# MOVING TO WORK

## Annual Plan FY2025

**Submitted July 18th, 2024**
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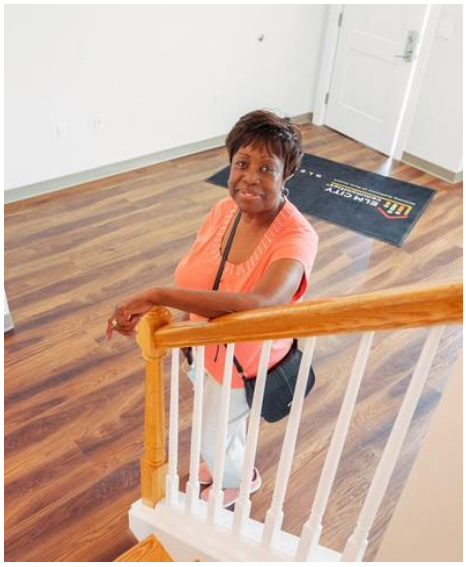

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85 Years
Elm City Communities
Housing Authority of New Haven

## City of New Haven

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## I. 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
- 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 Plan for FY25.

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 reinvigorate 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.

The ECC/HANH Moving to Work Annual Plan follows, emphasizing our focus on the following short- and long-term goals. The Agency, in all its departments functions as One Team Meeting Expectations.

On March 10, 2024, the MTW Agreement was extended for an additional 10 years to 2038.

# OUR VISION

We envision a New Haven where every resident has a quality home that they can afford in communities of their choice and opportunities to fulfill their goals.

# OUR MISSION

To make a positive difference in the lives of New Haven residents by developing and operating affordable communities of choice and providing opportunities for greater self-sufficiency.

# OUR VALUES

***WE CARE.***
***WE CREATE OPPORTUNITIES.***
***WE INNOVATE.***

***WE ARE COMMUNITY.***

# LEADERSHIP & PARTNERSHIPS:

Elm City Communities consists of the Housing Authority of the City of New Haven and two affiliated instrumentalities:
The Glendower Group, LLC, a non-profit development company.
360 Management Group, Co., a non-profit property management company. In addition, we have partnered with other entities to manage some properties.

# ONE TEAM, MEETING EXPECTATIONS!

House more families (more quickly) in highest quality housing in communities of their choice

Support residents' ability to live their best life and achieve goals that move them toward greater housing and life choices

Cost effective and cost-efficient delivery of services in ways that maximize impact in our communities (jobs, contracting, economic development, etc.)

Spark policy change that creates growth in housing market especially for families in need of affordable housing

SHORT TERM GOALS

## LIVER COST EFFECTIVE SOLUTIONS

- **Improve customer service**
  - Implement RingCentral customer service and reporting functionality
  - Fully incorporate paperless, AI enhanced technology in processes agencywide
  - Implement online portals for resident recertifications, landlord transactions and communication with ECC/HANH customers and partners
  - Streamline resident/participant interface
  - Evaluate rent simplification model and update as needed
  - Implement Talent Onboarding, Retention and Performance Management System based on equity and behavioral competencies

- **Maximize revenues**
  - Provide consistent building management which yields long term savings
  - Commercial space revenue maximization
  - Maintain strong financial standing
  - Explore new financing mechanisms for developing of affordable housing without federal subsidy
  - Identify vacant lots and underutilized parcels and non-performing assets
  - Increase the portfolio managed by 360 Management
  - Maximize use of ECC office space
  - Market relocation services

- **Energy efficiency and Green technology**
  - Continue implementation of energy efficient technologies to decrease utility costs and promote environmentally friendly practices
  - Explore composting pilot

- **Effective use of technology to streamline procedures and processes**

## SHORT TERM GOAL

## EXPAND HOUSING CHOICE

- **Complete the redevelopment/modernization and repositioning of LIPH and other ECC-owned portfolio**
  - Complete the redevelopment of the community space at 295 Wilmot
  - Transition portions of the scattered site portfolio to homeownership
  - Pursue resyndication of Eastview Terrace

- **Increase housing options by acquiring and developing new properties within and outside of New Haven**
  - Union Square, Clock Factory, East Grand Ave, Griswold, St. Luke's, Hazel St/Newhallville, 34 Level St.
  - Initiate acquisition of additional new properties within/outside of New Haven
    - Pursue acquisition of new properties for development into housing that is affordable
    - Partner with local government, non-profit entities and other developers/housing authorities for new or already existing properties
  - Advance local and statewide policy change that facilitates ECC/HANH creation of housing options for families on our extensive waitlist

- **Increase family options through investment in existing housing stock in New Haven**
  - Facilitate access to lead abatement resources to protect families with children under the age of 6 years in voucher funded rentals
  - Facilitate access to Inflationary Reduction Act funds by HCV LL to modernize and create energy efficient housing options

- **Improve family access to housing choice through enhanced mobility options, streamlined processes and effective support to decrease lease up time and increase access to housing of choice**
  - Revise and streamline ECC/HANH admissions criteria and preferences for greater transparency, efficiency and to achieve desired priorities
  - Streamline complex processes to make it easier for landlords to participate in the program and quickly get families into their units
  - Enhance a landlord recruitment and retention initiative
  - Facilitate HCV participant participation in City's Inclusionary Zoning housing opportunities

## INCREASE FAMILY SELF SUFFICIENCY

- **Ensure equitable service delivery and equitable outcomes for families**
  - Identify disparities in accessing services and implement corrective strategies to eliminate
  - Assist more families to reach or exceed New Haven's AMI through equitable delivery of self-sufficiency programming

- **Impactful service delivery to prepare youth for success**
  - Provide services that enable more youth to enter school "ready" and graduate "ready" for success
  - Model transformative approaches to engaging disengaged youth on college or career readiness
  - Maximize family participation on EITC, CHET and new Baby Bonds programs

- **Assist residents who are elderly and/or living with disabilities to sustain housing independence**
  - Explore the provision of housing for elder-care professionals in elderly only developments in exchange for services

- **Transition work-able adults to economic self-sufficiency**
  - Address unintended consequences in CARES initiative related to conflict with LIHTC rules
  - Explore creative ways to achieve homeownership in tight housing market
  - Partner with citywide efforts on inclusive economic growth to stimulate greater entrepreneurial success for residents
  - Incentivize HOH/Spouse or co-head for continued higher education

- **Robust evaluation of program outcomes**
  - Launch P20 WIN partnership to access family data from public education, higher education, employment, homeless service system, mental health and addiction services and more
  - Incorporate research and evidence-based practices on what works
  - Generate a report/workspace that easily demonstrates the current status of family self-sufficiency
  - Establish metrics for each program and collect data to measure the effectiveness of each program.

# LONG TERM GOALS

## DELIVER COST EFFECTIVE SOLUTIONS

- **Improve customer service**
  - Continued use of AI to support customer interface

- **Maximize revenues**
  - Development plan for vacant lots, underutilized parcels and non-performing assets
  - Ongoing assessment of contracts to determine if it would be more cost effective to add items to job descriptions, hire staff, etc.
  - Increase the portfolio managed by 360 Management
  - Increase relocation services contracts and agreements

- **Energy efficiency and green technology**
  - Energy efficient technologies implemented to decrease utility costs and promote environmentally friendly practices
  - Become leader in conversion of existing housing portfolio into energy efficient homes

- **Effective use of technology to streamline procedures and processes**
  - Integrate disparate IT systems and produce consolidated reporting
  - Implement a new Enterprise Resource Program (ERP) system to improve employee efficiency
  - Analysis of processes and procedures within and across departments to determine what is being doing manually that can be done automatically

# LONG TERM GOALS

## EXPAND HOUSING CHOICE

- **Complete the redevelopment/modernization/repositioning of LIPH portfolio**
  - Reposition a portion of scattered site portfolio into homeownership, Westville Manor, Crawford Manor, and Robert T. Wolfe

- **Increase housing options by acquiring and developing new properties within/outside of New Haven**
  - Advance Statewide policy change that facilitates ECC/HANH creation of housing options for families on our extensive waitlist
  - Development of new housing units (affordable rental and homeownership)
  - Reduce disparities in access to housing options in areas of family's choice

- **Increase family options through investment in existing housing stock in New Haven**
  - Design local non-traditional program models to increase opportunities for housing of choice in New Haven
  - Facilitate access to lead abatement resources to protect families with children under the age of 6 years in voucher funded rentals
  - Facilitate access to Inflationary Reduction Act funds by HCV LL to modernize and create energy efficient housing options

- **Improve family access to housing choice through enhanced mobility options, streamlined processes and more to decrease lease up time and increase access to housing of choice**
  - Accelerate family transition off housing subsidy for families who exceed income eligibility

## INCREASE FAMILY SELF SUFFICIENCY

- **Ensure equitable service delivery and equitable outcomes for families**
  - Secure funding to expand CED staff specifically to expand services to voucher participants
  - Eliminate disparities in access and outcomes for families
  - Create pipelines within ongoing or with new initiatives (ex: cradle to career but subsidy to self-sufficiency)

- **Impactful service delivery to prepare youth for success**
  - Provide Preschool, quality childcare and/or before and after school program to enable parents to work.

- **Assist residents who are elderly and/or living with disabilities to sustain housing independence**
  - Explore innovative housing options to allow more families to successfully age in place
  - Expand onsite medical partnerships and telehealth access
  - Launch on-site telehealth services

- **Transition work-able adults to economic self-sufficiency**
  - Partner with agencies and organizations that can assist families in increasing their savings and investments

- **Robust evaluation of program outcomes**
  - Secure research partner for ongoing evaluation

| Label | Description | Cost Effective | Expand Housing Choice | Increase Self-Sufficiency | FY Approved | Status |
|---|---|---|---|---|---|---|
| **1.1** | Development of Mixed-Use Development of 122 Wilmot Road | | ✓ | | 2009 | Closed[1] |
| **1.2** | Local Total Development Cost (TDC) Limits | ✓ | ✓ | | 2009 | Ongoing |
| **1.3** | Fungibility of MTW Funds | ✓ | | | 2012 | Closed |
| **1.4 & 1.10** | Defining Income Eligibility for the Project-Based Voucher Programs | ✓ | ✓ | | 2012 | Ongoing |
| **1.5** | HCV Preference and Set-Aside for Victims of Foreclosures | | ✓ | | 2009 | Closed[2] |
| **1.6 &1.28** | Mobility Services<br><br>(previously Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Programs and Increase Lease Up Success Rate for HCV Families) | | ✓ | | 2008<br>2020<br>2023<br>Revised 2025 | Ongoing |
| **1.7** | Tenant-Based Vouchers for Supportive Housing for the Homeless | | ✓ | ✓ | 2010 | Ongoing |

| | | | | | | |
|---|---|---|---|---|---|---|
| **1.9** | Increase the Allowed Percentage of Project Based Voucher (PBV) Units from 75 Percent to 100 Percent in a Mixed-Finance Development | ✓ | ✓ | | 2012 | Ongoing |
| **1.11** | 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 | | ✓ | | 2013 | Ongoing |
| **1.12** | Development of Replacement Public Housing Units with MTW Block Grant Funds | | ✓ | | 2013 | Ongoing |
| | | | | | | |
| | | | | | | |
| **Label** | **Description** | **Cost Effective** | **Expand Housing Choice** | **Increase Self-Sufficiency** | **FY Approved** | **Status** |
| **1.13** | Creation of a Commercial Business Venture at 122 Wilmot Road | ✓ | | | 2013 | Closed[3] |

[1] Project completed
[2] Initiative completed in 2019
[4] Project completed

| | | | | | | |
|---|---|---|---|---|---|---|
| **1.14** | Redevelopment of 99 Edgewood Avenue (Dwight Gardens) | | ✓ | | 2013 | Closed[4] |
| **1.18 Previously (1.15, 1.16, 1.17, 1.23, & 1.29)** | ECC/HANH Transformation/Development | | ✓ | | 2014 Revised in 2021 Revised in 2025 | Ongoing |
| **1.21** | Expanded Jurisdiction | | ✓ | | 2019 | Ongoing |
| **1.22** | Non-traditional Supportive Housing Program | | ✓ | | 2019 | Ongoing |
| **1.27** | Cap on Project-Based Units in a Project | ✓ | ✓ | | 2010 | Closed |
| | | | | | | |
| **Label** | **Description** | **Cost Effective** | **Expand Housing Choice** | **Increase Self-Sufficiency** | **FY Approved** | **Status** |
| **2.1** | Family Self-Sufficiency | | | ✓ | 2007 | Ongoing |
| **2.2** | Incremental Earned Income Exclusion | | | ✓ | 2008 | Closed |
| **2.3** | CARES (Caring About Resident Economic Self-Sufficiency) | | | ✓ | 2012 | Ongoing |
| **2.4** | Teacher in Residence | | | ✓ | 2015 | Ongoing |
| **2.5** | REACH | ✓ | | ✓ | 2019 | Ongoing |

[4] Project not being pursued

| | | | | | | |
|---|---|---|---|---|---|---|
| **2.11** | Community Health Network of CT (CHNCT) | ✓ | | | 2022 | Closed |
| **3.1** | Rent Simplification | ✓ | | | 2007 | Ongoing |
| **3.2** | UPCS Inspections | ✓ | | | 2008 | Closed[5] |
| **3.3** | Revised HQS Inspection Protocol | ✓ | | | 2011 | Closed[6] |
| **3.4** | Mandatory Direct Deposit for Housing Choice Voucher Landlords | ✓ | | | 2010 | Closed[7] |
| **3.5** | HCV Rent Simplification/Cost Stabilization Measures | ✓ | | | 2014 | Ongoing |
| **3.9** | LIPH Income Targeting: Marketing Initiatives for Higher Income Eligible Families | ✓ | | | 2008 | Closed |
| **Requires Funding Flexibility Only** | | | | | | |
| **Label** | **Description** | **Cost Effective** | **Expand Housing Choice** | **Increase Self-Sufficiency** | **FY Approved** | **Status** |
| **1.8F** | Farnam Court Transformation | | ✓ | | 2011 | Closed |
| **1.20F** | Redevelopment of West Rock | | ✓ | | 2011 | Closed |

[5] Initiative no longer requires MTW flexibility
[6] Initiative was revised and relaunched as item 3.5
[7] Initiative does not require MTW flexibility

| | | | | | | |
|---|---|---|---|---|---|---|
| **1.24F** | Fulton Park Modernization | | ✓ | | 2011 | Closed[8] |
| **1.25F** | Vacancy Reduction – Various Projects | | ✓ | | 2008 | Ongoing |
| **1.30F Previously 1.25** | Real Estate Development Acquisition | ✓ | ✓ | | 2023 | Ongoing |
| **2.6F** | Resident-Owned Business Development | | | ✓ | 2009 | Ongoing |
| **2.7F** | SEHOP Capital Improvement Fund | | | ✓ | 2010 | Ongoing |
| **2.8F** | Prison/Community Re-entry | ✓ | | ✓ | 2009 | Ongoing |
| **2.9F** | Resident Services for Elderly/Disabled Residents | | ✓ | ✓ | 2003 | Ongoing |
| **2.10F** | Jumpstart Incentive Program | | | ✓ | 2020 | Ongoing |
| **2.12F** | ECC Believes | | ✓ | | 2014 | Ongoing |
| **2.13F** | Sponsored Based Housing Program | | ✓ | ✓ | 2023 | Approved |
| **3.11F** | Creation of New Instrumentality Entities to Support ECC/HANH Goals and Strategic Planning activities | ✓ | | | 2019 | Ongoing/ Moved[9] |

[8] Redevelopment completed
[9] Moved to "MTW Initiatives Requiring Funding Flexibility Only"

## II. GENERAL OPERATING INFORMATION

| (I) GENERAL OPERATING INFORMATION |
|---|
| **ANNUAL MTW PLAN** |

### *A. 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.

| ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER | BEDROOM SIZE | | | | | | TOTAL UNITS | POPULATION TYPE* | # of Uniform Federal Accessibility Standards (UFAS) Units | |
|---|---|---|---|---|---|---|---|---|---|---|
| | 0/1 | 2 | 3 | 4 | 5 | 6+ | | | Fully Accessible | Adaptable |
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

**Total Public Housing Units to be Added in the Plan Year** N/A

NOTE: ECC/HANH is in the planning stages for these developments and the unit mix and UFAS information has not been finalized. ECC/HANH will update when that has been completed.

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

**If "Population Type" is "Other" please describe:**

| |
|---|
| **ECC/HANH will not add any new public housing units in FY2025. However, ECC/HANH will utilize the Faircloth to RAD flexibility and will update accordingly in future plans.** |

**ii. Planned Public Housing Units to be Removed**

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

| AMP NAME AND NUMBER | NUMBER OF UNITS TO BE REMOVED | EXPLANATION FOR REMOVAL |
|---|---|---|
| Scattered East | 6 | Modernization for homeownership opportunity |
| **TOTAL:** Public Housing Units to be Removed in the Plan Year | 6 | |

**iii. Planned New Project Based Vouchers**

Tenant-based vouchers that ECC/HANH 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).

| PROPERTY NAME | NUMBER OF VOUCHERS TO BE PROJECT-BASED | RAD? | DESCRIPTION OF PROJECT |
|---|---|---|---|
| Sponsored Based Housing (Youth Continuum) | 20 | No | Local Non-Traditional |
| Beacon – Chapel St | 38 | No | PBV |
| *2025 RFP for PBVs | 50 | No | Competitive proposals for PBVs |
| **TOTAL:** Planned new Project Based Units in Plan Year | 108 | | |

2025 RFP for PBVs - ECC recognizes the importance of providing housing opportunities. As a part of ECC/HANH strategy, we plan to have 50 vouchers available through an RFP process for project-based housing. It is anticipated that 25 will be leased in FY2025 and 25 in FY2026. As proposals are approved, the Plan will be updated accordingly.

### iv. Existing Project Based Vouchers

Housing Choice 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.

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

| PROPERTY NAME | NUMBER OF PROJECT-BASED VOUCHERS | PLANNED STATUS AT END OF PLAN YEAR* | RAD? | DESCRIPTION OF PROJECT |
|---|---|---|---|---|
| **Name** | **#** | **Status (below)** | **Yes/ No** | **Description** |
| PBV Beacon Communities Branford | 40 | Leased | No | PBV Units |
| PBV Dixwell Housing (Beulah) | 20 | Committed | No | PBV Units |
| PBV Hill Central Phase I | 32 | Leased | No | PBV Units |
| PBV NHP Foundation (West River) | 8 | Leased | No | PBV Units |
| PBV (Also Cornerstone) | 4 | Leased | No | 100% Supportive Housing |
| PBV 122 Wilmot Road | 13 | Leased | No | PBV units |
| PBV Brookside Phase 2 Rental | 51 | Leased | No | LIHTC PBV units |
| PBV Brookside Phase I Rental | 51 | Leased | No | LIHTC PBV units |
| PBV Casa Otonal | 12 | Leased | No | PBV units |
| PBV Cedar Hill | 4 | Leased | No | 100% Supportive Housing |
| PBV Chatham/Eastview | 2 | Leased | No | PBV units |
| PBV Christian Community Action (CCA) | 18 | Leased | No | PBV - Local Non-Traditional |
| PBV CUHO Existing | 24 | Leased | No | PBV Units - Scattered Site families |
| PBV CUHO New Construction | 5 | Leased | No | PBV Units - Scattered Site families |
| PBV Eastview Phase I | 49 | Leased | No | LIHTC PBV units |
| PBV Fellowship I | 18 | Leased | No | 100% Supportive Housing |
| PBV Fellowship II | 5 | Leased | No | 100% Supportive Housing |
| PBV Frank Nasti Existing | 11 | Leased | No | PBV units |
| PBV Mutual Housing Assoc. (Neighborhood Works/New Horizon) | 9 | Leased | No | PBV Units |
| PBV Mutual Housing Association New Construction | 20 | Leased | No | PBV units |
| PBV Mutual Housing Existing | 15 | Leased | No | PBV Units |
| PBV New Reach Portsea Place | 8 | Leased | No | PBV - Supportive Housing for homeless youth |
| PBV New Rowe Building | 32 | Leased | No | LIHTC PBV units |

| | | | | |
|---|---|---|---|---|
| PBV Norton Court (Continuum of Care) | 12 | Leased | No | 100% Supportive Housing |
| PBV Park Ridge | 60 | Leased | No | LIHTC PBV units |
| PBV QT Phase 1 | 23 | Leased | No | LIHTC PBV units |
| PBV QT Phase 2 | 23 | Leased | No | LIHTC PBV units |
| PBV QT Phase 3 | 16 | Leased | No | LIHTC PBV units |
| PBV Rockview Phase I Rental | 47 | Leased | No | LIHTC PBV units |
| PBV Seabury Cooperative – 400 Elm St | 39 | Leased | No | PBV Units |
| PBV Shartenburg | 20 | Leased | No | PBV units |
| PBV West Village Phase I | 15 | Leased | No | 100% Supportive Housing |
| **PBV SUBTOTAL** | **706** | | | |
| RAD 122 Wilmot Road | 34 | Leased | Yes | RAD/PBV |
| RAD 4 Fairmont | 97 | Leased | Yes | RAD/PBV |
| RAD 4 Ruoppolo | 104 | Leased | Yes | RAD/PBV |
| RAD Chamberlain Court (Stanley Justice Landing) | 7 | Leased | Yes | RAD/PBV |
| RAD Charles T. McQueeney | 149 | Leased | Yes | RAD/PBV |
| RAD Eastview | 53 | Leased | Yes | RAD/PBV |
| RAD Fair Haven/EVTII and Chatham | 55 | Leased | Yes | RAD/PBV |
| RAD Farnam II 4% | 36 | Leased | Yes | RAD/PBV |
| RAD Farnam II 9% | 52 | Leased | Yes | RAD/PBV |
| RAD Farnam Onsite I | 86 | Leased | Yes | RAD/PBV |
| RAD Fulton Park | 12 | Leased | Yes | RAD/PBV |
| RAD Group I CB Motley | 45 | Leased | Yes | RAD/PBV |
| RAD Group I Katherine Harvey Terrace | 17 | Leased | Yes | RAD/PBV |
| RAD Group I Newhall Gardens | 26 | Leased | Yes | RAD/PBV |
| RAD Group I Prescott Bush | 56 | Leased | Yes | RAD/PBV |
| RAD McConaughy 4% | 92 | Leased | Yes | RAD/PBV |
| RAD McConaughy 9% | 104 | Leased | Yes | RAD/PBV |
| RAD Monterey Place 1 | 42 | Leased | Yes | RAD/PBV |
| RAD Monterey Place 2 | 7 | Leased | Yes | RAD/PBV |
| RAD Monterey Place 2R | 28 | Leased | Yes | RAD/PBV |
| RAD Monterey Place 3 | 45 | Leased | Yes | RAD/PBV |
| RAD Monterey Place 4 | 42 | Leased | Yes | RAD/PBV |

| | | | | |
|---|---|---|---|---|
| RAD Monterey Place 5 | 17 | Leased | Yes | RAD/PBV |
| RAD Monterey Place- Edith B Johnson | 95 | Leased | Yes | RAD/PBV |
| RAD Monterey Place- William Griffin | 4 | Leased | Yes | RAD/PBV |
| RAD Ribicoff (Twin Brook) 4% | 51 | Leased | Yes | RAD/PBV |
| RAD Ribicoff (Twin Brook)– 9% | 44 | Leased | Yes | RAD/PBV |
| RAD Rockview 2/Westville | 62 | Leased | Yes | RAD/PBV |
| RAD/PBV West Village (formerly Howe Street Single Room Occupancy) | 80 | Leased | Yes | RAD/PBV |
| RAD Valley Townhouses | 32 | Leased | Yes | RAD/PBV |
| RAD Waverly Townhouses | 51 | Leased | Yes | RAD/PBV |
| RAD Winslow Celentano | 64 | Leased | Yes | RAD/PBV |
| **RAD SUBTOTAL** | **1689** | | | |
| **Total:**<br>**Planned Existing Project-Based Vouchers** | **2395** | | | |

### v. Planned Other 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.

| PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR |
|---|
| |
| ECC/HANH anticipates disposition of six (6) Scattered Site units for substantial rehabilitation and homeownership opportunities for families in the ECC/HANH homeownership program. |

### vi. General Description of Planned Capital Expenditures

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

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 locations that are remaining post-RAD conversions. 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 25,** 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, ECC/HANH has considered the needs across the entire portfolio.

