation of 70 Families in RAD Group 2A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farnam Emergency Relocation</td>
<td></td>
<td>52</td>
<td>0</td>
<td>0</td>
<td>52</td>
</tr>
<tr>
<td>State and Local Initiatives vouchers to support housing choice and preservation</td>
<td></td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>New Activity 50 Vouchers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*Expanding Housing Choice Subtotal</td>
<td></td>
<td>219</td>
<td>0</td>
<td>0</td>
<td>219</td>
</tr>
</tbody>
</table>
*Calculations are assigned. Do not change Numbers in Column F or in Rows with Sub totals and totals where an asterisk is present.

<table>
<thead>
<tr>
<th>PBV Efforts to End Homelessness</th>
<th>Efforts to End Homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>PBV Fellowship I</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>18</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>18</td>
</tr>
<tr>
<td>PBV Fellowship II</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>5</td>
</tr>
<tr>
<td>PBV Also Cornerstone (Continuum of Care)</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>4</td>
</tr>
<tr>
<td>PBV Norton Court (Continuum of Care)</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>12</td>
</tr>
<tr>
<td>PBV Cedar Hill</td>
<td>100% Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>4</td>
</tr>
<tr>
<td>PBV West Village</td>
<td>52 Howe St. – 100% Supportive Housing Single Room Occupancy Units</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
</tbody>
</table>

**PBV Efforts to End Homeless Subtotal**  
58 0 0 58

*Calculations are assigned. Do not change Numbers in Column F or in Rows with Sub totals and totals where an asterisk is present*

<table>
<thead>
<tr>
<th>PBV Housing Redevelopment</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PBV QT Phase 1</td>
<td>81 units – 28% of units PBV</td>
<td>23</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV QT Phase 2</td>
<td>79 units – 29% of units PBV</td>
<td>23</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV QT Phase 3</td>
<td>33 rental units 48% are PBV</td>
<td>16</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Eastview Phase I</td>
<td>102 units – 48% of units are PBV</td>
<td>49</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Chatham/Eastview</td>
<td>2 PBV</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>PBV Brookside Phase I Rental</td>
<td>100 affordable rental mixed - 50% of units are PBV</td>
<td>51</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Brookside Phase 2 Rental</td>
<td>51 PBV for affordable housing for families in 1 to 4-bedroom units</td>
<td>51</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Rockview Phase I Rental</td>
<td>47 units for affordable housing, 61% of units are PBV</td>
<td>47</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Project</td>
<td>Description</td>
<td>Units</td>
<td>1 Bed</td>
<td>2 Bed</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-------</td>
<td>-------</td>
<td>-------</td>
</tr>
<tr>
<td>PBV New Rowe Building</td>
<td>104 affordable mixed use, mixed finance development 31% of units are PBV</td>
<td>32</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV 122 Wilmot Road</td>
<td>13 PBV for affordable housing for elderly in 1- and 2-bedroom accessible units</td>
<td>13</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Park Ridge</td>
<td>100% Elderly/disabled housing</td>
<td>60</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV Frank Nasti Existing</td>
<td>Scattered Site PBV-Families</td>
<td>11</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PBV CUHO Existing</td>
<td>Scattered site PBV units for families</td>
<td>24</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

ECC/HANH MTW FY22 Plan
<table>
<thead>
<tr>
<th>PBV CUHO New Construction</th>
<th>Affordable 8-unit rental housing development - Families</th>
<th>5</th>
<th>0</th>
<th>0</th>
<th>5</th>
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</thead>
<tbody>
<tr>
<td>PBV Shartenburg</td>
<td>20 PBV units for the City initiative 360 State-Families</td>
<td>20</td>
<td>0</td>
<td>0</td>
<td>20</td>
</tr>
<tr>
<td>PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon) New Construction</td>
<td>8 rehabilitation / 12 new construction affordable housing - 45.5% of units are PBV</td>
<td>20</td>
<td>0</td>
<td>0</td>
<td>20</td>
</tr>
<tr>
<td>PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon)</td>
<td>9 MHA PBV units</td>
<td>9</td>
<td>0</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>Project Description</td>
<td>PBV</td>
<td>Casa Otonal</td>
<td>Christian Community Action (CCA)</td>
<td>New Haven Coliseum (previously Live Learn Play)</td>
<td>Expanded Jurisdiction</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>-----</td>
<td>-------------</td>
<td>---------------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>PBV Mutual Housing Existing</td>
<td>15</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>15</td>
</tr>
<tr>
<td>PBV Casa Otonal</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td>PBV Christian Community Action (CCA)</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>New Haven Coliseum (previously Live Learn Play)</td>
<td>19</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>19</td>
</tr>
<tr>
<td>Expanded Jurisdiction</td>
<td>19</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>19</td>
</tr>
<tr>
<td>Residences at Ninth Square</td>
<td>55</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>55</td>
</tr>
</tbody>
</table>

*PBV Housing Redevelopment Subtotal* 593 0 0 0 593
*Calculations are assigned. Do not change Numbers in Column F or in Rows with Sub totals and totals where an asterisk is present

<table>
<thead>
<tr>
<th>RAD Conversion</th>
<th>34 PBV</th>
<th>34</th>
<th>0</th>
<th>0</th>
<th>34</th>
</tr>
</thead>
<tbody>
<tr>
<td>RAD 122 Wilmot Road</td>
<td>34 PBV</td>
<td>34</td>
<td>0</td>
<td>0</td>
<td>34</td>
</tr>
<tr>
<td>RAD Eastview Phase I</td>
<td>102 units – 48% of units are PBV; remaining 53 ACC units converted to RAD PBV</td>
<td>53</td>
<td>0</td>
<td>0</td>
<td>53</td>
</tr>
<tr>
<td>RAD Ribicoff (Twin Brook) – 9%</td>
<td>44 units of RAD converted ACC units – 80% PBV; 11 market rate units</td>
<td>44</td>
<td>0</td>
<td>0</td>
<td>44</td>
</tr>
<tr>
<td>RAD Ribicoff (Twin Brook) – 4%</td>
<td>51 units of RAD converted ACC units</td>
<td>51</td>
<td>0</td>
<td>0</td>
<td>51</td>
</tr>
<tr>
<td>Location</td>
<td>Description</td>
<td>Total</td>
<td>RAD</td>
<td>ACC</td>
<td>PBVs</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>--------------------------------------------------</td>
<td>-------</td>
<td>-----</td>
<td>-----</td>
<td>------</td>
</tr>
<tr>
<td>RAD Fair Haven/Chatham/Eastview</td>
<td>55 units of RAD converted ACC units and 2 PBVs</td>
<td>55</td>
<td>0</td>
<td>0</td>
<td>55</td>
</tr>
<tr>
<td>RAD Monterey Place-Edith B Johnson</td>
<td>95 units of RAD converted ACC units</td>
<td>95</td>
<td>0</td>
<td>0</td>
<td>95</td>
</tr>
<tr>
<td>RAD Monterey Place-William Griffin</td>
<td>4 units of RAD converted ACC units</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>RAD Monterey Place 1</td>
<td>42 units of RAD converted ACC units</td>
<td>42</td>
<td>0</td>
<td>0</td>
<td>42</td>
</tr>
<tr>
<td>RAD Monterey Place 2</td>
<td>7 units of RAD converted ACC units</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>7</td>
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<tr>
<td>RAD Monterey Place 3</td>
<td>45 units of RAD converted ACC units</td>
<td>45</td>
<td>0</td>
<td>0</td>
<td>45</td>
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<tr>
<td>Property</td>
<td>Converted Units</td>
<td>2022</td>
<td>2023</td>
<td>2024</td>
<td>Total</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------------------------</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>-------</td>
</tr>
<tr>
<td>RAD Monterey Place 4</td>
<td>42 units of RAD converted ACC units</td>
<td>42</td>
<td>0</td>
<td>0</td>
<td>42</td>
</tr>
<tr>
<td>RAD Monterey Place 5</td>
<td>17 units of RAD converted ACC units</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>17</td>
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<tr>
<td>RAD Monterey Place 2R</td>
<td>28 units of RAD converted ACC units</td>
<td>28</td>
<td>0</td>
<td>0</td>
<td>28</td>
</tr>
<tr>
<td>RAD McQueeny Towers</td>
<td>150 units of converted ACC units</td>
<td>149</td>
<td>0</td>
<td>0</td>
<td>149</td>
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<tr>
<td>RAD Winslow Celentano</td>
<td>65 units of converted ACC units</td>
<td>62</td>
<td>0</td>
<td>0</td>
<td>62</td>
</tr>
<tr>
<td>RAD Prescott Bush</td>
<td>56 units of converted ACC units</td>
<td>56</td>
<td>0</td>
<td>0</td>
<td>56</td>
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<tr>
<td>Project Name</td>
<td>Units Converted</td>
<td>ACC</td>
<td>2021</td>
<td>2022</td>
<td>Total</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>-----------------</td>
<td>-----</td>
<td>------</td>
<td>------</td>
<td>-------</td>
</tr>
<tr>
<td>RAD Phase II Waverly Townhouses</td>
<td>52</td>
<td>51</td>
<td>0</td>
<td>0</td>
<td>51</td>
</tr>
<tr>
<td>RAD CB Motley</td>
<td>45</td>
<td>45</td>
<td>0</td>
<td>0</td>
<td>45</td>
</tr>
<tr>
<td>RAD Newhall Gardens</td>
<td>26</td>
<td>26</td>
<td>0</td>
<td>0</td>
<td>26</td>
</tr>
<tr>
<td>RAD Katherine Harvey Terrace</td>
<td>17</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>RAD Fulton Park</td>
<td>12</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td>RAD Chamberlain Court (Justice Landing)</td>
<td>7</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>7</td>
</tr>
<tr>
<td>RAD Westville Manor &amp; Valley Street</td>
<td>62</td>
<td>0</td>
<td>80</td>
<td></td>
<td>80</td>
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<tr>
<td>Scattered Site Multi-Family</td>
<td>115 units of converted ACC</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Mill River Crossing Phase I</td>
<td>86</td>
<td>0</td>
<td>0</td>
<td>86</td>
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<tr>
<td>RAD Farnam Onsite Phase II</td>
<td>92 Units of Converted ACC</td>
<td>42</td>
<td>0</td>
<td>0</td>
<td>42</td>
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<tr>
<td><strong>RAD Conversion Subtotal</strong></td>
<td><strong>1070</strong></td>
<td><strong>0</strong></td>
<td><strong>80</strong></td>
<td><strong>1150</strong></td>
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</tbody>
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*Calculations are assigned. Do not change Numbers in Column F or in Rows with Sub totals and totals where an asterisk is present*
<table>
<thead>
<tr>
<th>Program</th>
<th>Type</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>DMHAS Mental Health Transformation Grant – FUSE</td>
<td>Supportive Housing</td>
<td>10</td>
</tr>
<tr>
<td>Family Options – Homeless</td>
<td>Supportive Housing</td>
<td>15</td>
</tr>
<tr>
<td>Permanent Enrichment</td>
<td>Supportive Housing</td>
<td>10</td>
</tr>
<tr>
<td>Foreclosure Protection</td>
<td>Foreclosure Protection</td>
<td>15</td>
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<tr>
<td>Family Unification Supportive Housing</td>
<td>DCF Family</td>
<td>20</td>
</tr>
<tr>
<td>Homelessness/Imminent Danger of Homelessness (TBV)</td>
<td>(Formerly Foreclosure PBV)</td>
<td>40</td>
</tr>
<tr>
<td>Supportive Housing/Homelessness Prevention</td>
<td></td>
<td></td>
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<tr>
<td>------------------------------------------</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td></td>
<td>51</td>
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</table>

*Supportive Housing Efforts Subtotal | 171 | 0  | 0  | 171
### III: Proposed MTW Activities

All proposed activities that are granted approval by HUD are reported on in Section IV as “Approved Activities”.

<table>
<thead>
<tr>
<th>Increase Housing Choice</th>
<th>Summary Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Master Lease Unit Program</td>
<td></td>
</tr>
<tr>
<td>- Redevelopment of McConaughy Terrace</td>
<td></td>
</tr>
<tr>
<td>- Y2Y, Youth Overnight Program</td>
<td></td>
</tr>
<tr>
<td>- Community Health Network of Connecticut</td>
<td></td>
</tr>
<tr>
<td>- Nearly 1,000 families will have to be relocated temporarily to achieve this objective in a timely and cost-effective manner. The proposed Master Lease Program will provide a sorely needed relocation option like the master leasing of public housing units that are currently permitted as part of RAD.</td>
<td></td>
</tr>
<tr>
<td>- ECC/HANH is proposing to undertake the redevelopment of McConaughy Terrace and convert the property to a Project based Voucher model using the Rental Assistance Demonstration Program (RAD).</td>
<td></td>
</tr>
<tr>
<td>- Y2Y New Haven is a joint initiative of students from across New Haven, Youth Continuum, and Y2Y Network to open a student-led, gender inclusive 20-unit overnight program for young adults experiencing homelessness in Greater New Haven. Y2Y New Haven builds on the youth-to-youth model employed by Y2Y Harvard Square, the nation’s first student-run overnight program for young adults.</td>
<td></td>
</tr>
<tr>
<td>- The Housing Authority of New Haven (ECC/HANH) proposes an initiative in connection with the Community Health Network of CT (CHNCT) to provide layered rental subsidy to recipients of the HUSKY A or Husky D medical insurance program. The program seeks to pilot a combined subsidy model that merges funding from healthcare and housing providers that demonstrates the importance of</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cost Effective and Efficient Service Delivery</th>
<th>Increase Family Self-Sufficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Community Health Network of Connecticut</td>
<td></td>
</tr>
<tr>
<td>- Y2Y, Youth Overnight Program</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Cost Effective and Efficient Service Delivery</th>
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</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>
Proposed MTW Activities: HUD Approval Requested

IV: Approved MTW Activities

A. IMPLEMENTED ACTIVITIES

Increase Housing Choice

Initiative 1.2 – Local Total Development Cost (TDC) Limits

This initiative was approved in FY08 and implemented in FY09. This activity establishes TDC and HCC limits for ECC/HANH separate from HUD’s standard limits to better reflect local market conditions for development and redevelopment activities.

ECC/HANH prepared a TDC and HCC schedule, which reflects construction, and development costs in New Haven. ECC/HANH first submitted its revised Alternate TDC and HCC schedule as part of the Appendix to the MTW Fiscal Year 2009 Report. ECC/HANH used the approved 2009 TDC and HCC limits for the Rockview Phase I Redevelopment. During Fiscal Year 2012, ECC/HANH submitted revised TDC and HCC limits. Pursuant to the approval of the alternate TDC, the ECC/HANH updated its TDC and HCC, which was included in our 2017 MTW Plan, and is attached hereto in Appendix 1.

The market demands have driven costs higher, but the Authority has been and will continue to be a good steward of public resources. The TDC cost limitations derived from (1) construction cost data obtained from RS Repair and Modeling Cost, and (2) an analysis of unit size and construction cost data obtained from a survey of local mixed income developments, and an analysis of other local factors and market conditions affecting the cost of the development of mixed income communities in the local market area.

The Housing Authority has the following developments in its pipeline: Valley Townhomes; Farnam Phase II 4%, Farnam Phase II 9%; Westville Manor Phase I, and Westville Manor Phase II. As it relates to our approved TDC, the developments shall not exceed the approved TDC. These developments are in the predevelopment stages. The exception is the Farnam Court Phase II 4% and Farnam Court Phase II 9% projects, which are under development. The Authority continues to work diligently to find creative construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of the approved TDC. There are no new developments are expected to close requiring TDC.
Initiative 1.4 and 1.10 – Defining Income Eligibility for the Project Based Voucher Programs

This initiative was approved in FY12 and implemented in FY13. This activity defines the incomes to be eligible for Project Based Voucher Programs as follows:

- No less than 40 percent of the project-based vouchers awarded in any year to be awarded to families with incomes at or below 30 percent of the area median income, adjusted for family size.
- ECC/HANH will award up to 15 percent of the PBV’s allocated for any mixed finance project to families with incomes between 50 and 80 percent of Area Median Income for Brookside Phase 1 Rental.
- 45 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 Rental mixed finance development.

ECC/HANH does anticipate changes to the initiative or metrics. This initiative aims to decrease maintenance costs and increase durability of units and the quality of life of residents. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

<table>
<thead>
<tr>
<th>Initiative 1.4 and 1.10</th>
<th>Income Eligibility for Project Based Voucher Program</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PBV in Mixed Finance Developments</strong></td>
<td></td>
</tr>
<tr>
<td>Development</td>
<td>Units at or below 30% of AMI</td>
</tr>
<tr>
<td>Brookside I</td>
<td>0</td>
</tr>
<tr>
<td>Brookside II</td>
<td>0</td>
</tr>
<tr>
<td>Rockview I</td>
<td>20</td>
</tr>
<tr>
<td>Wilmont Crossing</td>
<td>0</td>
</tr>
<tr>
<td>Ribicoff 9%</td>
<td>11</td>
</tr>
<tr>
<td>Ribicoff 4%</td>
<td>25</td>
</tr>
<tr>
<td>Fair Haven- EVT</td>
<td>4</td>
</tr>
<tr>
<td>Fair Haven-Chatham</td>
<td>11</td>
</tr>
<tr>
<td>TwinBrook 4%</td>
<td>4</td>
</tr>
<tr>
<td>Total</td>
<td>71</td>
</tr>
</tbody>
</table>

Initiative 1.6 – Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Program)

Approved in FY08 and implemented in FY09 (Significant Change Proposed in FY20)

Under ECC/HANH’s MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods. This includes reasonable policies for setting rents and subsidy levels for tenant-based assistance.

During FY08, ECC/HANH began to implement MTW Rent Standards that allow ECC/HANH to approve exception rents in the following cases: Wheelchair accessible units; Large bedroom-size units, (4 bedrooms or larger); Expanded housing opportunities in neighborhoods with low concentrations of poverty; Housing opportunities in new development projects.
that include significant public investment to promote revitalization of neighborhoods; and Mixed-income housing opportunities that promote expanded housing opportunities and Deconcentration of poverty.

In addition, ECC/HANH approved budget-based rent increases for landlords who make major capital improvements in their property, including accessibility modifications. Requests for MTW Rent Standards will be reviewed on a case-by-case basis. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% without prior HUD approval. ECC/HANH will reexamine its MTW Rent Standards monthly to ensure that ECC/HANH does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, HAP RAD Payments, tenant rent payments to landlords, and any utility allowance amounts.

**Significant Changes to the Initiative in FY2020**

ECC/HANH made enhancements to the deconcentrating initiative and required different authorizations from what was initially proposed. Additionally, In an effort to model Indicator 15 of the Section 8 Management Assessment Program (SEMAP), ECC proposed to update HC#5 from the benchmark of 10 moves per year, to the SEMAP standard of:

- 2% higher of all Section 8 movers who moved to low poverty census tracts in the FY, compared to the total count of movers who moved to low poverty census tracts at the end of the last completed FY.

  *Example: If In FY 2018 the percent of families who moved to low poverty areas is 2.75%, the percent of families in FY19 must be of at least 4.75%, which is 2% higher than the total percent of families who moved to an area of low poverty in FY18.*

<table>
<thead>
<tr>
<th>Sample Percent Increase Tracker</th>
<th>Previous FY Percentage (2017)</th>
<th>Current FY Percentage (2018)</th>
<th>Goal Percentage Increase</th>
<th>2% of Previous Year (2017)</th>
<th>Is Current Percent Equal to or Greater than 2% of Previous Year?</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY2018</td>
<td>2.75%</td>
<td>2.53%</td>
<td>2.00%</td>
<td>4.75%</td>
<td>No</td>
</tr>
</tbody>
</table>

Note that the SEMAP measurement is Section 8 families with children and the ECC MTW measurement is all families, with and without children who move to areas of low poverty or high/very high opportunity.

HC#7, ‘Households assisted by services that increase housing choice’, will be added to HUD metrics for this initiative starting in FY20.

ECC/HANH is proposing an amendment in the FY2020 Plan to include the following:

**Security Deposit Assistance**

ECC/HANH provides mobility counseling services for voucher participants to assist their search for housing in non-impacted areas.

Subject to funding availability, families that agree to participate in mobility counseling and locate to census tracts in areas with low concentrations of poverty (Opportunity areas include the most recent U.S. Census Tracts and may be adjusted as necessary) will be given the opportunity for the following:

1. Application fees paid for up to 3 units (anticipating $30 per application or $90 per family)
2. Security deposit assistance (up to one month of contract rent) or
3. Assistance with repayment of past utility debts that would prevent a family from securing utilities in their own name (up to payment standard for family size)

The decision whether to offer the above assistance is at the discretion of ECC/HANH and will be paid up to the payment standard that the family is eligible to receive.
Incentive Fees

Expected cost of new addition to this initiative is estimated at $35,000 per year and includes a new mobility-counseling contract.

During FY21, the updates to this initiative were implemented. While ECC/HANH is still in the process of implementing updates, the FY21 report will reflect updates to services as of October 1, 2020. As a result of COVID, the roll out of updates were slow. During FY22 ECC/HANH will continue to work toward helping more families access housing in neighborhoods of choice.

Initiative 1.7 – Tenant-Based Vouchers for Supportive Housing for the Homeless

This initiative was approved in FY10 and implemented in FY11. Under ECC/HANH’s MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods.

ECC/HANH has designated use of housing choice voucher resources for the purpose of ending homelessness. ECC/HANH works in conjunction with City and Regional entities, Continuun of Care, shelters, transitional and permanent housing providers to prioritize and identify chronically homeless, homeless families and other homeless populations. ECC/HANH entered in a Memoranda of Understanding with organizations that provide housing for homeless with supportive services.

Current allocation of vouchers for this purpose is outlined in the table below.

There continues to be a need for vouchers for the homeless population and we are forming additional partnerships with homeless advocates. ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing housing choice.

<table>
<thead>
<tr>
<th>TBV Supportive Housing Efforts</th>
<th>Supportive Housing</th>
<th>10</th>
<th>0</th>
<th>0</th>
<th>10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant Based DHMAS Supportive – Housing First</td>
<td>Supportive Housing</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>DMHAS Mental Health Transformation Grant – FUSE</td>
<td>Supportive Housing</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Family Options – Homeless</td>
<td>Supportive Housing</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>15</td>
</tr>
<tr>
<td>Permanent Enrichment</td>
<td>Supportive Housing</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
</tbody>
</table>
Initiative 1.9 – Increase the Allowed Percentage of Project Based Voucher (“PBV”) Units from 75 Percent to 100 Percent in a Mixed Financed Development

This initiative was approved in FY12 and implemented in FY13. ECC/HANH has completed a Project Needs Assessment (“PNA”) of its entire portfolio. The PNA shows that over the next 20 years ECC/HANH’s needs would exceed available funds by a ratio of more than 3:1. In order to address this funding gap and to help assure the long-term viability of its portfolio, the Agency used the PNA to determine an asset management strategy for each of its developments. Part of this strategy included converting existing public housing to Project Based Assistance under Section 8(o) (13). ECC/HANH would dispose of properties under Section 18 of the Housing Act of 1937 or Rental Assistance Demonstration (RAD) prior to conversion to Project Based Vouchers.

ECC/HANH conducted analysis of the feasibility of converting Annual Contribution Contract (“ACC”) units to Project Based Units using criteria like that set forth under Section 22. ECC/HANH will increase its flexibility to allocate the number of units in a project from 75 percent as previously approved by HUD to 100 percent for the purpose of converting ACC units to PBV units under this initiative. The purpose is to provide cash flow to enable ECC/HANH to borrow private funds for the purpose of rehabilitating aging developments in ECC/HANH’s portfolio. ECC/HANH also seeks to waive the requirement of one-year tenancy which will allow participants greater flexibility in housing options.

The mobility issue is addressed by allowing the tenants the option to vacate the development during rehabilitation with an option to return upon the completion of such rehabilitation and/or the convenience of using a Tenant Based Voucher to relocate permanently. ECC/HANH will provide all the assistance and counseling as required under Section 18 or the Uniform Relocation Act, if applicable.

ECC/HANH will limit the amount of project based units in non-mixed finance projects to no more than 50% of the units in the project; provided, however, that the agency may project base up to 75 percent of the units in such project if the project will provide replacement units for public housing units lost as a result of demolition or disposition, if the project is undertaken in an area where significant investments are being made, if the project will help to reduce de-concentration of very low income families, or if the project is located in areas that provide increased access to transportation or employment opportunities.

HUD development of the Rental Assistance Demonstration Program has made this initiative unnecessary for projects approved for RAD conversion. However, ECC/HANH continues to have 985 units that are not currently approved for RAD conversion for which this authorization remains vital.

<table>
<thead>
<tr>
<th>Foreclosure Protection</th>
<th>Foreclosure Protection</th>
<th>15</th>
<th>0</th>
<th>0</th>
<th>15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family Unification</td>
<td>DCF Family</td>
<td>20</td>
<td>0</td>
<td>0</td>
<td>20</td>
</tr>
<tr>
<td>Supportive Housing</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Homelessness/Imminent</td>
<td>(Formerly Foreclosure</td>
<td>40</td>
<td>0</td>
<td>0</td>
<td>40</td>
</tr>
<tr>
<td>Danger of Homelessness</td>
<td>PBV)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(TBV)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supportive Housing</td>
<td>Supportive</td>
<td>51</td>
<td>0</td>
<td>0</td>
<td>51</td>
</tr>
<tr>
<td>Prevention 1</td>
<td>Housing/Homelessness</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prevention</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*Supportive Housing Efforts Subtotal</td>
<td>171</td>
<td>0</td>
<td>0</td>
<td>171</td>
<td></td>
</tr>
</tbody>
</table>
ECC/HANH does not anticipate any changes to the initiative or metrics and does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness and increasing housing choice.

**Initiative 1.11 – Increase the percentage of Housing Choice Voucher (NON-RAD) budget authority for the Agency that is permitted to project-base from 20% up to 25%**

This initiative was approved in FY13 and implemented in FY14. This authorization will allow for the continued redevelopment efforts of the underperforming developments as well as increase housing choices for our residents. It allows the Authority to use its vouchers to pool monies together in order to leverage funds for redevelopment efforts. This initiative was contemplated prior to the advent of the RAD program. The percentage of MTW project based did not include the full conversion of ACC sites to PBVs. The advent of RAD increases the proportion of the portfolio that will be project-based. ECC/HANH’s current percentage of non-RAD project based MTW vouchers is 11% (522 vouchers).

With the RAD portfolio award, ECC/HANH expects that percentage to increase to 32% of the portfolio during FY19. This is the result of the addition of 1431 RAD vouchers in addition to the above cited 522 vouchers. ECC/HANH does not anticipate any changes to the initiative or metrics and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing housing choice.

**Initiative 1.12 – Development of Replacement Public Housing Units with MTW Block Grant Funds**

This initiative was approved in FY13 and implemented in FY14. ECC/HANH has been very active in redeveloping and repositioning its aging public housing stock by leveraging private investment through the mixed-finance process and replacing demolished units with a variety of affordable housing types, including public housing, project-based vouchers and tax credit units. ECC/HANH has also been at the forefront of using its MTW authority creatively to complement and enhance these efforts.

In FY13, ECC/HANH proposed to begin a new initiative to develop public housing replacement units with MTW block grant funds while making use of MTW authority to waive or substitute certain program rules. ECC/HANH intended to pursue this initiative at certain specific sites in FY 13, including Farnam Courts and Abraham Ribicoff Cottages and Extensions, but intended to use this same model at other sites to be identified in the future.

Essentially, ECC/HANH will use MTW block grant funds (which are drawn collectively from public housing Operating Funds and Capital Funds and Section 8 Housing Choice Voucher funds) to develop public housing units through a mixed-finance process. The units will be operated as public housing for purposes of admissions, continued occupancy, resident rights, and certain other rules. However, for purposes of providing ongoing operating assistance, ECC/HANH will use its MTW authority to design and fund a local program to develop replacement public housing units under a local housing assistance payments contract with the owner entity, with operating assistance being utilized in a manner similar to the project-based voucher program. Among other things, this approach will allow ECC/HANH to pay debt service on private loans taken out to support redevelopment projects. To the extent necessary, under its MTW authority ECC/HANH will revise required forms to provide for this mix of applicable rules and seek any necessary HUD approvals.

ECC/HANH’s need to implement this initiative has been limited due to the RAD portfolio award. This approach may be applied to developments not selected or appropriate for RAD conversion.

ECC/HANH does anticipate changes to the initiative or metrics by adding the number of days a unit remains available to lease. In addition, the impact statement will be revised. This initiative meets the statutory objective of increasing housing choice.

**Initiative 2.1 – Family Self-Sufficiency (FSS) Program**

Approved and implemented in FY07.

**Description and Status**

ECC/HANH’s FSS program provides intensive counseling and case management services to help participant families achieve their self-sufficiency goals, according to each family’s needs. Adding new services has allowed ECC/HANH to provide much needed support to a larger number of LIPIH and Section 8 residents. Service referrals focus on:
• remedial education
• literacy classes
• GED preparation
• vocational and job skills/employability
• financial management

Since its implementation in FY07, ECC/HANH has continued to add new services and programs for participants. For example, ECC/HANH has invested in computer Learning Labs that offer services to assist families move toward self-sufficiency. ECC/HANH also created a specialized training program that offers training in fields with employment opportunities in New Haven, such as healthcare or automobile repair. This program aims to provide residents the skills necessary to obtain employment or increase earnings. ECC/HANH continues to provide classes and trainings to residents that are experiencing barriers to employment. Classes include, but are not limited to:

• pre-GED
• GED
• literacy
• financial literacy
• basic, intermediate, and advanced computer training
• job skills and life skills classes prior to applying for jobs

The MTW FSS program serves over 1,150 families. This includes:

• 570 Elderly/Disabled households
• 260 identified work-able families enrolled in MTW funded slots
• 178 families enrolled in the CARES Program
• 100 families enrolled in the HUD FSS grant-funded slots
• 60 Section Eight Homeownership Program (SEHOP) vouchers

The following table details the number of enrollment slots for each program.

<table>
<thead>
<tr>
<th>Program</th>
<th>Number of Slots</th>
<th>Benefits from Escrow</th>
<th>Owner</th>
<th>Supports</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD FSS Grant Funded Slots</td>
<td>150</td>
<td>Yes</td>
<td>FSS Coordinators</td>
<td>RSCs, CED Managers &amp; Supervisors, MSW</td>
</tr>
<tr>
<td>CARES Program</td>
<td>Up to 178</td>
<td>Yes</td>
<td>CARES Coordinator</td>
<td>CED Managers &amp; Supervisors, MSW</td>
</tr>
<tr>
<td>Work-able families</td>
<td>60</td>
<td>Yes</td>
<td>Program Managers</td>
<td>FSS Coordinators, CED Managers &amp; Supervisors, RSCs &amp; MSW</td>
</tr>
<tr>
<td></td>
<td>200</td>
<td>Yes</td>
<td>FSS Coordinators</td>
<td></td>
</tr>
</tbody>
</table>
Impact

This initiative is expected to increase the self-sufficiency of residents through employment, specialized training, higher education, and increased earnings. Currently, every FSS participant can attend workshops and seminars offered by the CED Family Self Sufficiency and Resident Owned Business programs. ECC/HANH also coordinates programs through the Connecticut Association Human Services, CONNCAT Training School, and HUD Homebuyer seminars, among other resources.