Some work items in the FY 25 MTW Plan are a continuation of MTW FY 24 Plan projects that were not fully completed by the end of FY 24. The post-COVID pandemic continues to impact product availability, work scheduling, product and project costs.

In FY 25, ECC/HANH plans to continue addressing health and safety concerns throughout the remaining LIPH portfolio. Under a grant award, lead abatement is continuing at Scattered Sites West and East properties and ECC/HANH is continuing to address housing-related hazards to include carbon monoxide, mold and associated asbestos. Funds have also been earmarked for Agency wide services and obligations. ECC/HANH reviewed the Physical Needs Assessment reports with management and Operations field staff, discussed needs not yet addressed and agreed upon the following priority work activities to be pursued in FY 25.

1. **Crawford Manor Upgrades-Fire Alarm System, Health-Safety, Interiors**
   - ECC/HANH continued with health-safety improvements including water booster pump, fire alarm system upgrade, a communication system in the building for fire fighters and a building electrical service upgrade completed FY 24. In FY 25, ECC/HANH plans to upgrade 12 more bathrooms (10 have already been completed), perform exterior masonry-structural repairs as recommended in a recent forensic report, conduct a survey for additional shower pan needs, and design and implement protective pans over critical basement equipment. Crawford is under consideration for future RAD conversion which include a major property redevelopment. MTW funds are allocated for building repairs that are needs prior to a RAD conversion. - Planned Expenditure: $750,000

2. **Robert T. Wolfe: Health and Safety Repairs**
   - During FY 23-24, ECC/HANH completed Phase 1 and Phase 2 of exterior and interior health-safety repairs that were identified through a building-wide assessment. Wolfe is planned for a future RAD conversion to include a major property redevelopment. ECC/HANH was awarded a Choice Neighborhoods Planning Grant in FY23. In this planning process, Wolfe redevelopment is being incorporated into the larger Union Square comprehensive redevelopment through ECC's Glendower Group. MTW funds are allocated

for building repairs that are needs prior to a RAD conversion. - Planned Expenditure: $850,000

3. **Essex Interior/Building/Site Upgrades**
   - Non-RAD conversion family development. - During FY 25, ECC/HANH plans to replace damaged basement access hatches and foundations, repair carports and balcony caps at half walls. ECC/HANH will repair 2-fire-damaged units, change site lighting pole heads to LED, replace playground surface and equipment; design replacement of electric power masts and distribution panels; investigate code upgrade for stoops and front doors; exterior building and parking improvements, perform an engineering study/survey for site drainage; investigate feasibility of separate heating for individual units. - Planned Expenditure: $600,000

4. **Scattered Sites Interior/Building/Site Upgrades**
   - **Scattered Sites West Interior Building/ Site Upgrades**
     i. Non-RAD conversion development. The units need kitchen and bathroom upgrades as well as plumbing, mechanical, electrical, interior doors, walls, ceilings, floors appliances; fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, site structure repairs and replacement related to life health and safety issues, etc. Planned Expenditure: $825,000

   - **Scattered Sites East Interior/Building/Site Upgrades**
     ii. 40 of 52 units are being considered for RAD conversions. ECC/HANH will identify 10 properties for full upgrades. The units need kitchen and bathroom upgrades as well as plumbing, mechanical, electrical, interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Planned Expenditure: $2,750,000

   - **Scattered Sites Multifamily Interior/Building/Site Upgrades**
     iii. There are 8 remaining Scattered Site Multifamily public housing units that are not converting to RAD. For the condo units, ECC/HANH will work with the condo association to resolve the exterior site and drainage issues. The units need kitchen and bathroom upgrades as well as plumbing, mechanical, electrical, interior doors, walls, ceilings, decks, entry stairs, railings, patio doors, floors, appliances, fences, sidewalks, lighting, building envelope and exterior repairs, code upgrades, etc. Planned Expenditure: $200,000

5. **Lead Paint Abatement—SS West, SS East**
   - HUD 2020 Lead-Based Paint abatement was awarded in May 2021 and allowed ECC/HANH to target removal of lead-based paint in scattered site properties, instead of encapsulation and to solicit bids for the abatement of the remaining properties. In FY 23, ECC/HANH was awarded contracts for Group B (3 SS West units) and Group C (8 SS East units). The contracts have completed and closed out. Bids were solicited for Group A (2 SS East units) Group D (3 SS West units and 21 SS East units). Group A bids exceeded the estimate, and the contract was not awarded. The group D abatement contract was awarded, and the work will continue in FY 25. - Planned Expenditure: $500,000

6. **Housing-Related Hazards Abatement**
   - ECC/HANH received a 2020 HUD Housing-Related Hazards grant award to address carbon monoxide, radon, mold and associated asbestos abatement, and pest infestation. Pest inspections and radon mitigation project has been completed. Carbon monoxide-smoke detectors installation, mold and associated asbestos abatement will continue in FY 25. Planned Expenditure: $1,500,000

7. **Emergency Safety & Security**
   - ECC/HANH received a 2023 HUD Emergency Safety & Security grant award in the amount of $250,000 to enhance security cameras and to upgrade access control at Essex Townhouses. The work will be completed, and all funds expended by the 9-17-25 deadline. Planned Expenditure: $5,000

**The following are agency wide funding projects:**

8. **Agency Wide Vacancy Reduction**
   - Funds are allocated for abatement costs and vacancy reduction efforts that may occur during FY 25. Planned Expenditure: $25,000

9. There are two (2) types of Indefinite Quantity Contracts that form the backbone of our Planning & Modernization and Glendower Design team. These services provide us a quicker procurement time as the projects unfold, and the ability to continually select the best, most cost-effective design solution.
   - **Indefinite Quantity Contract (IQC) Architectural & Engineering Consulting Services** - Planned Expenditure: $150,000
   - **IQC Environmental Consulting Services** Planned Expenditure: $250,000

10. **Administration Salaries & Benefits (CFP and MTW funding)**
    - Staff salaries and benefits in support of CFP FY 25 activities. Planned Expenditure: $375,000

11. **RAD Initial Year Funding Tool Costs**
    - CFP formula funds are allocated for RAD conversions for the initial year and funding for the remaining months of the calendar year, from the Housing Assistance Payments (HAP) contract effective dates. RAD conversions: Westville Manor and Scattered Sites Multifamily. Planned Expenditure: $558,229

12. **CFFP Bond Debt**
    - ECC/HANH leveraged CFP funds for development of Brookside Phase 1 Rental. The Bond Debt is paid from Capital Fund allocations in accordance with the HUD repayment schedule. Planned Expenditure: $374,237.50

**ECC/HANH's Reference to the most Recent HUD-approved Five-Year Plan:** Updated Rolling Five-Year Plan for FY2024-2028, submitted in EPIC 5-13-24 and approved 6-20-24.

**Long-term outcomes** of the planned FY 25 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.

| Description | MTW Goal or Initiative | Capital Expenditures Planned FY 2025 | CFP Total | MTW Total | Other Total | Total Estimated Project Cost | Comments |
|---|---|---|---|---|---|---|---|
| **Crawford Interior & Exterior Upgrade, including Health & Safety Work Items** | **Continue modernization and capital investment in current housing portfolio** | $750,000 | $750,000 | $0 | $0 | $1,500,000 | Continuation of health & safety improvements. Exterior masonry-structural repairs as recommended in recent forensic report. Upgrade 12 more bathrooms (10 done in earlier contract). Survey for additional shower pan needs. Design-implement protective pans over critical basement equipment. Funds allocated for building repairs needed until future Crawford major redevelopment through RAD conversion. |
| **Wolfe Health-Safety Work: Interior-Exterior Upgrade** | **Continue modernization and capital investment in current housing portfolio** | $850,000 | $50,000 | $800,000 | $0 | $850,000 | Funds allocated for health-safety building repairs needed until future Wolfe major redevelopment through RAD conversion. FY 23 Choice Neighborhoods Planning Grant |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | | | | awarded, incorporating Wolfe into larger Union Square comprehensive redevelopment project through ECC's Glendower Group. |
| **Essex Health-Safety Work: Interior/Exterior Upgrade** | **Continue modernization and capital investment in current housing portfolio** | $600,000 | $500,000 | $100,000 | $0 | $2,100,000 | Replace Bilco basement access doors, repair foundations, failing carports, siding, balcony caps at half walls, repair 2 fire-damaged units, change site lighting pole heads to LED. Replace playground surface & equipment. Design for replacement of electric power masts & distribution panels. Investigate code upgrade for stoops & front doors. Engineering study-survey for site drainage. Investigate feasibility of separate heating for individual units. |
| **Scattered Sites West Interior/Building/Site Upgrades** | **Vacancy Reduction-Expand housing choice; Continue modernization and capital investment in** | $825,000 | $825,000 | $0 | $0 | $6,000,000 | Non-RAD conversion development. Identify 3 properties for full upgrade. Units need kitchen & bathroom upgrade; |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **current housing portfolio** | | | | | | plumbing, mechanical, electrical, interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, bldg. envelope & exterior repairs, code upgrades, etc. Backlog of unfunded needs. |
| **Scattered Sites East Interior/Building/Site Upgrades** | **Vacancy Reduction- Expand housing choice; Continue modernization and capital investment in current housing portfolio** | $2,750,000 | $2,750,000 | $0 | $0 | $10,000,000 | Forty of 52 SS East units being considered for possible RAD conversion. Identify 10 properties for complete upgrade. Units need kitchen & bathroom upgrade; plumbing, mechanical, electrical, interior doors, walls, ceilings, floors, appliances, fences, sidewalks, lighting, bldg. envelope & exterior repairs, code upgrades, etc. Backlog of unfunded needs. |
| **Scattered Sites Multifamily Non-RAD Locations Interior/Building/Site Upgrades** | **Expand housing choice; Continue modernization and capital investment in current housing portfolio** | $200,000 | $200,000 | $0 | $0 | $3,000,000 | There are 8 remaining SS Multifamily LIPH units that are not proposed for conversion to RAD. Units need kitchen & bathroom upgrade; plumbing, mechanical, electrical, interior doors, walls, |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | | | | ceilings, floors, appliances, fences, sidewalks, lighting, bldg. envelope & exterior repairs, decks, entry stairs, railings, patio doors, code upgrades, etc. On 7 condo units, work with condo association. Backlog of unfunded needs. |
| **Continuation of Lead-Based Paint Abatement at SS West- SS East** | **Expand housing choice; Continue modernization and capital investment in current housing portfolio** | $500,000 | $500,000 | $0 | $0 | $3,700,000 | With lead 2020 grant funds, continue Group D 24 units lead paint abatement and related repairs contract as identified by inspection-risk assessments. |
| **Continuation of Housing-Related Hazards Grant activities** | **Expand housing choice; Continue modernization and capital investment in current housing portfolio** | $1,500,000 | $1,500,000 | $0 | $0 | $3,999,993 | Continue housing-related hazards abatement activities initiated in FY 2022. Carbon monoxide-smoke detectors, mold abatement. |
| **Emergency Safety & Security Grant: Security Camera & Access Control Upgrades at Essex** | **Expand housing choice; Continue modernization and capital investment in current housing portfolio** | $5,000 | $5,000 | $0 | $0 | $250,000 | Funds awarded Sept. 2023 for security camera enhancement and access control upgrades at Essex. Funds will be fully expended by 9-17-25 ESSG grant deadline. |
| **Agency Wide Vacancy Reduction/Unit Abatement** | **Vacancy Reduction- Expand housing choice; Continue** | $25,000 | $25,000 | $0 | $0 | $25,000 | Funds are allocated for abatement costs and vacancy reduction efforts |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **modernization and capital investment in current housing portfolio** | | | | | | that may occur during FY 2025. |
| **IQC A&E** | **Continue modernization and capital investment in current housing portfolio** | $150,000 | $150,000 | $0 | $0 | $200,000 | A&E consultant firms assist with design & construction management needs agency wide. |
| **IQC Environmental** | **Continue modernization and capital investment in current housing portfolio** | $250,000 | $250,000 | $0 | $0 | $400,000 | Environmental consultant firms assist with potential hazardous materials testing, preparation of scopes and abatement monitoring needs agency wide. |
| **Administration Salaries-Benefits (CFP & MTW)** | **Continue modernization and capital investment in current housing portfolio** | $375,000 | $375,000 | $0 | $0 | $375,000 | Covers portion of 3 staff salaries & benefits to support CFP activities. |
| **RAD Initial Year Funding Tool Costs** | **Expand housing choice** | $558,229 | $558,229 | $0 | $0 | $558,229 | As required by HUD, CFP formula funds are allocated for RAD conversions for the anticipated months of calendar year remaining from the Housing Assistance Payment (HAP) Contract effective dates. Estimated amount for Westville and SS Multi initial year funding. |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **CFFP Bond Debt** | **Expand housing choice** | $374,237.50 | $374,237.50 | $0 | $0 | $374,237.50 | Post defeasance bond debt FY 2025 in accordance with HUD repayment schedule. Payments are made in March and September. |
| **Total** | | **$9,712,467** | **$8,812,467** | **$900,000** | **$0** | **$33,332,460** | |

## B. *LEASING INFORMATION*

### i. Planned Number of Households Served

Snapshot and unit month information on the number of households, ECC/HANH plans to serve at the end of the Plan Year.

| PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH: | PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED* | PLANNED NUMBER OF HOUSEHOLD TO BE SERVED** |
|---|---|---|
| MTW Public Housing Units Leased | 9,780 | 815 |
| MTW Housing Choice Vouchers (HCV) Utilized | 72,324 | 6,027 |
| Local, Non-Traditional: Tenant-Based^ | 0 | 0 |
| Local, Non-Traditional: Property-Based^ | 456 | 38 |
| Local, Non-Traditional: Homeownership^ | 0 | 0 |
| **Planned Total Households Served:** | 82,560 | 6,880 |

* "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.

| LOCAL, NON-TRADITIONAL CATEGORY | MTW ACTIVITY NAME/NUMBER | PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED* | PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED* |
|---|---|---|---|
| **Tenant-Based** | **N/A** | 0 | 0 |
| **Property-Based** | **CCA, Sponsored Based Housing Program** | **456** | **38** |
| **Homeownership** | **N/A** | **0** | **0** |

* 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.

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
- 96% to 98% occupancy rate

- historical average number of new admissions
- historical average number end of participations

The planned number of LNT units is based upon the anticipated utilization in the CCA and Sponsored Based Housing initiative.

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

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

| HOUSING PROGRAM | DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS |
|---|---|
| **MTW Public Housing** | No issues<br>ECC/HANH has a robust waitlist and turnover management strategy that will minimize any leasing issues. |
| **MTW Housing Choice Voucher** | ECC/HANH reopened the HCV waitlists during FY21 and is using an online portal for the waitlist applications. However, due to the current housing stock shortage we anticipate some delays in lease ups. ECC worked with Mobility Works to enhance our mobility program and to assist families find units. Glendower provides mobility services to family. Additionally, ECC has partnered with CT DOH and was awarded a mobility grant to Expand Housing choice and lease ups in high opportunity areas. |
| **Local, Non-Traditional** | There were delays in lease ups for the Sponsored Based Housing Local Non-Traditional initiatives, due to delays in construction document development. The construction is anticipated to commence in the 1st quarter of FY25 with a 15-month construction period. |

## C. *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.

| WAITING LIST NAME | DESCRIPTION | NUMBER OF HOUSEHOLDS ON WAITING LIST | WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED | PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR |
|---|---|---|---|---|
| **LIPH** | **Site based. Not population specific.** | 28,500 | **Open** | **N/A** |
| **HCV** | **Program specific. Not population specific.** | 36,127 | **Open** | **N/A** |

**Please describe any duplication of applicants across waiting list:**

ii. Applicants can apply for more than one program within ECC/HANH. Numbers provided for each waitlist are not duplicated. ECC/HANH HCV and LIPH waitlists remain open. Applications have increased dramatically since the Applicant portal has opened and it easier for applicants to apply for the various waiting lists. the

| WAITING LIST NAME | DESCRIPTION OF PLANNED CHANGES TO WAITING LIST |
|---|---|
| **LIPH** | **No anticipated changes during the plan year.** |
| **HCV** | **No anticipated changes during the plan year.** |

### Who We Serve

ECC/HANH anticipates serving approximately 6880 families during FY 2025, 815 LIPH families and 6065 HCV families. During the 2001 baseline year, ECC/HANH served a total of 4,827 families. Current projected numbers reflect an increase of approximately 2,053 families or approximately 42.5% indicating that MTW status has continuously allowed ECC/HANH to increase the number of families being served.

In their respective programs, the vast majority of families fall in the Extremely Low-Income category with 71% of LIPH and 68% of HCV families in this income category. 43% percent of LIPH families and 32% of HCV families earn wages. The percentage of families reporting no income are 8% of LIPH and 5% of HCV families.

81% of households in LIPH range from 1 person to 3 person families and 74% of households in HCV, range from 1 person to 3 person families. The following table summarizes the population demographics.

| **ECC/HANH Population Demographics FY2025** | | | | | |
|---|---|---|---|---|---|
| | **LIPH** | | **HCV** | | **Total** |
| | **2025** | | **2025** | | **2025** |
| | | % of combined total | | % of combined total | |
| Total Households | 815 | 12% | 6065 | 88% | 6880 |
| Total Individuals | 1889 | 14% | 11,819 | 86% | 13708 |

| | | | | | |
|---|---|---|---|---|---|
| Average Income | $21,791 | | $19,357 | | |
| Average TTP | $520 | | $456 | | |
| Households with Extremely low income | 588 | 12% | 4,127 | 88% | 4715 |
| Households with Very Low income | 138 | 14% | 875 | 86% | 1013 |
| Households with Low income | 37 | 13% | 252 | 87% | 289 |
| Households Above low income | 64 | 28% | 167 | 72% | 231 |
| Households with No income | 65 | 18% | 295 | 82% | 360 |
| Households with Employment income | 360 | 15% | 2,007 | 85% | 2367 |
| Households with Public Assistance | 120 | 38% | 200 | 62% | 320 |
| Households with Social Security | 394 | 13% | 2,615 | 87% | 3009 |
| Households with Other Income | 160 | 24% | 498 | 76% | 658 |
| | | | | | |
| Minority Households | 532 | 15% | 3,130 | 85% | 3662 |
| Non-minority | 295 | 11% | 2,294 | 89% | 2589 |
| | | | | | |
| Elderly families | 213 | 12% | 1,637 | 88% | 1850 |
| Disabled families | 353 | 13% | 2,294 | 87% | 2647 |
| | | | | | |
| 1 member | 325 | 12% | 2393 | 88% | 2718 |
| 2 members | 209 | 15% | 1214 | 85% | 1423 |
| 3 members | 140 | 13% | 918 | 87% | 1058 |
| 4 members | 80 | 14% | 509 | 86% | 589 |
| 5 members | 42 | 19% | 238 | 81% | 280 |

| | | | | | |
|---|---|---|---|---|---|
| 6 members | 16 | 20% | 88 | 80% | 104 |
| 7 members | 11 | 22% | 37 | 78% | 48 |
| 8+ members | 4 | 12% | 27 | 88% | 31 |

**Low Income Public Housing**

ECC/HANH is starting FY2025 with a housing stock of 821 units and plans to end with 815 public housing units. This includes 431 site-based family units, 219 Elderly/Disabled units and 171 Scattered Site units to be reduced to 165 units.

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, a 73% reduction in units.

| Development Name | Development Type | Units beginning FY2025 | Planned Units to Add | Planned Units to Remove | Planned units at the end of FY2025 |
|---|---|---|---|---|---|
| **Val Macri** | Elderly/Disabled | 17 | 0 | 0 | 17 |
| **Crawford Manor** | Elderly /Disabled | 109 | 0 | 0 | 109 |
| **RT Wolfe** | Elderly /Disabled | 93 | 0 | 0 | 93 |
| **SUBTOAL** | | **219** | **0** | **0** | **219** |
| | | | | | |
| **Westville Manor** | Family | 89 | 0 | 0 | 89 |
| **Essex Townhouses** | Family | 35 | 0 | 0 | 35 |
| **Quinnipiac Terrace I** | Family | 58 | 0 | 0 | 58 |
| **Quinnipiac Terrace 2** | Family | 56 | 0 | 0 | 56 |
| **Quinnipiac Terrace 3** | Family | 17 | 0 | 0 | 17 |
| **Trinity Rowe** | Family | 46 | 0 | 0 | 46 |
| **Brookside Phase 1** | Family | 50 | 0 | 0 | 50 |
| **Brookside Phase II** | Family | 50 | 0 | 0 | 50 |
| **Rockview Phase 1 Rental** | Family | 30 | 0 | 0 | 30 |
| **SUBTOTAL** | | **431** | **0** | **0** | **431** |
| | | | | | |
| **Scattered Site - Multi Family** | Scattered Sites | 96 | 0 | 6 | 90 |
| **Scattered Site – West** | Scattered Sites | 23 | 0 | 0 | 23 |
| **Scattered Site – East** | Scattered Sites | 52 | 0 | 0 | 52 |
| **SUBTOTAL** | | **171** | **0** | **6** | **165** |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | |
| **TOTAL** | | **821** | **0** | **6** | **815** |

**Housing Choice Voucher Program**

During FY 2025, ECC/HANH will allocate at least 92% of its HCV funding to HCV program and administrative costs with an estimated 6065 vouchers utilized out of a HUD allocation of approximately 6,595 vouchers.

ECC/HANH's project based vouchering allocation includes the following:
At the start of the FY2025, ECC/HANH has allocated 706 non-RAD PBVs, 1,689 RAD PBVs for a total of 2,395 project-based vouchers. ECC/HANH plans to end FY205 with 2449 project-based vouchers

ECC/HANH plans to end FY 2025 with 3616 tenant-based vouchers and 2449 project based vouchers for a total of 6065 vouchers utilized.

(uses described in table below).

| Description | FY2025 Baseline | Planned units to be removed | Planned units to be added | Planned units at the end of FY 2025 |
|---|---|---|---|---|
| **MTW TBV Vouchers** | | | | |
| DMHAS Supportive - Housing First | 10 | 0 | 0 | 9 |
| DMHAS MHT Grant - FUSE | 10 | 1 | 0 | 9 |
| Family Options - Homeless | 15 | 7 | 0 | 8 |
| Permanent Enrichment | 10 | 1 | 0 | 9 |
| Foreclosure Protection | 17 | 2 | 0 | 15 |
| Family Unification Supportive Housing | 20 | 2 | 0 | 18 |
| Homelessness/Imminent Danger of Homelessness | 40 | 0 | 0 | 40 |
| Supportive Housing/Homelessness Prevention I | 51 | 0 | 0 | 51 |
| Ending Youth Homelessness (City of New Haven) | 0 | 0 | 40 | 40 |

| | | | | |
|---|---|---|---|---|
| Re-entry (Fresh Start/Project Longevity/Youth Violence Prevention) | 51 | 0 | 30 | 81 |
| CARES | 5 | 2 | 0 | 3 |
| West Rock Homeownership | 2 | 2 | 0 | 0 |
| Section Eight Home Ownership Program (SEHOP) | 60 | 40 | 0 | 20 |
| Farnum Relocation | 52 | 17 | 0 | 35 |
| RAD II Relocation | 7 | 6 | 0 | 1 |
| Valley Relocation | 32 | 3 | 0 | 29 |
| Westville Relocation Vouchers | 50 | 5 | 0 | 45 |
| Fair Share Vouchers | 18 | 2 | 0 | 16 |
| Stability Vouchers (Homelessness) | 9 | 1 | 0 | 8 |
| MTW Tenant Based Voucher | 3309 | 433 | 0 | 2876 |
| **MTW TBV Voucher Subtotal** | **3768** | **524** | **70** | **3314** |
| | | | | |
| **Non-MTW TBV Vouchers** | | | | |
| Emergency Housing Vouchers (EHV) | 37 | 4 | 0 | 33 |
| Church Street South (Tenant Protection Voucher) | 179 | 62 | 0 | 117 |
| Church Street South 2 | 15 | 2 | 0 | 13 |
| Church Street South 3 | 47 | 9 | 0 | 38 |
| Enhanced Vouchers | 11 | 2 | 0 | 9 |
| Seabury Enhanced Vouchers | 31 | 17 | 0 | 14 |

| | | | | |
|---|---|---|---|---|
| University Row (Tenant Protection Vouchers) | 12 | 0 | 0 | 12 |
| VASH Vouchers | 100 | 67 | 33 | 66 |
| **Non-MTW TBV Voucher Subtotal** | **432** | **163** | **33** | **302** |
| **TBV Totals** | **4200** | **687** | **103** | **3616** |
| **Non-RAD PBV** | **706** | **0** | **108** | **814** |
| **RAD/PBV Vouchers** | **1689** | **54** | **0** | **1635** |
| **Non-RAD PBV and RAD/PBV Subtotal** | **2395** | **54** | **108** | **2449** |
| | | | | |
| **GRAND TOTAL - TBV and PBV** | **6595** | **741** | **211** | **6065** |

**Emergency Housing Vouchers**

The American Rescue Plan (ARP) of 2021, section 3202 created the Emergency Housing Vouchers for individuals and families who are experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing stability.

Effective July 1, 2021, HUD allocated 37 EHVs to ECC/HANH. After September 30, 2023, ECC/HANH may not reissue any previously leased EHV, regardless of when the assistance for the formerly assisted family ends or has ended.

All referrals must come through the CoC Coordinated Entry system or from a Victims Services Provider. ECC/HANH has entered into an MOU with the CoC (Coordinated Access Network) who agrees to fulfill its responsibilities of prioritizing individuals and families for EHV assistance, determining the homelessness eligibility, referring individuals and families through the CoC's coordinated entry system, supporting individuals and families in processing voucher applications, supporting the housing search process, and planning for and coordinating the delivery of supportive services to support the housing stability of EHV participants.

ECC/HANH has received approval to implement the following rent simplification flexibilities to the Emergency Housing Vouchers.

- Rent simplification activities, consisting of:

- Multi-year recertification cycles (triennial for elderly or disabled households and biennial for work-able households)
- Simplified rent tiers with elimination of standard deductions, and $1,000 income bands beginning at $2,500.
- Exceptional expense tiers, allowing households with exceptional medical, disability, or childcare expenses to request a rent reduction.
- $50 minimum rent, with a hardship exemption for households unable to pay minimum rent.
- Transition period of one year from current income-based rent to the tiered-rent structure and minimum rent to avoid hardships.

- Rent simplification/cost stabilization measures, consisting of:
  - HQS inspections on a biennial and triennial schedule, matching recertification schedule and allowing participants and landlords to request a special inspection at any point if deficiencies are suspected.
  - Self-certification for curing failed inspections if failed items are unrelated to health and safety issues.
  - Limiting landlord rent increases to only the time of the household's bi or triennial recertification.

**Veterans Affairs Supportive Housing (HUD-VASH)**

In collaboration with the HUD-Veterans Affairs Supportive Housing (HUD-VASH) program, ECC/HANH provides Housing Choice Voucher (HCV) rental assistance for homeless Veterans and the Department of Veterans Affairs (VA) provides case management and clinical services. The VA provides these services for participating Veterans at VA medical centers (VAMCs), community-based outreach clinics (CBOCs), through VA contractors, or through other VA designated entities.

ECC/HANH has a VASH allocation of 100 vouchers, with a current 51% utilization rate.

In an effort to increase the voucher utilization and assist more veterans with housing and supportive services, ECC/HANH plans on utilizing the process for establishing its self as a Designated Service Provider (DSP) to act in the place of the VA for Veteran selection, referral, intake, case management and supportive services.

HUD and the VA recognizes that there is an additional opportunity to utilize all vouchers by providing new authorization allowing PHAs to also serve in the role of DSP. The DSP approval will allow ECC/HANH to issue a HUD-VASH voucher to a veteran without a referral from the VA.

Serving in the role as DSP, ECC/HANH (and/or a supportive service agency) must provide veteran selection, intake and temporary case management in the manner that is consistent with the requirements outlined in the HUD-VASH Operating Requirements. "Temporary" is defined as not lasting longer than 180 days (or any extension approved by the VA) for each veteran.

## III: Proposed MTW Activities: HUD Approval Requested

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

N/A

# IV: Approved MTW Activities: HUD Approval previously Granted

## A. IMPLEMENTED ACTIVITIES
### Increase Housing Choice

### Initiative 1.2 – Local Total Development Cost (TDC) Limits

#### i. Plan Year Approved, Implemented, Amended

This initiative was approved in FY08, implemented in FY09 and amended in FY12 and FY17.

#### ii. Description/Update

This activity establishes Total Development Cost (TDC) and Housing Construction Cost (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 ECC/HANH 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 Means Repair and remodeling Cost, and (2) an analysis of unit size and construction cost data obtained from a survey of local mixed income developments, and (3) an analysis of other local factors and market conditions affecting the cost of the development of mixed income communities in the local market area.

ECC/HANH has the following developments in its pipeline for TDC limits: Crawford Manor, 34 Level Street, Westville Manor Phase I, Westville Manor Phase II, Scattered Site Multifamily, St. Luke's, East Grand, Union Square (Robert T Wolfe), Clock Factory, State Street, Griswold and Newhallville which are still in the planning stages.

Valley Townhomes had a financial closing in the 1st quarter of FY23 and demolition began in the 2nd quarter of FY23. Occupancy began in the spring of FY24. There are 34 RAD/PBV units and 8 market rate units. The project cost is $23 million.

McConaughy Terrace had a financial closing in the 1st quarter of FY2024. Conversion occurred in December 2023 and occupancy began in December 2023. There are 104 units in McConaughy 9% and 92 units in McConaughy 4%.

As it relates to our approved TDC, the developments shall not exceed the approved TDC.

ECC/HANH continues to work diligently to find creative construction options to receive a quality development that will have a life cycle of 20 years while staying within the lower level of the approved TDC.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 aims to increase housing choice and cost efficiency of redevelopment efforts.

**Initiative 1.4 and 1.10 – Defining Income Eligibility for the Project Based Voucher Programs**

i. **Plan Year Approved, Implemented, Amended**

This initiative was approved in FY12 and implemented in FY13.

**ii. Description/Update**

To be eligible to receive assistance under the Project-Based Voucher (PBV) program, a family must meet the following income limits under Section 8(o) (4) of the Housing Act of 1937. Recipients of PBV program assistance must be:

- a very low-income family.
- a family previously assisted under this title.
- a low-income family that meets eligibility criteria specified by the public housing agency.
- a family that qualifies to receive a voucher in connection with a homeownership program approved under Title IV of the Cranston-Gonzalez National Affordable Housing Act; or
- a family that qualifies to receive a voucher under section 223 or 226 of the Low-Income Housing Preservation and Resident Homeownership Act of 1990.

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.

This initiative is designed to achieve an income mix at redeveloped properties and has been successful in supporting the redevelopment of units and preservation of units while successfully increasing the income mix in these developments.

The initiative includes the developments in the chart below.

| Income Eligibility for Project Based Voucher Program in Mixed-Finance Developments-FY2025* | | | | | | | |
|---|---|---|---|---|---|---|---|
| Development | Units at or below 30% of AMI | Percent | Units at 31-49% of AMI | Percent | Units at 50-80% of AMI | Percent | Total Units |
| BROOKSIDE PHASE I | 33 | 69% | 8 | 17% | 7 | 14% | 48 |
| BROOKSIDE PHASE II | 45 | 96% | 2 | 4% | 0 | 0% | 47 |
| CONSTANCE B MOTLEY | 36 | 90% | 4 | 10% | 0 | 0% | 40 |
| EASTVIEW TERRACE PHASE I | 38 | 78% | 10 | 20% | 1 | 0% | 49 |
| EASTVIEW TERRACE PHASE II | 32 | 65% | 13 | 27% | 4 | 8% | 49 |
| FAIRHAVEN CHATHAM | 26 | 81% | 5 | 16% | 1 | 3% | 32 |
| FAIR HAVEN EASTVIEW II | 14 | 58% | 9 | 38% | 1 | 4% | 24 |
| FULTON PARK | 11 | 92% | 1 | 8% | 0 | 0% | 12 |
| KATHERINE HARVEY TERRACE | 15 | 100% | 0 | 0% | 0 | 0% | 15 |
| MCQUEENEY TOWERS | 131 | 89% | 14 | 10% | 1 | 1% | 146 |
| NEWHALL GARDENS | 20 | 83% | 4 | 17% | 0 | 0% | 24 |
| MCCONAUGHY 4% | 24 | 92% | 1 | 4% | 1 | 4% | 26 |
| MCCONAUGHY 9% | 62 | 86% | 7 | 10% | 3 | 4% | 72 |
| MILL RIVER 4% | 21 | 66% | 11 | 34% | 0 | 0% | 32 |
| MILL RIVER 9% | 67 | 84% | 13 | 16% | 0 | 0% | 80 |
| PRESCOTT BUSH | 44 | 90% | 3 | 6% | 2 | 4% | 49 |
| QUINNIPIAC TERRACE PHASE I | 13 | 56% | 6 | 26% | 4 | 17% | 23 |
| QUINNIPIAC TERRACE PHASE II | 14 | 60% | 8 | 34% | 1 | 4% | 23 |
| QUINNIPIAC TERRACE PHASE III | 8 | 67% | 4 | 33% | 0 | 0% | 12 |
| RIBICOFF (TWINBROOK) | 35 | 80% | 5 | 11% | 4 | 9% | 44 |
| RIBICOFF 4 (TWINBROOK) | 41 | 82% | 7 | 14% | 2 | 4% | 50 |
| ROCKVIEW PHASE I | 22 | 76% | 7 | 24% | 0 | 0% | 29 |
| *ROCKVIEW PHASE II | | | | | | | |
| STANLEY JUSTICE | 5 | 71% | 2 | 29% | 0 | 0% | 7 |
| VALLEY TOWNHOMES | 9 | 69% | 4 | 31% | 0 | 0% | 13 |
| VALENTINA MACRI | 16 | 100% | 0 | 0% | 0 | 0% | 16 |
| WAVERLY TOWNHOMES | 38 | 78% | 8 | 16% | 3 | 6% | 49 |
| WILLIAM T ROWE | 22 | 69% | 7 | 22% | 3 | 9% | 32 |
| WILMOT CROSSING PBV | 13 | 97% | 1 | 7% | 1 | 0% | 15 |
| WILMOT CROSSING | 31 | 97% | 1 | 3% | 0 | 0% | 32 |
| WINSLOW CELENTANO | 55 | 90% | 5 | 8% | 1 | 2% | 61 |
| *data not currently available | | | | | | | |
| **Total** | **941** | | **170** | | **40** | | **1151** |

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

ECC/HANH does not anticipate 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 1.6 and 1.28 – Mobility Services**
Previously
Initiative 1.6 – Deconcentration of Poverty (Promote Expanded Housing Opportunities for HCV and PBV Program
Initiative 1.28 - Increase Lease Up Success Rate for HCV Families

**i. Plan Year Approved, Implemented, Amended**

- 1.6 - Deconcentration of Poverty
  Approved in FY2008 and implemented in FY2009 (Significant Change Amendment in FY2020)
- 1.28 - Increase Lease Up Success Rate for HCV Families
  Approved and implemented in FY2023

**ii. Description/Update**

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.

In FY08, ECC/HANH implemented Initiative 1.6 Deconcentration of Concentration using MTW Rent Standards to approve exception rents up to 150% of the FMR in the following cases:

- 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.
- Mixed-income housing opportunities that promote expanded housing opportunities and deconcentration of poverty.
- Wheelchair accessible units
- Large bedroom-size units, (4 bedrooms or larger)
- Budget-based rent increases for landlords who make major capital improvements in their property, including accessibility modifications.

In FY2020, ECC/HANH made enhancements to the Deconcentration (1.6) initiative and updated the benchmark in metric HC#5, Increase in Resident Mobility, to model SEMAP Indicator 15 from 10 moves per year to model the SEMAP Indicator 15.

- SEMAP Indicator 15 - <u>2% higher</u> 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.

In FY2023, due to the tight rental market and some HCV families having difficulty finding affordable units (apartments) to utilize their housing choice vouchers, ECC/HANH implemented Initiative 1.28, Increase Lease Up Success Rate for HCV Families, to offer incentives to families and landlords/owners to overcome barriers in finding affordable units and the ability to lease a unit in a timely manner.

**<u>Planned Non-Significant Change to the Initiative in FY2025</u>**

ECC/HANH proposes to combine the 2 initiatives due to the fact that both initiatives serve to assist families in moving to a unit of choice by providing mobility counseling and other incentives.

- **Participant Incentives**

Mobility Counseling Services

- ECC/HANH will provide mobility counseling services for families to assist in their search for housing with a focus on moves to non-impacted and/or high opportunity areas.

Security Deposit, Utility Deposit and Application Fee Assistance

- ECC/HANH will provide families with the following assistance:
    - Application fees paid for up to 3 units (anticipating $30 per application or $90 per family)
    - Security deposit assistance (up to one month of contract rent) for initial move-ins and paid directly to the owner on behalf of the family when other resources cannot.
        - The security deposit can be in the form of a check or security deposit guarantee.
        - The security deposit will be returned to ECC/HANH and will follow the family from one unit to the next, or
    - Assistance with repayment of past utility debts that would otherwise prevent a family from securing utilities in their own name
        - Assistance to be paid up to payment standard for family size or
        - Utility deposit assistance for family's utility deposit expenses.
            - Utility deposit assistance includes connection fees required for the utilities to be supplied by the tenant under the lease.
            - ECC/HANH may pay the utility deposit assistance directly to the utility company or may pay the assistance to the family when other resources cannot.
            - If paid to the family, ECC/HANH will require documentation the family paid the utility deposit. ECC/HANH will not require the utility supplier or family to return the utility deposit assistance to the ECC/HANH.
    - An automatic voucher extension, not to exceed 150 total days for families working with a Mobility Counselor Specialist.
    - Allowing new voucher families to move to another jurisdiction if they are experiencing difficulty in finding housing in New Haven. The request will be reviewed and approved at the discretion of the V.P. of HCV.

- **Landlord Incentives Payments**

ECC/HANH may pay the landlord an incentive fee upon lease up based on the bedroom size. The incentive fees are payable at lease execution and are listed below. The decision whether to offer an incentive fee is at the discretion of ECC/HANH.

| Unit Size | Amount |
|---|---|
| 1 Bedroom | $175 |
| 2 Bedroom | $275 |

| | |
|---|---|
| 3 Bedroom | $475 |
| 4+ Bedroom | $550 |

- Allow landlords/owners in the non-impacted/high opportunity areas, the opportunity to re-lease a unit for up to three families and receive the incentive payment, instead of receiving the incentive only at the first lease up for the property.
- Allow the incentive fee to be paid to landlords who may already be a landlord in the HCV program and own another property or multiple properties as opposed to a landlord who is new to the HCV program.
- Landlords who are engaged with a family who is receiving mobility counseling will receive an HQS checklist upon initial engagement with a family in order to be prepared for an HQS inspection for timelier lease ups.
- ECC/HANH will also exercise the option to allow families to move in quickly utilizing the options of the non-life-threatening or alternative inspection provision for initial HQS inspections as per the HCV Administrative Plan and Notice PIH 2017-20 (HA).

**iii. Planned non-significant Changes**

Initiatives 1.6 and 1.28 will be combined. Both initiatives increase housing choice and will utilize mobility counseling services, participant and landlord incentives to assist participants in leasing in housing of choice faster.

**iv. Planned Changes to Metrics Data**

Metrics

HC#1 – Additional Units of Housing Made Available (For units leased utilizing mobility counseling)

- Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).

*HC#5 – Increase in Resident Mobility (For units leased in deconcentrated areas)*

- Annual number of incremental households leased-up in low poverty areas* because of the activity.

Internal Metrics – Exception Rents granted will apply.

- Annual number of incremental households with exception rents approved due to bedroom size issue because of the activity
- Annual number of incremental households with exception rents approved due to an accessibility issue because of the activity

**v. Planned Significant Changes**

None

This initiative meets the statutory objectives, improving housing choice, and will give families more opportunities and assistance to find housing of choice and move into a new unit in a more timely manner and does not require different authorizations from what was initially proposed.

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

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY10 and implemented in FY11.

**ii. Description/Update**

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, Continuum of Care, shelters, transitional and permanent housing providers to prioritize and identify chronically homeless families and other homeless populations. ECC/HANH entered in Memoranda of Understandings with organizations that provide housing and supportive services for homeless families and individuals.

There continues to be a need for vouchers for the homeless population and we are forming additional partnerships with homeless advocates.

ECC/HANH will continue to engage with homeless agencies and providers in an effort to house homeless individuals and families.

ECC/HANH will also offer additional services with the Family Self Sufficiency programs for these individuals and families.

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

| TBV Supportive Housing Efforts | Description | FY2025 Baseline Vouchers | Planned Units to be Removed | Planned Units to be Added | *Planned Units at the end of FY2025 |
|---|---|---|---|---|---|
| Tenant Based DHMAS Supportive – Housing First | Supportive Housing | 10 | 0 | 0 | **10** |
| DMHAS Mental Health Transformation Grant – FUSE | Supportive Housing | 10 | 2 | 0 | **8** |
| Family Options – Homeless | Supportive Housing | 8 | 0 | 0 | **8** |

| | | | | | |
|---|---|---|---|---|---|
| Permanent Enrichment | Supportive Housing | 10 | 1 | 0 | **9** |
| Foreclosure Protection | Foreclosure Protection | 17 | 3 | 0 | **14** |
| Family Unification Supportive Housing | DCF Family | 20 | 1 | 0 | **19** |
| Homelessness/Imminent Danger of Homelessness (TBV) | (Formerly Foreclosure PBV) | 40 | 5 | 0 | **35** |
| Supportive Housing/Homelessness Prevention I | Supportive Housing/Homelessness Prevention | 51 | 0 | 5 | **56** |
| Housing Stability Voucher | Ending homeless in collaboration with the CoC and/or Victim Service Provider | 9 | 0 | 0 | **9** |
| OHHS – Unhoused Youth | Office of Housing and Homelessness Services | 0 | 0 | 20 | **20** |
| OHHS – NHPS/McKinney | Office of Housing and Homelessness Services | 0 | 0 | 20 | **20** |
| Re-entry (Fresh Start/Project Longevity/Youth Violence Prevention) | | 51 | 0 | 5 | **56** |
| | | | | | |
| ***Supportive Housing Efforts Subtotal** | | **226** | **12** | **50** | **264** |

### iii. Planned Non-Significant Changes

In the continued effort to end homelessness, ECC/HANH continues to engage partnerships with homeless advocates and the City of New Haven and has allocated 96 vouchers to assist unhoused youth and families and housing for re-entry and violence interruption services.

ECC/HANH also received 9 Stability Housing vouchers to assist in the effort to end homelessness. These vouchers will be administered in collaboration with the Continuum of Care and a Victim Service provider.

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

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 objectives of Increasing Housing Choice.

**Initiative 1.9 – Increase the Allowed Percentage of Project Based Voucher ("PBV") Units from 75 Percent to 100 Percent in a Mixed Financed Development**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY12 and implemented in FY13.

**ii. Description/Update**

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, ECC/HANH 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 which is 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 mobility 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 percent 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;
- the project is undertaken in an area where significant investments are being made;
- 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 non converted units that are not currently approved for RAD conversion for which this authorization remains vital.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

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%**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY13 and implemented in FY14.

**ii. Description/Update**

This authorization will allow for the continued redevelopment efforts of the underperforming developments as well as increase housing choices for our residents. It allows ECC/HANH 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 anticipated percentage of non-RAD project based MTW vouchers is *19 percent (814 vouchers), a 4% increase from the previous year.

RAD conversions are not included in the calculation re. percent project based.