In FY20, ECC/HANH continued to work with the Planning Coordinating Committee (PCC), made up of community partners, to provide training and resources to assist FSS participants in achieving self-sufficiency goals. Participating residents receive assistance in securing gainful employment as well as onsite job training through partnerships with local employers.

Additionally, through the Connect Home Initiative, 100 tablets have been purchased for use in the FSS program to help bridge the digital divide for residents who are seeking employment. The tablets will be used for both job search assistance and skills development. Participants will be able to utilize the tablets at home and during onsite sessions with coordinators.

In addition to the training and resources made available to residents, CED staff, including FSS staff, have also undergone training to be able to offer more information and expertise to program participants. For example, all staff have received a “Your Money, Your Goals” financial literacy training, which is also offered to all participants. A partnership with the City of New Haven Financial Empowerment Center has also just been secured to bring credit counseling training to staff, as well as onsite credit counseling and training to participants in the program. In addition, in FY19, CED staff, including Managers and Supervisors, FSS and Resident Service Coordinators, and the Recreational Therapist, received training in one-on-one budgeting through a grant from the Consumer Financial Protection Bureau as well as a self-sufficiency service coordination group facilitation training through Nan McKay, to assist in working directly with residents. Staff will now be able to provide workshops and 1:1 budget counseling to residents onsite at developments.

FSS will continue to offer programming beneficial to all residents, including a focus on empowerment, childcare, financial literacy, and mental health. In FY20, ECC/HANH will continue to promote class offerings to better serve residents’ needs and will continue to partner with other agencies that are a part of the Program Coordinating Committee (PCC). With the services provided by ECC/HANH to include computer classes, job skills training and assisting families in finding employment, ECC/HANH expects the average household earnings will increase and residents will continue to meet self-sufficiency goals.

Training and resources in FY20 included:
- FSS offered many onsite programs, including computer literacy classes, financial literacy classes, that are offered in rotation at various Learning Labs throughout the portfolio. Through these efforts 115 residents have participated at ECC/HANH Learning Labs.
- 24 residents participated in an on-site basic computer program and received a desktop computer through a local community partner
- 58 households completed their tax returns utilizing on site VITA tax services provided at Learning Labs (services stopped before the end of the tax season due to COVID-19)
- Financial Literacy Workshops Provided Onsite:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Registered</th>
<th>Completed</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>How to Spend During the Holidays</td>
<td>65</td>
<td>65</td>
<td>100%</td>
</tr>
<tr>
<td>Preparing for Tax Season with VITA Tax Services</td>
<td>54</td>
<td>54</td>
<td>100%</td>
</tr>
</tbody>
</table>
In FY20, CED launched Digital Inclusion Plan at an event with over 100 residents in attendance. Through the Connect Home Initiative, 100 tablets have been purchased for use in the FSS program to help bridge the digital divide for residents who are seeking employment. The tablets will be used for both job search assistance and skills development. Participants will be able to utilize the tablets at home and during onsite sessions with coordinators. Partnerships with the City of New Haven Financial Empowerment Center, Computers for Adaptive Learning and United Way to provide digital services to encourage financial literacy, budgeting, savings match, resume writing and job search skills.

Those being served are receiving intensive supportive services, such as case management, on site programming access to an escrow account. While most intensive supportive services are provided during the first two years of the program, all participants continue to be able to avail themselves of support as needed. ECC/HANH anticipates that as barriers and service needs are addressed, the need for such intensive support will wane.

FSS will continue to offer programming beneficial to all residents, including a focus on empowerment, childcare, financial literacy, and mental health. During FY22, ECC/HANH will continue to promote class offerings to better serve residents’ needs and will continue to partner with other agencies that are a part of the Program Coordinating Committee (PCC). With the services provided by ECC/HANH to include computer classes, job skills training and assisting families in finding employment, ECC/HANH expects the average household earnings will increase and residents will continue to meet self-sufficiency goals.

ECC/HANH does not expect to make any significant changes to this initiative.

**Initiative 4.7F REACH Grant.** Incentive Grant Program for ECC/HANH Residents Participating in Agency’s Family Self Sufficiency Program.

**Approved FY19**

Establishment of Incentive Grant Program for ECC/HANH Residents participating in Agency’s Family Self-Sufficiency Program, the REACH Grant will provide cash assistance to residents seeking to achieve defined self-sufficiency goals. (Participants do not include residents enrolled in HUD FSS Program or ECC/HANH CARES Program).

**Activity Description**

ECC/HANH proposes to phase out and replace the Earned Income Exclusion program with the REACH Grant Program. ECC/HANH residents that have elected to participate in the agency Non-HUD FSS Program, will be able to apply for and receive up to $500 per year for up to 5-years to support their achievement of goals that they have established for themselves as part of the Individuals Self Sufficiency Plan. REACH Grant funds will be managed by FSS Case Managers.

The REACH Grant Program seeks to reduce barriers and facilitate short term wins for residents as they move toward self-sufficiency. REACH grant funds will not roll over from year-to-year. The intent of not having funds carry forward for one year to the next is place an emphasis of goal achievement during each year of participation. This is a departure for previous programs that the Agency has established, like with the CARES Program and from the traditional HUD FSS Program, where participants can become eligible build or grow dollars in escrow accounts, which can be used to purchase automobiles, down payment for home purchase or educational expenses.

Instead the REACH Grant aims to support our residents in different ways. It is designed to be an accelerator that seeks to make the first or next step in a resident’s pursuit of their goals possible, without a great deal of bureaucracy, but with full transparency.

We anticipate that REACH Grant Funds will be used by residents in the following ways:
In establishing the REACH Grant program, ECC/HANH is attempting to determine if there is a direct correlation between receiving incentives and goal achievement for participants in the FSS Program. Grant awards must be made in the context of the Self-Sufficiency Goals that have been established by the participant and will be tracked using ECC/HANH new Case Management System. The case management system will be linked directly with Service Providers. FSS Case Managers will be able to see the impact of the REACH Grant on performance of success of our participants in real time, with the goal of not only being able to show the impact of how these funds are impacting the lives of our participants, but also to illustrate how small incentives have an impact of reducing subsidies.

Statutory objectives.

1) To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.

REACH Grant provides support to head of households and is designed to provide resources to overcome barriers or obstacles that often prevent individuals for moving forward or achievement of a defined goal. We very much see the REACH Grant Program as the “But for Stopper”. The program model is designed to give individuals the resource they need to move forward, without making them dependent on the resource for their future success.

2) Achieve Agency Cost Savings

The REACH Program will replace the Agencies IEE Program. Under the terms of the IEE Program that agency assumes the costs for the rent discounts that were applied for all program participants, regardless of whether or not they met the objectives of the initiative. We believe that the REACH Grant Program will not only result in agency cost savings in terms of the cost of program cost per resident, we also believe that impact of the REACH Grant will be more measurable than IEE Program that it is replacing.

Participants will work directly with FSS Case Managers for the receipt of REACH Grant Funds. In the event of a dispute or disagreement concerning the release of REACH Grant Funds to an eligible participant, the final decision concerning the grant award will be made by the ECC/HANH CED Director or his/her designee.

Results for this activity will be reviewed annually as part of the ECC/HANH MTW Report Submission to HUD. Changes to the program model will be made at that time. Changes to the program will be the result of performance or resource levels.

ECC/HANH is in the process of phasing out the IEE program and will launch the REACH program during FY22. During FY20, preparations were made to prepare and launch the program.

Initiative 2.5F Redevelopment of McConaughy Terrace units from LIPH to PBV/RAD

Proposed for FY 2022 McConaughy Terrace RAD conversion

A. Activity Description
   i. Describe the proposed activity.

ECC/HANH is proposing to undertake the redevelopment of McConaughy Terrace and convert the property to a Project based Voucher model using the Rental Assistance Demonstration Program (RAD). McConaughy Terrace currently contains 201 units of townhouse style family rental units within two different building types. These building types...
include four-unit buildings referred to as 4-plexes and traditional horizontal townhouse units containing 6 units each. McConaughey Terrace was built in the 1940s and has been reduced in decades past from its original design which included 291 units, including units removed to create a central park for residents and families. McConaughey is the largest ECC/HANH family development on the west side of New Haven and its continued operation as affordable family housing is necessary to assure continued affordability in New Haven. McConaughey provides employment and shopping opportunities due to its proximity to the commercial and employment corridor of State Route 63/Whalley Avenue and the site is served by both local and regional transportation services.

The long-term sustainability of McConaughey Terrace is at risk without the substantial rehabilitation of the existing on-site units. The redevelopment plan is to substantially rehabilitate all existing units and to construct up to 40 additional units by constructing new buildings similar in size and scale to the existing 4-plex units currently located within the development. The expansion of existing affordable units will help to address the overwhelming need for affordable housing in the New Haven area. The new proposed units will be constructed per ECC/HANH’s sustainable design standards. These design standards require the inclusion of more costly, yet sustainable, construction standards including but not limited to cementitious siding, quality flooring, and energy efficient HVAC and design components. To the extent feasible, the rehabilitation goal of existing units will increase energy efficiency and incorporate other sustainability measures. The development plan will also include the addition of market rate units within the newly constructed buildings, which is recognized as a successful method of economically integrating affordable developments and improving sustainability. The redevelopment will also include supportive services with a goal of improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

iii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

The redevelopment of McConaughey Terrace will meet two of the statutory objectives: a) improving housing choice and c) being more cost effective. McConaughey Terrace would be a long-term occupancy risk without the substantial rehabilitation proposed in this initiative. Under the RAD conversion model, all current physical needs will be addressed, and reserves will be established which assure capital funding for the first 20 years of operation. This will assure that this valuable family development will remain as affordable housing. The inclusion of new affordable and market rate units in an expanded development as described in A.i. will also improve housing choice by creating new affordable units. The redeveloped McConaughey Terrace will also be more cost effective to operate since the identified long-term capital needs will be addressed through the rehabilitation or reserves established under the mixed-finance model described. The RAD Project Based Voucher Model will also assure a more market reflective income and operating budget allowing for a more cost-effective management of the development.

iv. Provide the anticipated schedule for implementing the proposed activity.

Due to the high substantial rehabilitation costs, the redevelopment of McConaughey Terrace is only feasible through a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. ECC/HANH, through its development instrumentality The Glendower Group, intends to apply for 2020 9% Low Income Housing Tax Credits. If awarded under the 2020 9% LIHTC round, a financial closing will be targeted for the last quarter of 2022. It is anticipated that construction will take 18 months to assure that all required relocation activities will comply with the Uniform Relocation Act, applicable RAD notices, and family needs. Under this scenario the redevelopment will be complete, and all units re-occupied by the end of calendar year 2023.

B. Activities metrics Information

i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total cost of task in dollars (decrease)</td>
<td>Cost of task prior to implementation of the activity (in dollars)</td>
<td>Expected cost of task after implementation of the activity (in dollars)</td>
<td>Actual cost of task after implementation of the activity (in dollars)</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

CE #4: Increase in Resources Leveraged
<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of funds leveraged in dollars (increase).</td>
<td>Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.</td>
<td>Expected amount leveraged after implementation of the activity (in dollars).</td>
<td>Actual amount leveraged after implementation of the activity (in dollars).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

**HC #1: Additional Units of Housing Made Available**

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.</td>
<td>Housing units of this type prior to implementation of the activity (number). This number may be zero.</td>
<td>Expected housing units of this type after implementation of the activity (number).</td>
<td>Actual housing units of this type after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

**HC #2: Units of Housing Preserved**

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.</td>
<td>Housing units preserved prior to implementation of the activity (number).</td>
<td>Expected housing units preserved after implementation of the activity (number).</td>
<td>Actual housing units preserved after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

ii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity. 201 units to be preserved at baseline.

iii. Give the annual benchmark for each metric (a numeric value). N/A

iv. If applicable, give the overall and/or long-term benchmark(s) for each metric (a numeric value). TBD

v. Give the data source from which the metric data will be compiled.

ECC/HANH & Glendower Group tracking spreadsheets and software, including Emphasys Elite.

C. Cost Implications

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

There are both positive and negative cost implications associated with the redevelopment of McConaughy Terrace. The long-term implications are positive since the mixed finance proposal will allow for long term capital needs to be addressed through construction and the establishment of reserve accounts. Operations will also see cost savings based on the conversion to PBVs and the management of the property through the ECC/HANH instrumentality the 360 Group. Negative cost implications may include MTW flexibility through the provision of capital funds and RAD PBV overhang.
to assure that the development is both economically sustainable and competitive under the various funding rounds required to maximize non-MTW funding such as 4% LIHTC, 9% LIHTC, state capital funding, and private financing.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount, and discuss how the MTW PHA will manage the surplus or deficit anticipated.

Final cost implications will possibly include the inclusion of MTW capital funds as well as the differential in the RAD rents for McConaughy versus the fair market rents, known as the RAD overhang. Using projections based on current interest rates and LIHTC equity raise rates, it is anticipated that the McConaughy redevelopment would require approximately $3,000,000 in MTW capital funds and $200,000 annually in RAD rent overhang assistance. These are estimates based on current modeling and may possibly change as interest rate and the equity market change over time. Covid-19 could potentially impact costs as well as construction schedules and plans anticipate potential delays in construction and delivery of materials. This could be impacted in positive manner with the eventual abatement of Covid-19 impacts.

D. Need/Justification for MTW Flexibility

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

1. Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities

2. Attachment C. B. 1. b. vii. Single Fund Budget with Full Flexibility. If the agency chooses to establish single fund flexibility, the agency is authorized to use housing assistance payments for purposes other than payments to owners, so long as these purposes are consistent with other eligible uses of section 8 and section 9 funds.

3. Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.

4. Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period when vouchers expire and when vouchers will be reissued.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity. Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorizations that are applicable to an activity when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to the activity to include the correct authorization.

The above cited authorizations are required for this initiative as it involves use of single fund flexibility. The proposal includes the construction of 26 new units, include 10 ADA compliant units. McConaughy Terrace does currently not include any ADA units. The McConaughy Terrace site contains large underutilized sections. The construction of these new units will be constructed in a size and scale that is appropriate to the existing buildings in the site and neighborhood. In addition to the ADA units, the newly constructed units will include several 1-bedroom units which are not currently offered at the site, allowing for aging in place.

A. Rent Reform/ Term Limit Information (if applicable)

i. Impact analysis- Not applicable

ii. Hardship Case Criteria – not applicable

iii. Description of Annual Reevaluation – not applicable

iv. Transition Period- ECC/HANH expects to discontinue offering this incentive at the end of the two-year period. The families receiving services at the time of the end of program shall receive their benefit as stated in the agreement. Any families on the waitlist for the incentive will be notified.

V: Approved Initiatives Requiring Funding Flexibility Only

Initiative 3.10F Vacancy Reduction
This initiative was implemented in FY08.
ECC/HANH will continue to show improvement from the baseline FY2008 vacancy rate of 10%. Efforts will continue during FY 2022. ECC/HANH currently uses the funding flexibility to perform more unit turn over to reach an Occupancy percentage of 96%. The Agency has set a standard of unit turns by bedroom size. Typically, a 0- or 1-bedroom unit turn should occur within a 5 week period. A larger 3-5-bedroom unit may take several weeks particularly if hazardous materials (asbestos/lead) have been found in the unit. Funding allows the Agency to bulk, abate hazardous materials, renovate the unit, and manage all administrative functions supporting vacancy reduction. The Agency continues to identify resources and process to streamline vacancy reduction.

Elm City Communities is undergoing a major capital investment effort fueled in part by a RAD portfolio award. Conversion and modernization of significant numbers of units requires major scale resident relocation. These awards also indicate that parts of the portfolio needed significant rehabilitation. As such, as we move aggressively through these redevelopment efforts there will be impacts on our occupancy/vacancy rates. We will not house residents in units that are substandard. Many units that are scheduled for RAD redevelopment are in substandard condition requiring an investment to turn the unit. Turning a unit that is scheduled for redevelopment is an inefficient use of limited federal dollars. As such, we are balancing our redevelopment plan with our agency-wide vacancy reduction efforts. Elm City Communities is committed to reducing its vacancies and increasing its occupancy percentage.

Most of the units that have been vacant in excess of 180 days are units that are connected to a RAD or Modernization project which is scheduled to close between June 2020 and October 2020. The following schedule will highlight proposed closing dates and dwelling unit impacts for RAD/Modernization projects through 2020. Please note the vacant units identified in the conversions will not be re-occupied prior to the closing. Additionally, many units are readied for occupancy in order to be used for relocation for the residents in development undergoing RAD conversions. As such, our team readiness a unit and transfers a resident into that unit. The unit that becomes vacated then shows as vacant even though it is scheduled for disposition.

**Initiative 4.1F Resident Owned Business Development**

This initiative was approved and implemented in FY09.

ECC/HANH continues to strengthen Resident Owned Business (ROB) Development by providing technical assistance; business and financial capacity assessments; business entity formation, development of business plans, business conduct; bookkeeping and financial management; obtaining liability insurance; licensing, understanding the bonding process and other business growth training and supports. ECC/HANH ROB services cover both construction and non-construction Section 3 ROB/Vendors.

Under this program ECC/HANH serves residents that start their own businesses by providing technical assistance services. ECC/HANH support includes the following:

- Aid in the outreach, recruitment, and potential contractor’s capacity assessment.
- Provide a computerized database for Section 3, MBE, WBE and other small businesses to access for potential contract opportunities. Provide computer access for Resident Owned Businesses (“ROBs”) to obtain information on construction contract advertisements and communicate with other owners regarding potential contracting opportunities.
- Provide one on one consultation with Resident Owned Businesses once a week.
- Provide quarterly training workshops for participants that will assist Resident Owned Businesses in gaining a better understanding of ownership and basic business tools required to successfully operate a newly formed business. This will include, but is not limited to, instructional training in business plans development and business conduct, OSHA 10, bookkeeping and clerical, financial and payroll management, contract negotiating and cost estimating skills.

ECC/HANH continues to provide a revolving loan fund to which ROBs may apply for loans up to $25,000 by submitting a bona fide business plan and letter of intent for a pending contract award option. The prerequisites for the loan program are 1) only ECC/HANH Resident Owned Business Concerns may apply for the revolving loans; and 2) the business’ Principal must commit to enrolling into ECC/HANH’s Family Self Sufficiency Program (“FSS”). FSS has been designed to work specifically with participants on basic personal financial capability skills such as workshops on credit, basics of
banking, budgeting, saving, and insurance. Loan applications are reviewed by an ECC/HANH loan committee. Loan repayments are scheduled over a 12-month period. A total of $250,000 in MTW flexible funds are dedicated to the Revolving Loan Fund.

The ROBs are based on resident areas of interest and have included services in the construction trades, food truck operation, child care, transportation, and consulting areas.

There are currently 8 Resident Owned Businesses. In 2020, ECC/HANH will be working to add more businesses to the ROB portfolio by completing additional outreach and providing more information to the residents of ECC/HANH.

For FY 21 ECC/HANH does not anticipate any changes to the initiative and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing family self-sufficiency.

Initiative 4.2F SEHOP Capital Improvement Program

ECC/HANH launched the SEHOP (Section Eight Homeownership Program) Capital Improvement Program in FY2010. This program supports new homeowners with necessary capital improvements costing $500.00 or more that arise after being in the home for a minimum of three years. In reviewing this initiative, ECC/HANH determined that the need for this service is low. Families are purchasing homes with newer systems, roofs, and windows; making it less likely for families to request assistance.

In FY19 ECC/HANH made the decision to close and phase out this initiative. Only those with a current contract will have access to the program until the contract expires, or program participation ends. This program will continue to be monitored and reported on during FY22.

Initiative 2.2 – Incremental Earned Income Exclusion

This initiative was approved and implemented in FY08. ECC/HANH believes promoting self-sufficiency is most effectively accomplished through helping residents to access services and supports, while also assisting residents to have greater choice in allocating their limited resources. Incremental Earnings Exclusion is phased increases of the determination of earned income over the five-year term of a family’s participation in the FSS program. For example, ECC/HANH will exclude from the determination of annual income 100% of any incremental earnings from wages or salaries earned by any family member during the first year.

- Where the earned income increases (from the effective date of contract) of participants is excluded in increments according to the year of participation: 1st year of participation = 100%, 2nd year of participation = 75%, 3rd year of participation = 50%, 4th year of participation = 25%, 5th year of participation = 0%. During the 5th year, FSS staff will include all earned income in rent calculations.
- Note that during this period, if there is a contract, participants will not earn escrow benefits during the 1st year and may or may not during the following based on the rent increase and income exclusions.

This initiative is in the phase out mode since October 1 of FY19. As of said date, no new participants will be added to the IEE program. ECC/HANH is replacing this Initiative with a new initiative, REACH.

This initiative meets the statutory objective of increasing family self-sufficiency and will be closed out once all current participants have cycled through. Phase out of this program is still occurring during FY22.

Initiative 4.3F Prison Community Reentry

This initiative was approved in FY09 and implemented in FY10.

Under this program ECC/HANH serves individuals who have reentered society after completing a prison sentence. ECC/HANH offers mentoring, training, and housing for individuals that qualify for this program. ECC/HANH reentry
program candidates are referred by the City of New Haven. ECC/HANH interviews candidates immediately following referral, assessing not only their needs, but their strengths and the challenges they will likely face as they work to rejoin the community. Upon acceptance to the program, participants sign a one-year lease, affording them housing while they work toward their reentry goals. The goals are identified in an individualized service plan. Participants who suffer with a mental health illness and/or a substance use/abuse disorder must be compliant with treatment and employed or in a training program. They must also comply with probation or parole requirements. After one year, progress is assessed. Participants who have successfully achieved their individual service plan goals complete the program and are eligible to remain in housing. Individuals who have not met their service plan goals by the one-year mark can remain in the program as they continue to work toward their goals. Individuals participating in the program are expected to be lease compliant i.e. pay rent on time and will not be a nuisance to other residents.

Under this initiative ECC/HANH seeks to house individuals who have reentered society after completing a prison sentence. We currently have 3 segments of reentry. 1 for our Low-Income Public Housing (LIPH) and another for our Housing Choice Voucher (HCV) programs for New Admissions. The 3rd is the addition of the Family Reunification program where individuals coming from incarceration may be able to be added to a current ECC/HANH household under both LIPH and HCV.

After one year of case management, progress is assessed. Participants who have successfully achieved their individual service plan goals complete the program and are eligible to remain in housing. Individuals who have not met their service plan goals by the one-year mark can remain in the program as they continue to work toward their goals. Individuals participating in the program are expected to participate in family self-sufficiency services, be lease compliant i.e. pay rent on time and will not be a nuisance to other residents.

We envision that moving forward all families will be required to engage with our Self Sufficiency unit. The FSS unit will refer the families to the community partners that offer specialized training for our families to increase their employability which in turn fosters movement toward increased income and self-sufficiency.

Programs that fall under the reentry initiative include, Project Longevity under the Housing Choice Voucher Program, Fresh Start under the Low-Income Public Housing Program, and Family Reunification under both HCV & LIPH.

During FY22, we are updating the way families are able to enter the program by expanding entry opportunities. In prior years, there were a set number of slots per subsidy program. Starting October of 2022, 1 out of every 10 New Admissions (10% per year) will be set aside in each subsidy program and the cap on number of vouchers will be lifted. In other words, as long as we meet the 1 out of every 10, we can take on as many new participants as allowed under this process. All other features of the program will remain the same, with the exception of Family reunification being added to the count.

**Initiative 4.4F Resident Services for Elderly/Disabled**

This initiative was approved and implemented in FY03. No amendments have been made. Under this program ECC/HANH serves individuals who are elderly and/or disabled.

ECC/HANH offers a full array of self-sufficiency services that require flexibility in the use of ECC/HANH’s dollars to fund staff and contractual costs associated with mental health and substance abuse services provided on site in ECC/HANH’s mixed population developments. These services include, but are not limited to: Individual Psychosocial assessments, coordination of services, visiting nurses, home health aides, occupational therapist, provision of education regarding nutrition, exercise, mental health and substance abuse, engagement and outreach, skill building regarding housekeeping, financial literacy, recreational services, and crisis intervention.

On average each RSC will have a caseload of about 340 residents; case workers assess the participant’s needs, and create action plans for each individual, and depending on the level of need, meet with the residents as often as weekly to bi-monthly. Participants receive services specific to their needs. The program is geared toward keeping the residents in their units, and in the community by assisting them with coordination of lease compliance and accessing programs, & health services in the community. The team is also providing the services of a MSW to all the senior and disabled buildings. As
 Initiative 4.6F: Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities

Approved and implemented in FY17

Description of Activity: In 2017, ECC/HANH initiated the planning and formation of new affiliate-instrumentality entities to support the agency’s short term and long-term plans to establish a new corporate structure, better align revenues, and provide more coordinated and effective services to residents. These new instrumentality entities will be vehicles for ECC/HANH to partner with financial institutions and other investors to continue to redevelop and modernize the ECC/HANH portfolio of properties and support the agency’s mission of creating and preserving affordable housing opportunities and supportive services for low income and working families, the elderly and persons with disabilities. The business activities of these instrumentality entities will include: 1) Property management and consultant services 2) Development of mixed-use and mixed-income real estate projects, and 3) Social services and program activities for ECC/HANH owned and non-owned developments.

Through the establishment of new affiliate entities, ECC/HANH seeks to achieve the following: 1) reduce costs and achieve greater cost effectiveness of federal expenditures, 2) give incentives to families with children whose heads of household are working, seeking work, or are participating in job training or other programming that assists in obtaining employment and becoming economically self-sufficient, and 3) increase housing choices for low-income families.

The Formation of 360 Management Group Company

Impact Analysis: The formation of 360 Management Group Company, ECC/HANH’s property management affiliate-instrumentality contributed to the reduction of the agency’s cost reduction and greater cost effectiveness goals. The property management instrumentality received its 501 (c) (3) status in March 2018 and it assumed the property operations and compliance management of 456 units including RAD 1 Group and TwinBrook.

On May 15, 2018, ECC/HANH enhanced housing choice options with the conversion of 144 LIPH units to RAD 1 Group utilizing 18% of the targeted leverage goal of $60M from proposed RAD Conversion activities. The properties were Katherine Harvey Terrace, New Hall Gardens, Prescott Bush and Constance Baker Motley. Also included were, TwinBrook, also referred to as Ribicoff 4% and Ribicoff 9%, totally 106 units.

The proposed expenses related to the property management related activities was anticipated to be $800,732; in 2018 the property management related expenses totaled $630,830.23 - a decrease in the 1st year of 27%. Additionally, total operating costs for RAD 1 Group and TwinBrook decreased 140% from $1,845,476 to $770,321.

The MTW 2020 goals of 360 Management Group Company is to continue to reduce costs and increase cost efficiency by improving operations, increasing rent collection rates, and reducing vacancy rates to align with affordable housing industry standards.

In addition, 360 Management Group Company will increase its portfolio by another 488 for a total of 944 units with the RAD conversion of Fulton Park, Stanley Justice and Waverly (converted as of April 1, 2019), McQueeney and Celentano (anticipated to convert in October, 2019), and Ruoppolo and Fairmont Heights (anticipated to convert in early, 2020).

Finally, 360 Management Group Company will collaborate with the proposed Resident Services instrumentality to develop a business model to sell professional property management and resident services to other nonprofit or for profit companies that require expertise in compliance, property management and resident services in mixed income, affordable housing developments (e.g., LIHTC, inclusionary housing).

The Formation of a Resident Services Instrumentality

ECC/HANH is committed to creating resident services programming which gives incentives to families with children whose heads of household are working, seeking work, or are participating in job training or other programming that assists in obtaining employment and becoming economically self-sufficient. Currently these services are coordinated by ECC/HANH’s Community and Economic Development division that provides educational and workforce training, job placement, after-school youth and teen programs, mentoring, youth employment – all to link community resources to the families to achieve health and wellness, and financial literacy. In addition, ECC/HANH strives to connect Elderly/Disabled residents to resources and supportive services, in the areas of health and wellness, financial literacy, education and socialization to ensure residents remain independently housed, and achieve maximum quality of life through the provision of a variety of supportive care services. Resident services are also integral to improving the performance of ECC/HANH’s
public housing and affordable housing properties by reducing turnover, evictions, and preserving vibrant and well-maintained communities.

In accordance with Strategic Plan 2016-18, ECC/HANH MTW 2020 goal is to establish a nonprofit 501(c)3 Resident Services instrumentality. The purpose of the instrumentality is to create a social services affiliate organization dedicated to supporting and serving low-income residents of New Haven and surrounding communities, particularly those living in Elm City Communities’ affordable housing communities. This organization will provide services to residents directly and will coordinate activities with other community based partners.

A primary purpose of establishing a Resident Services instrumentality is to pursue revenue-generating opportunities that may not be available to a public housing authority. Using federal MTW funds, ECC/HANH currently supports a wide range of services for residents. However in light of changes or the expansion of ECC/HANH’s MTW funded initiatives, continued funding for resident services will be limited. The Strategic plan anticipates that the Resident Services instrumentality will ultimately secure funding through non-MTW funds to support at least 50% of residents’ services currently funded MTW sources.

The MTW 2020 proposed Resident Services instrumentality activities include: 1) identifying seed money or a loan commitment to support the initial activities to create a legal entity structure and to apply for 501 (c) 03 status; 2) develop a plan to structure the social services non-profit for maximum flexibility including marketing, staffing, salaries, and size so that it is fully funded by professional service fees and other non-MTW funds; 3) collaborate with Property Management to develop a business model to sell professional services in compliance, property management and resident service; and 4) engage a grant writer to assist in grant writing and the development of a comprehensive fundraising plan.

<table>
<thead>
<tr>
<th>Objectives MTW 2020</th>
<th>Time Frame</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify Seed Money/Loan Commitment</td>
<td>January, 2020</td>
</tr>
<tr>
<td>Create legal entity for Resident Services</td>
<td>April, 2020</td>
</tr>
<tr>
<td>Apply for 501 (c) 03 status</td>
<td>June, 2020</td>
</tr>
<tr>
<td>Structure the social services non-profit for maximum flexibility including marketing, staffing, salaries, and size so that it is fully funded by professional service fees and other non-MTW funds.</td>
<td>July, 2020</td>
</tr>
<tr>
<td>Collaborate with Property Management to develop business model to sell professional services</td>
<td>September, 2020</td>
</tr>
<tr>
<td>Engage a grant writer to assist in grant writing and the development of a fundraising plan.</td>
<td>December, 2020</td>
</tr>
</tbody>
</table>

**Initiative 4.10F Jumpstart Initiative – incentivizing higher income families to exit subsidized program**

Approved and Implemented in FY20

Description of Activity: This initiative has been created to assist higher income residents and participants to exit subsidized programs in advance of required program termination for over-income status. This initiative is designed to offer families the incentive and the resource needed to enter the private rental market or obtain unassisted homeownership.