**(Projected Total voucher count (6065) - RAD/PBV (1689) = non-RAD vouchers (4376))*
*(PBV (814)) is 19% of total non-RAD vouchers)*

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 1.18 – ECC/HANH Transformation/Development**

(Previously)
Initiative 1.15 and 1.17 – West Rock Transformation Plan/Major Redevelopment Efforts - Included Initiative 1.13;
Initiative 1.16 – Crawford Manor Transformation Plan;
Initiative 1.23 - St Luke's Whalley Avenue Development
Initiative 1.29F– Robert T. Wolfe Transformation Plan)

**i. Plan Year Approved, Implemented, Amended**

- Initiative 1.15 and 1.17 – West Rock Transformation Plan/Major Redevelopment Efforts
  Approved in FY2014, implemented in FY2017 and revised in FY2021.
- Initiative 1.16 – Crawford Manor Transformation:
  Approved in FY13, implemented in FY16, and placed on hold in FY17. This initiate was moved from on hold to active in FY22.
- Initiative 1.23 - St Luke's Whalley Avenue Development
  Approved and implemented in FY2022.
- Initiative 1.29F– Robert T. Wolfe Transformation Plan (Previously Initiative 1.24)
  Approved in and implemented in FY23.

**ii. Description/Update**

ECC/HANH's MTW flexibility has facilitated developments in many communities and continues to transform neighborhoods. ECC/HANH proposes one initiative to include all of its development activities.

The development activities are listed below.

- **West Rock Transformation**

The West Rock revitalization was originally 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 was 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 consist of 392 units, 352 family townhouse units and 40 senior units in a mid-rise building. The homeownership component consists of 38 units. The cost of the revitalization of the phases bulleted directly below was $240 million.

ECC/HANH's goals in undertaking the project were 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, improve essential services to residents and the quality of the surrounding neighborhood and integrate it more fully into the surrounding city.

Completed phases include:

- Brookside Phase I and II, Homeownership --ECC/HANH received HUD approval to dispose of the Brookside property in FY2010.
- Rockview Phase I (completed and leased in FY2014) and Rockview Phase II (completed and leased in FY2021) 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.
- Wilmot Crossing at 122 Wilmot Road
- Commercial development at Wilmot Road. (FY2013) In FY14, Initiative 1.13 – Creation of a Commercial Business Venture at 122 Wilmot Road had been combined into this initiative. 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.
- Ribicoff Cottages – Twin Brooks I and II. (FY 2015). Twin Brooks 9% was completed in December 2015 and Twin Brooks 4% was completed in FY2016.

The next phase involved the redevelopment of McConaughy Terrace, Valley Townhouses, and Westville Manor/34 Level St.

- **McConaughy Terrace**

In FY 2021 ECC/HANH began the process of redeveloping McConaughy Terrace to convert the property to a Project based Voucher model using the Rental Assistance Demonstration Program (RAD). McConaughy Terrace contained 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. McConaughy 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. McConaughy 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. McConaughy 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 McConaughy 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 26 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. These newly constructed units will also allow for the inclusion of accessible units at McConaughy Terrace. The existing development, dating from the 1940s, does not have any accessible units. Ten (10) new accessible units are included in the design plans.

The development plan included 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 for residents for improved access to jobs, high quality early learning programs, public assets, public transportation, and high-quality public schools and education programs.

McConaughy Terrace was awarded competitive 9% Low Income Housing Tax Credits and 4% Low Income Housing Tax Credits. The financial closings were completed in the first quarter of FY2024. 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 the second quarter of FY2025.

- **Valley Street Townhomes**

In FY 2021 Valley Street Townhomes received an award from the U.S. Department of Housing and Urban Development (HUD) under its Rental Assistance Demonstration (RAD) portfolio award to convert public housing units to Section 8 project-based rental assistance contracts. Valley Street Townhomes is located at 210-290 Valley Street, New Haven. ECC/HANH proposed to demolish and reconstruct this development as part of the conversion to RAD/PBVs. The new construction consists of 40 units (32 RAD LIHTC and 8 unassisted market units. 10% of the units will be accessible.

All units will be visitable per Connecticut state statute. A. community center was built as a separate structure on the same site for social services, development recreational activities, management services and includes a laundry facility for residents. The redevelopment of Valley Townhouses will continue the revitalization of the Housing Authority of New Haven's affordable public housing stock, provide residents with easy access to public transit, and promote economic diversity in the area. The site is served by 7-day per week bus service that links to the Whalley Avenue corridor and downtown New Haven providing direct linkages to commercial, employment, and medical services.

Valley Street Townhomes received 9% LIHTC funding and all other funding sources are in place. The Valley Street closing occurred in the first quarter of FY23. The construction period was estimated at 15 months and occupancy began in the second quarter of FY2024. All current residents were provided full RAD and URA relocation rights including the right to return to the completed development. Full occupancy is anticipated in FY2025.

- **Westville Manor**

Westville Manor/34 Level Street - Westville Manor originally contained 151 units of family housing. Westville Manor has outlived its economic useful life and is plagued by water infiltration, erosion and other moisture issues. The original design and building layout also do not provide areas of defensible space. Westville Manor consists of a series of linear buildings clustered around parking lots, on a terraced landscape due to steeply changing topography.

As a result of a combination of topography and design, the current development has experienced extensive moisture issues. The cost of rehabilitation is similar to the cost of redevelopment with the

result still being poorly designed units and likely future moisture problems. ECC/HANH is proposing a complete demolition and redevelopment of Westville Manor.

The redevelopment of Westville Manor represents the final piece in the transformation of ECC/HANH's West Rock Redevelopments into a new neighborhood that will become a community of choice. Westville Manor lies adjacent to a series of newly redeveloped properties that were completed under the West Rock Revitalization Plan. This plan was completed in conjunction with the City of New Haven and undertaken through the City's Planned Development District regulations.

Westville Manor is located in an area of many opportunities. In addition to abutting West Rock State Park, the West Rock neighborhood features a number of other public assets, including Southern Connecticut State University, a health care center, and elementary and pre-schools. Just beyond the northern boundary of the neighborhood is the suburban Town of Hamden.

Westville Manor will be redeveloped in three phases, 1 off-site phase and 2 onsite phases to replace the existing 151 units. The offsite phase, Rockview Phase 2, has been completed and is fully occupied. The original site will be completed in 2 phases due to the site and the number of units being developed. It is anticipated that on-site phase 1 will begin construction in FY2025 dependent on the obtaining of all funding. Phase 2, which will complete the replacement housing on-site, would likely begin 1 year after Phase 1.

The on-site units will be replaced through a bifurcated process to assure that resident displacement will be minimized, and that unit demolition will occur in phased manner upon receipt of funding. The on-site redevelopment plans include the incorporation of 20% market rate units to assure that the replacement development is not only sustainable but also a neighborhood of choice.

It was the intention of ECC/HANH to seek 9% LIHTC funding in the fall of 2021 for the first 50-unit phase and in 2022 for the second 59-unit phase. This application was not successful but was resubmitted under the 2024 Connecticut Housing Finance Authority 9% LIHTC round for Phase 1 onsite.

ECC/HANH received the approval from both the City of New Haven City Plan Commission and the Board of Alders for the Westville Manor Planned Development District (PDD). These approvals allow ECC/HANH to proceed with the completion of architectural plans and other required development documents. HUD has an approved a CHAP for this development. The project architect and construction manager at risk have been procured and the pre-construction process is proceeding as planned.

- **34 Level Street**

ECC/HANH purchased 34 Level Street, New Haven, CT. The subject property is comprised of a 43,339 square foot inactive skilled nursing facility, constructed on a 6.00-acre site. The improvements were built in 1958 and are in very poor condition. The property has been vacant since the nursing home was closed in 2010. The property is located in the West Rock neighborhood directly adjacent to Westville Manor. The redevelopment plan is to demolish the existing building(s) and redevelop the subject property as a 50-unit (47 1-bedroom and 3 two-bedroom units) elderly development that will allow for the elderly to live independently even as residents may require more assistance with activities of daily living. Through this redevelopment Glendower is planning to construct a 50-unit HUD 202 Elderly Housing Development with the following characteristics:

- Housing that is physically designed to promote the long-term wellness of Elderly Persons and allow them to age in place.
- Can provide a robust package of services that support the health and social well-being of Elderly Persons.
- Leverage Capital Advance funds with other financing sources to maximize the number of units created per dollar of HUD funding.

Glendower unsuccessfully applied for 2021 HUD Section 202 Supportive Housing for the Elderly program. The score under the 2021 round was very competitive and a proposal was resubmitted under the 2023 round. This application was successfully awarded in September 2023.

A mixed-finance model, the project is estimated to cost $20M, used with funding sources including Low Income Housing Tax Credits, Section 202 funds, private funding and MTW funding. The project will not convert to a RAD based model using in-place Faircloth Vouchers as previously proposed but will utilize the PRAC model to convert the units to RAD.

- **Crawford Manor Transformation Plan**

ECC/HANH applied for the Choice Neighborhoods Initiative Planning Grant, but it was not awarded. This initiative was placed on hold while an alternative plan and timeline could be devised. Crawford Manor will be redeveloped using a combination of State and Federal Historic Tax Credits as well as Low Income Housing Tax Credits.

Crawford Manor was designed by world-renowned architect Paul Rudolph in the 1960's brutalist style. Paul Rudolph was the Dean of the Yale School of Architecture at the time and this building is considered a local landmark and is listed on the national registry of Historic places. The listing on the National Register limits the type of rehabilitation that can be completed but also opens the redevelopment to non-MTW capital. ECC/HANH was dedicated to planning and procuring an historic consultant to work with ECC on the preparation of Historic Tax Credit applications.

The procurement process for the consultant began in FY2023 and a consultant was hired in FY2024. ECC/HANH also started the procurement process for an architect and construction manager and plans on completing 40% of the design documents and obtaining city planning approval.

The property currently contains 109 units in a mixture of studio and 1-bedroom units. If approved by the State Historic Preservation Office, a small number of units would be combined to allow for the inclusion of additional 1 bedroom or 2-bedroom units. Under no circumstances will the diminimis reduction of 5% be exceeded. This initiative only requires MTW fungibility.

- **St Luke's Whalley Avenue Development**

ECC/HANH through its instrumentality The Glendower Group, partnered with a community-based developer, St. Luke's Development Corporation to redevelop multiple adjacent commercial parcels along Whalley Avenue, just walking distance from downtown New Haven and Yale University, into a premier mixed-use development including commercial/retail space and market and affordable units. Currently under design, the project plans will provide for a comprehensive transformation of the corner of Whalley Avenue and Sperry Streets in the city of New Haven.

The project's parcels are in a newly designated "opportunity zone," where certain investments will be eligible for preferential federal tax treatment. The Project shall consist of approximately fifty-five residential units and appurtenant commercial or retail space. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

St. Luke's Development Corporation (SLDC) has acquired parcels located at 117-125 & 129 Whalley, 10-12 Dickerman, and 34-36 Sperry. SLDC requires certain predevelopment and development services in connection with the development of the Project, has determined a need for a co-developer to assist with the development of the Project, and desires to work with Glendower as co-developer to undertake the Project.

The Glendower Group (Glendower), a nonprofit 501(c)(3) corporation established in November 2001, is an instrumentality to the Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH). Glendower has been engaged in the development of real property for the past 20 years and has successfully developed over $700 million worth of developments in New Haven, Connecticut. Glendower is at the forefront of those leading the private sector market in affordable housing. Glendower provides comprehensive and integrated real estate development services specializing in affordable housing. Glendower's vision has always been high-quality, innovative, and fiscally sound housing for families.

This mixed income project will contribute to promote healthy lives, a strong community and robust economy. Residents of the Whalley Avenue building will have easy access to area amenities providing them the opportunity to participate in social activities and services available in their community. The pedestrian-friendly layout of the project will offer increased traffic to new and existing businesses leasing the commercial space, and the new building will improve curb appeal as it becomes the gateway to one of New Haven's most active commercial districts.

To assist in the development of this affordable housing development, Elm City Communities will provide up to 49 project-based vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and management of the property.

Due to costs related to the demolition of ancillary buildings and the new construction of a new approximate 55-unit residential building, with 49 affordable units, the development of St Luke's Whalley Ave is only feasible through a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group applied for a 4% Low Income Housing Tax Credit in the second quarter of FY 2024. Architectural documents are currently being drafted.

ECC/HANH currently has HUD approval for the conversion of 33 units under Faircloth to RAD.

City Plan approval has been obtained and the architectural team is progressing with the design documents. A Construction Manager at Risk has been chosen and the development team has been awarded a $6million State CIF grant.

The closing is anticipated for the 1st quarter of FY2025, construction will take 18 months and all units will be occupied by the second quarter of calendar year 2026.

This development still in the planning stages.

- **Union Square Transformation (Church Street South/Union Square and Robert T. Wolfe) (Previously Initiative 1.24 Robert T Wolfe Transformation)**

ECC/HANH through its instrumentality The Glendower Group, seeks to redevelop Robert T. Wolfe. Robert T Wolfe is directly adjacent to the former Church Street South housing complex. ECC purchased the Church Street South site with the intent of redeveloping this property in conjunction with the redevelopment of Robert T Wolfe. The site, currently vacant, was a former cinderblock complex, comprised of 301 apartments spread across 22 buildings on an expansive 13-acre parcel of land that was demolished in 2016.

ECC/HANH applied for and was awarded a Choice Neighborhoods Initiative Planning Grant in FY2023 to study the redevelopment of the Church St. South and R. T. Wolfe sites and how to increase connectivity to the downtown area. It is the intent of ECC to redevelop the Church Street South and Robert T Wolfe sites over multiple mixed-use and mixed-income developments over the next several years.

Robert T. Wolfe will be a transit-oriented redevelopment inclusive of commercial and other economic development improvements in the area. The redevelopment of Robert T Wolfe will create a desirable, walkable community, connecting residents to the downtown area and the New Haven train station. It is anticipated that the redevelopment will create approximately ninety (90) units with commercial and community space. The project's parcel is located near Union Station, a transit station.

This CNI planning grant will allow for a comprehensive approach to neighborhood transformation. This grant will provide up to $500,000 in funding to develop a transformation plan to revitalize Robert T. Wolfe and the surrounding neighborhood. As one of the older, blighted developments in our portfolio, Robert T. Wolfe is an ideal center, focused towards initiating a transformation plan.

As part of the transformation plan, ECC/HANH intends to not only redevelop the housing units at Robert T. Wolfe, but to transform the surrounding community into a community that supports the long-term economic sustainability of our residents and the long-term economic sustainability of the City of New Haven. Through collaboration with other community partners, to include the Economic Development Corporation, the City of New Haven, the Board of Education and many more, ECC/HANH anticipates redesigning the infrastructure to create more traffic flow through the community, redesigning the housing units to be more spacious, removing 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.

Due to costs related to the demolition of ancillary buildings and the construction of a new approximate 90-unit residential building, the redevelopment of Robert T. Wolfe will be feasible through a mixed finance deal which includes the inclusion of Low-Income Tax Credit (LIHTC) equity, private financing, and Choice Neighborhood Implementation funding.

The initial financial closings are anticipated for the third quarter of FY2025. It is anticipated that construction will take 18 months to assure that all required relocation activities will comply with the Uniform Relocation Act. Under this scenario the redevelopment will be complete, and all units occupied by the first quarter of calendar year 2026.

This development is still in the planning stages.

- **Hazel Street**

ECC/HANH through its instrumentality The Glendower Group, seeks to partner with a private developer to develop a mixed-income market and affordable housing development. Currently under design, the project plans will provide for a comprehensive transformation of a vacant overgrown lot in the Newhallville neighborhood in the City of New Haven.

The Glendower Gorup partnered with Newhallville Community Development, LLC ("NCD") to develop 201 Hazel Street and required certain predevelopment and development services in connection with the development of the Project.

The Project shall consist of approximately sixty-one (61) residential units. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

The Hazel Street development is currently under design, the project plans will provide for a comprehensive transformation of the neighborhood.

It is anticipated that the development will consist of sixty-one (61) rental units. To assist in the development of this affordable housing development, Elm City Communities will provide up to forty-eight Faircloth RAD vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and will property manage the property.

The development will be a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group will apply for 9% Low Income Housing Tax Credit in the first quarter of FY 2025. Architectural documents are currently being drafted.

ECC anticipates a closing of the first quarter of FY2026, construction will take approximately 18 months.

This development still in the planning stages.

- **East Grand Ave**

ECC/HANH through its instrumentality The Glendower Group will develop a mixed- use and mixed-income market and affordable housing development. Currently under design, the project plans will provide for a comprehensive transformation on a vacant lot in the Fair Haven Heights neighborhood in the City of New Haven.

The Project shall consist of approximately sixty (60) residential units with commercial use. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

ECC purchased the vacant parcel and one building with water views of the Quinnipiac River. The Glendower Group will develop 13 and 36 East Grand Avenue that requires certain predevelopment and development services.

ECC and Glendower procured an architect and the project will be under design. The project plans will provide for a comprehensive transformation of the neighborhood.

The development anticipates forty (40) rental units. To assist in the development of this affordable housing development, Elm City Communities will provide up to thirty-two (32) Faircloth RAD vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will develop and will assist in the planning, implementation, and will property manage the property.

The development will be a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group will apply for 4% Low Income Housing Tax Credit in the third quarter of FY 2025.

ECC anticipates a closing of the second quarter of FY2026, construction will take 18 months.

This development still in the planning stages.

- **State and George**

ECC/HANH through its instrumentality The Glendower Group, seeks to partner with a private developer, LMXD to develop a mixed-use mixed-income market and affordable housing development. Glendower and LMXD responded to an RFP issued by the City of New Haven and was selected as the preferred developer. A schematic design was presented, and ECC/HANH will have community engagement around further design. The project plans provide affordable housing downtown and in walking distance of the train station in the City of New Haven.

The Project shall consist of approximately one-hundred and seventy (170) residential units. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

The Glendower Gorup, the real estate development instrumentality of the Authority partnered with LMXD and will develop 7 Orange Street and 19, 25, 31, 39 and 53 George Street and requires certain predevelopment and development services in connection with the development of the Project.

The MOU with the City is being presented for approval and ECC/HANH will work comprehensively on the design.

The development will yield approximately one-hundred and seventy (170) rental units. To assist in the development of this affordable housing development, Elm City Communities will provide approximately sixty (60) Faircloth RAD and/or Project Based vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and will property manage the property.

The development will be a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group will apply for 4% Low Income Housing in FY 2025. ECC anticipates a closing in FY2026.

This development still in the planning stages.

- **Clock Factory**

ECC/HANH through its instrumentality The Glendower Group will develop a mixed- use and mixed-income market and affordable housing development. ECC/HANH will execute the purchase and sales agreement to purchase this property. There will be a due diligence period for purchase. The project plans will provide for a comprehensive transformation of a factory building in the City of New Haven.

The Project shall consist of approximately one hundred and ten (110) residential units and commercial use. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

The Glendower Gorup, the real estate development instrumentality of the Authority will develop 133 Hamilton Street that requires certain predevelopment and development services.

The development will yield approximately one-hundred and ten (110) units. To assist in the development of this affordable housing development, Elm City Communities anticipates providing approximately eighty-eight (88) Faircloth and/or Project Based vouchers utilizing flexibilities previously approved under MTW Plans. The vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will develop and will assist in the planning, implementation, and will property manage the property.

The development will be a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group will apply for 4% and/or 9% Low Income Housing Tax Credit in FY 2026.

This development still in the planning stages.

- **Griswold**

ECC/HANH through its instrumentality The Glendower Group, seeks to partner with a private developer to develop a mixed-income mixed-use market and affordable housing development. Currently under design, the project plans will provide for a comprehensive transformation on vacant land in the Town of Griswold. ECC/HANH is working with the Town of Griswold to execute a formal invitation to serve as a developer to create much needed quality affordable housing.

The redevelopment will be multi-phased that will yield approximately 276 mixed-income rental units, a YMCA and commercial space. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

The Glendower Gorup, the real estate development instrumentality of the Authority partnered with Heritage River Village Development, LLC ("HRVD") for 203-249 Preston Road development and

requires certain predevelopment and development services in connection with the Project. HRVD has determined a need for a co-developer to assist with the development of an affordable housing development, and desires to work with Glendower as co-developer to undertake the Project.

The Griswold development is currently under design, the project plans will provide for a comprehensive transformation in the town and bring quality affordable units where there is currently a shortage.

Phase I will consist of commercial space and approximately fifty-six (56) rental units. To assist in the development of this affordable housing development, Elm City Communities will provide up to forty-five (45) Faircloth RAD vouchers utilizing flexibilities previously approved under MTW Plans in Phase I of the development. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and will property manage the property.

The development will be a mixed finance model which includes the inclusion of Low-Income Tax Credit (LIHTC) equity and private financing. It is ECC/HANH's and HRVD's intent to make a loan to the partnership to assist with the redevelopment that shall be repaid from operating cashflow.

ECC/HANH, through its development instrumentality, The Glendower Group will apply for 4% and/or 9% Low Income Housing Tax Credit in FY 2025. Architectural documents are currently being drafted.

ECC anticipates a closing in FY2026, construction is anticipated to take 18 months.

This development still in the planning stages.

**iii. Planned Non-Significant Changes`**

ECC/HANH combined the following initiatives to one Transformation/Development Initiative
Initiative 1.15 and 1.17 – West Rock Transformation Plan/Major Redevelopment Efforts - Included
Initiative 1.13; Initiative 1.16 – Crawford Manor Transformation Plan;
Initiative 1.23 - St Luke's Whalley Avenue Development;
Initiative 1.29F– Robert T. Wolfe Transformation Plan. Changed to Union Square and added Church Street South.
ECC/HANH added the following developments.

- Hazel Street
- East Grand Ave.
- State and George Street
- The Clock Factory
- Griswold

**iv. Planned Changes to Metrics/Data Collection**

The following metrics will be combined:
HC#1 - Additional Units of Housing made Available
HC#2 Units Preserved

CE#4 Increase in Resources Leveraged

**v. Planned Significant Changes**

None
ECC/HANH does not require different authorizations from what was initially proposed.
This initiative meets the statutory objectives a) improving housing choice and b) cost effectiveness.

**Initiative 1.21 – Initiative Expanded Jurisdiction: Creating Housing Opportunities Outside of the City of New Haven in Areas of Opportunity**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY 2019.

**ii. Description/Update**

This initiative proposed to expand the jurisdiction of the ECC/HANH and its instrumentalities to develop affordable housing or site project-based vouchers in areas that have been identified as "opportunity areas". Opportunity areas have been mapped in the State of CT by the Open Communities Alliance and identify areas that are "opportunity-rich" with regard to educational outcomes, employment access, low poverty, lower crime rates and more. While the City of New Haven doesn't fare well across several of these measures, it is in close proximity (within 15 miles) of many towns that are considered High and Very High Opportunity.

Currently, achieving significant increases in mobility moves to areas of deconcentrated poverty has been difficult. Most ECC/HANH assisted families lease in the City of New Haven – a city of high rates of poverty (approximately 30% of families live in poverty). Affordable housing in the city is increasing with over 20% of housing units subsidized. Most census tracts in the city are classified as concentrated poverty areas. This initiative seeks to allow ECC/HANH and its instrumentalities to develop housing opportunities that allow families from ECC/HANH waitlists to obtain housing opportunities that currently do not exist.

ECC/HANH identified its first project and awarded 40 PBV vouchers to support a redevelopment effort in the neighboring suburb of Branford CT. During FY 2022, ECC/HANH entered into an MOU with Branford Housing Authority, completed an AHAP for the new construction and planned to assist with the subsidy of existing residents. The groundbreaking occurred in FY2022 and construction began in FY2023. Lease up of the 20 vouchers for existing residents began in the 3rd quarter of FY2023, 19 were leased. Full lease up anticipated in FY2025.

ECC/HANH and its instrumentality, The Glendower Group, has identified its second project and is working with the Town of Griswold to create a multi-phased mixed-income, mixed-use redevelopment in partnership with the YMCA. ECC/HANH is working with the Town of Griswold to execute a formal invitation to serve as a developer to create much needed quality affordable housing.

The redevelopment will be multi-phased that will yield approximately 276 mixed-income rental units, a YMCA and commercial space. The occupancy and income requirements shall conform to the requirements for "qualified residential projects" under section 142 of the Internal Revenue Code as well as the requirements of any other funding program.

The Glendower Gorup, the real estate development instrumentality of the Authority partnered with Heritage River Village Development, LLC ("HRVD") for 203-249 Preston Road development and requires certain predevelopment and development services in connection with the Project. HRVD has determined a need for a co-developer to assist with the development of an affordable housing development, and desires to work with Glendower as co-developer to undertake the Project.

ECC/HANH continues to pursue other development opportunities in areas beyond the City of New Haven. ECC/HANH is not looking to apply its other MTW flexibility to jurisdictions outside of ECC/HANH.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

The following metrics will be combined:
HC#1 - Additional Units of Housing made Available
HC#2 Units Preserved
CE#4 Increase in Resources Leveraged

**v. Planned Significant Changes**

None

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 improving housing choice.

**Initiative 1.22 – Local Non- Traditional (LNT) Housing - Time Limited Support for Families Transitioning from Homelessness**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY19.

**ii. Description/Update**

ECC/HANH proposes to co-develop Non-traditional housing supports for units of affordable housing for families transitioning from homelessness. This activity will be a 10-year PILOT program. 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 initiative is a 19-unit development (18 rental units and 1 superintendent unit) transitional housing development, owned by a community provider, Christian Community Action (CCA).

The Glendower Group, the real estate development entity of ECC/HANH entered into a partnership with CCA to develop the new non-traditional housing model that will assist in greater housing choice and self-sufficiency achievement for families who are high-risk and transitioning out of homelessness.

ECC/HANH will provide short-term, time limited housing assistance and CCA will provide the supportive services. The supportive housing model is for a 24-to-36-month transitional period. ECC/HANH will provide funding assistance for eighteen (18) NLT project-based units. Participation in the program does not guarantee any housing assistance beyond the 36-month program period.

ECC/HANH will provide non-traditional housing funding in the housing choice voucher program with subsidy paid at the 110% payment standard. Further this 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. During participation of this program participants will not be able to opt out and apply or request for a tenant-based voucher or mobility voucher.

During FY 2021, acquisition and renovation and program design was completed. During the fourth quarter of FY 2022, 18 families were leased and ECC/HANH anticipates continued full lease up in FY2025.

**iii. Planned Non-Significant Changes**

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

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 aims to increase self-sufficiency.

**Self Sufficiency Initiatives**

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

**i. Plan Year Approved, Implemented, Amended**

Approved and implemented in FY07.

**ii. Description/Update**

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 LIPH and Section 8 residents. Service referrals focus on:

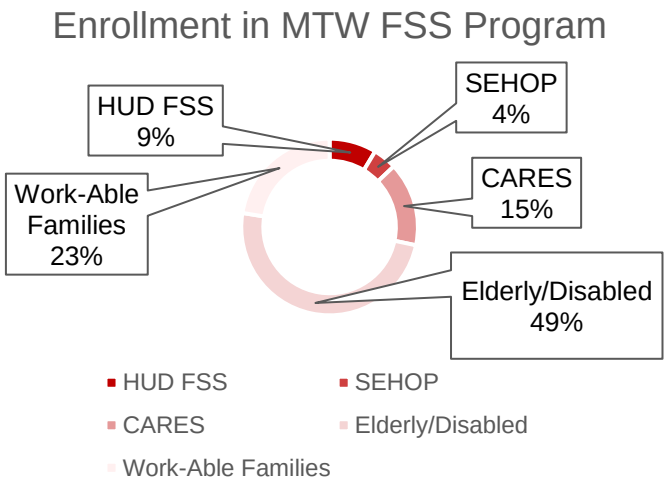
- remedial education
- literacy classes
- GED preparation
- vocational and job skills/employability
- financial management

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
- Up to 178 families enrolled in the CARES Program
- Up to 150 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.

| Program | Number of Slots | Benefits from Escrow | Owner | Supports |
|---|---|---|---|---|
| HUD FSS Grant Funded Slots | 150 | Yes | FSS Coordinators | RSCs, CED Managers & Supervisors, MSW |
| CARES Program | Up to 178 | Yes | CARES Coordinator | CED Managers & Supervisors, MSW |
| Work-able families | 60<br>200 | Yes<br>Yes | Program Managers<br>RSC Coordinators | FSS Coordinators, CED Managers & Supervisors, RSCs & MSW |
| Elderly/Disabled | 570 | No | RSC Coordinators | CED Managers & Supervisors, MSW, Recreational therapist, FSS coordinators |
| **TOTAL** | **1158** | | | |

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.

FSS will continue to offer programming beneficial to all residents, including a focus on empowerment, childcare, financial literacy, and mental health. In FY25, 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 has seen significant growth in the number of participants in the FSS program.

This initiative meets the statutory objectives of Self Sufficiency, Housing Choice and Cost Savings.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 aims to increase self-sufficiency.

**Initiative 2.3 – CARES (Caring About Resident Economic Self-Sufficiency)**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY12, implemented in FY13 and updated in FY15 and FY20.

**ii. Description/Update**

As an MTW Agency, ECC/HANH implemented a new pilot program to promote HUD's mission to promote self-sufficiency throughout the agency. ECC/HANH developed a pilot self-sufficiency plan for the Brookside Phase II Rental development and Rock View I (not RAD sites) that encompassed HUD's continued mission to increase self-sufficiency among residents and promote accountability.

Key program components:

- The C.A.R.E.S. Program (Caring About Resident Economic Self-Sufficiency) introduced the concept of term limits into the public housing and Section 8 programs administered by ECC/HANH. All residents, except those exempt under the program requirements will be subject to a 72-month time limit on receiving rental assistance.
- The second component of the program is that certain individuals will be required to participate in an intensive 24- month case management supportive program designed to overcome barriers to becoming self-sufficient. The returning residents are exempt but can voluntarily participate in the program. The agency will use its MTW flexibility to fund the required social service component of this program.
- At year three, in an effort to support transition to unassisted housing, CARES residents are paid their subsidy directly and learn to manage their finances and the payment of their full rental payment.
- At year three, CARES participants subsidy is frozen at that level.
- A deposit is made into the escrow account for all participating families. The deposit is equal to the amount of one year's subsidy and is available to deal with hardships, self-sufficiency needs or can be taken upon graduation from the program.

Prior to signing a lease at the redeveloped Brookside Phase II and Rockview I, all residents will have a pre-orientation that explains the CARES Program. At the end of the 72-month limit receiving rental assistance, the rent will be adjusted to Flat rent (public housing) or Market rent (PBV), less prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt, as described in the plan.

We recognize that there are individuals who due to no fault of their own will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an Individual Service Plan (ISP) and case manager and show progress towards the goals of the plan will continue to be able to receive assistance as long as they continue to make progress towards their goals. Out of the 101 units developed in the Brookside Phase II Rental project and 77 at Rockview I, all have been assessed and are required to enroll in the CARES program except those residents who are excluded.

There are two levels of engagement into the program, a Full CARES resident and Transition CARES resident.

- A Full CARES resident is an individual who possesses educational and job development skills that have a substantial demand in the labor market. The Full CARES participant typically is working full time and earning a livable wage.
- Transition CARES residents lack one or both criteria mentioned above. A typical Transition resident is working part time and/or in need of training to obtain higher wages and full-time job.

Residents and participants are incentivized to enroll in the CARES program because of the desirable residential community, intensive supportive services offered, the escrow payment and the increased control over the use of their funds (including subsidy dollars). CARES residents will receive a lump sum of the equivalent to the subsidy payments in the final year of the program deposited into an escrow account (REEF) at year 3 and released upon graduation from CARES.

Subject to the approval of ECC/HANH, the funds in the REEF at year three may be used to cover the following costs;

- A hardship (as defined under the Hardship Policy and Guidelines)
- Purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted),
- Start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted), purchase a computer, or enroll in higher education.

The monthly subsidy payment will be pre-determined at an initial assessment conducted prior to lease up in a manner consistent with ECC/HANH's Rent Simplification Program.

While the most intensive supportive services are provided during the first two years of the program, all participants continue to be able to avail themselves of the support as needed. It is anticipated that as barriers and service needs are addressed, the need for such intensive support will wane. This policy and procedural change have resulted in modifications to the MTW Plan, ACOP and Administrative Plan.

The CARES program description can be found in Appendix 3.

In 2015 the program was reviewed and updated to clarify that receipt of a TBV is not an option for families living at the CARES sites (Brookside II & Rockview I), regardless of participation in the CARES program or if they opted out; unless the family has an exemption.

At time of graduation, for some residents, this means transitioning to Fair Market rent or Flat rent, and for others, this means moving into a fair market unit in the community or purchasing a home.

Every participant in the CARES program is receiving on-going support and assistance through Family Self Sufficiency, homeownership, Resident-Owned Business, Connecticut Association Human Services-Financial Literacy, CONNCAT Training School, and other programs with ECC/HANH or in the community.

In 2018, the CARES program underwent improvements to focus on reinforcing the inaugural principles of the program. CARES' focus continues to provide case management, resources and tools to support participants in reaching self-sufficiency. As part of this effort, ECC/HANH offered participants

the opportunity to elongate their program participation to receive the full benefit of the CARES program. The following options were provided to participants:

- Participants remain at their original contract date in the CARES program with no changes in income or reset. Household will pay full rent to owner and will be subject to the 72-month time limit reflecting original contract date.
- Participants will remain at their original contract date in the CARES program, however, households will go back to year 3 income. Households will pay full rent to owner and will be subject to the 72-month time limit reflecting the original contract date.
- Participants will reset to year 3 as an extension to receive all resources & tools for families to reach self-sufficiency & reset to the year 3 annual recertification. Income will be based on year 3 to determine the monthly subsidy. Households will pay full rent to owner and will be subject to the 72-month time limit reflecting New Year 3 reset date.

During this time, program participation increased by 17%. Families participated in briefings and were reminded of the program rules and requirements and all families were again given the opportunity to opt into or out of the program. All current participants opted to stay in the program and a number of families who previously were not participating opted in.

CARES reached its 1st 72-month mark in FY22, and residents who chose option 1 are aware of the program requirements and are preparing to graduate from the program. To date 68 residents have successfully graduated from the CARES program.

**Change in Amendment #1 of the MTW 2020 Plan:**
**CARES Program Interim & Rent Hardship Rule During COVID19 and any pandemic or National, State or Local emergency affecting a large number of families in the community.**

CARES program will include an opportunity for families to request a rent adjustment during COVID19 and any similar pandemic or emergency affecting a significant number of families in the community. Families who experience a loss of income as a result of a natural disaster, local, state or national emergency such as COVID19 or the like, may have the opportunity to submit a request for interim rent change. The family must be able to provide documentation that proves that the loss of income is related to this a specific situation listed under this category.

In order to prevent the reprocessing of files when families go back to work during a time like this, the CARES coordinator 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 5th month) which would be an increase back to the amount prior to the decrease. 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.

The decrease in rent will reflect 30% of the total household income but will allow for families with total household incomes below $2500 annually, to pay as little as the minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for rent payments between $0 to $50 accordingly.

These individuals will meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent will then be modified accordingly based on the information collected. If a family is unable to pay the minimum rent because of a financial hardship the family may be eligible for a temporary waiver from paying Minimum Rent.

A family may be exempt from Minimum Rent for 120 days when the family experiences a hardship as a result of COVID19 and other similar pandemic or National, State or Local emergency affecting a large number of families in the community. There is no requirement to repay this rent during this type of circumstance, and no referral to FSS or community service will be required. Retroactive adjustments do not apply to families in the CARES program as they are required to pay rent based on the 3rd year rent calculation.

**CARES Escrow**

Families with an escrow balance may request funds for emergency services and needs associated with the current pandemic and other similar emergencies affecting families in the community. Families may request access to their escrow savings separate from the already embedded request for escrow outlined in CARES. This request will not count toward the number of requests allowed, per family. In addition to the current list of allowable uses, requests can include items such as, but no limited to:

- Food insecurities
- Home necessities
- Rent
- Related Medical Expenses
- Utility payments
- Transportation related expenses

Requests may be approved at the discretion of ECC/HANH only after all resources, such as access to food banks, diaper banks, and other community resources have been exhausted. All requests will need to be reviewed by the CARES committee under an expedited version of the current escrow request approval process and must be reviewed and signed by the Director of CED or designee.

**CARES**

Since implementation, 68 families have "graduated" from the CARES program by either successfully completing the 72-month time limit or successfully leaving the program prior to the end of the time limit.

At the end of the 72-months the CARES resident will no longer receive rental assistance and their rent will be adjusted to the Flat rent (public housing) or Market rent (PBV),

At the end of the 72-month the CARES resident also receives a lump sum of the equivalent to the subsidy payments in the final year of the program deposited into an escrow account (REEF) at year 3 and released upon graduation from CARES, whether they decide to move or stay and pay the Flat or market rent.

ECC/HANH has recently discovered that due to LIHTC rules and the rent cap on units based on AMI designation, some residents are not paying Flat or market rent and are paying a rent amount significantly less.

ECC/HANH proposes a significant change to address this issue.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

ECC/HANH proposes an update for participants who successfully graduate from the CARES program, who choose to stay on site and pay market rate.

**CARES Significant Change MTW FY25 Amendment #2:**

ECC/HANH proposes an update for participants who successfully graduate from the CARES program, who choose to stay on site and pay Flat Rent (LIPH) or market rate rent (PBV).

- Upon completion of the 72 months, the resident will be re-evaluated and recertified accordingly.
- The resident will not receive the final payout escrow until the resident has moved out of the CARES unit and is receiving zero subsidy.

Resident escrow will be deducted as noted below

| | |
|---|---|
| Resident who stays in the unit for up to 6 months after graduation date | 0% will be deducted from escrow balance |
| Resident who stays 6 months to up to 1 year and 11 months after graduation date | 25% will be deducted from escrow balance |
| Resident who stays 2 years | 50% will be deducted from the escrow balance |
| Resident who stays 3 years | 75% will be deducted from escrow balance |
| Resident who stays 4 years | 100% will be deducted from escrow balance |

Residents staying over 4 years from graduation date will be terminated from the CARES program. All Residents will abide by the CARES program obligations until fully terminated from the program. All extensions will require a yearly update meeting with CED Supervisor or designee.

Due to LIHTC rules, ECC/HANH is unable to raise the rent cap on the LIHTC units to reflect a market rate rent. However, ECC/HANH can incentivize the family to move, pursuant to the PILOT CARES program, by implementing a time limit (4 years) in which they can remain in the unit after graduation.

This will also allow the family to save money, by paying lower rent.  Also, the gradual deduction from their escrow balance, may incentivize them to move on sooner.
All graduation extensions must be approved by CED Director or designee.

ECC/HANH does not require different authorizations from what was initially proposed. This initiative aims to increase self-sufficiency.

**Initiative 2.4 – Teacher in Residence**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY15 and implemented in FY15.

**ii. Description/Update**

As part of ECC/HANH Believes, an ECC/HANH youth initiative, Elm City Communities seeks to make academic supports readily available to the approximately 2,000 school age youth residing in our developments. Modeled on the Officer in Residence program already implemented through HUD approval, ECC/HANH offers housing to teachers in exchange for the delivery of homework help and tutorial services for our youth.

Teachers housed through ECC/HANH Believes are called "Teachers in Residence" and the initiative provides ECC/HANH youth with the necessary academic assistance so many of our youth need, as well as help bridge a historical divide between educators and our families. Creating communities where teachers and parents reside, and commune regularly, shifts traditional relationships between teachers and parents. In turn, the program creates space for experiential learning, living, and communication. We are building relational pathways from the home into the classroom.

Teachers in the pilot program, as part of an agreement between ECC/HANH and each teacher, are required to provide educational assistance to ECC/HANH's youth residing at McConaughy Terrace (the development selected for the pilot where the Teachers in Residence will be housed). Educational assistance to Elm City Communities' school-aged youth is defined as follows:

- Conduct a site-base homework help program at the developments in which the Teacher in Residence resides, in conjunction with ECC/HANH staff, throughout the school year;
- Provide homework help and/or tutoring for students in their respective ECC/HANH developments;
- Facilitate site-based meetings for parent residents, in conjunction w/ECC/HANH staff, so that parents may better understand how to navigate the New Haven public schools; and
- Participate in the Tenant Resident Council.

ECC/HANH hosts meet and greets for each teacher at the identified ECC/HANH sites in order to spark relationships between and among the Teachers in Residence and the residents, facilitate communication between the teachers and ECC/HANH staff and to evaluate and alter the program, as needed. Specific terms of the program are included in the Teacher in Residence agreement.

The Special Use unit designation benefits teachers in providing subsidized housing as well as benefits residents as the teacher in residence will support academic achievement of ECC/HANH's youth through the aforementioned educational assistance. Increasing students' academic achievement has the potential to end the cycle of poverty for our families. In doing so we are building a new, vibrant middle class in New Haven; as this initiative increases the economic self- sufficiency of our families. Anticipated outcomes include improved academic success as students receive additional academic assistance, improved attendance in school as students better understand their respective academic material, and improved performance on district and/or standardized testing.

Program dollars are limited in terms of the ability to pay for such on-site services. By offering the incentive of housing, we are able to access these services without an additional outlay of cash. Efforts to ensure the academic success of young people reduce the likelihood that they become the next generation of subsidized housing recipients.

ECC/HANH has received HUD approval for one (1) MTW neighborhood services special use dwelling unit previously at Waverly townhouses, and now moved to McConaughy Terrace.

Teacher in Residence meets with ECC/HANH supervisor on a weekly basis as the program continues to develop at McConaughy. The expectation is that the Teacher in Residence also meets with the property manager, Community & Economic Development Manager and Resident Services Coordinator for the site on a quarterly basis to review progress, challenges, influence recruitment, coordinate activities and events. ECC/HANH will continue to work closely with the Board of Education to facilitate access to other pertinent information and to compare progress in program to school outcomes as well as attendance.

In an effort to find innovative ways to recruit new educators for this initiative, ECC/HANH has revised the specific term in the Teacher in Residence agreement, under Education and Experience.

ECC/HANH changed the language to the following:
"Must be a certified teacher in the State of CT currently teaching in the New Haven public schools or surrounding towns. This includes an Early Childhood Educator, Alternative Teacher, Magnet School Teacher, Retired Teacher or College Student seeking College secondary education.

ECC is also seeking to expand the requirement that only participants living in the New Haven district can apply. The opportunity will be available to participants who currently live in surrounding towns.

ECC/HANH has also discovered that some of our school aged youth also need emotional and social support in addition to educational assistance. This is due in part to students attending school virtually during the COVID-19 pandemic which contributed to their struggles in socialization, structure and emotional awareness and regulation. This has been a barrier for some youth in learning and taking full advantage of the TIR resources.

In understanding the importance of meeting youth where they are and knowing that a child cannot adequately learn in an environment where they don't feel secure, the TIR program has evolved into the incorporation of social emotional learning (SEL) in addition to academic tutoring.

In FY23, while working to recruit a new teacher, ECC/HANH partnered with Southern Connecticut State University to have Intern support in a temporary program to serve the families through an afterschool program. The Intern was also a former New Haven Public School teachers with a master's

degree in education. The Intern is a providing afterschool programming, case management to youth residents and developed program and workshop curriculum to support young children and families.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 family self-sufficiency.

**Initiative 2.5 - REACH Grant. Incentive Grant Program for ECC/HANH Residents Participating in Agency's Family Self Sufficiency Program.**

**i. Plan Year Approved, Implemented, Amended**

Approved FY19 and implemented in FY21

**ii. Description/Update**

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).

ECC/HANH closed out the Incremental Earned Income Exclusion program in FY21 and replaced it 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, places an emphasis on goal achievement during each year of participation. This is a departure from previous programs that ECC/HANH has established, like 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. Families that receive the REACH grant also receive wrap around services from the CED Department.

We anticipate that REACH Grant Funds will be used by residents in the following ways:

- Books for School or Educational Courses
- Application or Enrollment Fees
- Uniforms
- Testing Requirements
- Tools and Equipment for Work
- Technology
- Small Emergencies
- Short Term Transportation Needs

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 the ECC/HANH 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 or 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.

REACH will 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. ECC/HANH sees 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.

In FY24, ECC/HANH through surveys, interviews and 1:1 conversation analyzed the program to ensure that the residents have a greater understanding of the program. Information about the REACH grant is also included in the CED quarterly newsletter.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations. This initiative meets the statutory objectives of increasing self-sufficiency.

## Cost Efficiency

### Initiative 3.1 – Rent Simplification

#### i. Plan Year Approved, Implemented, Amended

Approved in FY07, implemented in FY08 and amended in FY20

#### ii. Description/Update

The full description of ECC/HANH's rent simplification program can be found in appendix 6.

ECC/HANH utilizes the Enterprise Income Verification (EIV) system for all third-party verifications. In FY08, ECC/HANH implemented the multi-year recertification cycles that recertifies "work-able" families every two years and elderly/disabled families[10] every three years. MTW families that don't meet the elderly/disabled definition will be considered work-able families.

ECC/HANH's rent simplification activities include the following major elements:

i. **Multi-year recertification cycles**.