National estimates indicate that 40% of US households cannot manage a $400 emergency expense. This highlights a national issue around families having sufficient savings to create a safety net for themselves. The lack of such savings makes it difficult for otherwise income ready families to exit subsidized housing.
In order to rent in the private market in New Haven landlords often charge one month security and first and last month’s rent. Typical security deposits held by ECC/HANH are $246. The gap between what a family may get back upon moving out and the amount needed to lease an unassisted unit may prove prohibitive to residents seeking their first apartment.

Meanwhile, ECC/HANH has an extensive waitlist of over 10,000 families waiting for opportunities to access needed supports through the LIPH and HCV programs. Currently, on an annual basis, 150 LIPH families and 100 HCV families end participation in the program. At this rate, it would take almost 40 years to work through the existing families on the waitlist.

Currently there are 51 LIPH and 130 HCV families reporting an income above the Low Income Limit. This is the targeted universe for the Jumpstart initiative (181 families). By offering families a one-time incentive payment based upon the average amount needed to rent in the private market, we seek to accelerate the move out/end of participation of higher income families allowing us to house a family off the waitlist.

As a new program, we anticipate a conservative enrollment during year one of 25% of eligible families seeking to enroll. This represents a 15% increase in annual EOPs. Upon enrollment, families will enter into a Jumpstart initiative agreement that allows them to end their participation with ECC/HANH’s LIPH or HCV program and provide to them the Jumpstart payment so long as:

1. The current unit passes housekeeping inspection with no damage beyond normal wear and tear.
2. The families is currently in good standing with regard to rental payments and other terms of the lease agreement.
3. The family is not under a repayment agreement.
4. The family can document an appropriate exit plan including having obtained new housing – rental or ownership.
5. The family understands that should they wish to return to subsidized housing they will need to go through the standard application process.

The family agrees to participate in follow up data collection and evaluation upon their exit to allow us to track the success of the initiative.

Payments will be made to families upon execution of the agreement along the following schedule and in amounts not to exceed the amounts below which are based upon currently Fair Market Rents:

<table>
<thead>
<tr>
<th>BR size</th>
<th>Security deposit</th>
<th>1st month</th>
<th>Last month</th>
<th>Subtotal</th>
<th>ECC/HANH low income refund</th>
<th>Total exposure</th>
<th>% anticipated to enroll</th>
<th>Total cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>965</td>
<td>965</td>
<td>965</td>
<td>2,895</td>
<td>72 $209,918</td>
<td>25%</td>
<td>18 $53,402</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>1,074</td>
<td>1,074</td>
<td>1,074</td>
<td>3,222</td>
<td>42 $134,132</td>
<td>25%</td>
<td>10 $33,533</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>1,299</td>
<td>1,299</td>
<td>1,299</td>
<td>3,897</td>
<td>33 $126,964</td>
<td>25%</td>
<td>8 $31,741</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>1,662</td>
<td>1,662</td>
<td>1,662</td>
<td>4,986</td>
<td>20 $99,271</td>
<td>25%</td>
<td>5 $24,818</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>1,979</td>
<td>1,979</td>
<td>1,979</td>
<td>5,937</td>
<td>14 $85,968</td>
<td>25%</td>
<td>4 $21,492</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>181 $405,983</td>
<td>25%</td>
<td>45 $163,983</td>
<td></td>
</tr>
</tbody>
</table>

Upon identification of a near over income family, the program will be explained to the family and a referral will be made to a Relocation Coordinator who will work directly with the family. The Relocation Coordinator will assist the family in identifying a unit in the private market.
Once landlord and resident have committed to the lease-up, ECC/HANH will provide the landlord with a promissory note detailing the payment amount and the requirements both the landlord and resident must fulfill in order to qualify. A check payment will be provided to the resident or landlord on the date of the EOP from ECC/HANH which is also the date of the new tenancy in the market rate unit. Upon move out of that unit, the security deposit, less any withholdings for damages, will be repaid to the resident for the resident’s use.

This program is subject to budget availability. Initial year budget is based upon the projections above. Subsequent year allocations will be informed by the results of the program. Should interest exceed budget allocations, the program shall be offered on a first come, first served basis.

Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective.

1. Increase Housing Choice for low income families
2. To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.

Impact Analyst

During FY20, a team of ECC/HANH staff met weekly to create program policies, procedures and forms associated with the jumpstart program. This program is scheduled to launch during the 1st quarter of FY22.

Activity Metrics Information

### SS #1: Increase in Household Income

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average earned income of households affected by this policy in dollars (increase). Families who graduated to self-sufficiency.</td>
<td>2020: Income at or above the HUD Low Income Limits (80%) by household size.</td>
<td>80% or above the Area Median Income by household size.</td>
<td>Actual average earned income of households affected by this policy prior to implementation (in dollars).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households receiving services aimed to increase self-sufficiency (increase). Total number of households receiving services under the jumpstart program per FY.</td>
<td>2020: 45 or 25% of the total number of families with income at or above the 80% AMI.</td>
<td>3% of total number of households served each year or 25% of eligible families per year (45 families based on first year total number of families who are at 80% of AMI or higher.</td>
<td>Actual number of households receiving self-sufficiency services after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>
### SS #8: Households Transitioned to Self Sufficiency

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Families who transitioned to self-sufficiency (graduated from the program). This includes families who transitioned to a market rate unit in the community or purchased a home without subsidized assistance.</td>
<td>2019: 181 Families who are above low income who are in the LIPH and HCV Program</td>
<td>15% Annual Increase in End of Participation (45 additional families through the Jumpstart Program)</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
<td></td>
</tr>
</tbody>
</table>

### HC #1: Additional Units of Housing Made Available

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). Number of units/vouchers made available as a result of families graduating to self-self-sufficiency under the Jumpstart Initiative.</td>
<td>2020: At Baseline we are ending participation for 250 families annually.</td>
<td>45 New Families housed annually as a result of housing made available when families in jumpstart transition to Self Sufficiency.</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
<td></td>
</tr>
</tbody>
</table>

No Significant Changes

**Major Redevelopment Efforts at West Rock (Previously Included Initiative 1.13)**

ECC/HANH received HUD approval to dispose of the Brookside property in FY2010. ECC/HANH requested approval of disposal of Rockview in FY12. Per HUD direction, Initiative 1.13 was folded into this Section V description since only single fund flexibility was required.

This project includes Brookside Phase I and II, Homeownership, 122 Wilmot and Rockview. During FY14, the Rockview Rental Phase I was completed and leased-up.

The West Rock revitalization is a project to redevelop two obsolete Public Housing developments, Rockview Terrace and Brookside, and one additional parcel that previously contained a commercial building. The 491 Public Housing units and the retail building that have stood on the three sites will be replaced with a mix of Project-Based Section 8/LIHTC rental, Public Housing/LIHTC rental and affordable homeownership housing totaling 472 units, along with 8,987 square feet of retail space at the 122 Wilmot site. The rental units will consist of 392 units, 352 family townhouse units and 40 senior units in a mid-rise building. The homeownership component will consist of 38 units.

The project will be carried out in multiple phases. The revitalization of the Brookside site will consist of two rental phases and one homeownership phase. The revitalization of the Rockview site will be carried out in two rental phases and two homeownership phases. The estimated cost of the revitalization of all three sites is $150-$200 million.
ECC/HANH has partnered with Michaels Development Company, a nationally known developer of affordable housing with a large portfolio, to redevelop the Rockview and Brookside public housing sites. Brookside, Rockview and the commercial space located at 122 Wilmot Road have all been demolished. During FY10, construction began on the infrastructure necessary for the Brookside rental and homeownerships phases.

The redevelopment of Rockview, Brookside and Wilmot Road are all part of ECC/HANH’s MTW Plan. ECC/HANH’s goals in undertaking the project are to replace the blighted public housing developments and commercial building on the three sites with high-quality, well-designed residential and commercial units, provide upgraded affordable rental and homeownership opportunities to residents, improved essential services to residents and improve the quality of the surrounding neighborhood and integrate it more fully into the surrounding city.

In FY14, Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road had been combined into this initiative. The following few paragraphs describe the additional activities formerly included in Initiative 1.13.

The Glendower Group, Inc., or an affiliate thereof, has developed a mixed-use facility at 122 Wilmot Road in accordance with 24 CFR 941, Subpart F and ECC/HANH’s MTW Agreement Attachment C, Section 14 of the Amended and Restated MTW Agreement. The 122 Wilmot Road is a part of the West Rock Redevelopment efforts of ECC/HANH. The mixed-use facility will provide for the Glendower Group Inc., or an affiliate thereof, an opportunity to develop one or more cooperative ventures to facilitate economic growth and create wealth in the West Rock community.

During FY13, Glendower began a new initiative to provide for working capital to cooperative corporations through the purchase of shares which may also entail the making of loans to the cooperative corporations. These cooperative ventures will serve the West Rock community that includes the following ECC/HANH developments: Brookside I, Brookside II, Rockview I, Ribicoff Cottages and Extension, Westville Manor, McConaughy Terrace, 122 Wilmot Road, Valley and Waverly Townhouses.

In FY14 ECC/HANH/Glendower continued to outreach to the community for businesses that would be interested in being housed in the Crossings at Wilmont Road and started to explore the feasibility of a cooperative venture being housed in the facility.

In FY15, ECC/HANH/Glendower closed on the redevelopment of Ribicoff Cottages and Ribicoff Cottages Extension.

The Authority successfully completed Brookside Phase 1, Brookside Phase 2, Rockview Phase 1, and Brookside Homeownership. The Authority closed on the Ribicoff 4% and Ribicoff 9% development deals. Ribicoff 9% was occupied in December 2015 and Ribicoff 4% was occupied in the spring of 2016. The Rockview Phase II development will be a 62 unit off-site component of the Westville Manor redevelopment and started leasing up in June, 2020.

The following table shows which MTW initiative was utilized in each redeveloped property.

<table>
<thead>
<tr>
<th>Buildings</th>
<th>Completed Construction</th>
<th>Lease up</th>
<th>TDC HCC Limits</th>
<th>PBV and Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>122 Wilmot Rd (WestRock)</td>
<td>10/31/2013</td>
<td>12/31/2013</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Brookside Phase I (WestRock)</td>
<td>8/10/2012</td>
<td>7/23/2013</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Brookside Phase II (WestRock)</td>
<td>11/1/2012</td>
<td>2/1/2013</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Rockview Phase I (WestRock)</td>
<td>12/31/2013</td>
<td>2/28/2011</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Ribicoff Cottage 9%</td>
<td>12/1/2015</td>
<td>12/30/2015</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Ribicoff Cottages 4%</td>
<td>February 2015</td>
<td>April 2016</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>
### Initiative 4.8 Fulton Park Modernization

This initiative was approved in FY11, placed on hold in FY12, and was reactivated in FY2016. This development is included in the RAD conversion for FY2016. The Authority completed a RPCA and submitted a RAD application on 10.9.2015 for the rehabilitation of Fulton Park. The Authority received RAD approval in spring of 2016 and the RAD conversion was completed in 2020. ECC/HANH does not anticipate any changes to the initiative or metrics, and does not require different authorizations from what was initially proposed. This initiative meets the statutory objective of increasing cost effectiveness and increasing housing choice.

### Initiative 1.8- Farnam Court Transformation Plan

This initiative was approved in FY11 and was implemented in FY12.

The Authority has conducted a community planning process regarding the redevelopment of this obsolete 240 unit housing development constructed in the 1940s. This development’s design lacks energy efficiency, positive urban design standards and has contributed to on-going crime issues in the area. It is surrounded by areas that are thriving or undergoing transformation and re-design of this property can better link it to its surroundings helping to create access and opportunity for residents. Farnam Court has been approved for conversion of the ACC units under the Rental Assistance Demonstration Program award.

As part of the transformation plan, ECC/HANH is proposing not only a redevelopment of the housing units at Farnam Court but transformation of the surrounding community into a community that supports the long term economic sustainability of our residents, as well as the long term economic sustainability of the City of New Haven along the Grand Ave./Mill River corridor. Through collaboration with other community partners, including the Economic Development Corporation, City of New Haven, the Board of Education and many more, the Authority anticipates to redesign the infrastructure to create more traffic flow through the community, redesign the housing units to be more spacious, remove barriers that individuals and families are facing by providing supportive services, and other critical components as they arise throughout the planning process. The supportive services may include, but are not limited to improved access to jobs, high quality early learning programs, public assets, public transportation, and high quality public schools and education programs. Additionally, the redevelopment will introduce market rate units to create a vibrant mixed-income development.

Farnam Court will replace 240 units of housing originally built in the 1940s and most recently improved in the 1980s. The redevelopment will occur in phases resulting in 228 replacement units and introducing 21 market rate units as well. The redevelopment includes new roads, streets, infrastructure, and utilities funded through a City of New Haven $8 million capital investment. The project will reconnect the Farnam Court neighborhood with the Grand Ave corridor and the vital Downtown and Wooster Square neighborhood. It also links to the Mill River neighborhood; a source of job opportunities.

Farnam Court Phase I – on site will involve the demolition of 148 units. These will be replaced with 2 mid-rise 5 story buildings housing 94 units – 86 assisted and 8 market rate units situated on 1.1 acres. Additionally these buildings will...
house 7,400 sq. feet of commercial and community/program space. The community space will support a vibrant comprehensive economic self-sufficiency program. This project is being financed through LIHTC 4% Bonds, a $4 million State of CT CHAMP award, HUD MTW flexible funds, City of New Haven capital dollars and private equity. This development is completed and fully occupied.

Farnam Court Phase II - on site will include the demolition of the remaining 92 units and construction of 111 units - 87 RAD assisted and 24 market rate units and a 3,600 sq. feet community center and central park. Phase II has been bifurcated into two distinct LIHTC phases to allow for the maximization of federal, state, and private financing and the minimization of the use of MTW funding. Both Phase II developments completed the financial closings in FY20 and are under construction.

Under ECC/HANH’s MTW Agreement with HUD, ECC/HANH is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program. ECC/HANH will apply local TDC design standards, PBV income tiering and MTW Rent Standards that allow ECC/HANH to approve exception rents. Under no circumstances may ECC/HANH approve an MTW Rent Standard above 150% without prior HUD approval. ECC/HANH will reexamine its MTW Rent Standards monthly to ensure that ECC/HANH does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, tenant rent payments to landlords, and any utility allowance amounts.

ECC/HANH does anticipate changes to the metrics to remove REAC Scores and replaced with the Number of Work Orders and Emergency Work Orders. This initiative meets the statutory objective of increasing housing choice.

**Initiative 1.15-1.17 RAD Finance Development for Rockview Phase II Rental & Westville Manor Transformation Plan**

ECC/HANH has aggressively redeveloped the West Rock community in multi-phases. To date, Brookside Phase I, Brookside Phase II, Rockview Phase I, Ribicoff Cottages 4%, Ribicoff Cottages 9% and Wilmont Crossing have all been completed transforming obsolete public housing and commercial sites into vibrant mixed income communities that brought 444 units of affordable and market rate rental housing, homeownership, associated community space and commercial space into the West Rock community. ECC/HANH worked successfully with the City of New Haven and the Town of Hamden to open a long-closed road thereby creating an access way into the community from the Town of Hamden. Westville Manor, a 150 unit LIPH development remains the only community not yet redeveloped.

Westville Manor is a family development with site, design and infrastructure issues that lend itself to a mixed finance redevelopment or RAD conversion and redevelopment. This transformation plan will include replacement units on the Westville Manor site and an off-site component, Rockview Phase II parcel (previously Initiative 1.15) and the redevelopment of the West Rock Community Center located at 295 Wilmot Road.

The Authority completed a master plan for the redevelopment of this site into a mixed income and if feasible, a mixed-use community with rental units, office space, and community room. The Authority closed on the off-site component, Rockview II and is currently under construction.

The Authority has undertaken an aggressive modernization program which includes the submission of an application for RAD funding for several sites including for Westville Manor. The Rockview Phase II development will be an off-site component of the Westville Manor redeveloped. Rockview II financially closed in June 2019 and construction was completed in August 2020. Occupancy will be completed by the first quarter of FY22. This initiative is part of the Westville RAD submission for the creation of replacement public housing units. The Authority intends to demolish Westville Manor and create these units on-site and off-site at Rockview Phase II Rental. Rockview Phase II Rental and Westville Manor on-site will rely on the MTW authorizations for alternative TDCs and commingling of funds. This initiative was approved in FY2014, was subsequently put on hold in FY2015, and was reactivated in FY2017.

The Authority submitted a 9% tax credit application in November 16 which was awarded in FY17. Closing was completed in FY20 and construction activities were completed in September 2020. Though the Covid-19 pandemic created various construction delays, the proactive management by The Glendower Group and the construction manager
allowed for the development to be completed on time and within budget. Lease up and relocation activities have been begun and will be completed in the first quarter of FY22.

During FY21 an additional component known as 34 Level Street is being added to the RAD Finance Development for Rockview II Rental and Westville Manor Transformation Plan initiative. 34 Level Street was purchased by HANH in 2020 and is located directly across Level Street from Westville Manor. 34 Level Street is a 6 acre site that currently contains a 43,339 square foot vacant skilled nursing facility. The improvements were built in 1958, and are in very poor condition and rehabilitation is not an option. The property has been vacant since the nursing home was closed in 2010. The Glendower Group, Inc. is proposing to use this site for affordable and/or mixed income affordable housing. The Glendower Group will submit a 202 Supportive Housing for Elderly Program application to the US Department of Housing and Urban Development which will be located on a portion of this site. The Glendower Group is proposing to construct a 50 unit elderly housing development on what is currently the vacant southern portion of the site. 34 Level Street will require MTW fungibility and will meet the statutory objective of expanding housing choice. The future development on the remaining portion of the site has not yet been determined.

ECC/HANH does anticipate changes to the initiative or metrics.

Closed activities that only required MTW funding flexibility:

Initiative 4.5F Cap on Project-Based Units in a Project

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
   Cap on Project-Based Units in a Project was implemented FY10. This initiative was closed out in FY12 and reported as closed in the MTW 2012 Report.

2. Provide the year the activity was closed out.
   This activity closed out in FY12 and was replaced by the initiative “Increase the Allowed Percentage of Project Based Units under Section 18 of the Housing Act of 1937 from 75 percent to 100 percent”.

3. In the year the activity was closed out provide the following:
   Subsequent approvals of the initiative “Increase the Allowed Percentage of Project Based Units under Section 18 of the Housing Act of 1937 from 75 percent to 100 percent” have made this initiative unnecessary. See Initiative 1.9 - Increase Cap on PBV units from 75 percent to 100 percent, the analysis of which is reported in this document in the Redevelopment section. No further analysis will be developed in this section.

   i. Discuss the final outcome and lessons learned.
      n/a

   ii. Describe any statutory exceptions outside of the current MTW flexibilities that might have provided additional benefit for this activity.
      None identified.

   iii. Provide a summary table, listing outcomes from each year of the activity (since the execution of the Standard MTW Agreement).
      n/a
      i. Provide a narrative for additional explanations about outcomes reported in the summary
Closed activities that only required MTW funding flexibility:

B. Not Yet Implemented Activities

Initiative 3.7 Non-Traditional Housing Support Time Limited Support for Families Transitioning from Homelessness

This initiatives was approved in FY19

ECC/HANH proposes to co-develop Non-traditional housing supports for units of affordable housing for families transitioning from homelessness. This support is targeted toward families seeking economic self-sufficiency following shelter and transitional housing offered through a community provider. The City of New Haven has identified the need for supportive housing units to assist families, specifically working families as they attempt to make the transition from shelter and transitional housing to permanent non-assisted housing.

The first project developed under this proposed initiative would be a 19 unit development owned by a community provider, Christian Community Action (CCA).

CCA owns a 19 unit transitional housing development that they seek to transition to 24 to 36 month supportive housing model. ECC/HANH seeks to enter into a partnership with CCA to develop new non-traditional housing models that assist in greater housing choice and self-sufficiency for high risk families transitioning out of homelessness. As part of the proposed activity, CCA and ECC/HANH will enter into a new partnership that will own the property where the program activities will take place.

Program Participants would be identified from shelters owned and managed by CCA and from other family shelter providers in the greater New Haven area. Families will receive case management support to achieve work goals that support independent living in 24 to 36 months. Once families graduate from the program, they will receive an additional year of support and mentorship. These services will be provided by CCA’s ARISE Center. The ARISE (Accessing Resources for Independence, Skill-Building and Employment) Center serves families that are residing within the CCA Hillside Family Shelter (HFS) and Stepping Stone Transitional Housing Program (SSTHP), as well as serving families for up to one year after they have moved from a CCA housing program and into permanent housing. The purposes of the ARISE Center services are to increase employability and promote family health, wellness and stability through the work of the ARISE Employment Services and Child and Family Services.

ECC/HANH proposes to provide non-traditional housing support modeled on the housing choice voucher program with subsidy paid at the 110% payment standard. Program income generated from the use of housing choice vouchers will be used to support necessary improvements to the building and to offset a portion of the administrative expenses associated with the program delivery model.

All Program Participants will agree to a maximum period of housing subsidy support of 36 months. At the end of the program period, unless otherwise authorized, it is the expectation that families will move into non-subsidized permanent housing, identify subsidized housing options inside or outside of the City of New Haven, or pursue other housing options for their families. Program participants can be placed on the ECC/HANH PBV waitlist, and are eligible to occupy one of the agency project based units while they are enrolled in the program or after their matriculation from the program. Participation in the program does not guarantee any housing assistance beyond the 36 month program period.

This activity will be a 10-year PILOT program and at the conclusion of the pilot period, the Authority will determine if it will make this Initiative a permanent activity. The 10-year pilot program is based on the following assumptions. (a) 1-
year acquisition, renovations and initial lease up period for program participants. (b) Completion of three thirty-six month program cycles for participants, which will be approximately 50 individuals and families. Our goal during this period is for 70% of our families to transition out of the program with higher incomes and into non-subsidized housing options. Participants who either do not meet the program requirements and are voluntarily or involuntarily released from the program, or who fail to identify housing options for themselves when the program will be completed, will have to seek outside support to address their unmet housing needs. All program participants will continue to have access to ARISE Center staff once they leave the program to support their efforts to become or remain self-sufficient.

In the event that program model does not meet its intended results, ECC/HANH, working in concert with CCA, can either choose to make significant changes to the program model, or transition the development into more traditional subsidized housing development for families in New Haven, that would be subject to the normal requirements of ECC/HANH.

Selection Process, Eligibility and Criteria Families will be selected for participation of CCA’s Moving to Work Program based on submission of completed application, income guidelines and willingness to fully participated in the Program.

Families that are homeless or at risk of homelessness, where the heads of household make a commitment to participate fully in the Program must submit a pre-application. All completed pre-applications will be time and date stamped and added to a waitlist maintained by CCA Workforce Housing Program. As openings becomes available families will be scheduled for a pre-screening interview. The Pre-Screening staff (the director of housing services and family coaches) will conduct a needs assessment focusing on the following areas: income, employment, childcare, housing and health, description of the Program goals and opportunities for the family to move to greater independence. The family will complete a full application to the Program. Along with the “full application” families will be required to submit the following documentation: proof of homelessness (letter from shelter provider), proof of income from all income sources, photo identification, birth certificate, social security card, health insurance card for all household members and immunization record (all the children).

To be eligible, household income cannot exceed the income limit of the New Haven-Meriden Area Median Income of Very Low (50%) Income Limit (see income guideline below), and the family desire to move closer to independence by articulating their willingness to fully participate in the workforce housing program for a successful exit to permanent housing.

Income Criteria: Total Household income cannot exceed the income limit for each household size:

**New Haven-Meriden Area Median Income - Very Low (50%) Income Limit**

<table>
<thead>
<tr>
<th>Household size</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Income Limit</td>
<td>29,000</td>
<td>33,150</td>
<td>37,300</td>
<td>41,400</td>
<td>44,750</td>
<td>48,050</td>
<td>51,350</td>
<td>54,650</td>
</tr>
</tbody>
</table>

ECC/HANH in partnership with CCA will incorporate current programmatic and results-based methods of serving families to support those heads of household who have a demonstrated desire to make positive changes. The ultimate goal is to instill hope, a desire to change and the commitment to work diligently to improve the quality of life for the heads of household— and all family members— that helps to break the cycle of poverty and homelessness. It is to be a stepping-stone out of poverty into new and greater economic stability.

The model recognizes that the heads of household face significant barriers to obtaining a living wage job. In addition, it recognizes that children have had significant, and in many cases, extended exposure to trauma that come from homelessness and poverty, and affords parents the opportunity to establish new ways to insure their healthy development. The ECC/HANH and CCA Team will use the SDII (Service Delivery Improvement Initiative), as a way to enhance internal practices. Its components are Motivational Interviewing, Person-Centered Practice and Trauma-informed care, all designed to support families in one continuous service pathway from their entrance into CCA until up to a year after they gain permanent housing.
The PILOT Program has been designed to help families move through phases of increased commitment, responsibility and develop the attitudes, behaviors, and skills needed to generate income, provide food, and secure permanent housing.

This initiative is on hold until a final plan and schedule for implementing the proposed activity can be agreed to with the partner agency.

This initiative involves use of single fund flexibility to acquire and rehabilitate the existing property, to provide case management supports to families through our previously approved MTW Family Self Sufficiency Program and to provide property management related services. This development will be carried out by ECC/HANH, the Glendower Group and 360 Management Group. Co, two instrumentalities of ECC/HANH and a non-profit provider, Christian Community Action.

Further this model is a non-traditional housing model involving short term assistance under a modified HAP agreement with modified payment standards for housing that is consistent with uses of Section 8 and 9 funds.

Participants will be selected off a waitlist managed by the non-profit partner and will consist of families transitioning from shelter care. ECC/HANH proposes to project base units in this development of which ECC/HANH or its instrumentality will be a co-owner.

Selected program participants will be required to pay 30% of their income toward their rental expenses during the program period. Rent calculation will be done in manner consistent with ECC-HANH’s rent simplification process. However, it should be noted that since it is the intent of the program to transition families out of the program within 36 months on admission, a portion of the participants rent payment will be put into a savings/escrow account during the program period. This amount, if the participant graduates from the program, may be used for support costs to transition to new housing once the program period is completed.

Participation in this program will not cause families to incur any additional rent burden and will positively impact their ability to build savings.

Total tenant share will be tracked for each family throughout their participation in the program, during the program period the participants rent burden will average up to 30% of their income. Participant’s income and employment status is tracked during the program period and for at least 1 year after graduation. As families approach program graduation, income will be compared to area fair market rents, there may be instances where a Participant has met all of the program requirements, but the local cost of housing or the scarcity of affordable market rate units are barriers to the individual transition out of the program. In these instances, participants can petition the program to receive a Good Standing Hardship Exemption. Participants would be eligible to receive up to two hardship extensions. Each extension period should be no longer than 90 days; however, families can have up to 30 days from the end of the extension period to move out.

At the conclusion of each Cohort, staff will complete a review and evaluation of program requirements, market barriers, case management approach and success factors and make changes to the program as needed.

A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.

Participants rent burden will be determined as part of the application process and reviewed annually as part of case management model. Program model will not place unnecessary rent burden on families as they attempt to become more economically self-sufficient.

A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded.

Total tenant share will be tracked for each family throughout their participation. Families rent burden will average up to 30% of income. This will be tracked through the agency’s MIS system. As families approach program graduation,
income will be compared to area fair market rents. Families rent burden in the unassisted market will be tracked for families throughout their transitional year. Families who upon program graduation experience a rent burden exceeding 40% of their monthly income may request a hardship exemption. The numbers of hardship requests, exemptions granted, extensions, terminations and graduations will be tracked. If the number of graduations fails to exceed the number of terminations in any year, the program will be re-evaluated.

Hardship Case Criteria

Throughout the family’s residence, the Family Coaches will monitor the degree to which the heads of household adhere to and comply with their plan.

During this period, Family Coaches stay in contact with families to see that the lessons learned while in residence are still being applied. (The Family Coaches are also available for support on an informal basis as needed after the one-year post-residence period.)

Their efforts, in this regard, are to meet with or call the heads of household to support the moving in and settling in process, to assist with accessing services and programs for them and their children and to offer continued after-care and employment support so that they will not return to homelessness. The willingness of the heads of household will determine the degree to which the Family Coaches are involved in the following areas:

- Willingness to meet after leaving the program
- Active engagement
- High level of motivation
- Continued compliance of Family Action Plan

CCA can initiate a process to terminate their participation in the program, and invite them to utilize ECC/HANH’s existing grievance procedure to try to resolve the problem. If it cannot be resolved through the grievance procedure, and CCA wants the participant to leave, they will need to go through a formal court eviction process (called “summary process”). The Summary Process has been approved by HUD and used by CCA as part of their previous work in federally funding transitional housing programs.

Program Extensions

This is a 36-month Program. The Family Coach will begin the exiting process with the head(s) of household at the 30-month benchmark to reach the 36-month program time limit with a successful move to permanent housing. However, families can request an extension, which will be granted if they have shown documentation to their Family Coach that they have secured an apartment and are awaiting a move in date or have extenuating circumstances (such as the family secured an apartment, but the apartment fell-through due to no fault of the family).

All requests must be submitted in writing and include a plan for the extension will facilitate the move to permanent housing for CCA’s Director of Housing Services to review. The Director of Housing Services will meet with the head(s) of Household, along with their Family Coach, to review the plan and the family’s progress.

The head(s) of household will have the opportunity to articulate their need for an extension and the timeframe needed to exit the program successfully, in these instances, participants can petition the program to receive a Good Standing Hardship Exemption. Upon receipt of a Good Standing Hardship Exemption, participants would be eligible to receive up to 2-hardship extensions. Each extension period should be not be longer than 90 days; however, families can have up to 30 days from the end of the extension period to move out.

Exit from the Program
This is both a very exciting and very scary time for families, in which they have found affordable, permanent housing and leave and, hopefully, with gainful implement or guaranteed and lasting income. It is also the time of greatest risk of returning to the head of household’s unhealthy patterns of behavior. It is one thing to maintain new habits while in a structured environment that regularly models appropriate behavior. It is another thing to maintain those habits upon return to an unstructured setting. To help ensure successful and seamless transitions, Family Coaches lend formal support and guidance to families for up to one year after date of departure from the program.

End of Participation Determination

Voluntary

Families may choose to move out of the Program at any time. The head(s) of Household must give their Family Coach written or verbal notice of their specified move out date, giving the Program a 30-day notice of move out.