- Triennial cycle (every three years) for elderly/disabled households (defined as head, co-head, or spouse is elderly and/or disabled)
- Biennial cycle (every two years) for work-able households (those that do not meet the elderly/disabled definition)
    - **Rationale**: Very little change in income takes place with elderly/disabled families on fixed income and there is little financial incentive for ECC/HANH to verify their income annually. Work-able families will benefit from two-year cycles as they will not pay incremental rent increases on any income increases for the two years between recertifications.
    - **Expected impact**: Administrative savings, increased participant satisfaction and reduced need for interim recertifications

ii. **Simplified Rent Tiers that incorporate deductions.** Rent tiers were built to simplify the rent calculation. Rents are based on $1,000.00 income bands starting at $2,500.00. Rent is based on the mid-point of each income band. In addition, ECC/HANH eliminated standard deductions for elderly, disabled and non-elderly households.

- **Rationale**: Using a band-based tiered rent schedule allows families to move away from verifying every dollar earned and deducted

[10] *Elderly/disabled families are newly defined as: all adult members (excluding live-in attendants) of the household are elderly (age 62) and/or disabled.*

- **Expected impact**: Less intrusive recertification process and increased understanding of the rent calculation methodology

iii. **Exceptional expense tiers.** Households with exceptional expenses may request a rent reduction. This includes large families (with more than two children). It also includes families with excessive medical, disability assistance, or childcare expenses. Participants are not required to provide documentation of every 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, all participants must contribute a minimum of $50 towards their monthly rent.

| Tiered Amount of Expenses | Monthly Rent Reduction |
|---|---|
| $ 2,000 - $ 3,999 | $ 75 (equivalent to $3,000 deduction) |
| $ 4,000 - $ 5,999 | $ 125 (equivalent to $5,000 deduction) |
| $ 6,000 + | Hardship Review |

- **Rationale:** Excessive resources are dedicated to verifying deductions for childcare, medical and disability allowances. Third-party verifications of these amounts are difficult to accomplish, and the agency often relies upon second- and first-party verifications of these deductions. Obtaining verification data also places an undue burden on the resident.

- **Expected impact:** Administrative savings, simplified process for residents/participants and fewer recertification appointments are expected. Also, rent tiers have been built to minimize impact on residents during the initial years and to phase in rent increases over time. Residents will not experience an overwhelming rent burden but will be incentivized to increase their earnings over time as their rent gradually increases. The impact on income has been tracked.

iv. **Minimum Rent of $50.** ECC/HANH established a minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for $0 rent. These individuals meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent is then modified accordingly based on the information collected. To move these residents towards self-sufficiency, they are referred to the Family Self-Sufficiency program if the adult household member is non-elderly/non-disabled.

- **Rationale:** All families should pay something for their housing.

- **Expected impact:** HCV subsidy should decrease, and LIPH rent rolls should increase. ECC/HANH will monitor the number of families on minimum rent and hardship requests to gauge the impact on families.

v. **Transition to Avoid Hardships.** 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.

- Year 1: 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.
- Year 2: No family shall be subject to an increase in TTP greater than $25/month
- Year 3: No family shall be subject to an increase in TTP greater than $50/month
- Year 4: No family shall be subject to an increase in TTP greater than $75/month
- Subsequent years: No family shall be subject to an increase in TTP greater than $100/month

Increases are based on a family's monthly TTP in the year immediately preceding the implementation of the Rent Simplification Policy.

- **Rationale:** Limit undue hardship to families due to minimum rents and streamlining of deductions.
- **Expected impact:** No sudden increase in hardship applications due to rent simplification activities.

The transition period has been successfully completed.

This initiative was updated to include removal of the requirement to follow up annually with Earned Income Disregard, Community Service & Flat Rent, and clarifying language to HCV Payment Standard increase or decrease at time of bi-triennial certifications was added.

**EID (LIPH)**

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 and, this will help streamline staff productivity by eliminating this 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/triennial 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 recertifications, 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 Biennial updates who would have an income increase at year two; benefiting from a full 2 years at 100% discounted Income, & families on Triennial 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 Biennial or Triennial cert, the specialist will enter the EID dates in Elite, dating back to the Start of the benefit, as well as end date.

ECC/HANH staff will still utilize worksheets as needed to determine if a person qualified for EID, in order to check off the boxes in Elite for PIC submission purposes. However, annual tracking and tracking at time of interim change would be eliminated in efforts to streamline the interim and bi/tri-ennial 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.

**Community Service Requirement (LIPH)**

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 who are 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.

**LIPH Community Service Significant Change MTW FY20 Amendment #1:**

Community Service requirements will not be required for families who experience a decrease in income due to loss of employment or decrease in hours as a result of COVID19 and any similar pandemic or national, state or local emergency that affects a significant number of families in the community. Residents will not be expected to make up these hours. The requirement will be reinstated when the stay at home and social distancing requirements are lifted. The 96 community service hours per year will be calculated by 8 hours a month and families will not be required to make up hours during months affected. ECC/HANH will establish time period for hold on CSSR as needed.

**Flat Rent**

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 at the time of the 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.

**Significant Change as part of amendment #1 to the FY20 MTW Plan:**
**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 two 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 a bi/tri-ennial certification. 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. Essentially, 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 be made clear to families of ECC/HANH via current forms of communication with families.

**Minimum Rent Hardship LIPH & HCV:**

The three-month hardship timeframe 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 as a result of such pandemic or emergency, will not be required to repay hardship and will not be required to participate in family self-sufficiency services. Under this type of circumstances only, no referrals will need to be made by in house staff as a result of hardship.

**Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103 and 104**

On 2/14/23, HUD issued a final rule on sections102, 103 and 104 of the Housing Opportunity Through Modernization Act of 2016. The final rule is effective January 1, 2024

ECC/HANH will review the sections that effect or coincide with this Rent Simplification Initiative will seek to propose any necessary significant changes at a later date.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

**<u>Payment Standard Significant Change MTW FY25 Amendment #2:</u>**

ECC/HANH 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.

Expected Impact:

- Accurate and streamlined accounting for all HCV participants.
- Cost savings to the agency derived from reduction in time spent revising and correcting miscalculations.

ECC/HANH proposes to allow for annual rental increase by processing an interim and to apply the current payment standards when processing interims for elderly/disabled households and any household that requests and receives a rent increase.

Because elderly and disabled households are on a triennial reexamination schedule and other households are on a biennial reexamination schedule, the previous years' FMR used to determine their subsidy amount is outdated and does not reflect the current costs of housing in New Haven. Since there is no affordability constraint to the amount an owner can charge after the initial lease term, when an owner requests a rent increase between scheduled reexaminations, the participant is forced to make a decision between increasing their monthly rent burden or incurring expensive moving costs.

When processing the interim, ECC/HANH will be able to use the current payment standard in effect for that year, rather than the payment standard that was in effect at the time of the participant's last regular re-examination.

The goal of this activity is to decrease the financial burden on these households by allowing the ECC/HANH subsidy to keep pace with the market. This will decrease the number of families whose rent burden exceeds 30% of their adjusted monthly income. Currently 10% of ECC's leased units are families whose rent burden exceeds 10%.

ECC/HANH does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness.

**Initiative 3.5 – HCV Rent Simplification/Cost Stabilization Measures**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved and implemented FY08 and updated in FY14 and FY22.

**ii. Description/Update**

ECC/HANH enacted Rent Simplification measures consistent with the FY08 MTW Plan. This initiative expanded those streamlining measures. This initiative replaced previous Initiative 3.3 - Revised HQS Inspection Protocol (closed out).

This proposed activity has three components:

**Part 1. HQS Inspections on Biennial/Triennial Schedule**

HQS Unit inspections will be placed on a schedule consistent with recertifications and will be conducted bi/triennially (in other words, recertifications and HQS inspections will coincide). However, Housing Choice Voucher participants and landlords can request a Special inspection, if necessary, at any point that deficiencies are suspected. The cost per inspection has decreased by 17%.

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 or made accessible via email or other electronic format 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 the initial inspection for new voucher holder. This option for a video inspection applies to special inspections and bi/triennial inspections, as well. 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 inspection appointment 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.

Since HCV caseload optimization changed recertification dates, HQS inspection dates were also changed correspondingly.

**Part 2. Self-Certification for Fails Not Related to Health/Safety**

A self-certification process will be used for inspection follow-up related to HQS inspection fails linked to items that are not health and safety related. For annual (biennial and triennial) HQS inspections, landlords and participants will be able to self-certify and submit documentation of correction of deficiencies. All participants retain the right to request a Special Inspection at any time.

**Part 3. Landlord Rent Increases on Biennial/Triennial Schedule**

Landlord rent increases will only be processed at the time the family is recertified. These recertifications take place biennially for work-able families and triennially for elderly/disabled families.

See Initiative 3.1 for definitions of elderly/disabled and work-able families.

As a result of the biennial/triennial schedule for rent increases, landlords are experiencing going many years without a rent increase if the opportunity to request an increase is missed. This is an unintended consequence of the initiative and ECC/HANH will seek to propose a significant change.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

**Payment Standard Significant Change MTW FY25 Amendment #2:**

ECC/HANH proposes to allow for annual rental increase by processing an interim and to apply the current payment standards when processing interims for elderly/disabled households and any household that requests and receives a rent increase.

Because elderly and disabled households are on a triennial reexamination schedule and other households are on a biennial reexamination schedule, the previous years' FMR used to determine their subsidy amount is outdated and does not reflect the current costs of housing in New Haven.

Since there is no affordability constraint to the amount an owner can charge after the initial lease term, when an owner requests a rent increase between scheduled reexaminations, the participant is forced to make a decision between increasing their monthly rent burden or incurring expensive moving costs.

When processing the interim, ECC/HANH will be able to use the current payment standard in effect for that year, rather than the payment standard that was in effect at the time of the participant's last regular re-examination.

The goal of this activity is to decrease the financial burden on these households by allowing the ECC/HANH subsidy to keep pace with the market. This will decrease the number of families whose rent burden exceeds 30% of their adjusted monthly income. Currently 10% of ECC's leased units are families whose rent burden exceeds 10%.

ECC/HANH does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness.

## IV: Approved Initiatives Requiring Funding Flexibility Only

Housing Choice

### Initiative 1.25F Vacancy Reduction

### i. Plan Year Approved, Implemented, Amended

This initiative was implemented in FY08.

### ii. Description/Update

ECC/HANH will continue to show improvement from the baseline FY2008 vacancy rate of 10%. ECC/HANH currently uses the funding flexibility to perform more unit turn over to reach a Vacancy rate of no more than 4% (Occupancy rate of 96%). In FY2024, the vacancy rate was 3% and efforts will continue during FY 2025.

ECC/HANH has set a standard of unit turns by bedroom size. Typically, a 0- 1-bedroom unit turn should occur within a 5-day 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. ECC/HANH continues to identify resources and process to streamline vacancy reduction.

ECC/HANH is undergoing a major capital investment effort fueled in part by a RAD portfolio award. redevelopment and modernization of significant numbers of units requires major scale resident relocation. As such, the redevelopment efforts, detailed herein, will continue to utilize the funding flexibility to effectuate its redevelopment efforts. 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. In FY23 $580,856 in MTW funds were spent for Vacancy reduction.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

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 objectives of increased housing choice.

**Self Sufficiency**

**Initiative 2.6F Resident Owned Business Development** (Previously Initiative 4.1F Resident Owned Business Development**)**

### i. Plan Year Approved, Implemented, Amended

This initiative was approved and implemented in FY09.

### ii. Description/Update

ECC/HANH continues to strengthen the 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 ROBS/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 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 a 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, childcare, transportation, and consulting areas.

In FY23, ECC/HANH identified a new strategy to make this initiative more effective, the department sought a consultant who specializes in motivational support for entrepreneurs. The goal is to offer a robust approach that includes a more hands-on, interactive, outreach and support. ECC/HANH contracted with a vendor who is committed to working with residents to cultivate, support, and provide entrepreneurial education, administrative and technical assistance that will result in access to economic independence.

In FY2025, ECC/HANH will continue working to support Residents who are interested in opening a businesses and residents who currently have a business.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 2.7F SEHOP Capital Improvement Program**

**i. Plan Year Approved, Implemented, Amended**

ECC/HANH launched the SEHOP (Section Eight Homeownership Program) Capital Improvement Program in FY2010.

**ii. Description/Update**

This program supports new homeowners with necessary capital improvements costing $500.00 or more that may arise after being in the home for a minimum of three years. The program was created to increase the livability and value of recently purchased homes. 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 at that time will have access to the program, until the contract expires, or program participation ends. New families will not be enrolled. There are currently 18 families eligible to receive the SEHOP funds.

During FY22 ECC/HANH introduced a SEHOP Capital Improvement Committee to review quotes received and assist in recommending any contractors selected for home improvement work. This program will continue to be monitored and reported on during FY25.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

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 objectives of increased housing choice.

**Initiative 2.8F Prison Community Reentry (Previously Initiative 4.3F)**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved in FY09, implemented in FY10 and updated in FY21.

**ii. Description/Update**

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's 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 re-entry.

1. For our Low-Income Public Housing (LIPH) for New Admissions
2. For our Housing Choice Voucher (HCV) programs for New Admissions
3. 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.

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.

In FY21 ECC/HANH updated the way families can access the program by expanding entry opportunities. In prior years, there were a set number of slots per subsidy program. Starting October of 2021, 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.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY24. This initiative meets the statutory objectives of providing Housing Choice and Family Self-Sufficiency.

**Initiative 2.9F Resident Services for Elderly/Disabled (Previously Initiative 4.4F)**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved and implemented in FY03 and updated in FY07.
Under this program ECC/HANH serves individuals who are elderly and/or disabled.

**ii. Description/Update**

In 2003, ECC/HANH implemented its Resident Services for Elderly/Disabled initiative in one of the buildings. The initiative was then extended to three additional sites in 2007. As of FY19, resident services have been expanded to all Elderly/Disabled Developments.

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 Resident Service Coordinator (RSC) will have a caseload of about 430 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 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, either through 3rd party supportive services or an in-house MSW.

As a result of providing these services to our residents, we have seen a higher rate of residents remaining in the community indefinitely.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was proposed during FY24. This initiative meets the statutory objectives of providing housing choice and family self-sufficiency.

**Initiative 2.10F Jumpstart Initiative – incentivizing higher income families to exit subsidized program (Previously Initiative 4.10F)**

**i. Plan Year Approved, Implemented, Amended**

Approved and implemented in FY20.

**ii. Description/Update**

This initiative has been created to assist higher income residents and participants exit subsidized programs in advance of required program termination due to 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 residents 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 40,000 families waiting for opportunities to access needed supports through the LIPH and HCV programs. Currently, on an annual basis, approximately 150 LIPH families and 200 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.

At baseline there were 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[11]:

| Jumpstart Initiative Payment Program - FY2024 FMR | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **BR Size** | **Baseline Security Deposit** | **Security Deposit FY2024** | **1st month** | **Last Month** | **Subtotal** | **ECC/HANH Refund** | **# Families Over Income** | **Total Exposure** | **% anticipated to enroll** | **# Families anticipated to enroll** | **Total Cost** |
| 0 | $ 965 | $1,251 | $1,251 | $1,251 | $ 3,753 | | - | $ - | 25% | - | $ - |
| 1 | $ 1,074 | $1,374 | $1,374 | $1,374 | $4,122 | | - | $ - | 25% | - | $ - |
| 2 | $ 1,299 | $ 1,676 | $1,676 | $1,676 | $5,028 | | 4 | $20,112.00 | 25% | 1 | $5,028.00 |
| 3 | $ 1,662 | $2,062 | $2,062 | $2,062 | $6,186 | | 15 | $92,790.00 | 25% | 4 | $24,744.00 |
| 4 | $ 1,979 | $2,358 | $2,358 | $2,358 | $7,074 | | 1 | $7,074.00 | 25% | 1 | $7,074.00 |
| | | | | | $26,163 | | 20 | $ 119,976.00 | 25% | 6 | $36,846.00 |

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 a landlord and the resident have committed to the lease-up, ECC/HANH will provide the landlord with a promissory note detailing the payment amount and the requirements that 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 and the results of the program. Should interest exceed budget allocations, the program shall be offered on a first come, first served basis.

The activity will achieve the following statutory objectives and the specific impacts on that statutory objective.

[11] FMRs will be adjusted annually.

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.

During FY20, a team of ECC/HANH staff met weekly to create program policies, procedures and forms associated with the jumpstart program. Although the program launched during the 2nd quarter of FY21, the implementation was slow due to eligible families being impacted by COVID19, with some losing employment or hours at their employment. ECC/HANH will conduct additional outreach to families who may be eligible for the program and will continue to monitor them and provide support to the families.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

ECC/HANH does not anticipate any changes to the metrics and does not require different authorizations from what was initially proposed during FY24. This initiative meets the statutory objectives of increased housing choice, family self-sufficiency and cost effectiveness.

**Initiative 2.12F – ECC Believes!**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved and implemented in FY2014.

**ii. Description/Update**

Elm City Believes! is a 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 support systems 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 practices supported as well as founded on feedback from our 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 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).
See Appendix 5 for a full program description.

ECC Believes! goals include improved school attendance, improved academic achievement and positive youth development.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

ECC/HANH does not anticipate any changes to the metrics in FY25 and does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of increased housing choice.

**Initiative 2.13F Sponsored Based Housing Program (SBHP) (Previously Initiative 4.11F)**

**i. Plan Year Approved, Implemented, Amended**

This initiative was approved and implemented in FY2023

**ii. Description/Update**

According to the HUD, 2020 Annual Homeless Assessment Report (AHAR) to Congress, approximately 34,000 people under the age of 25, experienced homelessness on their own as an "unaccompanied youth" and 90% of them were young adults, between the ages of 18 and 24. In Connecticut, on any given day, approximately 150 young adults, between the ages of 18-24 are experiencing homelessness.
(1) United States Interagency Council on Homelessness

In an effort to end homelessness and assist these vulnerable young people, ECC/HANH is seeking to design a program to offer sponsor-based housing models using MTW flexibility and broader use of funds to design a program where ECC/HANH provides the Sponsored Based Housing Program (SBHM) provider (a community-based provider) with funding to support the housing needs of this population outside of the traditional HCV model. The sponsor will provide housing through either housing owned and operated by the sponsor or in properties that are master leased by the sponsor.

Per Notice PIH-2011-45 (HA) this initiative is a Local Non-traditional use of a broader use of HCV funding. This activity will be implemented under the category, Rental Subsidy Programs. ECC/HANH will use MTW funds to provide a rental subsidy to a 3rd party Social Service entity who will manage the intake and administration of the subsidy program.

This program will be a partnership with a Social Service Agency that will provide supportive services to individuals. Funding only will be issued to the Social Service Agency by ECC/HANH to support the housing operating needs. The Social Service Agency is responsible for all aspects of the process to include determining eligibility to the program, obtaining all necessary documentation from the young adults, providing the housing, providing the supportive services and completing an exit strategy. This includes the intake and administration of the program.

ECC/HANH seeks provide up to 20 Local Non-Traditional units for the program.

ECC/HANH will select the sponsor-based housing entities through one of the following means:

- ECC/HANH may issue a public solicitation for sponsor-based providers
- ECC/HANH may piggy-back off of a local or state issued solicitation for housing funds to support housing for this designated population
- ECC/HANH may select a sponsor through a non-competitive process when neither of the first two options yield sufficient potential partners

The target population are 18–24-year-old individuals that experiencing homelessness or fleeing domestic violence (HUD categories 1 and 4). These individuals are "literally homeless" or at risk of becoming homeless, meaning that their housing situation cannot be resolved through referrals to services outside of the crisis response system.

The goal of the program is to prevent and end youth homelessness by building comprehensive systems of care for these young people, aged 18-24 and providing temporary transitional housing.

The Sponsored Based Housing Program (SBHP) is a short-term crisis housing program and will assist the individuals with meeting their basic needs and obtaining permanent housing. The objective is to ensure that youth experiencing homelessness receive the temporary shelter and assistance needed to quickly obtain permanent housing. The average amount of time that the youth will stay in the program is 60 - 90 days. The Social Service Agency will provide appropriate housing for up to 60 – 90 days unless a situation warrants a longer stay.

The crisis housing settings may range from a congregate shelter, shared apartments, multi-bedroom homes, among other options. The facility must include privacy in showers, bathrooms (including at least one private, gender-neutral bathroom with shower), and sleeping areas. There will also be sufficient lockable storage capacity for personal belongings.

ECC/HANH has identified its first sponsor-based housing program provider. 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 was selected through the option allowing ECC/HANH to piggy-back off of a local or state issued solicitation for housing funds in order to support this designated population.

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 the 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.

During FY2024, the Glendower Group continued to assist Youth Continuum in the planning and execution of the young adult shelter on Grand Ave. In FY2023, an architect and Construction Manager at Risk were selected by the Youth Continuum with Glendower's assistance. Glendower and Youth Continuum continued to hold ongoing meetings and briefings with the State of Connecticut Department of Housing (DOH), the primary funder. In FY2024, Glendower worked with the owner and CM@R to refine the construction plans to bring them in budget while maintaining the original goals and overall design.

The Architect has completed Design Development drawings and is prepared to proceed to construction documents once funding has been finalized. ECC/HANH anticipated that construction documents will be issued in the final quarter of FY2024, and the construction will start in the first quarter of FY25 with a 15-month construction period.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

ECC/HANH does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of increase housing choice and increase self-sufficiency.

**Initiative 1.30F – Real Estate Development Acquisition (Previously Initiative 1.25)**

**i. Plan Year Approved, Implemented, Amended**

Approved in FY2023.

**ii. Description/Update**

Raising a family is expensive, especially in Connecticut. ECC/HANH sees the impact firsthand with the families that we serve. Connecticut is facing an affordable housing crisis leaving far too many families struggling to make ends meet. Estimates suggest that over 40% of CT families are rent-burdened. Furthermore, the New Haven market has an older housing stock with non-local ownership. ECC/HANH reimagines communities comprehensively and brings federal subsidies that will be leveraged to allow for a reinvestment in our local housing stock.

ECC/HANH is through its instrumentality The Glendower Group, seeks to increase affordable housing opportunities through a two-pronged approach: the purchase of existing and the purchase of vacant sites on which to develop affordable and mixed income housing. ECC/HANH and its real estate development instrumentality, The Glendower Group, Inc.'s strategy is to purchase real estate when they become available and rehab and/or redevelop. This will allow ECC/HANH and Glendower to create quality affordable rental and homeownership opportunities. Further, ECC/HANH and Glendower will leverage dollars, which we've demonstrated in past development efforts of at least 3:1, and to make capital improvements to provide for quality affordable housing. ECC may use Faircloth to RAD (Faircloth) vouchers where feasible to assist in the sustainability and affordability of these developments.

The parcels may be located in various neighborhoods throughout the City of New Haven. The purchases can be made by ECC/HANH, Glendower, an affiliate of Glendower, or a combination thereof. ECC/HANH and Glendower will seek to utilize its capital to leverage other investments such as tax credits, grants and private debt for the purchase and rehabilitation of said units. Further, ECC/HANH and Glendower seek to partner with the City of New Haven and the State of Connecticut to effectuate the acquisitions.

The Glendower Group (Glendower), a nonprofit 501(c)(3) corporation, established in November 2001, is an instrumentality to the Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH). Glendower has been engaged in the development of real property for the past 20 years and has successfully developed over $700 million worth of developments in New Haven, Connecticut: Glendower is at the forefront of those leading the private sector market in affordable housing. Glendower provides comprehensive and integrated real estate development services specializing in affordable housing. Glendower's vision has always been high-quality, innovative, and fiscally sound housing for families.

The acquisitions and developments will contribute to promote healthy lives, a strong community and robust economy. Residents will have access to high quality housing with access to ECC/HANH's social service activities.

To assist in with the acquisition and stabilizing the affordable housing local market, ECC/HANH will provide project-based vouchers utilizing flexibilities previously approved under MTW Plans. The project-based vouchers will be issued, consistent with all other ECC/HANH project-based vouchers activities and will be issued in accordance with the HUD regulations and ECC/HANH redevelopment efforts. The Glendower Group will act as the developer or co-developer and will assist in the planning and implementation of the development. ECC/HANH's property management instrumentality, 360 Management Group, will manage the acquired properties, where feasible.

ECC/HANH in conjunction with Glendower either has or is in the process of purchasing a number of sites for development. These sites will include the use of Faircloth Vouchers to support the RAD eligible units to be developed. New developments using Faircloth vouchers currently include:

- Hazel Street Housing - This development is being purchased and co-developed in conjunction with The Glendower Group and the Newhallville Development Corporation. The development will include approximately 61 total units and 48 RAD Faircloth units. Glendower will own this development post-completion. The redevelopment will be completed using either 4% or 9% LIHTCs among other sources of funds.

- 16 East Grand Ave Housing - This development site has been purchased by The Glendower Group. The development will include approximately 40 total units including 32 RAD Faircloth units. Glendower will own this development post-completion. The redevelopment will be completed using either 4% or 9% LIHTCs among other sources of funds. This site was purchased for $1,420,000 using MTW flexibility.

- New Haven Clock Factory - This development site is in the process of being purchased by The Glendower Group. The site includes the historic New Haven Clock Factory which will be rehabilitated into approximately 110 total units including approximately 88 RAD Faircloth units. Glendower will own this development post-completion. The redevelopment will be completed using Historic Tax Credits and either 4% or 9% LIHTCs among other sources of funds. The Purchase and Sales Agreement contemplates an acquisition cost of $4,500,000.

- Church Street South/Union Square - ECC has purchased the former Church Street South development site. The site will be redeveloped into upwards of 1,000 mixed income housing units along with commercial spaces and public spaces. ECC was awarded a HUD Choice Planning Neighborhood grant of $500,000 in 2023 to study and prepare a development implementation plan. It is anticipated that the site will be developed through multiple developments. This site was purchased for $21,000,000 using MTW flexibility.

- State and George Street - ECC/HANH through its instrumentality The Glendower Group, partnered with a private developer, LMXD to develop a mixed-use mixed-income market and affordable housing development. Glendower and LMXD responded to an RFP issued by the City of New Haven and was selected as the preferred developer. The Project shall consist of approximately one-hundred and seventy (170) residential units. To assist in the development of this affordable housing development, Elm City Communities will provide approximately sixty Faircloth RAD and/or Project Based vouchers.

- Griswold - ECC/HANH and its instrumentality, The Glendower Group, partnered with Heritage River Village Development, LLC ("HRVD") to develop a mixed-income mixed-use market and affordable housing development. The redevelopment will be multi-phased that will yield approximately 276 mixed-income rental units, a YMCA and commercial space. Phase I will produce commercial space and approximately 56 rental units, with 45 being Faircloth and/or PBV.

This initiative meets two of the statutory objectives: a) improving housing choice and c) being more cost effective. The inclusion of new affordable and market rate units where quality affordable housing doesn't currently exist will also improve housing choice by creating new affordable units.

**iii. Planned Non-Significant Changes**

This initiative will be expanded to include the purchase of vacant properties or non-housing structures that can be converted to affordable housing. This will complement the expansion of affordable housing and create a multi-pronged approach to expanding affordable housing opportunities.

**iv. Planned Changes to Metrics/Data Collection**

In addition to the purchase of existing portfolios, the metric will be expanded to include either the purchase of or creation of new affordable units.

**v. Planned Significant Changes**

None

ECC/HANH does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness and increase housing choice.

**Cost efficiency**

**Initiative 3.11F: Creation of new instrumentality entities to support ECC/HANH goals and strategic planning activities**

**i. Plan Year Approved, Implemented, Amended**

Approved and implemented in FY17

**ii. Description/Update**

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**

In 2017, ECC/HANH approved the formation of 360 Management Group Company and hired its first employee to serve as Senior Vice President. The property management instrumentality received its 501 (c) (3) status in March 2018 and it assumed the property operations and compliance management of 312 units.

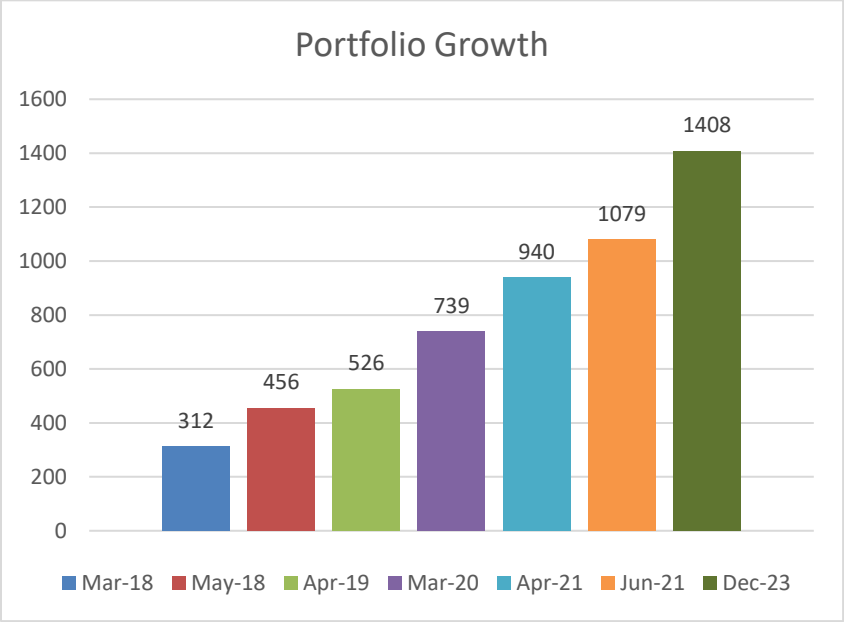
Since that time, 360 Management is providing property management services to 1408 units in 23 developments.

List of Developments Managed by 360 Management Group.

| Development | Community | Designation | Units |
|---|---|---|---|
| Eastview Terrace | Eastview Terrace I | Family | 102 |
| Fairhaven/Chatham | Eastview Terrace II | Family | 25 |
| Fairhaven/Chatham | Chatham | Family | 32 |
| Mill River Phase I | Mill River Phase I | Family | 94 |
| Mill River Phase II | Mill River Phase 2B | Family | 66 |
| Mill River Phase III | Mill River Phase 2A | Family | 45 |
| RAD II | Waverly Townhouses | Family | 51 |
| RAD II | Stanley Justice | Family | 7 |
| RAD II | Fulton Park | Family | 12 |
| Twinbrooks | Ribicoff 4 | Family | 51 |
| Twinbrooks | Ribicoff 9 Market | Family | 11 |
| Twinbrooks | Ribicoff 9 | Family | 44 |
| Valley Townhouses | Valley Townhouses | Family | 40 |
| McConaughy Terrace | McConaughy Terrace 4% | Family | 93 |
| McConaughy Terrace | McConaughy Terrace 9% | Family | 130 |
| | | | **803** |

| Development | Community | Designation | Units |
|---|---|---|---|
| RAD 1 | New Hall Gardens | Elderly/Disabled | 26 |
| RAD 1 | Constance B. Motley | Elderly/Disabled | 45 |
| RAD 1 | Katherine Harvey Terrace | Elderly/Disabled | 17 |
| RAD 1 | Prescott Bush | Elderly/Disabled | 56 |
| RAD III | Winslow-Celentano | Elderly/Disabled | 64 |
| RAD III | Charles T. McQueeney | Elderly/Disabled | 149 |
| RAD IV | Matthew Ruoppolo Manor | Elderly/Disabled | 103 |

| | | | |
|---|---|---|---|
| RAD IV | Fairmont Heights | Elderly/Disabled | 98 |
| Wilmont | Wilmot Crossing | Elderly/Disabled | 47 |
| | | | **605** |
| **TOTAL** | | | **1408** |




ECC/HANH's redevelopment strategic goal was to achieve at least a 10% savings on total operating expenses by:

1) participating in HUD's Rental Assistance Demonstration program, which allows public housing agencies to leverage public, and private debt and equity; and

2) creating 360 Management Group, Co. (360) to serve as its managing agent and reducing operating expenses in comparison to the operating expenses incurred by LIPH.

The formation of 360 Management Group Company, ECC/HANH's property management affiliate-instrumentality has contributed to the reduction of the agency's cost reduction and greater cost effectiveness goals since the formation of 360 Management Group, Co.

The MTW FY2025 goals of 360 Management Group Company is to continue to reduce costs and increase housing options.

During FY2025 ECC/HANH continues to explore the formation of a Resident Services Instrumentality.

### iii. Planned Non-Significant Changes

None

### iv. Planned Changes to Metrics/Data Collection

None

### v. Planned Significant Changes

None
ECC/HANH does not require different authorizations from what was initially proposed. This initiative meets the statutory objectives of cost effectiveness and increase housing choice.

## B. Not Yet Implemented Activities

None

## C. Activities on Hold

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

#### i. Plan Year Approved, Implemented, Amended

This initiative was approved in FY13 and implemented in FY14. Placed on hold in FY24.

In recent years, ECC/HANH has moved towards converting and repositioning LIPH units through a RAD mixed finance model and has not used this initiative since 2013. ECC/HANH's need to implement this initiative has been limited due to the RAD portfolio award.

However, this approach may be applied to developments not selected or appropriate for RAD conversion and has been placed on hold.

#### ii. Description/Update

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 FY13, 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.

The MTW activity envisioned by this initiative was achieved with nearly 300 LIPH units redeveloped in new mixed finance developments.

In FY2024, this initiative was placed on hold. ECC/HANH may reactivate this initiative for developments not selected or appropriate for RAD conversion.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

## 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 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) and closed out.
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.
Completion of the Mixed-Use development occurred in 2013.

**Initiative 1.3 – Fungibility**

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

**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) and closed out.
This initiative was approved in FY09 and implemented in FY10. This activity was closed out in FY19.

2. Explain why the activities was closed out.
This initiative prevents displacement of families due to foreclosure. The demand for foreclosure vouchers decreased during FY2017 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.

**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) and closed out.
Approved in FY13. This activity was closed out in FY14.

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.

**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) and closed out.
This activity was approved in FY2013 and was never implemented. This activity was closed out in FY14.

2. Explain why the activities was closed out.
ECC/HANH was directed by HUD to eliminate in MTW reporting. ECC/HANH 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.

**Initiative 2.2 – Incremental Earned Income Exclusion**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This initiative was approved and implemented in FY08 and closed out in FY21.

2. Explain why the activity was closed out.
ECC/HANH has replaced this Initiative with a new initiative 2.5 REACH.

**Initiative 2.11 Community Health Network of CT (CHNCT)**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This activity was approved in FY22 and was never implemented. This activity was closed out in FY22.

2. Explain why the activities was closed out.
The activity was closed out due to the partner, Community Health Network of CT (CHNCT), being unable to commit to the initiative at this time.

**Initiative 3.2. UPCS Inspections**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
UPCS Inspections were approved and implemented in FY08. This activity was closed out in FY13.

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.

**Initiative 3.3 – Revised HQS Inspection Protocol**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
Revised HQS Inspections: Approved and implemented in FY11. This activity was closed out in FY15.

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

**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) and closed out.
Mandatory direct deposit for Housing Choice Voucher landlords was approved and implemented in FY10. This activity was closed out in FY14.

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.

**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 and implemented (if applicable) and closed out.
This initiative was first approved in FY08. Implementation of the marketing initiatives for Higher Income Eligible families began during FY09 with the development of marketing materials. Due to ECC/HANH's focus on redevelopment activities, this initiative was placed on hold in FY12 and continued to be deferred in FY14.

2. Explain why the activity was closed out.
No actions were taken towards reactivating this activity as instead focus was on redevelopment into mixed income communities. Incentives have not been needed to attract higher income residents to these communities. ECC/HANH will no longer pursue this activity.

**Initiative 1.8F- Farnam Court Transformation Plan**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
This initiative was approved in FY11 and was implemented in FY12. This initiative was closed in FY23.

2. Explain why the activities was closed out.
The goal of this initiative was to transform an obsolete and unsustainable housing complex to a vibrant mixed-income, mixed use development that would also maintain affordable housing opportunities for our residents by creating a new neighborhood that included the creation of a central park with a community building. This initiative has been completed.

**Initiative 1.24F Fulton Park Modernization**

1. Specify the Plan Year in which the activity was first approved and implemented (if applicable) and closed out.
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. ECC/HANH completed a RPCA and submitted a RAD application on 10.9.2015 for the rehabilitation of Fulton Park. ECC/HANH received RAD approval in spring of 2016 and the RAD conversion was completed in 2020. This development was included in what is categorized as RAD 2 which also included Stanley Justice Landing and Waverly Townhomes. The rehabilitation project is complete and RAD units are fully leased. 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.

2. Explain why the activity was closed out.
The activity was closed because the RAD conversion was completed in 2020. The redevelopment is complete, and the site is fully leased.

***Closing Out Activities***: An approved activity must be closed out in an Annual MTW Report. If an Annual MTW Plan is to be submitted after the MTW PHA has decided to close the activity but prior to the submission of an Annual MTW Report, the to-be-closed activity should be listed in the "Not Yet Implemented Activities" or the "On Hold Activities" subsection of the Annual MTW Plan as applicable. The associated discussion and timeline should indicate that the MTW PHA will close out the activity in the next Annual MTW Plan as applicable.

## V. Planned Application of MTW Funds

| (II) SOURCES AND USES OF MTW FUNDS |
|---|
| **ANNUAL MTW PLAN** |

### A. PLANNED APPLICATION OF MTW FUNDS

**i. Estimated Sources of MTW Funds**

ECC/HANH shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

| FDS LINE ITEM NUMBER | FDS LINE ITEM NAME | DOLLAR AMOUNT |
|---|---|---|
| 70500 (70300+70400) | Total Tenant Revenue | $ 1,800,000 |
| 70600 | HUD PHA Operating Grants | $ 102,000,000 |
| 70610 | Capital Grants | $ 2,500,000 |
| 70700 (70710+70720+70730+70740+70750) | Total Fee Revenue | $0 |
| 71100+72000 | Interest Income | $ 1,000,000 |
| 71600 | Gain or Loss on Sale of Capital Assets | $ 0 |
| 71200+71300+71310+71400+71500 | Other Income | $ 100,000 |
| 70000 | Total Revenue | $ 107,400,000 |
| | | |

**ii. Estimated Application of MTW Funds**

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

| FDS LINE ITEM NUMBER | FDS LINE ITEM NAME | DOLLAR AMOUNT |
|---|---|---|
| 91000(91100+91200+91400+91500+91600+91700+91800+91900) | Total Operating - Administrative | $ 4,200,000 |
| 91300+91310+92000 | Management Fee Expense | $ 14,000,000 |
| 91810 | Allocated Overhead | $ 0 |
| 92500 (92100+92200+92300+92400) | Total Tenant Services | $ 200,000 |
| 93000 (93100+93600+93200+93300+93400+93800) | Total Utilities | $ 1,300,000 |
| 93500+93700 | Labor | $ 0 |
| 94000 (94100+94200+94300+94500) | Total Ordinary Maintenance | $ 3,800,000 |
| 95000 (95100+95200+95300+95500) | Total Protective Services | $ 130,000 |

| | | |
|---|---|---|
| **96100 (96110+96120+96130+96140)** | **Total Insurance Premiums** | $ 800,000 |
| **96000 (96200+96210+96300+96400+96500+96600+96800)** | **Total Other General Expenses** | $ 750,000 |
| **96700 (96710+96720+96730)** | **Total Interest Expense & Amortization Cost** | $ 0 |
| **97100+97200** | **Total Extraordinary Maintenance** | $ 200,000 |
| **97300+97350** | **HAP + HAP Portability-In** | $ 76,000,000 |
| **97400** | **Depreciation Expense** | $ 1,000,000 |
| **3397500+97600+97700+97800** | **All Other Expense** | $ 0 |
| **90000** | **Total Expenses** | **$ 102,380,000** |

Estimated Total Expenses include Line Item 97400 Depreciation Expense for $1,000,000 which is a non-cash item.

After adjusting for depreciation expense, Estimated Total Revenue exceeds Estimated Total Expense by $6,020,000, which has been planned for development projects.

| |
|---|
| N/A |

**iii. Description of Planned Application of MTW Single Fund Flexibility**

ECC/HANH shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, ECC/HANH 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. ECC/HANH 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 APPLICATION 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. |

## (IV.) *PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING*

| Original Funding Source | Beginning of FY - Unspent Balances | Planned Application of PHA Unspent Funds during FY |
|---|---|---|
| HCV HAP* | $ 35,907,813 | $ 7,000,000 |
| HCV Admin Fee | $0 | $ 0 |
| PH Operating Subsidy | $ 5,783,242 | $ 5,783,242 |
| **TOTAL:** | **$41,691,055** | **$12,783,242** |

**Description of Planned Expenditures of Unspent Operating Fund and HCV Funding**
The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy

## (V). 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 FY25

## (VI). RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. **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.

| RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION |
|---|
| ECC/HANH has received approval to convert a significant proportion of its portfolio under the RAD conversion process.<br>• ECC/HANH completed the conversion of Ribicoff Cottages to Twin Brook under a RAD redevelopment resulting in 95 RAD units.<br>• ECC/HANH converted all formerly LIPH units at the Monterey Place development resulting in 280 RAD units.<br>• ECC/HANH converted 34 LIPH to RAD units at Wilmot Crossing and 53 LIPH units to RAD units at Eastview Terrace. (There are also 13 PBV units at Wilmot Crossing and 49 PBV units at Eastview Terrace)<br>• ECC/HANH converted 244 LIPH units at Farnam Courts in a multi-phase redevelopment. The first phase resulted in 57 new offsite RAD units at Fair Haven and through the second phase 86 new RAD units on site at Mill River Crossing. The final 2 on-site Farnam phases have also been completed. Phase 2a with 36 RAD units was completed in October 2021 and the final phase 2B containing 52 RAD units was completed in May 2022.<br><br>Through a portfolio award, HUD also approved the RAD conversion of 11 additional sites through 4 groupings. RAD 1 – 4 are completed and occupied<br>• 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.<br>• RAD 2 converted an additional 70 units at Stanley Justice, Fulton Park and Waverly Townhouses.<br>• RAD 3 has converted 213 units at McQueeney Towers and Celentano Towers.<br>• RAD 4, converted an additional 201 units at Fairmont Heights and Ruoppolo Manor.<br>• Rockview 2 was also completed in FY21 which transferred 62 units from Westville Manor as an offsite component of the multi-phase Westville Manor redevelopment.<br>• McConaughy Terrace, ECC/HANH removed 201 LIPH units, created 196 RAD/LIHTC units.<br>• Valley Street Townhomes removed 40 LIPH Units. Created 32 units onsite and 8 at Westville Manor CAT agreement (under construction).<br><br>The following developments are in the planning phase for RAD conversions,<br>• Westville Manor - 89 units (planning)<br>• 34 Level Street - approximately 55 units using the PRAC model (planning)<br>• Crawford Manor - 109 Units (planning)<br>• Scattered Sites - 88 units (planning)<br>• Robert T. Wolfe/Union Square Transformation approximately - 1,000 units (planning) |

**ii. 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.**

Yes

**iii. 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?**

| First RAD Significant Amendment |
| --- |

**Significant Change as part of amendment #1 to the FY23 MTW Plan:**
**Scattered Sites**

# VI. Administrative

## *A. Board Resolution and Certifications of Compliance*

**MEMORANDUM**

**To:** **Board of Commissioners**

**Date:** **July 16, 2024**

**From:** **Karen DuBois-Walton, President**

**RE:** **Resolution Authorizing the Approval of MTW Annual Plan for FY 2025**

---

**7ACTION:** Recommend that the Board of Commissioners adopt Resolution **#07-38/24-R**

**TIMING:** Immediately

**DISCUSSION:** 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.

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.

The MTW Plan includes the following types of initiatives:

- Initiatives that are proposed for the upcoming fiscal year;
- Initiatives that have been approved by HUD in previous years and are still being implemented;
- Initiatives requiring funding flexibility only that have been approved by HUD in previous years and are still being implemented;
- Initiatives that are Not Yet Implemented;
- Activities that are on Hold;
- Activities that are Closed Out; and
- Planned Application of MTW Funds.

Section II (C) of the Authority's Moving to Work Agreement (the "Agreement") requires that ECC/HANH hold at least one public hearing per Annual MTW Plan submission and make the Annual MTW Plan available for public comment for at least thirty (30) days. ECC/HANH agrees to take into account public comments on the program design, including comments from current tenants/participants to the extent such comments are provided.

The thirty (30) day comment period began on Monday, April 15, 2024, and copies of the Moving to Work (MTW) FY2025 Plan were made available on the agency website, Twitter and Facebook.

A public hearing was held on Monday, May 13, 2024, at 4:00 pm via Teams.

One (1) written comment was received.

ECC/HANH requests Board approval for the MTW Annual Plan for Fiscal Year 2025. We request the Board's authorization for submission to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Plan for FY2025 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.

The Annual MTW Plan is due not later than seventy-five (75) days prior to the start of the Agency's fiscal year, unless otherwise approved by HUD.

**FISCAL IMPACT:** None

**SOURCE OF FUNDS:** MTW Funds

**STAFF:** Evelise Ribeiro, Director of Compliance and Moving to Work Initiatives

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3. ECC/HANH will carry out the MTW Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

4. The MTW FY2025 Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which ECC/HANH is located.

5. ECC/HANH contains a certification by the appropriate State or local officials that the MTW FY2025 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 ECC/HANH's jurisdiction and a description of the manner in which the MTW Plan is consistent with the applicable Consolidated Plan.

6. ECC/HANH 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 ECC/HANH's involvement and maintain records reflecting these analyses and actions.

7. ECC/HANH will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

8. ECC/HANH will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

9. ECC/HANH 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 2 at 24 CFR Part 135.

10. ECC/HANH will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

11. ECC/HANH 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.

12. ECC/HANH 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.

13. ECC/HANH will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

14. ECC/HANH 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, ECC/HANH 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.