Involuntary

If it is determined, after several and continuous efforts and meetings, that the heads of household do not intend to participate fully, the process of termination and invitation to utilize the existing grievance procedure and resolve the problem will be extended.

It will begin with the sending of a discharge letter, indicating that the family must exit the Program due to lack of participation. This action comes with care and compassion for the family and due process. Therefore, every effort is made through conversation and proper documentation of the actions that led to the termination.

The head of household will be entitled to a mediation process with the Family Coach, Director of Housing Services and Director of Programs to insure that every effort is made for the family to remain in the program and a clear and due process and a plan for corrective action, with description of the goals and timelines for improvement.

Should all efforts to re-engage the head of household fail, the head(s) of household will be informed, in writing, about the termination. The head of household can submit a request to meet with CCA’s Fair Hearing Committee who will meet with the head of household. If the Fair Hearing Committee revokes the decision, the family will remain in the Program with the expectations of any infractions of non-compliance would be remedied by outlining stipulated rules that the family must follow within the next 30-60 days; the family will have a probationary period. If program termination proceeds, CCA will follow eviction procedures and the ECC/HANH will afford the resident all rights under the program termination guidelines of the agency’s HCV Administrative Plan.

Description of Annual Reevaluation

All residents will be subject to Annual Re-evaluations of their income and rent share throughout the course of their participation. Rent will be calculated per the agency’s Rent Simplification Plan previously approved by HUD. All aspects with the exception of Biannual and Tri-annual review will stand.

Transition Period

This is a new initiative, as such there is not a transition period from a previous initiative. ECC/HANH anticipates that program activities will begin during FY22 and lease ups will begin once the proposed renovations to the project site and the selection of the initial program participants are completed.

Total tenant share will be tracked for each family throughout their participation. Families rent burden will average 30% of income or below. No family’s rent burden shall exceed 40%. This will be tracked through the agency’s MIS system. As families approach program graduation, income will be compared to area fair market rents. Families rent burden in the unassisted market will be tracked for families throughout their transitional year. Any families who upon program graduation will experience a rent burden exceeding 40% of their monthly income will be allowed to request a hardship
exemption. Numbers of hardship requests, exemptions granted, extensions, terminations and graduations will be tracked. If the number of graduations fails to exceed the number of terminations in any year, the program will be re-evaluated.

During FY21 rehab was completed for this site. During FY22 the team is working on documents and voucher issuance.

ECC/HANH does not anticipate changes to this initiative or metrics during FY22.

Initiative 4.10F Y2Y Youth Program-Overnight program for young adults experiencing homelessness

A. Activity Description

Y2Y New Haven is a joint initiative of students from across New Haven, Youth Continuum, and Y2Y Network to open a student-led, gender inclusive 20-unit overnight program for young adults experiencing homelessness in Greater New Haven. Y2Y New Haven builds on the youth-to-youth model employed by Y2Y Harvard Square, the nation’s first student-run overnight program for young adults.

ECC/HANH will provide 20 project-based vouchers for program. Case management services will be provided by Y2Y. The Community and Economic Development department of ECC/HANH will be the lead in communicating with the Y2Y staff.

Y2Y New Haven is a program of Youth Continuum, a New Haven based, not-for-profit agency that provides Connecticut’s most comprehensive array of resources dedicated to preventing and addressing youth homelessness. Y2Y Network will provide key technical assistance and added capacity to support the student-led components of the Y2Y New Haven program.

Y2Y New Haven’s model focuses on providing young adults with a safe, vibrant and welcoming environment with comprehensive pathways out of homelessness and opportunities for leadership development. As part of our youth-to-youth model, guests, Y2Y New Haven student volunteers, and Youth Continuum staff will collaborate to operate a safe and affirming space for all. Y2Y New Haven’s service model is broken into three categories: Sanctuary, Pathways out of Homelessness, and Advocacy and Leadership Development.

Sanctuary

- 20 gender-inclusive semi-private sleeping pods
- Gender-inclusive restrooms and showers
- Dinner and breakfast
- Laundry
- Internet and computer access
- Y2Y New Haven will be co-located with Youth Continuum’s drop-in and outreach center, which offers a food bank, diaper bank, clothing closet, and lunch

Pathways out of Homelessness

Participants will be provided with the following services by Y2Y, Youth Continuum. These services will be tracked by the Y2Y staff and will be provided on a monthly or quarterly basis to ECC/HANH CED department.

- Professional case management
● Medical and behavioral health care through a fully integrated onsite clinic
● HIV/AIDS specialist care
● Legal aid
● Career development programming
● On-site social enterprise business with direct job opportunities and training for youth
● Enrichment based activities

i. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective.

1) Increase Housing Choice for low income families

2) To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.

ii. Provide the anticipated schedule for implementing the proposed activity.

B. Activity Metrics Information

i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.

1) Self Sufficiency 5 - Households assisted by services that increase self sufficiency

2) Self Sufficiency 8 – Households transitioned to self sufficiency

3) Housing Choice 1 - Additional units of housing made available

ii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity.

1) At baseline there are xxx young adults living in a subsidized unit.

2) At baseline we are housing xxx young adults annually.

3) At baseline XXX young adults transitioned (graduated) to self-sufficiency.

iii. Give the annual benchmark for each metric.

1) Up to xxx new individuals will be stably housed.

iv. If applicable, give the overall and/or long-term benchmark for each metric.

1) ECC/HANH’s long term goal is to develop a housing subsidy that is appropriate to stabilize young individuals with steady employment income and housing of choice.

v. Give the data source from which the metric data will be compiled.

1) Family income data will be collected in agency MIS (Emphasys ELITE)
2) Amount of HAP subsidy paid will be collected in agency MIS system

3) Self-sufficiency services provided will be tracked by an Y2Y and Youth Continuum and provided to ECC/HANH on a monthly or quarterly basis.

4) 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). Households receiving self-sufficiency services prior to implementation of the activity (number). Expected number of households receiving self-sufficiency services after implementation of the activity (number). Actual number of households receiving self-sufficiency services after implementation of the activity (number). Whether the outcome meets or exceeds the benchmark.

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement Baseline Benchmark Outcome Benchmark Achieved?

Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after Whether the outcome meets or exceeds the benchmark.

this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided. The activity (number). This number may be zero. implementation of the activity (number). implementation of the activity (number).

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
the activity (increase). If units
reach a specific type of
household, give that type in this
box. Housing units of this type prior to implementation of the activity (number). This number may be zero. Expected
housing units of this type after implementation of the activity (number). Actual housing units of this type after
implementation of the activity (number). Whether the outcome meets or exceeds the benchmark.

C. Cost Implications

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.
Maximum annual exposure for ECC/HANH is approximately xxx. Year 1 estimates are less than $xxx.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW
PHA will manage the surplus or deficit anticipated. Anticipated costs are included in the chart above.

D. Need/Justification for MTW Flexibility

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor
section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

1) Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related
services or other case management activities

2) Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by
an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal
entity.

3) Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period, when vouchers expire and
when vouchers will be reissued.

4) Attachment C. D. 2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment
standards, rents or subsidy levels for tenant based assistance

5) Attachment C. D. 1.d. The agency is authorized to implement term limits for HCV units designated as part of the MTW
demonstration.

6) Attachment C. D. 4. Waiting List Policies

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity. Every reasonable effort should be
made by the MTW PHA to reference the complete and correct authorizations that are applicable to a particular activity
when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to
the activity to include the correct authorization.
E. Rent Reform/Term Limit Information (if applicable)

i. Impact analysis

1) A description of how the proposed MTW activity will impact household rent/tenant share. This is structured as a flat subsidy for low income young adults. Individuals would be assisted with self-sufficiency activities provided by Y2Y and Youth Continuum to ensure a smooth transition by the end of the assisted period.

2) A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts. Families will be enrolled in the FSS program providing support of a staff member from the Community and Economic Development Department. Each family will be entered into our case management MIS system which tracks family goals and progress. Lease compliance data will be collected monthly by the CED team. Support will be provided for families to move toward their self-sufficiency goals and to remain lease compliant.

3) A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc. N/A

4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded. N/A

ii. Hardship Case Criteria

1) Families selected for this initiative will meet the financial criteria and will be assisted to rent a unit that does not cause rent-burden. This program is designed to provide a flat subsidy that does not fluctuate based upon income changes. As such, there is some risk to families that may face a loss of income.

2) Participants who have no income or a decrease in income will not be required to submit an interim change. The cost of the unit

iii. Description of Annual Reevaluation

1)

iv. Transition Period

1) Beginning six months prior to the end of the time limited flat subsidy, families will begin their transition to self-sufficiency by completing their transition

Initiative 2.6F  Master Lease Unit Program

Activity Description

Elm City Communities (ECC) is converting almost 1,400 units from public housing to project-based rental assistance under the U.S. Department of Housing and Urban Development (HUD) Rental Assistance Demonstration (RAD) Program. Nearly 1,000 families will have to be relocated temporarily to achieve this objective in a timely and cost-effective manner. The proposed Master Lease Program will provide a sorely needed relocation option similar to the master leasing of public housing units that are currently permitted as part of RAD. Providing these families with tenant-based vouchers or cash assistance to relocate to privately-owned units is another option, but this can be a time-consuming and arduous process.
This process also has barriers such as residents whose credit or criminal history makes it difficult for them to past screening by private owners. In other cases, these families may not be able to get utilities in their name because they or their family members have significant balances. Add these impediments to the fact that it can be unduly costly to provide the mobility counseling needed to find housing for such a large number of families in the private sector during such a compressed timeframe. Under this program, these units will be utilized for families who choose to return to their original site after redevelopment is complete.

The proposed Master Leased Program is particularly adaptable to situations like these where there is an immediate need for temporary housing for 12 months or less. Under this program, ECC will be the Master Tenant and enter into a Master Lease with a Landlord for a period of up to sixty (60) months. ECC will conduct outreach to identify Landlords who are willing to execute Master Leases.

Contrary to the standard Section 8 Lease Housing Program whereby ECC enters in a HAP Contract with the Landlord and the participant and the Landlord execute a lease, ECC will enter into a Master Lease Agreement with the Landlord. The Master Lease will be a Rider to the HAP Contract between ECC and the Owner. There will also be a HAP Contract Addendum that spells out the modifications to the HAP Contract required to effectuate the Master Lease Program.

Participation in the program is voluntary. A Landlord with units in abatement or with outstanding code violations will not be eligible to participate in this program.

**Term**

The term of the Master Lease Agreement may be for a period of up to sixty (60) months.

**Rent**

The rent at which housing will be available to ECC for leasing is also a significant programming consideration. Maximum rents will be capped at no more 120 percent of FMR for larger dwelling units of three or more bedrooms and 110 percent of FMR for smaller apartments of less than three bedrooms. ECC may approve rents of up to 150 percent of FMR if modifications are needed to a Leased Unit to satisfy a reasonable accommodation. Rents, of course, cannot exceed reasonable rents according to HUD regulations.

**Dwelling Units.**

Units leased under the Master Lease Program Leased Units must:

a. Satisfy Housing Quality (HQS) standards (HQS)
b. Comply with ECC occupancy standards
c. Be reasonably accessible to public transportation, schools, and shopping
d. Comply with all local rules and building code requirements
e. Be an eligible housing type under Section 8 regulations

**Screening of Residents**

Since these are existing ECC residents, they cannot be rescreened by Landlords.

**Maintenance and Operation**

The Landlord will be responsible for all maintenance and operations per the terms of the Master Lease Agreement.

**Utility Bills**

The Landlord will be responsible for payment of all utility bills, thereby eliminating one of the significant barriers to providing relocation housing in the private sector.

**Security Deposits**
ECC will continue to hold residents’ existing security deposits. ECC will pay Landlords a security deposit per HUD regulations and State law.

misdescribed how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

The statutory goal for this initiative is: To provide housing choice for families. By providing additional units for relocation purposes, families are given more housing options to best meet the needs of all family members.

B.

i. Provide the metrics from the “standard HUD metrics” section that are applicable to the proposed activity

ii. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the proposed activity. N/A

iii. If applicable, give the overall and/or long-term benchmarks(s) for each metric (a number value). N/A

<table>
<thead>
<tr>
<th>HC #5: Increase in Resident Mobility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit of Measurement</td>
</tr>
<tr>
<td>Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HC #7: Households Assisted by Services that Increase Housing Choice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit of Measurement</td>
</tr>
<tr>
<td>Number of households receiving services aimed to increase housing choice (increase).</td>
</tr>
</tbody>
</table>

iv. Give the data source from which the metric data will be compiled.

Data sources include the agency’s resident processing program, Emphasys Elites, VMS, and as well as other needed software programs and spreadsheets.

C. Cost Implications. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

i. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.
C. Need /Justification for MTW Flexibility

i. Cite the authorization(s) detailed in attachment C and/or D of the Standard MTW agreement (or applicable successor section in future iteration of the MTW agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

ECC and HUD have entered into a Moving to Work Agreement (MTW Agreement). ECC is authorized to determine the following necessary operational policies and procedures for all Section 8 assistance the Agency is provided under Section 8(o) of the Housing Act of 1937. The Agency is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. However, any revised HAP contract must include language noting that the funding for the contract is subject to the availability of Appropriations. The Agency is authorized to determine the length of the lease period, when vouchers expire, and when vouchers will be reissued.

The Agency is authorized to define, adopt, and implement a reexamination program currently mandated in the 1937 Act and its implementing regulations.

Explain why the cited authorization(s) is needed to engage in the proposed activity. Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorization(s) that are applicable to a particular activity when proposing the activity. A failure to the correct statute or regulation will require a technical revisions to the activity to include the correct authorization(s)

Initiative 3.8 Community Health Network of CT (CHNCT)

A. Activity Description

i. Describe the proposed activity

Elm City Communities, The Housing Authority of New Haven (ECC/HANH) proposes an initiative in connection with the Community Health Network of CT (CHNCT) to provide layered rental subsidy to recipients of the HUSKY A or Husky D medical insurance program. The program seeks to pilot a combined subsidy model that merges funding from healthcare and housing providers that demonstrates the importance of investing in social determinants of health and to potentially open up new sources of funding and partnership to address housing need in this community. By demonstrating the power of housing stability to support medical stabilization, we hope to learn lessons that may lead to program expansion and additional partnerships.

ECC/HANH and CHNCT will provide a combined subsidy for up to four families for a period of no more than 24 months per family. Families in this program will be required to participate in a person-centered program provided by the Community Health Network of CT, developed to help members manage the social, medical, financial, and behavioral health issues associated with complex conditions.

All Program Participants will agree to a maximum period of housing subsidy support of 24 months. At the end of the program period, unless otherwise authorized, it is the expectation that families will continue to rent market rate units in the community without subsidy or will have identified subsidized housing options inside or outside of the City of New Haven.

Program participants will be screened and referred by CHNCT and placed on a program specific waitlist. Program participants must meet the income eligibility criteria for CHNCT’s Medicaid program. Program participants will not be placed on any of the regular ECC/HANH waitlists unless the family has applied via an open waitlist process. Participation in the program does not provide any housing assistance beyond the 24-month program period.

Rental assistance will be treated as a layered subsidy in the following order:

1. The family will be responsible for paying their portion of the rent in a market rate unit based on ECC/HANH’s Rent Simplification rent calculation.
2. The Community Health Network of CT will provide $500.00 toward the families rent on a monthly basis for a period of up to 2 years (24 months).
3. ECC/HANH will assist each participating family with the remaining rent balance for up to 2 years (24 months).
Additionally, ECC/HANH will cover the cost of administrative support and the cost of HQS inspections per family during the term of this program which is expected to run for a period of two years at an estimated amount of $1,623.00 per household. The following table shows the total expected costs of ECC/HANH’s administrative expense based on four families accessing this program during a period of 2 years per family.

<table>
<thead>
<tr>
<th>Process</th>
<th>Allocation of Resources</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allocation of 1 staff member to process each applicant from intake to lease-up 3 Hours (One Time Cost)</td>
<td>HCV Administrative Tasks</td>
<td>3 hours per family @ $27/hr</td>
</tr>
<tr>
<td>1st Allocation of Inspection Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Initial</td>
<td>Up to 9 Inspections Per Unit</td>
<td>4 Families</td>
</tr>
<tr>
<td>1 Fast Re-inspect</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Special</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Repeat for unscheduled unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Initial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Fast Re-inspect</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allocation of Finance Dept. Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initial Rental payment set-up</td>
<td>Initial &amp; Monthly check processing</td>
<td>0.25 hours/40% Fringe</td>
</tr>
<tr>
<td>Total Expected Expense</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

ECC/HANH will pay a maximum subsidy amount of $330.00 per month toward rent, as part of the subsidy layering, to cover any remaining balance after the participant portion and the CHNCT funds have been applied. This next table shows the potential out of pocket cost of the rental subsidy provided by ECC/HANH, by family size, for this program.
The expected cost of ECC/HANH’s out of pocket rental assistance averages $31,680.00 for the two-year program with an additional $3,000.00 included in the budget for purposes of covering two additional families if needed. The total program cost for ECC/HANH is not to exceed $41,172.00.

Administrative costs: $6,492.00
Additional administrative costs for two more families: $3,000.00
ECC/HANH (2 year) Out of Pocket Rental Assistance based on the largest bedroom size shown in the table: $31,680.00
CHNCT Funds: $48,000.00
Total Program Cost: $89,172.00

Families can receive up to two years of assistance under this program, however the term can be shorter if the funds available do not cover two full years. This would be the case if a family leaves the program after a period of less than two years, and a new family comes in to access to the remaining subsidy period, based on the agreed upon amount per month ($500). It may be possible to arrange the spreading of the subsidy during a longer period of coverage for the new family if the total amount does not exceed the agreed upon program total.

CHNCT Program & Services
CHNCT’s Care Management program, Intensive Care Management, is a system of collaborative processes which assesses, plans, implements, coordinates, monitors, and evaluates options and services to meet an individual’s health needs. The correlation between receipt of the rental subsidies and the services provided by CHNCT creates an opportunity and consistency for members to receive appropriate care management services. Knowing the member’s permanent address at least for the 2 years, allows the care management team the ability to readily locate members and maintain contact to offer ongoing services to manage their medical and behavioral health conditions. Additional benefits include 1:1 engagement with a CHNCT nurse care manager, registered dietitian and/or community health worker to provide coaching in lifelong skills targeting improvement in overall self-management and elimination of barriers associated with social determinants of health.

- Intensive Care Management (ICM) is comprised of a multidisciplinary staff of nurses, Social Worker, Behavioral Health Coordinator, Community Health Workers, Dietitians, and non-clinical support staff.
  - Promotes quality, cost-effective improved health outcomes for members who have complex or specific healthcare needs.
  - Assists members who are affected by the underlying factors relating to the social determinants of health.
  - Is a voluntary, person-centered program developed to help members manage the social, medical, financial, and behavioral health issues associated with complex conditions.
  - Provides coaching and resource coordination to support and empower HUSKY members to help them take control of managing their healthcare needs.
Focus includes high-risk, high-need members which includes those with frequent hospitalizations or emergency department (ED) visits.

- **ICM Engagement Process:**
  - Completes the assessment and develops a care plan for both member and family members. Working with members at home, CHNCT nurses will assess health conditions, health perception, cultural values, coping mechanisms, self-care practices, and social determinants of health to support the member’s ability to prioritize important areas and goals.
  - Assists members who are affected by the underlying factors relating to the social determinants of health.
  - CHNCT will complete a person-centered plan of care to assess barriers.
  - Arrange transportation to medical appointments
  - Rental assistance for no more than two years paid to ECC/HANH to administer.
  - Identify PCP and specialists that would support the member’s complex health needs.
  - Coordinate services with the Connecticut Behavioral Health Partnership for behavioral health needs and link to community resources

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on statutory objectives.

1. **Increase Housing Choice for low income families:**
   During the two-year period, families will have the opportunity to live in a community of choice in a market rate unit.

2. **To give incentives to families with children where the head of household is working, is seeking to work or is preparing to work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient.**

Families will receive supportive services provided by CHNCT which will prepare the families to move toward financial self-sufficiency during the two-year period. Care management’s wrap around services will include an assessment of each member’s current financial status, developing a plan for supporting housing independence; and assist members to explore employment and educational opportunities to get job training.

iii. Provide the anticipated schedule for implementing the proposed activity.

1. April 2020 Obtain ECC/HANH Board approval.
2. April/May 2020 - Obtain HUD Approval for New MTW Activity
3. April-May 2020- Send program information to families on the ECC/HANH waitlist
4. April 2020 – Program Enrollment Begins
5. May 2020 – Begin the lease-up process

B. Activity Metrics Information

i. Provide Metrics from the “standard HUD Metrics” section that are applicable to the proposed activity.

<table>
<thead>
<tr>
<th><strong>SS #1: Increase in Household Income</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unit of Measurement</strong></td>
</tr>
<tr>
<td>Average earned income of households affected by this policy in dollars (increase).</td>
</tr>
</tbody>
</table>
### SS83: Increase in Positive Outcomes in Employment Status

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Employed Full-Time</td>
<td>Head(s) of households in &lt;&lt;category name&gt;&gt; prior to implementation of the activity (number). This number may be zero.</td>
<td>Expected head(s) of work-able households in &lt;&lt;category name&gt;&gt; after implementation of the activity (number).</td>
<td>Actual head(s) of work-able households in &lt;&lt;category name&gt;&gt; after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
<tr>
<td>(2) Employed Part-Time</td>
<td>Percentage of total work-able households in &lt;&lt;category name&gt;&gt; prior to implementation of activity (percent). This number may be zero.</td>
<td>Expected percentage of total work-able households in &lt;&lt;category name&gt;&gt; after implementation of the activity (percent).</td>
<td>Actual percentage of total work-able households in &lt;&lt;category name&gt;&gt; after implementation of the activity (percent).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
<tr>
<td>(3) Enrolled in an Educational Program</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4) Enrolled in Job Training Program</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(5) Unemployed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(6) Other</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### SS85: Households Assisted by Services that Increase Self Sufficiency

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households receiving self sufficiency services prior to implementation of the activity (number).</td>
<td>Households receiving self sufficiency services prior to implementation of the activity (number).</td>
<td>Expected number of households receiving self sufficiency services after implementation of the activity (number).</td>
<td>Actual number of households receiving self sufficiency services after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>
iv. If applicable, give the overall and/or long-term benchmark(s) for each metric (a numeric value) N/A

v. Give the data source for which the metric will be compiled.

ECC/HANH will utilize Emphasys Elite, tracking sheets and the agency case management software program in combination to track families and compile data.

C. Cost Implications
i. State whether the proposed activity will result in any cost implications (positive and or negative) for the MTW PHA.

ECC/HANH expects to incur costs for this program. MTW funds will be utilized.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount, and discuss how the MTW PHA will manage the surplus or deficit.

ECC/HANH expects to incur cost in the amount of, and not expected to exceed $41,172.00 for administrative costs and out of pocket subsidy associated with this program. MTW funding will be utilized.

D. Need/Justification for MTW Flexibility

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for &quot;self-sufficiency&quot; to use for this metric. Each time the PHA uses this metric, the &quot;Outcome&quot; number shall also be provided in Section (II) Operating Information in the space provided.</td>
<td>Households transitioned to self-sufficiency (&lt;&lt;PHA definition of self-sufficiency&gt;&gt; prior to implementation of the activity (number). This number may be zero.</td>
<td>Expected households transitioned to self-sufficiency (&lt;&lt;PHA definition of self-sufficiency&gt;&gt; after implementation of the activity (number).</td>
<td>Actual households transitioned to self-sufficiency (&lt;&lt;PHA definition of self-sufficiency&gt;&gt; after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit of Measurement</th>
<th>Baseline</th>
<th>Benchmark</th>
<th>Outcome</th>
<th>Benchmark Achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households receiving services aimed to increase housing choice (increase).</td>
<td>Households receiving these services prior to implementation of the activity (number). This number may be zero.</td>
<td>Expected number of households receiving these services after implementation of the activity (number).</td>
<td>Actual number of households receiving these services after implementation of the activity (number).</td>
<td>Whether the outcome meets or exceeds the benchmark.</td>
</tr>
</tbody>
</table>
i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

1. Attachment C. B. 1. b. iii. Single Fund Budget with Full Flexibility. The provision of housing or employment related services or other case management activities

2. Attachment C. B. 1. b. vii. Single Fund Budget with Full Flexibility. If the agency chooses to establish single fund flexibility, the agency is authorized to use housing assistance payments for purposes other than payments to owners, so long as these purposes are consistent with other eligible uses of section 8 and section 9 funds.

3. Attachment C. B. 1. c. Single Fund Budget with Full Flexibility. These activities may be carried out by the Agency, by an entity, agency or instrumentality of the Agency, a partnership, a grantee, contractor or other appropriate party or legal entity.

4. Attachment C. D. 1.b. The agency is authorized to determine the length of the lease period when vouchers expire and when vouchers will be reissued.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity. Every reasonable effort should be made by the MTW PHA to reference the complete and correct authorizations that are applicable to a particular activity when proposing the activity. A failure to cite the correct or entire statute of regulation will require a technical revision to the activity to include the correct authorization. The above cited authorizations are required for this initiative as it involves use of single fund flexibility to provide time limited subsidy to families, relocation services through an instrumentality of the agency, use of HCV funds for administrative costs, and modified tenancy rules.

A. Rent Reform/Term Limit Information (if applicable)

i. Impact analysis- Not applicable

ii. Hardship Case Criteria – not applicable

iii. Description of Annual Reevaluation – not applicable

iv. Transition Period- ECC/HANH expects to discontinue offering this incentive at the end of the two-year period. The families receiving services at the time of the end of program shall receive their benefit as stated in the agreement. Any families on the waitlist for the incentive will be notified.
C. Activities on Hold

This section includes approved activities that have been implemented and ECC/HANH has stopped implementing but has plans to reactivate in the future.

**Initiative 1.16 – Crawford Manor Transformation Plan**

This initiative was approved in FY13, implemented in FY16, and placed on hold in FY17.

The Authority applied for the Choice Neighborhoods Initiative Planning Grant, but it was not awarded. This initiative is being placed on hold while an alternative plan and timeline is being devised. This grant would have allowed for a comprehensive approach to neighborhood transformation, including the provision of up to $500,000 in funding to develop a transformation plan to revitalize Crawford Manor and the surrounding neighborhood. The Authority also planned to use this grant to assist with detailing a comprehensive neighborhood transformation plan. As one of the older, blighted developments in our portfolio, Crawford Manor is an ideal center focus towards initiating a transformation plan.

The transformation plan would have included not only a redevelopment of the housing units at Crawford Manor, but transformation of the surrounding community into a community that supports the long term economic sustainability of our residents, as well as the long term economic sustainability of the City of New Haven along the Route 34 corridor. Through collaboration with other community partners, including the Economic Development Corporation, City of New Haven, the Board of Education and many more, the Authority anticipates to redesign the infrastructure to create more traffic flow through the community, redesign the housing units to be more spacious, remove barriers that individuals and families are facing by providing supportive services, and other critical components as they arise throughout the planning process. The supportive services may include but are not limited to improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

This activity remains on hold while ECC/HANH explores funding and redevelopment opportunities for this high-rise development. The property was designed by world-renowned architect Paul Rudolph in the 1960’s brutalist style. The property is listed on the national registry of Historic places which both limits rehabilitation activities but provides an avenue for the inclusion of State and Federal Tax Credits into any financing plan.
D. Closed-Out Activities

This section includes all approved activities that have been closed out, including activities that ECC/HANH does not plan to implement and obsolete activities.

Initiative 4.9 LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families

1. Specify the Plan Year in which the activity was first approved, implemented, and placed on hold.
This initiative was first approved in FY08. Due to ECC/HANH’s focus on redevelopment activities, this initiative was placed on hold in FY12 and continued to be deferred in FY14.

Implementation of the marketing initiatives for Higher Income Eligible families began during FY09 with the development of marketing materials. Outreach will continue during FY11.

2. Report any actions that were taken towards reactivating the activity.
No actions were taken towards reactivating this activity in FY16, ECC/HANH will no longer pursue this activity.

Initiative 1.1 – Development of Mixed-Use Development at 122 Wilmot Road

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This activity was Proposed and approved in 2009 MTW Annual Plan, it was implemented in FY14. The development was completed and occupied in September 2013.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to close out this activity.

3. Provide the year the activity was closed out.
This activity was closed out in FY2014.

Initiative 1.3 – Fungibility

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
Approved in FY12 and implemented in FY13.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to eliminate in MTW reporting as it is not necessary to list as an initiative.

3. Provide the year the activity was closed out.
This activity was closed out in FY13.

Initiative 1.5 – HCV Preference and Set-Aside for Victims of Foreclosures

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This initiative was approved in FY09 and implemented in FY10.

2. Explain why the activities was closed out.
This initiative prevents displacement of families due to foreclosure. The demand for foreclosure vouchers decreased during F Y2017 and FY18. In addition, many participants either ported out to another jurisdiction or left the HCV program, thereby reducing the need for the number of set aside vouchers even further. At the end of FY 18 there were 18 families leased and in the 1st quarter of 2018, there were 17 families leased.

ECC/HANH was able to assist families with the foreclosure vouchers at a time when homes were being foreclosed. Now that the market has stabilized and there are fewer foreclosures, there isn’t as great of a need for the set aside of the foreclosure vouchers, and so the Foreclosure Waiting List is now closed. ECC/HANH allocated the remaining vouchers and closed out the initiative in FY19. During FY20, there were 15 vouchers in use. ECC/HANH is in the process of reallocating these vouchers as the families are absorbed via port out or end participation.

3. Provide the year the activity was closed out.
This activity was closed out in FY19.

Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
Approved in FY13.

2. Explain why the activities was closed out.
HUD instructed ECC/HANH to close-out this activity. It was combined with Section V: Initiatives Requiring MTW Funding Flexibility Only, Major Redevelopment Efforts at West Rock and the description of the activity is now placed in that section of the report.

3. Provide the year the activity was closed out.
This activity was closed out in FY14.

Initiative 1.14 – Redevelopment of 99 Edgewood Avenue (Dwight Gardens)

ECC/HANH will use MTW Block Grant Banks to develop housing through a mixed finance process

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
This activity was approved in FY2013 and was never implemented.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to eliminate in MTW reporting. The Authority and its instrumentality, the Glendower Group, Inc., determined that this redevelopment undertaking was no longer feasible and therefore did not pursue the redevelopment efforts with the co-developer. During FY2014 ECC/HANH determined that the Redevelopment of 99 Edgewood Avenue k/n/a Dwight Gardens would not benefit ECC/HANH because the feasibility of the project needed to be expended in order to complete the redevelopment.

3. Provide the year the activity was closed out.
This activity was closed out in FY14.

Initiative 3.2. UPCS Inspections

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
UPCS Inspections were approved and implemented in FY08.

2. Explain why the activities was closed out.
MTW authorization was no longer required. Since ECC/HANH implemented the initiative in FY08, HUD subsequently permitted all PHAs to inspect on a similar schedule. It is no longer being reported on as an MTW initiative.
3. Provide the year the activity was closed out.
This activity was closed out in FY13.

**Initiative 3.3 – Revised HQS Inspection Protocol**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
   Revised HQS Inspections: Approved and implemented in FY11.

2. Explain why the activities was closed out.
   This activity will be replaced with Initiative 3.5.

3. Provide the year the activity was closed out.
   This activity will be closed out in FY15.

**Initiative 3.4. Mandatory Direct Deposit for Housing Choice Voucher Landlords**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable).
   Mandatory direct deposit for Housing Choice Voucher landlords was approved and implemented in FY10.

2. Explain why the activities was closed out.
   This activity was closed since it does not require MTW flexibility as it is covered by general operational flexibility provided to all PHAs. Although the activity continued in FY14 and will in the future, it will no longer be reported on as an MTW initiative.

3. Provide the year the activity was closed out.
   This activity was closed out in FY14.

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**A. ESTIMATED SOURCES AND USES OF MTW FUNDS**

### (II) SOURCES AND USES OF MTW FUNDS

#### ANNUAL MTW PLAN

<table>
<thead>
<tr>
<th>FDS LINE ITEM NUMBER</th>
<th>FDS LINE ITEM NAME</th>
<th>DOLLAR AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>70500</td>
<td>Total Tenant Revenue</td>
<td>$1,650,637</td>
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<tr>
<td>70600</td>
<td>HUD PHA Operating Grants</td>
<td>$94,848,600</td>
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<tr>
<td>70610</td>
<td>Capital Grants</td>
<td>$3,850,000</td>
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<tr>
<td>70700 (70710+70720+70730+70740+70750)</td>
<td>Total Fee Revenue</td>
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</tr>
<tr>
<td>71100+72000</td>
<td>Interest Income</td>
<td>$0</td>
</tr>
</tbody>
</table>
ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

<table>
<thead>
<tr>
<th>FDS LINE ITEM NUMBER</th>
<th>FDS LINE ITEM NAME</th>
<th>DOLLAR AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>91000/91100+91200+91400+91500+91600+91700+91800+91900)</td>
<td>Total Operating - Administrative</td>
<td>$3,987,293</td>
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<tr>
<td>91300+91310+92000</td>
<td>Management Fee Expense</td>
<td>$9,337,886</td>
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<tr>
<td>91810</td>
<td>Allocated Overhead</td>
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</tr>
<tr>
<td>92500 (92100+92200+92300+92400)</td>
<td>Total Tenant Services</td>
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<tr>
<td>93000</td>
<td>Total Utilities</td>
<td>$2,285,034</td>
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<tr>
<td>93500+93700</td>
<td>Labor</td>
<td>$0</td>
</tr>
<tr>
<td>94000 (94100+94200+94300+94500)</td>
<td>Total Ordinary Maintenance</td>
<td>$3,498,034</td>
</tr>
<tr>
<td>95000 (95100+95200+95300+95500)</td>
<td>Total Protective Services</td>
<td>$172,050</td>
</tr>
<tr>
<td>96100 (96110+96120+96130+96140)</td>
<td>Total Insurance Premiums</td>
<td>$650,585</td>
</tr>
<tr>
<td>96000 (96200+96210+96300+96400+96500+96600+96800)</td>
<td>Total Other General Expenses</td>
<td>$1,907,001</td>
</tr>
<tr>
<td>96700 (96710+96720+96730)</td>
<td>Total Interest Expense &amp; Amortization Cost</td>
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<tr>
<td>97100+97200</td>
<td>Total Extraordinary Maintenance</td>
<td>$1,313,187</td>
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<tr>
<td>97300+97350</td>
<td>HAP + HAP Portability-In</td>
<td>$65,393,290</td>
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<td>97400</td>
<td>Depreciation Expense</td>
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<tr>
<td>3397500+97600+97700+97800</td>
<td>All Other Expense</td>
<td>$0</td>
</tr>
<tr>
<td>90000</td>
<td>Total Expenses</td>
<td>$93,737,295</td>
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</tbody>
</table>

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

Estimated Total Expenses include Line Item 97400 Depreciation Expense for $4,927,935, which is a non-cash item. After adjusting the depreciation expense, Estimated Total Revenue exceed Estimated Total Expenses by $11,746,977, which has been planned for development projects under the Non-MTW activities and other Capital Expenditures which will be recorded on the balance sheet.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a
thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

**PLANNED USE OF MTW SINGLE FUND FLEXIBILITY**

Single fund flexibility is made possible by the MTW program. It enables ECC/HANH to make improvements at some of its developments, enables vacancy prep which increases occupancy, enables major redevelopment efforts, continually improves the operational conditions of our RAD sites from our project-based vouchers, and enables provision of services to our residents through the self-sufficiency initiatives including SEHOP Capital Improvement program, Resident Owned Business program, and the Prison Community/Reentry Program as well as the Resident Services for Elderly/Disabled.

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**B. LOCAL ASSET MANAGEMENT PLAN**

i. Is the MTW PHA allocating costs within statute?  
   - No

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?  
   - Yes

iii. Has the MTW PHA provided a LAMP in the appendix?  
   - Yes

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.
   
   No Proposed Changes in FY22

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**C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

ii. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

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**RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

- No
- Yes

No Proposed Changes in FY22
ECC/HANH has received approval to convert a significant proportion of its portfolio under the RAD conversion process. ECC/HANH completed the conversion of Ribicoff Cottages to Twin Brook under a RAD redevelopment resulting in 95 RAD units. ECC/HANH converted all formerly LIPH units at the Monterey Place development resulting in 280 RAD units. ECC/HANH converted 34 LIPH and 53 LIPH units to 87 RAD units at Wilmont Crossing and Eastview Terrace respectively. ECC/HANH is converting 244 LIPH units at Farnam Courts in a multi-phase redevelopment. The first phase resulted in 57 new RAD units at Fair Haven and through the second phase 86 new RAD units on site at Mill River Crossing. Through a portfolio award, HUD also approved the RAD conversion of 11 additional sites through 4 groupings. RAD 1 included 144 units of elderly only LIPH units were converted to RAD units at Prescott Bush, Katherine Harvey Terrace, Newhall Gardens and Constance Baker Motley. RAD 2 converted an additional 70 units at Stanley Justice, Fulton Park and Waverly. RAD 3 is currently under construction and has converted 213 units at McQueeney Towers and Celentano Towers. RAD 4, which closed in FY20, converted an additional 201 units at Fairmont Heights and Ruoppolo Manor. Rockview 2 was also completed in FY20 which will transfer 62 units from Westville Manor as an offsite component of the multi-phase Westville Manor redevelopment.

iii. 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

iv. 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?

There are no proposed changes to the RAD Significant Amendment.

VI. Administrative

Board Resolution – Approving ECC/HANH’s MTW FY22 Annual Plan
To: Board of Commissioners

From: Karen DaBols-Walton, Ph.D., President

Date: September 15, 2020

RE: Approval of MTW Annual Plan for FY 2021

ACTION: Recommend that the Board of Commissioners adopt Resolution #09-35/20-R

TIMING: Immediately.

DISCUSSION:

As a MTW agency, ECC/HANH is required to provide an Annual MTW Plan and an Annual MTW Report. The MTW Annual Plan for FY 2021 was made available for public review; copies were made available on the Elm City Communities Website and at 360 Orange Street Reception area. A Ring Central Phone and Video public hearing was held on Monday, July 27, 2020. No public comments were received.

ECC/HANH submits for Board approval the MTW Annual Plan for Fiscal Year 2021. We request the Board’s authorization for submission to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Plan for FY 2021 and all related or required certifications and HUD forms, of which the attached document is a part, as well as all necessary documentation and submissions of the Plan.

FISCAL IMPACT: None.

STAFF: Lesley Negron, Director of Moving to Work Initiatives
Office of Asset Management
Housing Authority of the City of New Haven

Resolution #09-85/28-R

APPROVING ECC/HANH'S MTW ANNUAL PLAN FOR FY 2021

WHEREAS, ECC/HANH is required, to provide an Annual MTW Plan and an Annual MTW Report; and

WHEREAS, The MTW Annual Plan for FY 2021 was made available for public review on, and a public hearing was held on Monday, May 27, 2020; and

WHEREAS, ECC/HANH received no public comments; and

NOW, THEREFORE, BE IT RESOLVED THAT THE BOARD OF COMMISSIONERS hereby authorizes the submission to the U.S. Department of Housing and Urban Development (HUD) the Moving to Work Annual Plan for FY 2021 and make the following certifications and agreements with HUD in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.

2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Board(s) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form (HUD-50075).

4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990.

5. The 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.

8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.


11. The PHA will comply with requirements with regard to a drug-free workplace required by 24 CFR Part 26 Subpart F.

12. The PHA will comply with requirements with regard to compliance with restrictions on bidding required by 24 CFR Part 27, 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.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition for Relocation Assistance Act of 1970 and implementing regulations at 24 CFR Part 24.

14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.9(b)(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 CFR 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.

17. The PHA will keep records in accordance with 24 CFR 98.20 and facilitate an effective audit to determine compliance with program requirements.

18. 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.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present on September 15, 2020.

Karen Dalbois-Walton, Ph.D.
Secretary/President

9/15/20

Date

REVIEWED:
MC CARTER & ENGLISH, LLP
GENERAL COUNSEL

By: [Signature]
Rudra Joshi Young, Esq.
A Partner
Certificate 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 Housing to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official, if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (DOB), hereinafter referred to as "the Plan," of which this document is a part and waive 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 MTW PHA published notice that a hearing would be held, that the Plan and all information relevant to the public hearing were available for public inspection for at least 30 days, that there were no less than 10 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comments.

The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Board) 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 MTW PHA certifies that the Board of Directors has reviewed and approved the Plan for the Standard Risk of Program as concluded in the Capital Plan/Program Annual Statement/Performance and Evaluation Report, Form HUD-5017, (or successor form as required by HUD).

The MTW PHA will comply with 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.

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.

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 Impediments to Fair Housing Study, for the PHA's jurisdictions and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

The MTW PHA will affirmatively further fair housing by fulfilling the requirements of 24 CFR 50.7 and 24 CFR 50.15(b), which requires that it will take affirmative action to further the goals and enforce the provisions of fair housing (PHA) conducted in accordance with the requirements of 24 CFR 50.15(b) through 50.18(b), that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 50.16(a)(2). Until the time the MTW PHA is required to submit an AAR, and that AAR has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to Fair Housing Choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 96.

The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1977.

In accordance with 7 CFR 5.505(d)(3) of HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquires concerning the gender identification or sexual orientation of any applicant for or occupant of HUD assisted housing.

The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 4, Accessibility, and with the enforcement of Standards and Requirements for Accessibility for the Physically Handicapped.

The MTW 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 96.

The MTW PHA will comply with requirements with respect to a drug-free workplace required by 24 CFR Part 23, Subpart C.
110

THE MTW 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.

14. The MTW 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.

15. The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(c).

16. The MTW 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 MTW 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.

17. With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or similar determinations wage requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

18. The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

19. The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

20. The MTW 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 200.

21. The MTW 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 approved under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

22. 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

The Housing Authority of New Haven

MTW PHA NAME

CT004

MTW PHA NUMBER/IA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompanying documentation herewith, is true and accurate. Warnings: 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).

EBRY CLEMONS

NAME OF AUTHORIZED OFFICIAL

BOARD CHAIRMAN

TITLE

9/23/2020

DATE

* Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA. 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.
Documentation of Public Hearing and Public Comment Period

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

Results of Agency Directed Evaluations of Demonstration

ECC/HANH has contracted with Enterprise Community Partners to position the agency for a future case studies and evaluation of its MTW program and each of its initiatives. Enterprise is completing the 3rd year of a three-year contract to complete ECC/HANH’s MTW Plans and Reports each year and has coordinated with ECC/HANH’s data collection software provider for optimal data collection. Enterprise has provided data collection recommendations to ensure ECC/HANH is collecting data for metrics to support proper reporting and support a future evaluation.

Lobbying Disclosures
Disclosure of Lobbying Activities (SF-LLL)
Appendix 1

ECC/HANH’s local total development cost (TDC) limits as approved by HUD.

The following pages detail ECC/Hanh’s Alternate TDCs.

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Appendix 2

Local Asset Management Plan:

Under the First Amendment to the MTW Agreement 10-15-08, ECC/HANH is permitted to design and implement its own Local Asset Based Management Program so long as the ECC/HANH and HUD agree that the principles and understanding outlined in the Amendment are adhered to.

- ECC/HANH developed a program wherein Excess Operating Reserves are funded from the General Fund Account and will be used to cover deficits through a journal voucher once per year to ensure that the transfer of funds from the General Fund to a project to cover any operating deficits are reflected on the income and expense statement of the project.
- ECC/HANH uses project-based accounting and project-based budgeting for direct costs incurred by each property.
- ECC/HANH considers its cost allocation plan for the entire operation of the Agency, rather than a strict focus on only the MTW program. This cost allocation plan addresses the larger ECC/HANH operation as well as the specific information required related to the MTW Program.
- All associated activities funded under the MTW Single Fund authority are deemed as a single cost objective. The MTW Program cost objective includes the Asset Management Projects in the public housing program, housing choice vouchers—both project-based and tenant-based vouchers, development activities funded from MTW, resident services, case management services, capital fund program, and any other activity that is permitted under the Amended and Restated MTW Agreement.
- ECC/HANH’s proposed cost allocation system is more comprehensive than HUD’s Asset Management System, which is a fee-for-service approach specific to the asset management projects in the public housing program. In consideration of ECC/HANH’s other programs such as business activities, ECC/HANH’s proposed LAMP addresses much broader than public housing properties and includes the entire ECC/HANH operation.
- ECC/HANH will use a simple fee system of charging up to 10% of the project/program funds to cover the costs of the Central Office Cost Center (COCC). ECC/HANH views the up to 10% fee as reasonable when compared to the fees earned for administering other programs or non-profit affiliates.

Proceeds from the energy performance contracts and other non-federal sources to support project operations are not reflected in the operating statements for each project. The COCC operates on the allowable fees as described above. ECC/HANH systematically reviews information regarding the financial, physical and management performance of each project and identifies non-performing assets. All non-performing assets will have a management plan that includes a set of measurable goals to address. During FY09, ECC/HANH conducted an updated Physical Needs Assessment for each project. The work was completed in FY2010 and was fully reported in the FY10 report. Finally, ECC/HANH has implemented a Risk Management Program in accordance with §990.270.

The market demands have driven costs higher, but the Authority has been and will continue to be a good steward of public resources. The TDC cost limitations derived from (1) construction cost data obtained from RS Repair and Modeling Cost, and (2) an analysis of unit size and construction cost data obtained from a survey of local mixed income developments, and an analysis of other local factors and market conditions affecting the cost of the development of mixed income communities in the local market area.

The Housing Authority has the following developments in its pipeline: Rockview Phase II; Farnam Phase II 4%, Farnam Phase II 9%; Westville Manor Phase I, and Westville Manor Phase II. As it relates to our approved TDC, the developments shall not exceed the approved TDC. These developments are in the predevelopment stages, except for Rockview that is in the closing stage. Rockview’s TDC aligns more closely with the HUD approved TDCs. This is in large part of not having a significant amount of infrastructure. The Authority continues to work diligently to find creative
construction options to receive a quality development that will have a lifecycle of 20 years while staying within the lower level of the approved TDC.

Appendix 3

CARING ABOUT RESIDENT ECONOMIC SELF-SUFFICIENCY (CARES) PILOT PROGRAM FOR WEST ROCK REVITALIZATION INITIATIVES

Appendix 4

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN
MOVING TO WORK SUFFICIENCY PROGRAM

RENT SIMPLIFICATION PROCEDURES FOR THE PUBLIC HOUSING PROGRAM
Public Housing Program Rent Simplification
ECC/HANH believes there is a better way to administer essential housing programs, one that encourages long-term self-sufficiency for both the program participants as well as the agency.

Rent Simplification: Equity & Efficiency
The proposed system rewards families who increase their incomes and provides them with more opportunities to save while easing ECC/HANH burden of administering these housing programs.

Everyone Should Contribute
ECC/HANH believes that every family should contribute towards their housing. Under Rent Simplification, the criteria under which a family can claim zero income and not pay any rent are not changed. What will change is the amount of time families will be permitted to request an interim adjustment. The minimum rent will remain at $50.00 per month.

Fiscal Equity for ECC/HANH
Rent Simplification is forecast to be revenue-neutral. In other words, the implementation of Rent Simplification will not increase the amount of rental revenue to the ECC/HANH

Approvable Method
Rent Simplification allows all stakeholders to easily understand how tenant rents are determined, and armed with some basic income data, anticipate what future rents will be. This will allow families to easily plan for future expenses and savings.

Measurable Reduction in Administrative Time
By simplifying the rent determination and deduction procedures in Federal Public Housing, Rent Simplification makes the job of recertifying tenants significantly easier.

Transition to Avoid Hardships
ECC/HANH has devised a system that is not only revenue neutral for the organization but will not result in any undue hardship to our families. There will be a transition period of one year from the current income-based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy. Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification.
Asset Exclusion
Asset exclusion is raised to $50,000.00. Increasing the asset exclusion amount allows residents to accumulate more assets before they are calculated as income. Families will self-certify that they do not have assets in excess of $50,000.00.

Earned Income Disallowance (EID)
This benefit is embedded into the Rent Simplification rule so the provision of EID by definition of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit; however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. The maximum amount of time a family can be enrolled in the Federal EID is 24 months with a start/stop clock of 48 months. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/tri annual certification comes up. In many cases the 48-month window will not be used as most families will receive the Rent Simplification benefit throughout the life of the EID; for the most part eliminating the need to stop or re-start the EID clock.

When individuals are up for bi/tri certs, anyone who would have benefited from the EID will have the months checked off in Elite for tracking purposes, however, a reduction from 100% to 50% does not occur, therefore, a family will generally benefit from a minimum of 48 months of discounted wage increases at 100% EID.

Families on Bi-annual updates who would have an income increase at year two; benefiting from a full 2 years at 100% discounted Income, & Families on Tri-annual Updates who would have an income Increase at year three, benefiting from a full 3rd year of 100% discounted income.

It is still required that at time of Bi-annual or Tri annual cert: The specialist enters EID dates in Elite, dating back to the Start of when benefit would have started, as well as end date.

ECC/HANH staff will still utilize worksheet as needed to determine if a person qualified, in order to check off boxes in Elite for tracking purposes, however, annual tracking and tracking at time of interim change would be eliminated in efforts to streamline the interim and certification process, relieving staff of the additional burden and allowing families to benefit from the full extent of Rent Simplification as written. Tracking in Elite will only occur at time of bi/tri certifications.

Other Exclusions
All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (x11) as the $480 dependent deduction is eliminated. All income earned by full-time college students will no longer be included in the determination since there will no longer be the $480 dependent deduction to offset income.

Annualized Income Calculation
Prospective and past income may be used to calculate resident rents, especially for families with irregular or sporadic employment histories. For families with income of up to and including $5,000.00 we will accept a self-certification. For families earning more than $5,000.00 of wages and salaries we want pay stubs covering the most recent four weeks of employment or a W-2 or 1099 within 180 days of the effective date of recertification. We must complete EIV or other UIV as required by HUD.

Annual Reexaminations
Reexaminations are currently conducted every year for non-elderly households and every two years for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. ECC/HANH must perform more than 3,200 LIPH reexaminations every year. This is inordinately time consuming and an exceedingly complex process. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all their increased earnings between annual reexaminations. CSSR requirements will be reviewed at time of bi/tri certification for families and individuals who are not exempt and required to complete the required 96 hours per year. Household members exempt from having to meet the CSSR will be required to certify exemption at time of bi-tri certification. This change relieves staff of the additional burden of annual tracking and
allowing families to benefit from the full extent of Rent Simplification as written. Tracking in Elite will only occur at time of bi/tri certifications

Effective FY15 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn’t meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).

ECC/HANH believes this new definition more closely matches the spirit of a “work-able” family since all work-able families would have at least one work-able adult. Under the prior definition, an elderly/disabled family only needed a head, co-head, or spouse to be elderly or disabled which led to some families with work-able adults being categories as elderly/disabled. This change will also give ECC/HANH the ability to better track earnings and employment for work-able families; and the better population division will give ECC/HANH the flexibility to implement work-able specific rent policy changes in the future if it so chooses.

Deductions for Exceptional Expenses

Excess resources are dedicated to verifying deductions for child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second- and first-party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

Households with exceptional expenses may request a rent reduction. This includes large families (with more than two (2) dependents). It also includes families with high medical expenses, disability assistance expenses, or childcare expenses.

The amount of the expense is set in $2,000.00 tiers. This allows ECC/HANH to move away from verifying every dollar. Tenants are not required to provide documentation of every dollar of expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier.

The amount of monthly rent reduction is established at the mid-range of the tier.

Households with exceptional expenses will receive a direct reduction of the monthly rent. However, no tenant’s rent will be reduced below a rent of $50.00 as a result.

<table>
<thead>
<tr>
<th>Tiered Amount of Expenses</th>
<th>Monthly Rent Reduction</th>
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<tr>
<td>$ 2,000 - $ 3,999</td>
<td>$ 75 (equivalent to $3,000 deduction)</td>
</tr>
<tr>
<td>$ 4,000 - $ 5,999</td>
<td>$ 125 (equivalent to $5,000 deduction)</td>
</tr>
<tr>
<td>$ 6,000 +</td>
<td>Hardship Review</td>
</tr>
</tbody>
</table>

Changes in Family Composition

Residents are still required to get permission from the Housing Manager and the Director of Housing, Management to add anyone to a household and to report changes in family composition. A family's rent is recalculated if the addition or subtraction of a household member results in an income change of $200.00 per month or more, or that causes the family to move from one income tier to another. This increase in rent does not count as an interim reexamination.

Mandatory Interim Reexaminations Policy

Residents must request an interim reexamination if any of the following conditions occur:

Change in family composition that affects the voucher size or bedroom size.
The addition of a family member 18 years of age or older

Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.

Addition of a live-in aid
Income increase following an interim rent reduction

If ECC/HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to ECC/HANH.

Optional Interim Reexaminations Policy
Residents have the option to request three (3) interim reexaminations during every twelve (12) month period. Interims may be granted in the following instances:

Decrease in family income that is expected to last 90 days or more if it will result in a change in the family’s income tier (exclude seasonal workers; see below)

Increase in Exceptional Expenses of at least $2,000.00

Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed.

Households receiving a requested interim rent reduction must report any subsequent income increase to ECC/HANH within thirty (30) days of occurrence. Failure to report the change within thirty (30) days results in retroactive rent changes, and depending on the severity of the circumstances, lease termination.

Rent Simplification Interims:
Rent Simplification in both LIPH and HCV will include a request to adjust rent during COVID19 and any similar pandemic or national, state, or local emergencies that affect a large number of families in the community. In order to prevent staff having to reprocess files when families go back to work during a time like this, ECC/HANH will create a letter which advises the families of decrease to their rent for 3 months, as a result of loss or decrease in income. At the end of the 3 months, the rent will be adjusted back to what it was before the decrease. Staff would process 2 actions, the decrease, and a second action (effective on the 1st day of the 4th month) which would be an increase back to previous amount. This way, families will not need to report the increase and staff can give 30-day notice of the potential increase change at the same time they are giving the decrease notice.

If families are not yet back to work or the change is permanent, they must report the change to ECC/HANH as soon as they are aware so that the second interim may be cancelled or adjusted. This change does not cancel or supersede the current interim change rule where families are not required to report a new income or increase in income if the previous decrease was associated with an annual certification. In other words, Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed.

Seasonal workers who are employed for a period of time less than 12 months annually will have their rent calculated over a 12-month period using the 9 or 10 months of income earned. During the months the worker is not actively working, the family will not be able to request a rent reduction as the rent has already been adjusted over a 12-month period.

Permanent loss of income (i.e., death of an income earner) results in a permanent, rather than interim, rent reduction. This decrease in rent does not count as an interim reexamination. Under this circumstance, the family is not required to report a subsequent increase in income until the next scheduled certification.

Verification of Annual Income from Wages and Salaries and Assets
ECC/HANH MTW FY22 Plan Amendment #1

To reduce the administrative burden associated with the verification of income ECC/HANH has amended its Admission and Continued Occupancy (ACOP) to specify that:

For earnings from wages and salaries where Annual Income for the prior period of up to and including $5,000.00, self-certification from family is all that shall be required as verification of income.

For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third party source of Upfront Income Verification.

Self-certification of all sources of Annual Income shall be required in all cases.

For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands

Rents are based on $1,000.00 income bands starting at $2,500.00. Using a band-based rent schedule allows the ECC/HANH and residents to move away from verifying every dollar earned and deducted. (See Exhibit A)

At January 31, 2007, both the median and mode percentage of Total Tenant Payment (TTP) to annual income is 28.5 percent. That is, most families pay 28.5 percent of their family income (before utility allowance) as rent. Fifty-two (52) percent of households pay 28 percent or more of annual income for TTP; six percent pay less than 10 percent; 13 percent pay between 10 and 20 percent; and 26 percent pay between 20 and 27 percent of income as TTP.

Rent will be set at 28.50 percent of income for income tiers of $1000.00 starting at $2,500.00. The rent will be calculated at the lower end of each tier. For example, for the $2,500.00 to $3,499.00 tier, the rent will be calculated at 28.50 percent of $2,500.00. Families with incomes below $2,500.00 will be charged the minimum rent. Families will be permitted to apply for a hardship if verifiable proof is provided that their total expenses exceed $2,000.00

Minimum Rents and Flat Rents

Families with annual income below $2,500.00 will pay a minimum rent of $50.00. In no event shall any family pay less than 25 percent of its Annual Income for TTP.

All residents at a rent of $50.00, except for the elderly and persons with disabilities, are referred to the Family Self Sufficiency (FSS) Program for job or benefit counseling. Families may still choose the existing Flat Rent option for public housing. The Flat Rent option certification form will only be signed at time of bi/tri certification; however, families will have the opportunity to switch to the Flat rent once a year. Annual notice will go out to families, but signature will not be required except for at time of scheduled bi/tri certification. This change is in line with efforts to streamline the certification process; relieving staff of the additional burden and allowing families to benefit from the full extent of Rent Simplification as written.

Zero Income Households

Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent except for elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.

All families who apply for such hardship exemption, except for elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency.

ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirements. Residents will be notified of their right to request a hardship exemption through the Application for Exemption from
Minimum Rent, a copy of which will be provided to tenants at lease-up and at each recertification appointment and mailed to residents at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in tenant rent change notifications, the form lease agreement and all form documents related to the exemption process.

Criteria for Hardship Exemption from Minimum Rent Requirement

A family is automatically exempt from the minimum rent requirements for a 90-day period when the family’s circumstances fall into any one of the following criteria:

When a family has lost eligibility or is awaiting eligibility determination from a Federal, State, or local assistance program.
When the family would be evicted because it is unable to pay the minimum rent.
When the income of the family has decreased because of changed circumstances, including loss of employment.
When a death in the family has occurred; or
Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the “Criteria for Minimum Rent Exemption”).

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirement.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long-term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve-month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH’s Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve-month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the “FSS Program”). Elderly and disabled families are not required to enroll in the FSS Program.

Once the Authority identifies a resident’s need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

5. Hardship Review Committee

All “Applications for Exemption from Minimum Rent” shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family’s option, the Hardship Review Committee may include one (1) resident of ECC/HANH who is in good standing.

When a resident submits an application or a ECC/HANH employee submits an application on behalf of a resident, ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days.

The resident cannot be evicted for nonpayment of minimum rent while resident’s Application for Exemption from Minimum Rent is pending or during the 90-day period of suspension, whichever is longer.
The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:

that ECC/HANH has received an Application for Exemption from Minimum Rent,

that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90-day suspension,

that there can be no eviction for non-payment of rent during the suspension period.

the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and

that, except for elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

If the Committee determines that the hardship is of a temporary nature (the hardship is expected to last less than 90 days), at the end of the 90-day period, the resident’s rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

If the Committee determines that the hardship is of a long-term nature (the hardship is expected to last more than 90 days), the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation about this requirement.

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH’s FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

If the hardship is determined to be non-existent, the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be reinstated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

If the hardship exemption is determined to be temporary:

that a temporary hardship exemption was granted.

the effective dates of the exemption.

the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and
that the resident has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

**If the hardship exemption is determined to be long-term:**

that a long-term hardship exemption was granted.

whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place.

that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and

that the resident must notify ECC/HANH within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.

**Minimum Rent Hardship during COVID19 and any similar pandemic or national, state or local emergencies that affect a large number of families in the community:**

The three month hardship time-frame will be increased to four months during COVID19 and any similar pandemic or national, state or local emergencies that affect a large number of families in the community. Additionally, families who fall under the hardship repayment requirement will not be required to repay hardship. Referrals to FSS are not required as a result of this type of decrease.

**If the hardship is determined to be non-existent:**

that a hardship exemption was denied;

the reason for such determination; and

the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any resident who disagrees with the decision may request a grievance in accordance with ECC/HANH’s grievance procedures, a copy of which will be included with the written decision. In cases where a grievance is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

**Mixed Families**

For mixed families, where some households include members with citizenship or eligible immigration status as well as those without, rents are calculated using the simplification model; subsidy is then prorated using current methods.

**Fraud Prevention**

After two or more instances of job loss or income drop within ninety (90) days of a scheduled reexamination (based on current and prior reexamination history), ECC/HANH sets a rent based on the past year’s W-2 or other information available for income verification. Households are advised that this is a potential fraud issue and that they have the right to grieve through the normal process to more fully explain the reasons for the pattern of income loss. ECC/HANH will set the rent after the Conference Panel review.

Households with two or more instances of job loss or income drop within ninety (90) days of a scheduled certification do not have access to the Hardship Review Committee.

**Rent Simplification Implementation - Public Housing**

Residents will receive notice of the new policy on July 1, 2007 and the policy will take effect on January 1, 2008 for all reexaminations with an anniversary effective date on or after January 1, 2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.

A staggered approach is used to integrate the two-year and three year reexamination cycles. Initially in fiscal year 2008, all families will be re-examined during the first year.
In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.
Rent Simplification is expected to be fully implemented by December 31, 2010.

**Low Income Public Housing (LIPH) Program**

**Rent Simplification Rent Tier Schedule**

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<th>Rent Tier</th>
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Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent with the exception of elderly and disabled families will be referred to the Family Self Sufficiency Program.

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirement.

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency.

ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirements and in accordance with the provisions set forth herein. Residents will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to tenants at lease-up and at each recertification appointment and mailed to residents at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in tenant rent change notifications, the form lease agreement and all form documents related to the exemption process.

1. Criteria for Hardship Exemption from Minimum Rent Requirement

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family’s circumstances fall into any one of the following criteria:

When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;  
When the family would be evicted because it is unable to pay the minimum rent; 
When the income of the family has decreased because of changed circumstances, including loss of employment; 
When a death in the family has occurred; or 
Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the “Criteria for Minimum Rent Exemption”).

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirement.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days.

A long-term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH’s Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the “FSS Program”). Elderly and disabled families are not required to enroll in the FSS Program.

Once the Authority identifies a resident’s need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.
2. Initiation of Hardship Exemption Review

An Application for Exemption from Minimum Rent may originate from either a ECC/HANH employee or the resident family.

ECC/HANH employees must complete and submit an Application for Exemption from Minimum Rent on behalf of a resident family whenever any evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption (as set forth above).

A resident family also has the right to request a hardship exemption from minimum rent. Such request must be in writing and must state the family circumstances that qualify the family for a hardship exemption.

3. Notification of the Right to a Hardship Exemption

ECC/HANH will notify all families of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the Application for Exemption from Minimum Rent, a copy of which will be provided to residents at lease up and at each recertification appointment or mailed to residents for interim recertifications.

ECC/HANH will also notify all families in writing of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the following documents: resident rent change notifications when monthly rent is set at the minimum rent, the form lease agreement and all form documents related to the hardship exemption process.

ECC/HANH will also notify all families in all of the above documents that all families that are exempt from the minimum rent requirement will be referred to the Family Self Sufficiency (FSS) Program in order to assist the family in moving toward self-sufficiency. Elderly and disabled families are not required to participate in the FSS program.

4. Hardship Review Committee

All "Applications for Exemption from Minimum Rent” shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family’s option, the Hardship Review Committee may include one (1) resident of ECC/HANH who is in good standing.

The Application for Exemption from Minimum Rent shall originate from the family or from a ECC/HANH employee whenever evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption.

When a resident submits an application or a ECC/HANH employee submits an application on behalf of a resident, ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days.

The resident cannot be evicted for nonpayment of minimum rent while resident’s Application for Exemption from Minimum Rent is pending or during the 90 day period of suspension, whichever is longer.

The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:
that ECC/HANH has received an Application for Exemption from Minimum Rent,

that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,

that there can be no eviction for non-payment of rent during the suspension period;

the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and

that, with the exception of elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

If the Committee determines that the hardship is of a temporary nature (the hardship is expected to last less than 90 days), at the end of the 90-day period, the resident’s rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

If the Committee determines that the hardship is of a long-term nature (the hardship is expected to last more than 90 days), the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

ECC/HANH may deny a resident a long-term exemption from the minimum rent requirement, if the resident fails to attend the scheduled meeting with the Hardship Review Committee. ECC/HANH will provide each resident one opportunity to reschedule the meeting. If the resident fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting shall inform residents that persons with disabilities are entitled to reasonable accommodation with regard to this requirement.

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and actively participates in ECC/HANH’s FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

If the hardship is determined to be non-existent, the resident will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

**If the hardship exemption is determined to be temporary:**

That a temporary hardship exemption was granted;

the effective dates of the exemption;

the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and

that the resident has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.
If the hardship exemption is determined to be long-term:

that a long-term hardship exemption was granted;

whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place;

that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and

that the resident must notify ECC/HANH within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.

If the hardship is determined to be non-existent:

that a hardship exemption was denied;

the reason for such determination; and

the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any resident who disagrees with the decision may request a grievance in accordance with ECC/HANH’s grievance procedures, a copy of which will be included with the written decision. In cases where a grievance is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

7. Termination of Long-Term Exemptions

ECC/HANH may conduct periodic reviews of all long-term hardship exemptions to determine if the hardship continues to exist and, for non-elderly and non-disabled residents, whether the resident is complying with FSS requirements.

If ECC/HANH determines that a family is no longer eligible for a long-term hardship exemption (because the hardship no longer exists or the non-elderly/non-disabled tenant has not complied with FSS requirements), ECC/HANH shall notify the family of the proposed termination of the long-term hardship exemption, the effective date of the proposed termination, and the reason for such proposed termination. This letter shall be delivered to the resident by first class mail no later than thirty (30) days prior to the effective date of the proposed termination. Any resident who disagrees with the proposed termination may request a grievance in accordance with ECC/HANH’s grievance procedures, a copy of which will be included in the notice of termination. In cases where an appeal is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

The Executive Director may waive any or all of these requirements in cases where he/she determines that the hardship conditions are likely to be permanent.
## PUBLIC HOUSING RENT SIMPLIFICATION SUMMARY
### EXCEPTIONS TO LIPIH REGULATIONS

<table>
<thead>
<tr>
<th>Topic</th>
<th>Regulator Provision</th>
<th>Current Policy</th>
<th>Alternative MTW Policy for Public Housing Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Income</td>
<td>24 CFR Part 5.609(a)(4) 5.609(c)(8)(x11)</td>
<td>Any income derived from an asset to which any member of the family has access. Adoption assistance payments for any child in excess of $480.00 received.</td>
<td>Excludes asset from the determination of annual income to the extent the amount does not exceed $50,000. All income earned by fulltime student will be excluded who is over 18. Students who are HOH or spouse are not excluded. All income earned by a family from adoption assistance will be excluded.</td>
</tr>
</tbody>
</table>

| Income Exclusion for Person Enrolled in FSS Program | 24 CFR Part 5.609(b)(1) | Incremental earnings and benefits resulting in any family member from participation in a qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. | Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member during the first year of FSS program participation, 75% in 2nd year, 50% in 3rd year, 25% in 4th year and 0% in 5th year, as long as the household is enrolled in the FSS Program. This will not exceed 5 years. A family’s eligibility to receive this optional income disallowance is limited to a total of 48 months. In addition, for families that qualify and receive the federal EID, the total number of months that a family may receive the optional income disallowance provided for under this subparagraph and under the Federal Earned Income Disregard (EID) may not exceed 48 months. In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving the federal EID as set forth in 24 CFR Part 5.617. Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying federal program, whether or not the member is enrolled in the FSS program. |

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<tr>
<td>Business Income for Resident Owned Businesses</td>
<td>24 CFR Part 5.609(b)(2)</td>
<td>The net income from the operation of a business or profession is included in determining annual income.</td>
<td>Exclude 100 Percent of any net income derived from the operation of a business; provided the business qualifies as a resident owned business under 24 CFR Part 963.5. During the first year of enrollment in FSS program 100 percent; 75 percent in the second year; 50 percent in the third year; 25 percent in the fourth year; 0 percent exclusion thereafter.</td>
</tr>
<tr>
<td>Earned Income Disallowance</td>
<td>24 CFR Part 960.255</td>
<td>Incremental income earned by a family member, provided the increase in income is the result (1) of employment of a family member was previously unemployed for one or more years prior to employment; (2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families</td>
<td>The Federal EID benefit is embedded into the Rent Simplification rule so the provision of EID by definition of regulation, and annual tracking is eliminated for LIPH Participants. Families will not lose out on the benefit, however, ECC/HANH will help streamline staff responsibility by eliminating the requirement. The Federal Earned Income Disregard (EID) will continue to be implemented in the LIPH program for families who are required to report increase in wages or new job under the LIPH Rent Simplification Rules. The maximum amount of time a family can be enrolled in the Federal EID is 24 months with a start/stop clock of 48 months. At the beginning of the 12 months of 50% EID, an interim will not be conducted; the family will remain at the 100% until the scheduled bi/tri annual certification comes up. Families who do already receive the benefit of no increase in rent with higher wages under the Rent Simplification rule will be tracked in Elite under EID at time of Bi-Tri annual certifications.</td>
</tr>
<tr>
<td>Mandatory Deductions</td>
<td>24 CFR Part 5.611</td>
<td>(1) $480 for each dependent; (2) $400 for any elderly family or disabled family; (3) The sum of the following to the extent the sum exceeds three percent of annual income: (i) Un-reimbursed medical</td>
<td>Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions</td>
</tr>
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<td>expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.</td>
<td>Families with verifiable deductions in excess of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must exceed $2,000 and shall be the sum of (1) Mandatory Deductions determined in accordance with Section 5.611 (2), plus non-reimbursed utility expenses (except telephone and cable)</td>
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<tr>
<td></td>
<td>24 CFR 5.611</td>
<td>A PHA may adopt additional deductions from annual income. ECC/HANH had none</td>
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<td>(a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family’s monthly adjusted income; (2) 10 percent of the family’s monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by</td>
<td>The Total Tenant Payment (TTP) will be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually.</td>
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<td>24 CFR 5.628</td>
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<tr>
<td>Hardship Provision for Exceptional Expenses</td>
<td>24 CFR 5.611(2))</td>
<td>A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.</td>
<td>A family may be exempt from minimum rent as follows; When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program, including a family that includes a member who is a non-citizen; When the family would be evicted because it is unable to pay the minimum rent; When the income of the family has decreased because of changed circumstances, including loss of employment; Family whose shelter expenses, plus un-reimbursed medical, childcare and disability expenses exceed 40 percent of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek a deduction in rent for exceptional expenses.</td>
</tr>
<tr>
<td>Minimum Rent</td>
<td>24 CFR 5.630</td>
<td>A family may be exempt from minimum rent of $50.00 as follows: (i) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances; (iv) A death has occurred in the family’s household; (v) any other circumstances to be considered by the PHA to be reason to waive the minimum rent requirement.</td>
<td>A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in ECC/HANH’s Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the “FSS Program”). Elderly and disabled families are not required to enroll in the FSS Program.</td>
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<tr>
<td>Utility Allowances and Reimbursements</td>
<td>24 CFR 5.632(a) and (b)</td>
<td>Tenant Paid Utilities to be deducted from TTP to determine tenant rent.</td>
<td>No. Change. ECC/HANH will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughy Terrace and all Scattered Site properties.</td>
</tr>
<tr>
<td>Annual Reexamination of Income and Family Composition</td>
<td>24 CFR 960 Part 257</td>
<td>Reexamination of income must occur every year, except every two years for elderly or disabled households.</td>
<td>Reexamination of income will occur every three years for Elderly and Disabled families and every two years for all other families. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually. Additionally the Community Service requirement will be reviewed annually for all household members who are not disabled, working less than 20 hours per week or enrolled in classes under the FSS program.</td>
</tr>
<tr>
<td>Interim Reexamination</td>
<td>24 CFR 960 Part 257</td>
<td>A family may request an interim reexamination of family income because of any changes since the last examination. The owner must make the interim reexamination within a reasonable time after the family request. Currently, family must report any change in income that amounts to $200 or more a month.</td>
<td>A family can request only three interim re-examinations each 12 months with the exceptions of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled or a family enrolled in FSS may make one request for an interim for a hardship exemption each 12 months.</td>
</tr>
<tr>
<td>Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000</td>
<td>24 CFR 5.659</td>
<td>The owner must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available: (1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.</td>
<td>Only a self-certification will be required for income up to and including $5,000.00. For income above $5,000.00 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV. Asset exclusion is raised to $50,000.00 and only self-certification will be required.</td>
</tr>
<tr>
<td>Determination of Tenant Total Payment (TTP)</td>
<td>24 CFR 5.628</td>
<td>a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the TTP based upon income-tiered approach. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification</td>
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<td>family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent</td>
<td>Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed more than $50 during the third year; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately preceding the implementation of Rent Simplification. The families TTP after the fifth year shall be whatever amount is determined under Rent Simplification. These limitations on rent increase shall only apply to increases in TTP that result from the imposition of Rent Simplification and not for increases that result from changes in family composition or changes in family income.</td>
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Housing Choice Voucher Program Rent Simplification
ECC/HANH believes there is a better way to administer essential housing programs, one that encourages long-term self-sufficiency for both the program participants as well as the agency.

The Rent Simplification policies apply only to the Housing Choice Voucher (HCV) Program included under the agency’s MTW Program. The Moderate Rehabilitation Program, Mainstream for Elderly, Welfare to Work VASH, RAD, and Enhanced Vouchers are not covered by this policy.

Rent Simplification: Equity & Efficiency
The proposed system rewards families who increase their incomes, and provides them with more opportunities to save while easing ECC/HANH’s burden of administering these housing programs.

Everyone Should Contribute
ECC/HANH believes that every family should contribute towards their housing. Under Rent Simplification, the criteria under which a family can claim zero income and not pay any rent are not changed. What will change is the amount of time families will be permitted to request an interim adjustment. The minimum rent will be increased from $25.00 per month to $50.00 per month for the HCV Program.

Fiscal Equity for ECC/HANH
Rent Simplification is forecast to be revenue-neutral. In other words, the implementation of Rent Simplification will not increase the amount of rental revenue to the ECC/HANH.

Approvable Method
Rent Simplification allows all stakeholders to easily understand how tenant rents are determined, and armed with some basic income data, anticipate what future rents will be. This will allow families to easily plan for future expenses and savings.

Measurable Reduction in Administrative Time
By simplifying the rent determination and deduction procedures in Federal Public Housing, Rent Simplification makes the job of recertifying tenants significantly easier.

Transition to Avoid Hardships
ECC/HANH has devised a system that is not only revenue neutral for the organization, but will not result in any undue hardship to our families. There will be a transition period of one year from the current income based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy. Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than $25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50; $75 a month during the fourth year; and $100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification.
Asset Exclusion
Asset exclusion is raised to $50,000.00. Increasing the asset exclusion amount allows residents to accumulate more assets before they are calculated as income. Families will self-certify that they do not have assets in excess of $50,000.00.

Earned Income Disallowance
The Earned Income Disallowance (EID) under Sec. 5.617 for all HCV participants EID is eliminated.

Other Exclusions
All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (v) as the $480 dependent deduction is eliminated. All income earned by full-time college students will no longer be included in the determination since there will no longer be the $480 dependent deduction to offset income.

Annualized Income Calculation
Prospective and past income may be used to calculate resident rents, especially for families with irregular or sporadic employment histories. For families with income of up to and including $5,000.00 we will accept a self-certification. For families earning more than $5,000.00 of wages and salaries we want pay stubs covering the most recent four weeks of employment or a W-2 or 1099 within 180 days of the effective date of recertification. We must complete EIV or other UIV as required by HUD.

Annual Reexaminations
Reexaminations are currently conducted every year for non-elderly households and every two years for elderly and disabled households. ECC/HANH spends on average three hours per annual reexamination. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all of their increased earnings between annual reexaminations. During the first year all families will be recertified. This process will be phased in over a three-year period.

Effective FY15 (October 2014), ECC/HANH updated its definitions of elderly/disabled and work-able families. Under the policy change, an elderly/disabled family will be defined as one in which all adult members (excluding live-in attendants) are elderly and/or disabled. A work-able family will be one that doesn’t meet the new elderly/disabled definition. Work-able households under the new definition will have reexaminations every two years (biennial schedule) and elderly/disabled households will have annual reexaminations every three years (triennial schedule).

ECC/HANH believes this new definition more closely matches the spirit of a “work-able” family since all work-able families would have at least one work-able adult. Under the prior definition, an elderly/disabled family only needed a head, co-head, or spouse to be elderly or disabled which led to some families with work-able adults being categories as elderly/disabled. This change will also give ECC/HANH the ability to better track earnings and employment for work-able families; and the better population division will give ECC/HANH the flexibility to implement work-able specific rent policy changes in the future if it so chooses.

Deductions for Exceptional Expenses
Excess resources are dedicated to verifying deductions for child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second and first party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, ECC/HANH will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households.

Households with exceptional expenses may request a rent reduction. This includes large families (more than two children). It also includes families with high medical expenses, disability assistance expenses, or childcare expenses. Combined, exceptional expenses must total no less than $2000.00 in order for family to qualify for the additional monthly rent deduction.

The amount of expense is set in $2,000.00 tiers. This allows ECC/HANH to move away from verifying every last dollar. Tenants are not required to provide documentation of every dollar of expense; rather, tenants need only provide documentation sufficient to meet the appropriate tier.

The amount of monthly rent reduction is established at the mid-range of the tier.

Households with exceptional expenses will receive a direct reduction of the monthly rent. However, no tenant’s rent will be reduced below a rent of $50.00 as a result.
### Tiered Amount of Expenses and Monthly Rent Reduction

<table>
<thead>
<tr>
<th>Tiered Amount of Expenses</th>
<th>Monthly Rent Reduction</th>
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</thead>
<tbody>
<tr>
<td>$2,000 - $3,999</td>
<td>$75 (equivalent to $3,000 deduction)</td>
</tr>
<tr>
<td>$4,000 - $5,999</td>
<td>$125 (equivalent to $5,000 deduction)</td>
</tr>
<tr>
<td>$6,000 +</td>
<td>Hardship Review</td>
</tr>
</tbody>
</table>

### Changes in Family Composition

Residents are still required to get permission from the Housing Manager and the Director of Housing, Management to add anyone to a household and to report changes in family composition. A family's rent is recalculated if the addition or subtraction of a household member results in an income change of $200.00 per month or more, or that causes the family to move from one income tier to another. This increase in rent does not count as an interim reexamination.

#### Mandatory Interim Reexaminations Policy

Residents must request an interim reexamination if any of the following conditions occur:

- Change in family composition that affects the voucher size or bedroom size.
- The addition of a family member 18 years of age or older
- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.
- Addition of a live-in aid
- Income increase following an interim rent reduction

If ECC/HANH grants an exceptional deduction for any family and there is a subsequent change then the family must report that change to ECC/HANH.

#### Optional Interim Reexaminations Policy

Residents have the option to request three (3) interim reexaminations during every twelve (12) month period. Interims may be granted in the following instances:

- Decrease in family income that is expected to last 90 days or more if it will result in a change in the family’s income tier (exclude seasonal workers; see below)
- Increase in Exceptional Expenses of at least $2,000.00

Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed. This rule does not apply to Hardships. See language related to hardships.

Households receiving a requested interim rent reduction must report any subsequent income increase to ECC/HANH within thirty (30) days of occurrence. Failure to report the change within thirty (30) days results in retroactive rent changes, and depending on the severity of the circumstances, lease termination.

Seasonal workers who are employed for a period of time less than 12 months annually will have their rent calculated over a 12 month period using the 9 or 10 months of income earned. During the months the worker is not actively working, the family will not be able to request a rent reduction as the rent has already been adjusted over a 12 month period.

Permanent loss of income (i.e., death of an income earner) results in a permanent, rather than interim, rent reduction. This decrease in rent does not count as an interim reexamination. Under this circumstance, the family is not required to report a subsequent increase in income until the next scheduled certification.

### Verification of Annual Income from Wages and Salaries and Assets

To reduce the administrative burden associated with the verification of income ECC/HANH has amended its Admission and Continued Occupancy (ACOP) to specify that:
For earnings from wages and salaries where Annual Income for the prior period of up to and including $5,000.00, self-certification from family is all that shall be required as verification of income.

For earnings from and salaries of more than $5,000.00 the most recent pay stubs for recent 4 weeks of employment, or W-2 or 1099 within 180 days of the anniversary date shall be required in addition to the self-certification, but only to the extent that verification of Annual Income is not available from a third party source of Upfront Income Verification.

Self-certification of all sources of Annual Income shall be required in all cases.

For families with total assets of $50,000.00 or less a self-certification of said assets shall be required.

Income Tiered Rents Calculated within $1,000 Bands
Rents are based on $1,000.00 income bands starting at $2,500.00. Using a band-based rent schedule allows the ECC/HANH and residents to move away from verifying every last dollar earned and deducted. (See Exhibit A)

At January 31, 2007, both the median and mode percentage of Total Tenant Payment (TTP) to annual income is 28.5 percent. That is, most families pay 28.5 percent of their family income (before utility allowance) as rent. Fifty two (52) percent of households pay 28 percent or more of annual income for TTP; six percent pay less than 10 percent; 13 percent pay between 10 and 20 percent; and 26 percent pay between 20 and 27 percent of income as TTP.

Rent will be set at 28.50 percent of income for income tiers of $1,000.00 starting at $2,500.00. The rent will be calculated at the lower end of each tier. For example, for the $2,500.00 to $3,499.00 tier, the rent will be calculated at 28.50 percent of $2,500.00. Families with incomes below $2,500.00 will be charged the minimum rent. Families will be permitted to apply for a hardship if verifiable proof is provided that their total expenses exceed $2,000.00

Minimum Rents

Families with annual income below $2,500.00 will pay a minimum rent of $50.00. In no event shall any family pay less than 25 percent of its Annual Income for TTP.

Zero (0) Income Households
A family claiming zero ($0) rent is automatically exempt from the minimum rent requirements for a 90 day period when the family’s circumstances fall into any one of the following criteria:
When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
When the family would be evicted because it is unable to pay the minimum rent;
When the income of the family has decreased because of changed circumstances, including loss of employment;
When a death in the family has occurred; or
Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the "Criteria for Minimum Rent Exemption").

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long term exemption from the minimum rent requirement and the HAP will be adjusted accordingly.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days. At the end of the 90 days, the family will undergo an interim increase.

A long term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days. At the end of the long term hardship, an interim is conducted to adjust the family’s income.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a participant is elderly, disabled or is enrolled in ECC/HANH’s Family Self-Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the FSS Program). Elderly and disabled families are not required to enroll in the FSS Program.

Once ECC/HANH identifies a participant’s need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days. At the end of the hardship, an interim will be conducted to bring family up to speed on current household income.
Hardship Review

All “Applications for Exemption from Minimum Rent” shall be forwarded to the Hardship Review Committee.

The Hardship Review Committee shall consist of the Executive Director or his/her designee, the Chief Operations Officer or his/her designee, the Service Center Director or his/her designee, and the Assistant Executive Director of Community and Economic Development or his/her designee. At the family’s option, the Hardship Review Committee may include one (1) participant of ECC/HANH who is in good standing.

The Application for Exemption from Minimum Rent shall originate from the family or a ECC/HANH employee if the family experiences any one of the Criteria for Minimum Rent Exemption.

When a participant submits an application or a ECC/HANH employee submits an application on behalf of a participant, ECC/HANH will suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days and adjust the HAP payment accordingly.

The participant’s assistance cannot be terminated for nonpayment of minimum rent while participant’s Application for Exemption from Minimum Rent is pending or during the 90 day period of suspension, whichever is longer.

The Hardship Review Committee shall send a letter to all participant families who have applied for Hardship Exemption from Minimum Rent stating:

that ECC/HANH has received an Application for Exemption from Minimum Rent,

that ECC/HANH will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,

that there can be no termination of assistance for nonpayment of rent during the suspension period;

the date for a meeting with the participant to discuss the hardship exemption request, giving the participant family at least ten days advance notice of such meeting and informing the participant that he or she may have one opportunity to reschedule the meeting; and

that, with the exception of elderly and disabled families, the participant family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

The Hardship Review Committee will review the circumstances surrounding the request and determine if the request is temporary, long term or nonexistent.

If the Committee determines that the hardship is of a temporary nature (the hardship is expected to last less than 90 days), at the end of the 90-day period, the participant’s rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The participant will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH.

If the Committee determines that the hardship is of a long-term nature (the hardship is expected to last more than 90 days), the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

ECC/HANH may deny a participant a long term exemption from the minimum rent requirement, if the participant fails to attend the scheduled meetings with the Hardship Review Committee. ECC/HANH will provide each participant one opportunity to reschedule the meeting. If the participant fails to attend the scheduled meetings, ECC/HANH may deny the long-term exemption from the minimum rent requirement. The letter scheduling the meeting, shall inform participants that persons with disabilities are entitled to reasonable accommodation with regard to this requirement.

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirements for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls and
actively participates in ECC/HANH’s FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS program within 30 days from the date of the Application of Exemption from Minimum Rent.

If the hardship is determined to be nonexistent, the participant will be responsible for paying rent to ECC/HANH for any rent that was suspended while tenant's Application for Exemption from Minimum Rent was pending. The minimum rent shall be re-instated retroactively to the initial date of the suspension. Participant will have an opportunity to enter into a reasonable repayment agreement with ECC/HANH for any back rent that is due and owing to ECC/HANH. Upon completion of the review process, the Hardship Review Committee shall render a written recommendation to the Executive Director, who shall then adopt or reject the recommendation and shall issue a written decision that states as follows:

If the hardship exemption is determined to be short term:

- that a short-term hardship exemption was granted;
- the effective dates of the exemption;
- the basis for the decision to grant a short-term exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and
- that the participant has a right to enter into a reasonable repayment agreement with ECC/HANH for the minimum rent that was suspended and is now owing to ECC/HANH.

If the hardship exemption is determined to be long term:

- that a long-term hardship exemption was granted;
- whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place; and
- that all non-elderly, non-disabled participants are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and
- that the participant must notify ECC/HANH within 10 days if the hardship ceases to exist because the participant has obtained a source of income sufficient to pay (at least) the minimum rent.

If the hardship is determined to be non-existent:

- that a hardship exemption was denied;
- the reason for such determination; and
- the terms and condition on which the participant family must pay back the minimum rent that was suspended and is now owing to ECC/HANH.

All letters concerning Hardship Review Committee determinations shall state that any participant who disagrees with the decision may request an informal hearing in accordance with ECC/HANH’s hearing procedures, a copy of which will be included with the written decision. In cases where a hearing is sought, no action shall be taken by ECC/HANH until the grievance process is completed.

Mixed Families
For mixed families, where some households include members with citizenship or eligible immigration status as well as those without, rents are calculated using the simplification model; subsidy is then prorated using current methods.

Fraud Prevention
After two or more instances of job loss or income drop within ninety (90) days of a scheduled reexamination (based on current and prior reexamination history), ECC/HANH sets a rent based on the past year's W-2 or other information available for income verification. Households are advised that this is a potential fraud issue and that they have the right...
to grieve through the normal process to more fully explain the reasons for the pattern of income loss. ECC/HANH will set the rent after the Conference Panel review.

Households with two or more instances of job loss or income drop within ninety (90) days of a scheduled certification do not have access to the Hardship Review Committee.

Rent Simplification Implementation – Housing Choice
Residents will receive notice of the new policy on July 1, 2007 and the policy will take effect on January 1, 2008 for all reexaminations with an anniversary effective date on or after January 1, 2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.
A staggered approach is used to integrate the two-year and three year reexamination cycles.
Initially in fiscal year 2008, all families will be re-examined during the first year.
In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.
Rent Simplification is expected to be fully implemented by December 31, 2010.

SEMAP WAIVERS
The SEMAP verification methods and ratings are set forth under 24 CFR Part 983. As a result of the Rent Simplification Plan many of these indicators will either no longer be relevant or the Authority and/or HUD will be unable to measure ECC/HANH’s performance; therefore, ECC/HANH will request a waiver of the following SEMAP indicators beginning October 1, 2007.

Sec. 985.3(c). Determination of Adjusted Income.
Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000 in the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required.

Section 985.3(i) Annual reexaminations.
This indicator shows whether the PHA completes a reexamination for each participating family at least every 12 months (24 CFR 5.617). A waiver of this indicator is required since ECC/HANH will no longer reexamine every family each year.

Section 985.3(m) Annual HQS Inspections.
This indicator shows whether the PHA inspects each unit under contract at least annually. (24 CFR 982.405(a).
ECC/HANH will no longer inspect every unit every year, but will instead inspect units according to the families’ biennial or triennial recertification schedule.

Section 985.307(m) Rent to Owner: Reasonable Rent

Section 985.3(n) Lease-Up.
This indicator shows whether the PHA enters HAP contracts for the number of units reserved under ACC for at least one year. Due to the funding fungibility under MTW, Section 8 funds are used according to the priorities set forth in the MTW Annual Plan.

Alternative Inspection Schedule
ECC/HANH will no longer inspect each unit every year, but will instead inspect units according to the families’ biennial or triennial recertification schedule, unless:
The participant or landlord requests a special inspection due to violations noticed by either party.

Hardship Waiver Policy and Guidelines
Families with Annual Income below $2,500 annually shall pay the minimum rent of $50.00 per month.

All families placed on minimum rent with the exception of elderly and disabled families will be referred to the Family Self Sufficiency Program.
If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long-term hardship exemption from the minimum rent requirements.

All families placed on minimum rent must be informed in writing of the procedures for applying for a hardship exemption from the Minimum Rent Requirement and the ability to have minimum rent waived.

All families who apply for such hardship exemption, with the exception of elderly persons and persons with disabilities, will be referred to the Family Self Sufficiency Program in order to assist the family in moving towards self-sufficiency. ECC/HANH will notify all families of their right to request a hardship exemption from the minimum rent requirement and in accordance with the provisions set forth herein. Participants will be notified of their right to request a hardship exemption through the Application for Exemption from Minimum Rent, a copy of which will be provided to participants at lease-up and at each recertification appointment and mailed to participants at each interim recertification. The policy and procedures for requesting such hardship exemption will also be included in participant rent change notifications, Application for Exemption from Minimum Rent and all form documents related to the exemption process.

Criteria for Hardship Exemption from Minimum Rent Requirement.

A family is automatically exempt from the minimum rent requirements for a 90 day period when the family’s circumstances fall into any one of the following criteria:
- When a family has lost eligibility or is awaiting eligibility determination from a Federal, State or local assistance program;
- When the family would be evicted because it is unable to pay the minimum rent;
- When the income of the family has decreased because of changed circumstances, including loss of employment;
- When a death in the family has occurred; or
- Other circumstances determined by ECC/HANH to be reasons to waive the minimum rent requirement (collectively, the “Criteria for Minimum Rent Exemption”).

If a family is unable to pay the minimum rent because of a financial hardship, the family is eligible for a temporary or long term exemption from the minimum rent requirement and the HAP will be adjusted accordingly.

A temporary hardship exemption exists when none of the above criteria is expected to last for more than 90 days. At the end of the 90 period, an interim will be completed to set the family to rent based on the new current income.

A long term hardship exemption exists when at least one of the above criteria is expected to last for more than 90 days. At the end of the long-term hardship, an interim will be completed to set the family to rent based on the new current income.

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a participant is elderly, disabled or is enrolled in ECC/HANH’s Family Self-Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the FSS Program). Elderly and disabled families are not required to enroll in the FSS Program.

Once ECC/HANH identifies a participant’s need for a hardship exemption from the minimum rent requirement or the family requests such exemption, the minimum rent shall be suspended immediately for a period of 90 days.

Initiation of Hardship Exemption Review

An application for Exemption from Minimum Rent may originate from either a ECC/HANH employee or the participant family.

ECC/HANH employees must complete and submit an Application for Exemption from Minimum Rent on behalf of a participant family whenever any evidence exists that the family falls into any one of the Criteria for Minimum Rent Exemption (as set forth above).

A participant family also has the right to request a hardship exemption from minimum rent. Such request must be in writing and must state the family circumstances that qualify the family for a hardship exemption.

Notification of the Right to a Hardship Exemption
ECC/HANH will notify all families of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the Application for Exemption from Minimum Rent, a copy of which will be provided to participants at lease up and at each recertification appointment or mailed to participants for interim recertifications.

ECC/HANH will also notify all families in writing of the ability to receive a hardship exemption from minimum rent and the procedures for applying for such a hardship exemption in the following documents: participant rent change notifications, the Application for Exemption from Minimum Rent and all form documents related to the hardship exemption process.

ECC/HANH will also notify all families in all of the above documents that all families that are exempt from the minimum rent requirements will be referred to the Family Self Sufficiency (FSS) Program in order to assist the family in moving toward self-sufficiency. Elderly and disabled families are not required to participate in the FSS program.

### Significant Change to MTW FY20 Plan Amendment #1

**Rent Simplification Interims HCV & LIPH:**

Rent Simplification in both LIPH and HCV will include a request to adjust rent during COVID19 and any similar pandemic or National, State or Local emergency affecting a large number of families in the community. In order to prevent staff having to reprocess files when families go back to work during a time like this, ECC/HANH will create a letter which advises the families of decrease to their rent for 120 days (4 months), as a result of loss or decrease in income. At the end of the 4 months, the rent will be adjusted back to what it was before the decrease. Staff would process 2 actions, the decrease, and a second action (effective on the 1st day of the 4th month) which would be an increase back to previous amount. This way, families will not need to report the increase and staff can give 30 day notice of the potential increase change at the same time they are giving the decrease notice.

If families are not yet back to work or the change is permanent, they must report the change to ECC/HANH as soon as they are aware so that the second interim may be cancelled or adjusted.

This interim option does not cancel or supersede the current interim change rule where families are not required to report a new income or increase in income if the previous decrease was associated with an annual certification. In other words Interim rents normally remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled certification date, except when the increase occurs after an interim decrease has been processed. With that said, COVID19, or similar pandemic or national, state or local emergency related interim decreases will remain in effect for the full 120 days. Any increases after this time period must be reported to ECC/HANH within 10 days of the change.

During these moments, the start and end date of interim decrease requests will made clear to families of ECC/HANH via current forms of communication with families.

**Minimum Rent Hardship LIPH & HCV:**

The three month hardship time-frame will be increased to four months during COVID19 and any similar pandemic or national, state or local emergency affecting a large number of families in the community. Additionally, families who fall under the hardship repayment requirement will not be required to repay hardship.

**Housing Choice Voucher HQS Inspections**

HQS Inspections may be conducted via video conference on a case by case basis with the Owner or his/her designee present at the inspection site. Inspection appointments will be scheduled as usual and will be attended in person by the landlord or designee. All HQS inspections forms will be mailed to the owner or designee in advance of the scheduled appointment. A certified HQS inspector must participate on the video conference and will guide the homeowner or designee through the inspections process. This process will be allowed for initial inspections of previously inspected units, meaning if a unit was previously occupied by a family receiving HCV subsidy, the unit may qualify for a video inspection for initial inspection for new voucher holder, as well as special inspections and bi/triennial inspections. Failed initial inspections will follow the current inspections protocol and timeline with the added option of proceeding via video conference. A 2nd failed inspection will require that an inspector go out to the site and inspect the corrected deficiencies in person.

The landlord or designee will bring the provided forms to the inspections aptt and will sign the landlord portions of all forms while on video conference. The Inspector will serve as the witness to the landlord or designee signature and will sign as such. The inspector must include any notes regarding the process, including any information or areas that were not inspected or discussed during this time.
With the exception of HVAC & other home systems, special inspections may be conducted via video conference. In the same way as the Initial and bi/triennial inspections, a 2nd fail will trigger an in-person inspection by the HQS inspector.

**Exceptional Expenses**

**Applicability** - Deductions permitted under 24 CFR Part 5.611(a) shall be permitted only to the extent the sum of anticipated deductions permitted under said Part 5.611(a) for the year are expected to equal or exceed $2,000. Families with Exceptional Expenses that equal or exceed $2,000 may request a rent deduction. The amounts of expenses are set in $2,000 tiers. This allows ECC/HANH to move away from having to verify every dollar of every deduction. Participants will no longer be required to provide documentation for every dollar of expenses, but, instead, participants need only provide documentation sufficient to the expenses of the appropriate tier.

The amount of the rent deduction is established at the mid-range of each tier. Families with Exceptional Expenses will receive a reduction in the rental payment as set forth on the following table:

<table>
<thead>
<tr>
<th>Tiered Amount of Exceptional Expenses</th>
<th>Monthly Rent Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>$ 2,000 - $ 3,999</td>
<td>$ 75 (equivalent to $3,000 deduction)</td>
</tr>
<tr>
<td>$ 4,000 - $ 5,999</td>
<td>$ 125 (equivalent to $5,000 deduction)</td>
</tr>
<tr>
<td>$ 6,000 +</td>
<td>Hardship Review</td>
</tr>
</tbody>
</table>

Elderly persons and persons with disabilities always have the right to request a Reasonable Accommodation(s). Rents are determined in accordance with the methods and income measures set forth in ECC/HANH’s Public Housing Rent Simplification Policies.
## Exception to HCV Regulations

<table>
<thead>
<tr>
<th>Topic</th>
<th>Exceptions to HCV Program Regulations</th>
<th>Current Policy</th>
<th>Alternative MTW Policy for Housing Choice Voucher Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Income</td>
<td>24 CFR Part 5.609(a)(4)</td>
<td>Any income derived from an asset, to which any member of the family has access.</td>
<td>Excludes assets, from the determination of annual income, to extent the amount is $50,000 or less. All income earned by a fulltime student will be excluded. All income earned by a family from adoption assistance will be excluded.</td>
</tr>
<tr>
<td>Income Exclusion for Person Enrolled in FSS Program</td>
<td>24 CFR Part 5.609(b)(1)</td>
<td>Incremental earnings and benefits to any family member, received from participation in a qualifying State or local employment training program, (including training programs not affiliated with a local government); and training of a family member participating as resident management staff.</td>
<td>Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member during the first year of FSS program participation, 75% in 2nd year, 50% in 3rd year, 25% in 4th year and 0% in 5th year, as long as the household is enrolled in the FSS Program. This will not exceed 5 years. Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying federal program, whether or not the member is enrolled in the FSS program.</td>
</tr>
<tr>
<td>Business Income for Resident Owned Businesses</td>
<td>24 CFR Part 5.609(b)(2)</td>
<td>The net income from the operation of a business or profession is included in determining annual income.</td>
<td>During the first year of enrollment in the FSS program, exclude 100 percent of any net income derived from the operation of a business; provided the business qualifies as a resident owned business under 24 CFR Part 963.5. 50 percent exclusion during the second year; 25 percent exclusion the third year.</td>
</tr>
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<tr>
<td>Earned Income Disallowance for Persons with Disabilities</td>
<td>24 CFR Part 5.617(a)</td>
<td>Incremental income earned by a previously unemployed disabled person in the 12 months prior to becoming employed, provided the increase in income is the result of: employment of a family member, previously unemployed for one or more years prior to employment; (2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families.</td>
<td>Eliminated from HCV program</td>
</tr>
<tr>
<td>Mandatory Deductions</td>
<td>24 CFR Part 5.611</td>
<td>(1) $480 for each dependent; (2) $400 for any elderly family or disabled family; (3) The sum of the following, to the extent the sum exceeds three percent of annual income: (i) Un-reimbursed medical expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities (4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.</td>
<td>Eliminate all mandatory deductions.</td>
</tr>
<tr>
<td>Additional (Exception) Expenses Deductions</td>
<td>24 CFR 5.611</td>
<td>None</td>
<td>Families with verifiable deductions that or exceed of $2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must equal or exceed $2,000 and shall be the sum of: Mandatory Deductions determined in accordance with Section 5.611 (a), plus</td>
</tr>
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<tr>
<td>Total Tenant Payment</td>
<td>24 CFR 5.628</td>
<td>Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (a) 30 percent of the family's monthly adjusted income; (b) 10 percent of the family's monthly income; (c) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (d) The minimum rent, as determined in accordance with Sec. 5.630.</td>
<td>TTP to be based upon (1) income-tiered TTP structure or the minimum TTP $50 for a family with income of up to $2,500 annually</td>
</tr>
<tr>
<td>Hardship Provision</td>
<td>24 CFR 5.630(b)</td>
<td>A family may be exempt from minimum rent as follows: (i) When the family has lost eligibility or is waiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances, including loss of employment.</td>
<td>A family whose shelter expenses, plus unreimbursed medical, childcare and disability expenses exceed 40% of annual income or whose medical, childcare or disability expenses of $6,000 or more annually may seek hardship.</td>
</tr>
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<td>-------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Minimum Rent</td>
<td>24 CFR 5.630</td>
<td>$25.00 for HCV. $50.00 for LI PH</td>
<td>HCV increased from $25.00 a month to $50.00 a month so that LI PH and HCV have same minimum rent amount.</td>
</tr>
<tr>
<td>Utility Allowances and Reimbursements</td>
<td>24 CFR 5.632(a) and (b)</td>
<td>Tenant Paid Utilities to be deducted from TTP to determine tenant rent.</td>
<td>No change. Tenant paid utilities to be deducted from TTP to determine tenant rent.</td>
</tr>
<tr>
<td>Medical Deductions</td>
<td>24 CFR 5.611(c)</td>
<td>Reexamination of income must occur every year, except every two years for elderly or disabled households.</td>
<td>No longer applicable unless they exceed applicable threshold.</td>
</tr>
<tr>
<td>Annual Reexamination of Income and Family Composition</td>
<td>24 CFR 982.516</td>
<td>Reexamination of family income will occur every three years for Elderly or Disabled families and every two years for all other families, instead of every year.</td>
<td>Reexamination of family composition will only occur if a family notifies ECC/HANH of a change in family composition since this will affect the determination of appropriate size unit. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. ECC/HANH will do UIV and submit a 50058 annually.</td>
</tr>
<tr>
<td>Interim Reexamination</td>
<td>24 CFR 982.516</td>
<td>A family may request an interim reexamination of family income for any changes since the last annual reexamination. ECC/HANH must conduct the interim reexamination within a reasonable time period after the family request. Currently, family must report any change in income that exceeds $200 or more a month.</td>
<td>A family may request a maximum of three interim re-examinations within a 12-month period, with the exception of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled, may only make one request for an interim for a hardship exemption each 12 months, unless one</td>
</tr>
<tr>
<td>Topic</td>
<td>Exceptions to HCV Program Regulations</td>
<td>Current Policy</td>
<td>Alternative MTW Policy for Housing Choice Voucher Program</td>
</tr>
<tr>
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<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Verification of Wages, Salaries and Assets below $50,000</td>
<td>ECC/HANH must obtain and document in the family’s file third party verification of the following factors, or must document in the file why third party verification was not available: (1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.</td>
<td>Only a self-certification will be required for income up to and including $5,000. For income above $5,000 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. ECC/HANH will continue to conduct EIV or UIV.</td>
<td></td>
</tr>
<tr>
<td>Determination of Tenant Total Payment (TTP)</td>
<td>Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) if the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent TTP based upon income-tiered approach. No family shall be subject to an increase in TTP greater than $25.00 a month during the second year family is of the Rent Simplification Policy. The increase in TTP during the third year of the Rent Simplification Policy shall not exceed $50 a month. The increase in TTP during the fourth year of the Rent Simplification Policy shall not exceed $75 a month. The increase in TTP during the fifth year shall not exceed $100 a month above the monthly TTP in the year immediately preceding the implementation of Rent Simplification Policy. These limitations on rent increase shall only apply to increases in TTP that result from the implementation of the Rent Simplification Policy and not rent</td>
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<tr>
<td>Topic</td>
<td>Exceptions to HCV Program Regulations</td>
<td>Current Policy</td>
<td>Alternative MTW Policy for Housing Choice Voucher Program</td>
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<td>--------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>increases that result from changes in family composition or changes in family income.</td>
<td></td>
</tr>
<tr>
<td>Annual Inspections</td>
<td>24 CFR Part 982.405(a)</td>
<td>ECC/HANH must inspect each unit annually during Section 8 assisted occupancy. 24 CFRP Part 982.405 (a) states that: The PHA must inspect the unit leased to a family prior to the initial term of the lease, at least annually during assisted occupancy, and at other times as needed, to determine if the unit meets the HQS. (See §982.305(b)(2) concerning timing of initial inspection by the PHA.)</td>
<td>ECC/HANH will no longer inspect every unit every year, but will instead inspect units every two years, unless the first unit inspection conducted after the implementation of the Rent Simplification Policy shows that the unit; (1) failed an inspection, or (2) the unit had a failed inspection in the three years prior to the implementation of the Rent Simplification Policy. A unit must have three consecutive years without a failed inspection to qualify for the bi-annual inspection. Units for which landlords are requesting increases in HAP payment will also be inspected prior to ECC/HANH granting any such increase.</td>
</tr>
<tr>
<td>Waiver of SEMAP Indicator</td>
<td>24 CFR Part 985.3(c)</td>
<td>Determination of Adjusted Income. Beginning October 1, 2007, Total Tenant Payment will be based Annual Income by income tiers. Additional, ECC/HANH will no longer include assets of less than $50,000 is the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required by HUD.</td>
<td></td>
</tr>
<tr>
<td>Topic</td>
<td>Exceptions to HCV Program Regulations</td>
<td>Current Policy</td>
<td>Alternative MTW Policy for Housing Choice Voucher Program</td>
</tr>
<tr>
<td>-------</td>
<td>---------------------------------------</td>
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<td>------------------------------------------------------------</td>
</tr>
<tr>
<td>Waiver of SEMAP Indicator</td>
<td>24 CFR Part 985.3(m)</td>
<td>Annual HQS Inspections. This indicator shows whether the PHA inspects each unit under contract at least annually. CFR 982.405(a). ECC/HANH will no longer inspect every unit every year, but will instead inspect a unit every two years unless the unit’s inspection history indicates a need for an annual inspection as set forth above.</td>
<td></td>
</tr>
<tr>
<td>Waiver of SEMAP Indicator</td>
<td>24 CFR Part 985.3(n)</td>
<td>Lease-Up. This indicator shows whether or not ECC/HANH enters HAP contracts for the number of units reserved under ACC for at least one year. ECC/HANH currently has a waiver of this provision and request that it be extended until September 30, 2008</td>
<td></td>
</tr>
<tr>
<td>Portability procedures</td>
<td>24 CFR Part 983.355(c)(1)</td>
<td>ECC/HANH would like to have the ability to re-determine the eligibility of adult household members by performing a background check to ensure that family members do not have a criminal background.</td>
<td></td>
</tr>
<tr>
<td>Waiver of Requirement to give 12 month notice to family about Payment Standard decrease</td>
<td>24 CFR 982.505(3)(iii)</td>
<td>(iii) The PHA must provide the family with at least 12 months’ notice that the payment standard is being reduced during the term of the HAP contract before the effective date of the change.</td>
<td>The PHA will notify families at the time of biennial or triennial recertification that the payment standard may increase or decrease at the next reexamination based on the approved FMR at that time.</td>
</tr>
<tr>
<td>Waiver to allow a decrease in payment standard the effective date of</td>
<td></td>
<td>The initial reduction in payment standard cannot take place before the effective date of the family’s second regular reexamination following the effective date of the decrease in payment standard.</td>
<td>The PHA will use the payment standard in effect on the date of reexamination whether it is a decrease or an increase.</td>
</tr>
</tbody>
</table>
the family's second regular reexamination following the effective date of the decrease in payment standard.

### Housing Choice Voucher (HCV) Program
#### Rent Simplification Rent Tier Schedule

<table>
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<th>Income Range</th>
<th>$0</th>
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<td>Above</td>
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<td>$24,499</td>
<td>$558</td>
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</tbody>
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Appendix 5

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN
ECC/HANH BELIEVES: YOUTH INITIATIVE!

Housing Authority of the City of New Haven Background
From the Housing Authority of the City of New Haven to Elm City Communities
The Housing Authority of the City of New Haven (ECC/HANH) was established in 1938 by the City of New Haven in response to the United States Housing Act of 1937. Elm Haven, ECC/HANH’s first housing development, planned in 1939, was one of the earliest public housing projects in the nation, a forward-thinking trend that still exists within ECC/HANH’s philosophy today.

Quinnipiac Terrace and Farnam Courts were subsequently completed in 1941. As wartime labor flooded into New Haven, these family developments were noted for their effective use of space in a city facing a housing crisis. Again, ECC/HANH had prepared for the future.

The post-World War II population increased the housing shortage and the Housing Authority was the leading builder of new units in the city, which included moderate-income housing at McConaughy Terrace, Brookside and Rockview developments. In the 1950s and ’60s, ECC/HANH completed expansion construction at Elm Haven and Farnam Courts.

In 1989, Elm Haven was rebuilt as the Monterey Place neighborhood, and in 2001, ECC/HANH received HUD status as a Moving to Work (MTW) agency, one of fewer than 36 MTW agencies in the nation at that time. In 2003, ECC/HANH
received a grant for the reconstruction of Quinnipiac Terrace, and has since completed significant work at West Rock and Eastview Terrace.

MTW has enabled ECC/HANH to renovate senior housing, increase its number of accessible units to accommodate the needs of New Haven residents with disabilities, and has transformed its public housing stock into housing of choice. MTW has enabled ECC/HANH to provide a robust self-sufficiency program.

In 2009, the Housing Authority changed its name to “Elm City Communities” (ECC) to better capture the essence of that to which the Housing Authority of New Haven aspires: creating affordable, safe, decent neighborhoods with stability and positive opportunities for all our residents.

Today, Elm City Communities’ developments and scattered sites provide affordable community living and quality of life services for more than 1,900 families comprising low- and middle-income households, families with children, seniors, disabled, young couples starting out, people in career transition and those saving to buy a home of their own. Since its inception, the Housing Authority of New Haven has continuously demonstrated its commitment to the people of New Haven with foresight, dedication and sensitivity.

ECC/HANH Believes
Placing a premium on youth
Elm City Communities/Housing Authority of the City of New Haven’s (ECC/HANH) mission is to provide, now and in the future, affordable communities of choice and opportunities for greater self-sufficiency for residents of the City of New Haven. In the spirit of its original creation, Elm City Communities continues to find new ways to serve the ever-changing needs of an ever-growing population.

As a MTW agency, we not only have the flexibility to pilot programs that support families ability to gain self-sufficiency, it is our responsibility as a MTW agency to demonstrate innovative policies and programs that support our mission as well as model in this effort for public housing authorities around the country.

We, at Elm City Communities, are proud of our accomplishments to date but know we must do more if we are to truly help the majority of our families become self-sufficient; it is not enough to simply help the adults within our households. We must support our youth and by placing a premium on our young people’s success, we achieve the results public housing authorities across the nation seek—higher turnovers and a shrinking waitlist.

A youth initiative focused on academic achievement
Elm City Believes is a new youth initiative that leverages smart housing policy and programs in order to advance academic outcomes for student residents so that we may see success among New Haven’s young people through increased high-school graduation, postsecondary completion, and employment attainment. Launched as ECC/HANH Believes in April of 2014, Elm City Believes provides a cradle-to-career pipeline of learning resources for children and youth and sustains the notion that our children’s success relies on supportive in-school and out-of-school experiences. Elm City Believes has the potential to stop the cycle of poverty among the families utilizing ECC/HANH and in so doing we have the opportunity to build a new, vibrant middle class in New Haven.

Elm City Believes is comprised of supports that expand upon the good work ECC/HANH has been doing as well as enhance what the nationally recognized New Haven Public Schools are doing. Programs are research-based and best practice supported as well as founded on feedback from ECC/HANH residents, ECC/HANH staff, and community stakeholders. As such, we focus our youth initiative on 1) academic supports and afterschool programming to reduce the achievement gap; 2) parent and family engagement in their children’s education; and 3) increasing New Haven Promise’s admittance and other programs that support post-secondary opportunities. In addition to the array of ECC/HANH-wide programs, ECC/HANH has school-specific partnerships that cater to individual student needs (e.g. Tutoring and small group homework help, whole-family wraparound evaluations and mental health supports, student attendance and engagement assistance).

11 New Haven Promise is a scholarship and support program for New Haven Public School students that reside in New Haven, which provides full tuition to any in-state public university or college: http://newhavenpromise.org/
Why now?
Although some young people are able to rise above the circumstances of birth and family structure in order to advance academically, personally, and professionally, most do not without intensive supports from an array of service providers and caring, community-based organizations.

**Students are not hopeful:** 46% students surveyed[^12] lack hope for the future, reporting they feel stuck in their lives (32%) or discouraged about the future (14%).

**Students are not success-ready:** Only 33% of U.S. students surveyed[^13] in grades 5 through 12 are success-ready, meaning students have hope[^14], are engaged[^15], and their well-being[^16] is thriving—things that significantly relate to student performance and influence outcomes such as grades, credits earned, achievement scores, likelihood to stay in school, and future employment. The fact of the matter is that students in the U.S. become less engaged every year and we are in essence creating psychological dropout factories.

**Students are not workforce-ready:** Less than 30% of Americans (3 in 10)[^17] feel high school graduates are prepared for college, and less than 20% (2 in 10)[^18] of Americans feel graduates are ready to enter the labor force. Employers now rank reading and writing as top deficiencies in new hires—one in five U.S. workers reads at a lower skill level than their job requires[^19]; written communications tops the list of applied skills found lacking in high school and college graduates alike.[^20]

**Poverty rate in New Haven is too high (population ≥ 25 years)**[^21]
25.0% of residents that have less than a high school degree
10.8% of residents that have high school graduates
3.8% of residents that have bachelor’s degree or higher

Connecticut saw a 50% increase in child poverty since 1990[^22]

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[^12]: 2013 Gallup poll of more than 600,000 students in grades 5 through 12 from school districts across the country
[^13]: Ibid.
[^14]: Student hope is defined by how students view their future. It’s their belief that they can, and will, succeed at school and beyond.
[^15]: Student engagement is defined by the non-cognitive engagement—paying attention in class, how students feel, overall behavior, etc.
[^16]: Student well-being is defined by how students evaluate their lives and the extent to which they report positive daily experiences.
[^17]: 2013 Phi Delta Kappa/Gallup poll
[^18]: 2013 Phi Delta Kappa/Gallup poll
[^19]: http://arts.gov/sites/default/files/ToRead.pdf
[^20]: http://arts.gov/sites/default/files/ToRead.pdf
[^21]: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_S1701
[^22]: http://datacenter.kidscount.org/data#CT
<table>
<thead>
<tr>
<th>ECC/HANH Believes School Partnerships</th>
<th>Leverage opportunities for ECC/HANH to Address Mutual Challenges and Concerns as Part of ECC/HANH Believes</th>
<th>ECC/HANH Interventions and Strategies</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| Common Ground High School            | • Coordinate with school to identify child-level needs  
• Individuated case management for students and families | • Homework help and tutoring  
• Attendance assistance  
• Technology assistance  
• Whole-family evaluations  
• Mental health support for students and families | • Academic increase on state standardized tests  
• Decrease in Ds and Fs  
• School attendance increase  
• School discipline decrease  
• Number of students graduating  
• Number of students matriculating to college  
• Number of students graduating from college |
| Wintergreen Interdistrict Magnet School (WIMS), an ACES K-8 school | • Coordinate with school to identify child-level needs  
• Individuated case management for students and families | • Homework help and tutoring  
• Attendance assistance  
• Whole-family evaluations  
• Mental health support for students and families | • Academic increase on state standardized tests  
• School attendance increase  
• School discipline decrease  
• Number of students matriculating to 9th grade |
| Lincoln Bassett preK-6 School (Partnership w/ ConnCAT in discussion for SY 2015-16) | • Coordinate with school to identify child-level needs  
• Increased supports for students and families | • Homework help and tutoring  
• After school enrichment, Coding program for grades 5-6  
• Parent engagement  
• Parent supports | • Academic increase on state standardized tests  
• Number of students matriculating to 7th grade |
| New Haven Public Schools             | • Coordinate with school to identify child-level needs  
• Increased enrollment in schools of choice | • Youth Stat  
• TBD | • TBD |
| Adult Education (In partnership w/ existing work and Project MORE in) | • Coordinate with school to identify student-level needs  
• Coordinate with school to identify family-level needs | • Attendance assistance  
• Whole-family evaluations  
• Mental health support for students and families  
• Parent engagement | • School attendance increase  
• Number of students age 17-30 receiving GED |
### Academic Supports and Afterschool Programming to Reduce Achievement Gap

<table>
<thead>
<tr>
<th>ECC/HANH Believes Programs</th>
<th>Leveraging Opportunities that Addresses Challenges and Concerns as Part of ECC/HANH Believes</th>
<th>ECC/HANH Interventions and Strategies</th>
<th>Indicators</th>
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</thead>
<tbody>
<tr>
<td><strong>ECC/HANH Believes Programs</strong></td>
<td><strong>Leverage Opportunities that Addresses Challenges and Concerns as Part of ECC/HANH Believes</strong></td>
<td><strong>ECC/HANH Interventions and Strategies</strong></td>
<td><strong>Indicators</strong></td>
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<td><strong>Parent supports</strong></td>
<td><strong>Family supports</strong></td>
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<tr>
<td><strong>Number of formerly incarcerated students age 17-30 completing GED</strong></td>
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</table>

#### Academic Supports and Afterschool Programming to Reduce Achievement Gap

- Partner or administer out-of-school enrichment programs to support achievement in identified academic areas of need
- Use housing authority developments to support high quality out of school enrichment programs
- Raise awareness among parents about out-of-school academic programs
- Leverage role as Housing Authority to drive quality programs
- Dinner Pilot during standardized testing window *AGR
- After school program w/ ConnCAT: for 40 kids in Grades 5-8 *AGR
- After school program w/ Solar Youth: for 86 kids in Grades k-12 *AGR
- After school program w/ BGCNH: for 125 kids in Grades k-8 *AGR
- After school program w/ Leap for Kids: for 20 kids in Grades k-12 *AGR
- Nonprofit Evaluations *AGR
- Homework Clubs @ every site *AGR
- Computer Labs @ every site *AGR
- Middle College for remediation: Wilbur Cross, Coop, and NHA *AGR
- Technology for blended learning and flipped classrooms *AGR

#### Indicators

- Increase in student participation in community programs and improved quality of community programs
- Percent of 12th graders receiving a high school diploma
- Increase in 12th grade cohort
- Academic increase on state standardized tests
- Decrease in Ds and Fs
- School attendance increase
- School discipline decrease
- Number of students graduating
- Number of students matriculating to college
- Number of students graduating from college
### Access to High-Quality Early Learning and High-Quality Childcare

*ECC/HANH Believes Flagship Program*

**POINT:** Karen DuBois-Walton

- Leverage role as Housing Authority to encourage more youth to read, especially at an early age with parents
- Leverage role as Housing Authority to advocate for the importance of high-quality early learning
- Leverage role as Housing Authority to advocate for the importance of high-quality early childcare
- Leverage role as Housing Authority to advocate and change policies that support parents and families w/ OEC
- Leverage role as Housing Authority to advocate and change policies that support parents and families w/ DOT

- Summer Read Program *AGR, PFE
- Early learning and literacy campaign *AGR, PFE
- Regulation and/or legislation changes to Care 4 Kids *AGR
- Regulation and/or legislation changes to public transportation *AGR

- Percent of 2-5 year olds that enroll in quality early learning programs
- Percent of 2-5 year olds that complete quality early learning programs
- Pre-K Oral Language assessment
- Percent of students entering Kindergarten age-level expectations in all 6 areas: social-emotional, physical, cognitive, language, literacy, math

### Parent and Family Engagement in Children’s Education

**Parent Support Network** *PFE

- Organize formal and informal platforms for engaging families around the importance of education and academic opportunities for their children and parental engagement with the school system.
- Demonstrate cultural competency and offer translation services to parents and families with limited English-speaking abilities

- Summer BBQs *PFE
- Sports League *PFE
- Parent workshops and trainings *PFE, AGR
- Parent Ambassadors *PFE
- Facts for Families *PFE
- Text 4 Education *PFE, AGR

- Attendance of parents in school sponsored events and conferences
- Stable numbers of Parent Ambassadors
- Increase numbers of parents who attend workshops and/or trainings
- Increase numbers of parents who have leadership opportunities around the city
- Increase numbers of parents who have leadership opportunities within their child’s school and influence on decision making at their school or district
<table>
<thead>
<tr>
<th>Student Attendance, Truancy, and Discipline</th>
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<tbody>
<tr>
<td><strong>ECC/HANH Believes Flagship Program</strong></td>
</tr>
<tr>
<td><strong>POINT</strong>: Sheila Allen-Bell</td>
</tr>
<tr>
<td>- Educate parents on the importance of school and classroom stability</td>
</tr>
<tr>
<td>- Leverage role as Housing Authority to improve student attendance</td>
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<tr>
<td>- Leverage role as Housing Authority to improve student truancy</td>
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<td>- Leverage role as Housing Authority to reduce student discipline</td>
</tr>
<tr>
<td>- Direct case management work w/ NHPS students through Youth Stat *AGR, PFE</td>
</tr>
<tr>
<td>- Direct case management work w/ identified ECC/HANH students attending NHPS *AGR, PFE</td>
</tr>
<tr>
<td>- Homework help *AGR</td>
</tr>
<tr>
<td>- Whole-family evaluations *AGR, PFE</td>
</tr>
<tr>
<td>- Mental health support for students and families *AGR, PFE</td>
</tr>
<tr>
<td>- School attendance increase</td>
</tr>
<tr>
<td>- School discipline decrease</td>
</tr>
<tr>
<td>- Decrease in chronic absence, defined as missing 10% or more of the school year</td>
</tr>
<tr>
<td>- Percent of K-5 students missing fewer than 10 days</td>
</tr>
<tr>
<td>- Percent of 9th graders triggering early warning indicators (e.g., six or more absences and one or more course failures; one or more suspensions or expulsions)</td>
</tr>
</tbody>
</table>
### New Haven Promise Informational Sessions and other Programs to Support Postsecondary Opportunities

- Offer support during academic transitions: middle to high; high to postsecondary; postsecondary to employment and self-sufficiency
- Leverage role as Housing Authority to create postsecondary avenues
- Leverage role as Housing Authority to provide adult relationships through youth employment
- Leverage role as Housing Authority to celebrate youth
- Provide supports for completion of a postsecondary degree or credential

- NHP informational sessions for parents *PSO, AGR, PFE
- NHP informational sessions for students *PSO, AGR
- NHP applications for 8th graders *PSO, AGR, PFE
- PSAT and SAT supports *PSO, AGR
- ECC/HANH apprenticeship program *PSO, AGR
- Afterschool job shadow program *PSO, AGR
- Student Training and Employment Program (STEP) *PSO, AGR
- Graduation gift *PSO, AGR, PFE
- Youth Leadership Council (YLC) and STEP alumni group *PSO, AGR

- Percent of eligible students that complete the New Haven Promise application
- Percent of graduating college bound students that complete the FAFSA
- Developmental assets data (savings)
- Increase in percent of seniors that take the PSAT and SAT
- Percent of students receiving New Haven Promise awards
- Percent of graduates that enroll in postsecondary college or technical school
- Percent of students at state universities, community colleges, and technical colleges enrolling in pre-college and/or remedial coursework
- Percent of students continuing past the first year of postsecondary
- Percent of students that graduate from 2- and 4-year colleges and universities

### College Week

- Leverage role as Housing Authority to avail students of the fact that postsecondary is a viable option for after high school graduation
- 5 days of intensive supports during winter break for grades 9-12 that is geared toward postsecondary *PSO, AGR, PFE

(Same as above)
### System issues that need to be addressed

- MOUS, Data Sharing Agreements, Consent Forms, and FERPA
- Culture of high expectations and excellence at ECC/HANH
- Moving to Work status
- Start-up funds
- Financial sustainability
- Culture change among academic, community and stakeholder partners
- Sustainable social capital between schools and families
Appendix 6
POLICIES FOR MIXED FINANCE DEVELOPMENT
NON-MTW ACTIVITY
Policy is entered in the plan to inform the public of Policies of Mixed Finance Developments.

ECC/HANH’s public housing portfolio presently includes fifteen mixed finance developments: Monterey Place Phase 1, 2, 3, 4, 5 and 2R, Eastview Terrace Phase 1, William T. Rowe, Brookside Phase 1, Brookside Phase II, Rockview Phase 1 Rental, 122 Wilmot Road and Quinnipiac Terrace Phase 1, 2 and 3. The housing in all developments is owned and managed by private companies, according to management agreements, which have established their own policies for admissions and occupancy, according to the following guidelines:

The management agent of the mixed finance development must establish written policies for admissions and occupancy. The admissions and occupancy policies for the mixed finance development must be submitted to, and approved by ECC/HANH.

The admissions and occupancy policies for the mixed finance developments must comply with HUD regulations and federal fair housing and civil rights requirements. The aforementioned mixed-finance developments have had their admissions and occupancy plans and policies set forth in previous MTW plans.

The West Rock Redevelopment consists of the Brookside Phase 1 Rental, Brookside Phase 2 Rental and Rockview developments. As such, pursuant to the MOA these units are subject to the Preferences indicated below, however, notwithstanding the method of selection for new admissions, the Owner is permitted to transfer families among and in between Brookside Phase 1, Brookside Phase 2 and Rockview Rental Phase 1; provided that such transfers are in accordance with the Transfer Procedures set forth in Priorities 1-6 below:

1. Relocation due to modernization

Where modernization activities will make units uninhabitable during construction, the Owner will require residents to relocate, either temporarily or permanently, and relocation options may include transfer to another PHA Assisted unit owned and managed by the Owner.

The relocation options of resident families will be specified in a Relocation Plan, and all Owner relocation activities will be conducted according to the requirements of the Uniform Relocation Act and implementing regulations. Resident families are entitled to all the rights specified in the URA and implementing regulations, including proper notice, offers of comparable units, and payment of certain relocation costs.

If a resident family refuses or has failed to relocate after 2 appropriate unit offers, provided that the Owner has complied with the requirements of the URA (and its implementing regulations, including requirements for proper notice), the Owner will begin lease termination proceedings against the family.

2. Families occupying units with accessibility or other special features that are not needed by the occupant family

The Owner has a limited number of accessible units with special features suited to persons with mobility-related disabilities. According to this ACOP, accessible units will be assigned first to current resident families or applicants in need of accessibility features. If there are no current residents nor applicants in need of the unit’s accessibility features, the unit may be offered to another family that does not need that unit’s accessibility features. However, as a condition of admission, the occupant family is required to consent to transfer to another appropriately-sized unit when/if the Owner has a resident or applicant in need of the unit’s accessibility features. Families who are admitted to an accessible unit, but who do not require the unit’s accessibility features, are required to sign a lease addendum to this effect. The Owner will maintain a list of households residing in accessible units but not needing their apartments’ accessibility features, who will be required to transfer when the Owner has a resident or applicant in need of the apartment’s accessibility features.

If an accessible unit (or unit with other special features) is occupied by a family that doesn’t require the unit’s accessibility features, when the Owner identifies that there is a need for the unit’s accessibility features, the Owner will require the unit’s
occupant family to transfer to another, appropriately sized unit. The Owner will provide at least 30 days written notice that, when a unit of the proper size becomes available, the family will be expected to consent to a transfer.

Families required to transfer under this policy will be offered 1 comparable unit of the appropriate size for the household. If a family has rejected the unit offer, the Owner may begin lease termination proceedings against the family.

3. **Emergency transfers due to un-inhabitability of unit**

The Owner will prioritize, and may require, transfers in cases where the resident’s unit has been damaged by fire, flood, or other causes to such a degree that the unit is not habitable, provided the damage was not the result of an intentional act, carelessness, or negligence on the part of the resident or a member or guest of the resident's household.

The Owner may, at its discretion, permit continued occupancy and permit and prioritize a transfer in cases where the damages that resulted in the unit’s un-inhabitability were a result of carelessness or negligence of the resident or a member or guest of the resident's household, provided that the resident has, in writing, accepted the responsibility for such damage and has agreed to make restitution to the Owner for the expense of repairing such damage.

4. **Protection of victims and witnesses**

The Owner will authorize emergency transfers in cases where the Owner has received sufficient documented evidence of an emergency situation in which the family is subject to risk of violence and that a transfer to a different HANH public housing development will be effective in reducing the family’s risk of threatened violence. Emergency transfers due to risk of violence may be provided in the following circumstances:

- Residents who are participants in a government-sponsored witness protection program.
- Residents who have been subjected to domestic violence.

Households who have provided documentation that indicates a reasonable probability of threatened violence due to fear of retaliation for witnessing an incident, or providing testimony in an eviction or criminal proceeding.

- Residents who are victims of hate crimes.

Before considering an administrative transfer based on threats of violence, the Owner will require documentation that (1) there is a reasonable probability of violence, (2) the risk of violence is not due to the lease violations or other actions of family members, and (3) the family has taken any available actions to reduce its vulnerability to threats of violence (such as police involvement with documented reports, restraining orders, criminal trespass, etc.). In addition, the family must demonstrate that a transfer to another unit at the Brookside Phase 1 Community or HANH public housing unit or development will effectively reduce the family’s risk of violence.

In cases in which the Owner determines that the risk of violence is valid (and sufficiently documented and that transfer to another public housing development will effectively end the threatened violence), and after approval by Owner the application will be forwarded to HANH for approval. ECC/HANH will prioritize this transfer to the next available unit of the appropriate size. ECC/HANH will also consider issuing a voucher on a case-by-case basis. The family is permitted to reject this unit and maintain its priority emergency transfer status only if:

- The resident provides evidence that the threatened violence would continue in this new site, or
- The offered unit does not have accessibility or other special features to accommodate a disability, which features were present in the resident's current apartment and/or were requested and approved through HANH’s reasonable accommodations procedures.
Otherwise, if a family has requested an emergency transfer due to threats of violence but has rejected a unit offer that would address their emergency needs, the family will be removed from consideration as an emergency transfer and will be offered the opportunity to request a transfer based on good cause.

In cases in which HANH determines that there is a reasonable probability of violence that is sufficiently documented and that transfer to another public housing unit would not at all be effective in reducing the threat of violence, HANH may, at its discretion, refuse to transfer a family and, instead, may offer the family a Section 8 voucher so that they could relocate in the private market. This is an exceptional measure, and HANH will grant a Section 8 voucher to families under these circumstances only when (a) it is clear that transfer to another public housing development would not reduce the family’s vulnerability to documented threats of violence, (b) relocation into the private apartment market with a voucher may effectively reduce the family’s vulnerability to documented threats of violence, and (c) the family has taken steps necessary to reduce the family’s vulnerability to threatened violence, including police reports, restraining orders, criminal trespass procedures, etc.

5. Under-housed or over-housed.

The Owner may initiate or require transfers of households who are under-housed by a degree of 2 bedrooms, or who are over-housed, according to the Owner’s occupancy standards.

At the Brookside Phase 1 Community, the household is over or under-housed by a degree of two bedrooms. Over and under housed transfers by a degree of one bedroom shall also be considered on a case by case basis for reasons of good cause. Transfers to larger units may be approved only when the family size has increased through birth, marriage, legal adoption, award of custody (permanent or temporary custody greater than six (6) months), reconciliation of separated co-heads, return of a minor to legal custody of the household, or for approved medical or disability purposes.

If the Owner determines a resident family is over or under housed, the Owner will inform the resident in writing that when a unit of proper size becomes available, the Resident will have to move. The resident will receive at least 30 days’ notice of the date by which the transfer must be complete.

6. Emergency Transfers

HANH may permit or require a transfer in emergencies, such as severe medical needs, upon approval of the Executive Director or her designee.

CARES – Brookside Phase II and Rockview Phase 1 Rental – the following preferences was approved by the ECC/HANH Board of Commissioners via Resolution # 11-225/11-R and Resolution # 01-02/13-S respectively: The following modifications will be made to the ECC/HANH ACOP specific to the Brookside Phase 2 and Rockview Phase 1 Rental Mixed Finance Development:

- An admission preference for “working families” for all PBV units;
- An admission preference for former and current West Rock residents for all ACC units will apply pursuant to the agreement between the Tenant Resident Council (“TRC”) for West Rock and the Developer and is as follows:
  - First preference—all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development,
  - Second preference—all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH,
  - Third preference—all residents of Westville Manor or Ribicoff Cottages at the time of the
execution of the MOA between TRCs of West Rock and ECC/HANH,

- **Fourth preference**—applicants in accordance with all other preference set forth in the ACOP.

- In accordance with the MOA, all relocated residents that are in “good standing” as defined in the ACOP will be permitted to exercise their right to return.
- Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to families on the Authority’s transfer waiting list, then to families on the Authority’s accessible waiting list.
- Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.
- In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment any deal-specific management documents and this ACOP those documents shall control. Provided however that in all events notwithstanding anything in this addendum to the contrary the applicable public housing requirements shall control.
- Income tiering in accordance with the ACOP such that 100 percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income.
- Rent determination for returning families will continue to be done in accordance with ECC/HANH’s Rent Simplification Policies under ECC/HANH’s Alternative Rent Determination Policy.
- Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.
- Flat Rent determination for new families shall be done annually.
- CARES (Caring About Resident Economic Self-Sufficiency) as further defined in Exhibit C attached hereto.
- Definition of “Tenant in Good Standing” for “returning residents” who have preference are as follows (i) ECC/HANH deems a household not to be in good standing if ECC/HANH has taken legal action against the household and has obtained an execution for possession, allowing it to evict the household. At this stage of the legal process, all rights to cure the lease violation have been exhausted, and so have the appeals processes through both the Housing Court and the Housing Authority’s internal grievance procedure; (ii) Households which have reached court-stipulated agreements with the Housing Authority to cure lease violations (such as nonpayment of rent) are considered to be in good standing as long as they abide by the terms of the stipulated agreement; (iii) Households which have received a pre-termination notice or notice to quit or are at any subsequent stage of eviction process are still considered to be in “good standing” for the purposes of the MOA until they have “exhausted all rights to cure and appeals”, this means that households under eviction remain in good standing until ECC/HANH obtains an execution for eviction.

In addition, the policies governing the 122 Wilmot Road development were approved via Resolution 12-243/11-R and included the following: Thirteen (13) PBV units will be designated for the elderly with preference for former West Rock residents pursuant to the agreement between the Tenant Resident Council (“TRC”) for West Rock and the Developer and is as follows:

THE PREFERENCE SYSTEM

a) An Admission preference does not guarantee admission.
b) Preferences establish the order of applicants on the waiting list.
c) Every applicant must still meet the Wilmot Crossing at West Rock’s Selection Criteria as set forth in the ACOP before being offered an apartment.
d) Verification must be submitted in order to be given a preference.
e) Preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer (prior to execution of a lease), have the oldest application date on the waiting list for the size and type of unit sought.
f) An admission preference for the thirteen (13) Project Based Section 8 (PBV) units are set forth below:
a. The thirteen (13) PBV units are designed Elderly Only.
   i. Preference for these 13 PBV units are as follows:
      1. First preference – all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and ECC/HANH by order of when people initially moved into the development;
      2. Second preference - all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
      3. Third preference - all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and ECC/HANH;
      4. Fourth preference - applicants in accordance with all other preference set forth in the ACOP.

   g) Within the aforementioned preferences, the following preferences will prevail:
      a. Displaced Persons as defined under Section II Housing Glossary Terms of the ACOP.
      b. Documented victims of domestic violence, dating violence or stalking.
      c. Local preference based on Income Targeting 24 CFR 960.202. The Owner and ECC/HANH have agreed pursuant to the Regulatory and Operating Agreement.

   h) Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to a family on the Authority’s transfer waiting list, then to the Authority’s accessible waiting list.

   i) Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.

   j) In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment, any deal-specific management documents and this ACOP, those documents shall control. Provided however, that in all events notwithstanding anything in this addendum to the contrary, the applicable public housing requirements shall control.

   k) Income tiering in accordance with the ACOP such that 100% percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income and that public housing units shall be leased to families with income above 30 percent of the area median income if households below 30% area median income are not available and eligible for occupancy so that vacant units are not unoccupied.

   l) Rent determination for returning families will continue to be done in accordance with ECC/HANH’s Rent Simplification Policies under ECC/HANH’s Alternative Rent Determination Policy.

   m) Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.

   n) Flat rent determination for new families shall be done annually.
MASTER LEASE AGREEMENT BETWEEN HOUSING AUTHORITY OF CITY OF NEW HAVEN D/B/A ELM CITY COMMUNITY AND LANDLORD

THIS MASTER LEASE AGREEMENT (“Master Lease”) is entered into as of the _____ day of _________ (the “Effective Date”), by and between HOUSING AUTHORITY OF THE CITY OF NEW HAVEN D/B/A ELM CITY COMMUNITIES (“Master Tenant”) and the Landlord. Landlord and Master Tenant may hereinafter be individually referred to as “a Party,” or collectively referred to as “the Parties.”

RECITALS

This Master Lease is made with reference to the following facts, which the Parties agree are true:

1. Landlord currently owns the Property located at ________________________________.

2. Master Tenant is rehabilitating or constructing residential developments under the U.S. Department of Housing and Urban Development Rental Assistance Demonstration Program (“RAD”).

3. Master Tenant and the United States of America, acting by and through the Department of Housing and Urban Development (“HUD”), have entered into a Moving to Work Agreement (“MTW Agreement”) whereby the Master Tenant is permitted, subject to HUD review and approval, to enter into a Housing Assistance Payment Contract (“HAP Contract”), attached hereto as Exhibit A and the HAP Contract Addendum attached hereto as Exhibit B, or provide direct cash payments to a Landlord for Contract Units in the Property. The Master Tenant shall enter into this Master Lease Agreement with the Landlord for the Contract Units identified in Exhibit C of this Agreement according to the terms of this Agreement and the HAP Contract. In the event, a HAP Contract is entered into between the Master Tenant and the Landlord and there are any conflicts between the terms of this Agreement and the terms of the HAP Contract, the terms of this Agreement shall prevail.

TERMS
1. **Property.** Landlord leases to Master Tenant and Master Tenant lease from Landlord the Contract Units listed on the attached Exhibit C (each, a “Leased Unit or Contract Unit”).

2. **Use of Leased Units.** Subject to Paragraph 8 hereof, the Leased Units shall be used by Master Tenant solely to temporarily house residents of the RAD Program (each, a “Resident” and collectively, the “Residents”) until the RAD Units at the subject Project are available for occupancy.

3. **Leases for RAD Units.** The Resident and the Master Tenant have entered into a Low Income Public Housing Lease (“LIPH Unit Lease”) or RAD Unit Lease. The Master Tenant and the Resident agree that: (a) the Resident will occupy the Leased Unit pending the availability of the RAD Unit; (b) the LIPH Unit Lease or RAD Lease will cover and apply to the Resident's tenancy in the Leased Unit, and (c) pending such relocation, Landlord will serve as Master Tenant’s management agent and temporary housing provider to the Resident.

4. **Term.** The term of this Master Lease shall begin on the Effective Date. It shall end on the date that this Master Lease has terminated as to all Leased Units according to Paragraph 8 of this Master Lease (the “Termination Date”) unless sooner terminated with respect to individual RAD Units as provided in Paragraph 8 hereof; provided however that the maximum term of any Master Lease shall not exceed sixty (60) months.

5. **Appurtenant Rights.** Appurtenant to each Leased Unit and included in the rights conveyed by this Master Lease is the right to access all roads, sidewalks, paths, parking areas, facilities, community centers, playgrounds or grounds of the Property and to enjoy otherwise all rights and privileges of any other resident of that Property.

6. **Property Management, Certifications, and Reporting.** The Landlord will operate the Leased Units as Master Tenant's management agent (the “Agent”) and temporary housing provider for Residents. Landlord covenants that it will (i) enforce and fulfill all obligations of Master Tenant to HUD according to regulations outlined in 24 CFR Part 982 for a RAD Unit Lease or 24 CFR Part 966 for a LIPH Unit Lease, the Residents, and any other person or Party related to a Leased Unit that arise under the LIPH Unit Leases or RAD Unit Leases and applicable federal, state or local law and requirements, and (ii) shall cause the Leased Units to be managed by the Agent in compliance with all applicable federal, state or local requirements. In the event, any federal, state or local requirements require Master Tenant to make any certification concerning the Leased Units, if requested by Master Tenant, Landlord will make such certification directly with full responsibility for the contents thereof (except for any statement relating specifically to the status of Master Tenant). Landlord shall, at its own cost and expense, comply with all applicable reporting requirements and obligations concerning the Leased Units for which it is responsible. At the request of Master Tenant, Landlord shall provide a copy of such reports to Master Tenant at least ten (10) days in advance of the submission thereof to the extent practicable. Master Tenant shall have access at all times to the tenant files for the Leased Units, concerning matters pertaining to occupancy during the term of Master Lease.

7. **Relocation to New Units.** From time to time at the request of Master Tenant, including when informed by Master Tenant that one or more RAD Units have become available for occupancy and that such RAD Unit(s) have been reserved for identified Residents, Master Tenant and if requested by Master Tenant, Landlord, will give the designated Residents any notices relating to relocation per federal, state and local requirements. The form of such notices will be prepared by or at the direction of Master Tenant and subject to the reasonable approval of Landlord. The Landlord will assist Master Tenant and its designated relocation agent to coordinate the relocation of Residents. Master Tenant is responsible for all aspects of and will carry out the relocation of Residents from the Leased Unit to the RAD Unit. Master Tenant shall pay for all third-party costs reasonable and necessary to carry out the
relocation of Residents from the Leased Units to the RAD Units, including all expenses that are required to be paid under applicable law, per applicable HUD RAD requirements.

8. **Termination as to Leased Units by Master Tenant.** This Master Lease will terminate as to each Leased Unit, and Master Tenant will have no further liability for that Leased Unit, as of the date (a) Resident(s) of the Leased Unit vacate the Leased Unit to move to a RAD Unit or (b) a Leased Unit becomes vacant for any other reason. Following the Master Lease termination concerning a Leased Unit, Master Tenant shall have no further responsibility for such Leased Unit or its Resident.

9. **Rent, Payments, Revenue, Expenses.** Effective as of the Effective Date and terminating as of the Termination Date, Master Tenant hereby assigns to Landlord all rents or other amounts collected from Residents under the LIPH Unit Leases or RAD Unit Leases for the Leased Units and any other payments due to Master Tenant under this Agreement, but solely for the period in which the Resident resides in the Leased Unit. Landlord accepts such assigned amounts in full payment for its responsibilities hereunder, and in consideration, thereof will pay all expenses of or relating to the Leased Units. In the event Resident moves from a Leased Unit to a RAD Unit other than on or about the first of the month, Landlord shall pay over to Master Tenant a pro-rated portion of any rent collected for such month and a pro-rated portion of the Housing Assistance Payments or direct cash payments due under this Agreement.

10. **Utilities.** The Landlord will be responsible for paying all utility bills.

11. **Rents and Security Deposits.** The Landlord will retain each LIPH Unit Lease or RAD Unit Lease and related documentation in its files. Master Tenant will retain all prepaid Resident rents and security deposits in its possession for each LIPH or RAD Unit. Master Tenant shall pay to Landlord the Security Deposit for each Leased Unit per HUD regulations and State law. Upon termination of the Master Lease for the Leased Unit, the Landlord shall return the Security Deposit to the Master Tenant per State law. The Master Tenant and Landlord shall execute a Security Deposit Agreement in the form attached hereto as Exhibit D.

12. **Keys, Certificates, and Other Deliverables.** The Landlord will retain (i) all keys, combinations, access cards and locks to any Leased Unit; (ii) all certificates, licenses and other authorizations, including without limitation certificates of occupancy, necessary for the full use, operation, maintenance and occupancy of the Leased Units; and (iii) copies of all books, records, operating statements, contracts, and other files relating to the operation of the Leased Units.

13. **Landlord’s Duty to Maintain and Repair Leased Units and Care of Property.** Landlord represents that the Leased Units meet all applicable federal, state, and local requirements, including the local housing code and HUD’s Housing Quality Standards. Landlord covenants that during the term of this Master Lease it will maintain the Leased Units in safe, sanitary and habitable condition per all applicable federal, state and local requirements, including the local housing code and HUD’s Housing Quality Standards, and shall be responsible for all repairs or replacements necessary for that maintenance, subject to Paragraph Error! Reference source not found. hereof. Notwithstanding anything to the contrary set forth herein, Master Tenant shall have no responsibility for any repairs or replacements of any portion of the Leased Units or to pay any costs of any kind associated therewith.
14. **Access.** Subject to the rights of Residents under Connecticut law, Landlord may enter any Leased Unit at any time and provide access to Master Tenant upon request with reasonable notice.

15. **Insurance.** (a) At all times during the term of this Master Lease, Landlord shall obtain and maintain at least the following insurance coverages: commercial liability insurance naming the Master Tenant as a named insured, under which the insurer will defend and indemnify the Master Tenant, as applicable, against all claims and demands for any injury to persons or Property which may be claimed to have occurred in or around the Leased Units in an amount equal to Two Million and No/100 Dollars ($2,000,000.00) in respect to any one accident and One Million and No/100 Dollars ($1,000,000.00) with respect to property damage arising out of any one occurrence. Such commercial liability coverage shall consist of bodily injury liability (including death), personal injury liability, property damage liability, contractual liability and independent contractors liability; (b) In addition to the foregoing coverages, Landlord shall maintain insurance on the Leased Units, together with Landlord's personal Property located thereon, including, without limitation, all furniture, fixtures, goods, machinery, equipment and inventory, against loss by fire, flood, water, theft or other insurable casualty, on an "all-risk" form sufficient to provide 100% replacement value of such Property; and (c) Neither Party shall be liable to the other Party (or its successors and/or assigns) for, and each Party waives any right of subrogation with respect to, any loss or damage caused by fire or any of the risks enumerated in a standard "All Risk" insurance policy, and, in the event of such loss, each Party's insurance companies shall waive any right of subrogation against the Parties in connection therewith.

16. **Unfitness for Occupancy.** If any Leased Unit is rendered unfit for occupancy by fire, accident or other casualties, Landlord may at its own expense relocate affected Residents as necessary within the Leased Units or other suitable housing available to Landlord (the "Alternate Unit"), the Alternate Unit will be substituted as the Leased Unit, and all applicable provisions of this Master Lease will remain in effect with respect to any such Alternate Unit. Master Tenant shall have no obligation to relocate affected Residents, to repair, restore or rebuild any Leased Unit, or to pay any costs associated therewith, except as provided in Paragraph Error! Reference source not found.

17. **No Assignment, Transfer, or Subletting.** Master Tenant may not assign or transfer this Master Lease or assign or sublet any Leased Unit, except to the current Residents thereof, without the written permission of the Landlord, which such approval shall not be unreasonably withheld, conditioned or delayed. The Landlord may not assign or transfer this Master Lease without the written permission of Master Tenant.

18. **Default by Master Tenant.** If Master Tenant breaches this Master Lease and fails to correct the breach when so notified in writing by the Landlord, Master Tenant will be in default of this Master Lease and this Master Lease may be terminated by Landlord with respect to all of the Leased Units by the exercise of any remedy at law or in equity. Landlord shall give Master Tenant at least thirty (30) days’ prior Notice to Quit, but only after providing Master Tenant a minimum of thirty (30) days’ prior written notice of the nature of the default and an opportunity to cure as therein provided. Notwithstanding the foregoing, if the default complained of, other than for the payment of monies, is of such a nature that the same cannot be rectified or cured within such thirty (30) day period. Master Tenant shall have the additional time required to remedy or cure such default, provided that Master Tenant is proceeding with due diligence to cause such cure to be completed promptly. In no event shall a default by a Resident under any New Unit Lease constitute a default by Master Tenant under this Master Lease. The investor limited partner of Master Tenant shall have the right, but not the obligation, to cure any default of the Master Tenant hereunder.

19. **Default by Landlord.** Landlord shall be deemed to be in default of this Master Lease if Landlord shall be in default in the full performance of any of its promises, covenants or agreements contained in this Master Lease.
and such default in performance continues for more than thirty (30) days after written notice thereof from Master Tenant to Landlord specifying the particulars of such default or breach of performance. Notwithstanding the foregoing, if the default complained of, other than for the payment of monies, is of such a nature that the same cannot be rectified or cured within such thirty (30) day period, then Landlord shall have the additional time required to rectify or cure such default, provided that Landlord is proceeding with due diligence to cause such cure to be completed promptly. Upon any default of this Master Lease by Landlord, Master Tenant shall be entitled to pursue all remedies available to Master Tenant at law or in equity, including, but not limited to, the right to terminate this Master Lease with respect to all of the Leased Units. In no event shall a default by a Resident constitute a default by Landlord, but the first part of this sentence will not excuse any failure of Landlord (in its role as housing provider) to enforce lease compliance by each Resident diligently.

20. **Indemnification.** Landlord acknowledges that Master Tenant shall have no responsibility whatsoever for the use, operation, or maintenance of the Leased Units or any responsibility or obligation to cause the Leased Units to comply with applicable law. Landlord shall indemnify and hold harmless Master Tenant and its members and managers, and their respective officers, directors, employees, agents, and instrumentalities from all liability, losses or damages, including reasonable attorney's fees and costs of defense, which Master Tenant or any of its members, managers, officers, directors, employees, agents or instrumentalities incur as a result of claims, demands, suits, causes of actions, or proceedings of any kind or nature arising out of, relating to or in connection with the Leased Units, or connection with any breach of this Master Lease by Landlord or its employees, agents, servants, partners, principals or subcontractors. Landlord shall pay all claims and losses in connection therewith. He shall investigate and defend all claims, suits, or actions of any kind or nature in the name of Master Tenant, where applicable, including appellate proceedings, and shall pay all costs, judgments, and reasonable attorney's fees, which may issue thereon. However, nothing herein shall be deemed to indemnify Master Tenant from any liability or claim arising out of the gross negligence or willful misconduct of Master Tenant. Notwithstanding the foregoing, Landlord’s obligation to indemnify and hold Master Tenant harmless will be without recourse to Landlord’s public housing or Housing Choice Voucher Section 8 assets, including, without limitation, (a) any “project,” as such term is defined in the public housing Annual Contributions Contract (“ACC”) or HAP Contract, (b) any operating receipts of Landlord (as the term “operating receipts” is defined in the ACC or HAP Contract) that are subject to the ACC or HAP Contract, or (c) any public housing or Section 8 operating reserve of the Landlord required under the ACC or HAP Contract.

21. **Bankruptcy.** The Master Lease shall terminate if: (i) Master Tenant is adjudicated bankrupt or insolvent; or (ii) Master Tenant files or acquiesces in a petition in any court in any bankruptcy, reorganization, insolvency or similar proceeding; or (iii) Master Tenant makes an assignment or other conveyance for the benefit of creditors; or (iv) any execution or attachment is issued against Master Tenant or its Property and is not dismissed within ninety (90) days; or (v) a receiver or trustee is appointed for the Property and assets of Master Tenant and is not discharged within ninety (90) days; provided, however, that (a) nothing herein shall lessen the entitlement of the Landlord to all payments as provided in Paragraph Error! Reference source not found., and (b) nothing herein shall limit the right of Landlord in its sole discretion to continue to house the Resident by the direct provision of housing not involving the Master Tenant in any manner.

22. **Compliance with HAP Contract or ACC.** Landlord covenants to comply with the provisions of the HAP Contract or ACC applicable to Master Tenant in its role as housing provider, including but not limited to providing to Residents, at Landlord’s sole cost and expense, all supportive services required under the HAP Contract or ACC (if any), and to take all actions required of Master Tenant to cause the Leased Units to comply with the provisions of the HAP Contract or ACC.
23. **Severability of Provisions.** If any provision of this Master Lease is held to be unenforceable, the remainder of the Master Lease shall remain valid and enforceable to the fullest extent permitted by law.

24. **No Waiver.** No waiver of any breach of any covenant, condition, or Agreement contained in this Master Lease shall operate as a waiver of any subsequent breach of the same covenant, condition, or Agreement.

25. **Governing Law.** This Master Lease shall be governed by the law of the State of Connecticut, without regard to conflicts of laws principles.

26. **Notices.** All notices, demands, requests, approvals, consents or other instruments required or desired to be given by either Party to the other shall be personally delivered or sent by U.S. certified or registered mail, return receipt requested, first-class postage prepaid, addressed as follows:

27. **Binding.** This Master Lease shall be binding on all successors, heirs, assignees, or transferees of Landlord and Master Tenant.

28. **Counterparts.** This Master Lease may be executed in separate counterparts, each of which will constitute an original. PDF, facsimile, or other electronic images of signatures will be deemed originals for all purposes.

29. **Parties Bound.** No officer, director, shareholder, employee, Agent, or other person authorized to act for and on behalf of either Party shall be personally liable for any obligation, express or implied, hereunder.

[Signatures on following page]
IN WITNESS WHEREOF, This Master Lease has been executed as of the date first above written.

LANDLORD:

By:___________________________
Duly Authorized

MASTER TENANT:

HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

By: ________________________
Karen DuBois-Walton, Ph.D.
President
EXHIBIT B HAP CONTRACT ADDENDUM
EXHIBIT C LEASED UNITS
EXHIBIT D SECURITY DEPOSIT AGREEMENT
Appendix 7

MASTER LEADE FACILITY INFORMATION PRICE PROPOSAL FOR EXHIBIT E

Landlord’s Name:
Landlord’s Phone Number:
Landlord’s Email Address:

Facility Name______________________________
Street__________________ City____________ State______ Zip Code______

Total Units in Facility _______
Units to be Master Leased _______

Proximity in Miles to: Public Transportation ___; Shopping ____; Government Office____; Support Services ___
Health Care _____

Rentable Square Feet of Facility _______

Commencement Date of Master Lease _______

Proposed Contract Rents:

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<th>Average Rentable Square Feet</th>
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