15. With respect to public housing ECC/HANH 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.

16. ECC/HANH will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

17. ECC/HANH will comply with the Lead-Based Paint Poisoning Prevention Act And 24 CFR Part 35.

18. ECC/HANH 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).

19. ECC/HANH 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.

20. All attachments to the MTW 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 ECC/HANH and at all other times and locations identified by ECC/HANH in its Plan and will continue to be made available at least at the primary business office of ECC/HANH.

[CERTIFICATION PAGE FOLLOWS]

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 June 18, 2024.

Karen DuBois-Walton
President/Secretary

7/16/24
Date

REVIEWED:
MCCARTER & ENGLISH, LLP
GENERAL COUNSEL

By: _____
Rolan Joni Young, Esq.
A Partner

**LINK TO MTW SUMMARY:**

ME1 48704735v.1

# Certifications of Compliance

## CERTIFICATIONS OF COMPLIANCE

***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT***
***OFFICE OF PUBLIC AND INDIAN HOUSING***

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair 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 **10/01/2024**), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

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

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW 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.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C–1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with 24 CFR 5.105(a)(2), 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.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) 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 75.

form ***HUD 50900: Certifications of Compliance (3/2021)***

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) 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(a).

(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 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.

(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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

(22) 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 approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(23) 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.

***Housing Authority of the City of New Haven*** — ***CT004***

***MTW PHA NAME*** — ***MTW PHA NUMBER/HA CODE***

***I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).***

***William E. Kilpatrick*** — ***Board Chair***

***NAME OF AUTHORIZED OFFICIAL*** — ***TITLE***

***SIGNATURE*** — 7/16/24 ***DATE***

form ***HUD 50900: Certifications of Compliance (3/2021)***

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* ***Must be signed by either the Chair 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 Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

## B. Documentation of Public Hearing Process

**NOTICE OF PUBLIC HEARING FOR**
**THE ELM CITYCOMMUNITIES, HOUSING AUTHORITY OF NEW HAVEN (ECC/HANH)**
**MOVING TO WORK (MTW) FY2025 ANNUAL PLAN**

Section II and Section VII of the Authority's Moving to Work Agreement {the "Agreement") requires that before the Agency can file its Approved Annual Moving to Work Plan ("Plan") and Report ("Report")to the U.S. Department of Housing and Urban Development (the "HUD") that it must conduct a public hearing, consider comments from the public on the proposed Plan, obtain approval from the Board of Commissioners, and submit the Plan to HUD.

The thirty (30) days comment period begins on **Monday, April 15, 2024** and copies of the Moving to Work (MTW) FY2025 Plan, will be made available on the agency website www.elmcitycommunities.org or via Twitter, www.twitter.com/ECCommunities or via Facebook www.facebook.com/ElmCityCommunities.

You are invited to provide written comments addressed to: ECC/HANH, Moving To Work FY2025 Annual Plan Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 or via email to: eribeiro@elmcitycommunities.org.

Pursuant to said Sections II and VII), a public hearing where public comments will be accepted and recorded is scheduled for **Monday, May 13, 2024 at 4:00pm** via
https://v.ringcentral.com/join/664815939?pw=991f363d509d063fafd3d433d79287e0

Meeting ID: 664815939
Password: s8Zt3qzZYg

Or dial:
+12679304000 United States (Philadelphia, PA)
Access Code / Meeting ID: 664815939
Dial-in password: 7898379994
International numbers available: https://v.ringcentral.com/teleconference

Any individual requiring a Reasonable Accommodation to participate in the hearing may call the Reasonable Accommodation Manager (203) 498-8800, ext. 1507 or at the TDD Number (203) 497-8434.

**AVISO DE AUDIENCIA PÚBLICA PARA**
**THE ELM CITYCOMMUNITIES, AUTORIDAD DE VIVIENDA DE NEW HAVEN (ECC/HANH)**
**MOVERSE AL TRABAJO (MTW) PLAN ANUAL PARA EL AF2025**

La Sección II y la Sección VII del Acuerdo de Mudarse al Trabajo de la Autoridad {el "Acuerdo") requieren que antes de que la Agencia pueda presentar su Plan Anual Aprobado de Mudarse al Trabajo ("Plan") y su Informe ("Informe") al Departamento de Vivienda de EE. UU. y Desarrollo Urbano (el "HUD") que debe llevar a cabo una audiencia pública, considerar los comentarios del público sobre el Plan propuesto, obtener la aprobación de la Junta de Comisionados y presentar el Plan al HUD.

El período de comentarios de treinta (30) días comienza **el lunes 15 de abril de 2024** y las copias del Plan Moving to Work (MTW) para el año fiscal 2025 estarán disponibles en el sitio web de la agencia www.elmcitycommunities.org o a través de Twitter, www.twitter. com/ECCommunities o a través de Facebook www.facebook.com/ElmCityCommunities.

Le invitamos a enviar comentarios por escrito dirigidos a: ECC/HANH, Moving To Work FY2025 Annual Plan Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 o por correo electrónico a: eribeiro@elmcitycommunities.org.

De conformidad con dichas Secciones II y VII), se programa una audiencia pública donde se aceptarán y registrarán comentarios públicos para el lunes **13 de mayo de 2024 a las 4:00 p.m**.
vía
https://v.ringcentral.com/join/664815939?pw=991f363d509d063fafd3d433d79287e0
ID reunión: 664815939
Contraseña: s8Zt3qzZYg
O marcar:
+12679304000 Estados Unidos (Filadelfia, PA)
Clave de Acceso / ID de Reunión: 664815939
Contraseña de acceso telefónico: 7898379994

Números internacionales disponibles: https://v.ringcentral.com/teleconference
Cualquier persona que requiera una Adaptación Razonable para participar en la audiencia puede llamar al Gerente de Adaptación Razonable (203) 498-8800, ext. 1507 o al Número TDD (203) 497-8434

**Housing Authority of the City of New Haven/Elm City Communities**
**Public Hearing: MTW FY2025**
**Monday, May 13, 2024**
**360 Orange Street, New Haven, CT**
**06511**
**(Via RingCentral teleconference)**

Attendance:

Evelise Ribeiro, ECC/HANH
Karen DuBois-Walton
Frank Rivera
Catherine Hawthorne
Yvonne Temple
Tanya Chirsky
Jasmine Ruiz

The public hearing was called to order at 4:00 p.m. by Evelise Ribeiro, Director of Compliance and Moving to Work Initiatives.

Ms. Ribeiro read the legal notice aloud which stated the reason the public hearing was being called. She noted that the notice was in English and Spanish and both versions would be submitted for the record.

**NOTICE OF PUBLIC HEARING FOR**
**THE ELM CITYCOMMUNITIES, HOUSING AUTHORITY OF NEW HAVEN (ECC/HANH)**
**MOVING TO WORK (MTW) FY2025 ANNUAL PLAN**

Section II and Section VII of the Authority's Moving to Work Agreement {the "Agreement") requires that before the Agency can file its Approved Annual Moving to Work Plan ("Plan") and Report ("Report")to the U.S. Department of Housing and Urban Development (the "HUD") that it must conduct a public hearing, consider comments from the public on the proposed Plan, obtain approval from the Board of Commissioners, and submit the Plan to HUD.
The thirty (30) days comment period begins on **Monday, April 15, 2024** and copies of the Moving to Work (MTW) FY2025 Plan, will be made available on the agency website www.elmcitycommunities.org or via Twitter, www.twitter.com/ECCommunities or via Facebook www.facebook.com/ElmCityCommunities.

You are invited to provide written comments addressed to: ECC/HANH, Moving To Work FY2025 Annual Plan Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 or via email to: eribeiro@elmcitycommunities.org.

Pursuant to said Sections II and VII), a public hearing where public comments will be accepted and recorded is scheduled for **Monday, May 13, 2024 at 4:00pm** via

https://v.ringcentral.com/join/664815939?pw=991f363d509d063fafd3d433d79287e0

Meeting ID: 664815939
Password: s8Zt3qzZYg

Or dial:
+12679304000 United States (Philadelphia, PA)
Access Code / Meeting ID: 664815939
Dial-in password: 7898379994
International numbers available: https://v.ringcentral.com/teleconference

Any individual requiring a Reasonable Accommodation to participate in the hearing may call the Reasonable Accommodation Manager (203) 498-8800, ext. 1507 or at the TDD Number (203) 497-8434.

**AVISO DE AUDIENCIA PÚBLICA PARA**
**THE ELM CITYCOMMUNITIES, AUTORIDAD DE VIVIENDA DE NEW HAVEN (ECC/HANH)**
**MOVERSE AL TRABAJO (MTW) PLAN ANUAL PARA EL AF2025**

La Sección II y la Sección VII del Acuerdo de Mudarse al Trabajo de la Autoridad {el "Acuerdo") requieren que antes de que la Agencia pueda presentar su Plan Anual Aprobado de Mudarse al Trabajo ("Plan") y su Informe ("Informe") al Departamento de Vivienda de EE. UU. y Desarrollo Urbano (el "HUD") que debe llevar a cabo una audiencia pública, considerar los comentarios del público sobre el Plan propuesto, obtener la aprobación de la Junta de Comisionados y presentar el Plan al HUD.
El período de comentarios de treinta (30) días comienza **el lunes 15 de abril de 2024** y las copias del Plan Moving to Work (MTW) para el año fiscal 2025 estarán disponibles en el sitio web de la agencia www.elmcitycommunities.org o a través de Twitter, www.twitter.com/ECCommunities o a través de Facebook www.facebook.com/ElmCityCommunities.
Le invitamos a enviar comentarios por escrito dirigidos a: ECC/HANH, Moving To Work FY2025 Annual Plan Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 o por correo electrónico a: eribeiro@elmcitycommunities.org.
De conformidad con dichas Secciones II y VII), se programa una audiencia pública donde se aceptarán y registrarán comentarios públicos para el lunes **13 de mayo de 2024 a las 4:00 p.m**. vía

https://v.ringcentral.com/join/664815939?pw=991f363d509d063fafd3d433d79287e0
ID reunión: 664815939
Contraseña: s8Zt3qzZYg
O marcar:
+12679304000 Estados Unidos (Filadelfia, PA)
Clave de Acceso / ID de Reunión: 664815939
Contraseña de acceso telefónico: 7898379994

Números internacionales disponibles: https://v.ringcentral.com/teleconference
Cualquier persona que requiera una Adaptación Razonable para participar en la audiencia puede llamar al Gerente de Adaptación Razonable (203) 498-8800, ext. 1507 o al Número TDD (203) 497-8434

**Public Comments – Public Hearing**
At 4:03 pm., the meeting was opened to take public comments.
At 4:07 pm, there was a second call for public comments.
At 4:09 pm, there was a third call for public comments.
At 4:11 pm, there was fourth call for public comments.

Ms. Ribeiro stated that the public comment period ends on Tuesday, May 14, 2024, therefore public comments can still be submitted via email to eribeiro@elmcitycommunities.org or physically delivered to her office.

At 4:15 pm, there was fifth call for public comments.

The names of attendees were read for the record.

**Adjournment:**

Ms. Ribeiro thanked the participants, and the public hearing was adjourned at 4:16pm.

**Other Public Comments Received**
ECC/HANH staff met with the City of New Haven Community Services staff on March 25, 2024 to discuss tenant-based voucher allocation for supportive Housing and advised of the MTW FY 2025 Annual Plan public review and comment period.

On Monday April 15, 2024, Eliza Halsey, Community Services Coordinator provided a comment and request for voucher allocation in the effort to end homelessness.

"The City of New Haven proposes to broaden the categories for voucher coordinated through the City to allow greater flexibility to meet a range of needs. The City is requesting vouchers for the Violence Interruption Program for Re-entry and Youth and to end homelessness for unhoused individuals and families and individuals and families engaged with McKinney Vento." The request was for a voucher allocation of 420 vouchers.

### *C. Planned and Ongoing Evaluations*

*ECC/HANH does not have any current evaluations.*

# Lobbying Disclosures

## Disclosure of Lobbying Activities (SF-LLL)

# DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

| 1. Type of Federal Action: | 2. Status of Federal Action: | 3. Report Type: |
|---|---|---|
| [NA] a. contract<br>b. grant<br>c. cooperative agreement<br>d. loan<br>e. loan guarantee<br>f. loan insurance | [NA] a. bid/offer/application<br>b. initial award<br>c. post-award | [NA] a. initial filing<br>b. material change<br>**For Material Change Only:**<br>year _____ quarter _____<br>date of last report _____ |

| 4. Name and Address of Reporting Entity: | 5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: |
|---|---|
| ☐ Prime ☐ Subawardee<br>Tier _____, *if known*:<br><br>**Congressional District**, *if known*: 4c | NA<br><br>**Congressional District**, *if known*: |
| **6. Federal Department/Agency:**<br>NA | **7. Federal Program Name/Description:**<br>NA<br>CFDA Number, *if applicable*: _____ |
| **8. Federal Action Number**, *if known*:<br>NA | **9. Award Amount**, *if known*:<br>$ NA |
| **10. a. Name and Address of Lobbying Registrant** (*if individual, last name, first name, MI*):<br>NA | **b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*):<br>NA |

**11.** Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Signature: [signature]
Print Name: Karen DuBois-Walton
Title: President
Telephone No.: 203-498-8800 ext 1001 Date: 7/16/24

**Federal Use Only:**

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Standard Form LLL (Rev. 7-97)

## Appendix 1

ECC/HANH's local total development cost (TDC) limits as approved by HUD.
The following pages detail ECC/Hanh's Alternate TDCs.

| HUD HCC 2013 | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **0** | **1** | **2** | **3** | **4** | **5** | **6** |
| Detached | $ 96,195 | $ 122,916 | $ 144,239 | $ 170,801 | $ 200,549 | $ 219,593 | $ 237,542 |
| Row House | $ 78,165 | $ 102,750 | $ 121,542 | $ 148,120 | $ 176,091 | $ 194,147 | $ 211,074 |
| Walk Up | $ 71,663 | $ 97,219 | **$ 123,709** | $ 161,949 | $ 201,180 | $ 226,579 | $ 251,643 |
| Elevator | $ 81,545 | $ 114,163 | $ 146,781 70 | $ 195,708 | $ 244,635 | $ 277,253 | $ 309,871 |

| HUD HCC FACTORS | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **0** | **1** | **2** | **3** | **4** | **5** | **6** |
| Detached | -33.31% | -14.78% | 16.60% | 18.42% | 39.04% | 52.24% | 64.69% |
| Row House | -35.69% | -15.46% | -1.75% | 21.87% | 44.88% | 59.74% | 73.66% |
| Walk Up | -42.07% | -21.41% | 0.00% | 30.91% | 62.62% | 83.16% | 103.42% |
| Elevator | -44.44% | -22.22% | 0% | 33.33% | 66.67% | 88.89% | 111.11% |

| ECC/HANH HCC 2013 | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **0** | **1** | **2** | **3** | **4** | **5** | **6** |
| Detached | $ 145,318 | $ 185,685 | $ 217,896 | $ 258,023 | $ 302,962 | $ 331,731 | $ 358,846 |
| Row House | $ 118,081 | $ 155,221 | $ 183,609 | $ 223,759 | $ 266,014 | $ 293,290 | $ 318,861 |
| Walk Up | $ 108,259 | $ 146,866 | $ 186,882 | $ 244,651 | $ 303,915 | $ 342,285 | $ 380,149 |
| Elevator | $ 109,828 | $ 153,759 | $ 197,690 | $ 263,587 | $ 329,483 | $ 373,414 | $ 417,346 |

| HUD TDC 2013 | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **0** | **1** | **2** | **3** | **4** | **5** | **6** |
| Detached | $ 168,342 | $ 215,103 | $ 252,419 | $ 298,901 | $ 350,961 | $ 384,288 | $ 415,699 |
| Row House | $ 136,788 | $ 179,813 | $ 212,699 | $ 259,210 | $ 308,159 | $ 339,757 | $ 369,380 |
| Walk Up | $ 125,410 | $ 170,134 | $ 216,490 | $ 283,411 | $ 352,064 | $ 396,513 | $ 440,376 |
| Elevator | $ 130,472 | $ 182,661 | $ 234,850 | $ 313,133 | $ 391,416 | $ 443,605 | $ 495,794 |

| ECC/HANH TDC 2013 | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | 0 | 1 | 2 | 3 | 4 | 5 | 6 |
| Detached | | $ 228,356.69 | $ 291,789.97 | $ 342,408.21 | $ 405,464.41 | $ 476,082.62 | $ 521,291.12 | $ 563,900.08 |
| Row House | | $ 185,556.06 | $ 243,917.71 | $ 288,527.99 | $ 351,621.68 | $ 418,022.08 | $ 460,885.17 | $ 501,067.76 |
| Walk Up | | $ 170,120.98 | $ 230,789.37 | $ 293,672.84 | $ 384,451.85 | $ 477,581.46 | $ 537,876.94 | $ 597,377.37 |
| Elevator | | $ 178,470.14 | $ 249,858.09 | $ 321,246.04 | $ 428,328.23 | $ 535,410.42 | $ 606,798.37 | $ 678,186.32 |

| PERCENT CHANGE ECC/HANH TDC 2008-2013 | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | 0 | 1 | 2 | 3 | 4 | 5 | 6 |
| Detached | | 15.00% | 13.00% | 10.73% | 9.54% | 9.11% | 9.20% | 8.94% |
| Row House | | 1.50% | 2.94% | 2.73% | 5.14% | 6.20% | 6.94% | 7.49% |
| Walk Up | | 16.75% | 16.65% | 17.70% | 18.47% | 20.73% | 21.86% | 23.14% |
| Elevator | | 10.45% | 10.45% | 10.45% | 10.45% | 10.44% | 10.45% | 10.45% |

| PERCENT CHANGE COMPARISON HUD TO ECC/HANH TDC | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | 0 | 1 | 2 | 3 | 4 | 5 | 6 |
| Detached | | 0.76% | 0.74% | 0.73% | 0.64% | 0.72% | 0.72% | 0.71% |
| Row House | | 0.66% | 0.67% | 0.67% | 0.73% | 0.69% | 0.70% | 0.70% |
| Walk Up | | 0.76% | 0.76% | 0.77% | 0.79% | 0.79% | 0.80% | 0.80% |
| Elevator | | -0.20% | -0.20% | -0.20% | -0.20% | -0.20% | -0.20% | -0.20% |

| ECC/ HANH TDC 2017 | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 0 | 1 | 2 | 3 | 4 | 5 |
| Detached | | $ 258,686.46 | $346,915.00 | $420,699.00 | $514,164.00 | $604,941.00 | $660,932.00 |
| Row House | | $ 237,989.56 | $326,544.00 | $397,097.00 | $488,020.00 | $579,524.00 | $638,384.00 |
| Walk Up | | $ 237,989.56 | $286,276.00 | $363,110.00 | $474,222.00 | $590,780.00 | $665,145.00 |
| Elevator | | $ 210,661.90 | $294,926.29 | $379,191.42 | $505,589.28 | $631,956.64 | $716,250.81 |

## 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 ECC/HANH 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.

ECC/HANH has the following developments in its pipeline for TDC limits: Crawford Manor, 34 Level Street, Westville Manor Phase I, Westville Manor Phase II, Scattered Site Multifamily, St. Luke's, East Grand, Union Square (Robert T Wolfe), Clock Factory, State Street, Griswold and Newhallville which are still in the planning stages. As it relates to our approved TDC, the developments shall not exceed the approved TDC.

The financial closings for McConaughy Terrace were completed in the first quarter of FY2024. The redevelopment will be complete, and all units re-occupied by the end of the second quarter of FY2025.

The Valley Street closing occurred in the first quarter of FY23. The construction period was estimated at 15 months and occupancy began in the second quarter of FY2024.

Westville Manor, 34 Level Street, and Crawford Manor are in the predevelopment stages. ECC/HANH 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. ECC/HANH also continues to seek alternative funding sources to reduce the need for MTW fungibility by seeking funding under the FHLB AHP program, State funding through the State of Connecticut Department of Housing and Department of Economic and Community Development.

# Appendix 3

CARING ABOUT RESIDENT ECONOMIC SELF-SUFFICIENCY (CARES)

**PILOT PROGRAM FOR WEST ROCK REVITALIZATION INITIATIVES**

## Goals and Objectives of the Program

The Housing Authority of the City of New Haven (ECC/HANH) is a Moving to Work (MTW) Agency. The MTW Program provides MTW Agencies with an opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase affordable housing choices for low-income families. ECC/HANH has been able to use the flexibility provided under the MTW Program to begin implementing a West Rock Revitalization Plan that will provide almost 500 units of housing and appurtenant commercial and community space. To help ensure the long-term success of this investment it is critical that ECC/HANH address the social and economic issues that are vital to long-term sustainable growth in the Community.

ECC/HANH has chosen to implement the CARES program in conjunction with the West Rock Revitalization Plan based upon statistical data from recent needs assessment conducted among the 187 former families of the Brookside and Rockview developments, where 31 residents responded. The results of this assessment show that 35.5 percent of families need job training, 29 percent need day care services and 22.6 percent need employment services. In order to realign the public assistance model and get more residents self-sufficient, we need to address the everyday challenges that our current residents are faced with. ECC/HANH anticipates achieving the largest impact by focusing on a sub-community that is most affected by the societal stigmas. Additionally, the poverty rate for the City of New Haven in 1999 was 24.4 percent as compared to 51 percent for the West Rock residents as a whole and 69 percent for the target residents of this program. Our goals are to increase the number of families in the West Rock community who are achieving household income and self-sufficiency to be able to attain a market rate unit or other affordable housing without assistance.

**Eligibility/Threshold Requirements**

To be eligible to participate in the CARES program, the following criteria must be met;

- All adult members of the household, 18 years of age or over, must execute a CARES Addendum to the Standard PHA or HCV Lease Agreement;
- Be current in all lease obligations to ECC/HANH and the management company;
- Be a resident in "good standing" as defined in the ACOP and Administrative Plan;
- Have been employed at least 12 months out of the prior 36 months before applying for the CARES program;
- Have a GED or High School diploma or be capable of obtaining such GED or High School diploma within 24-months of applying for program. Applicants for the program that do not have a GED or High School diploma must show progress towards meeting this goal;
- Enroll in the ECC/HANH FSS Program; and
- Open an IDA account
-

Families will live at West Rock for up to 24-months with supportive housing to become self-sufficient and supportive services will be based upon their education level (GED or High School diploma or not); household income (above or below the Federal Poverty Level); the employability of each person based upon their employment history as well as the results of their employability assessment.

**Program Overview**
Brookside and Rockview families will be given the options, at lease up, to stay in a public housing program or reside in a Project Based Voucher (PBV) unit or to accept a Tenant Based CARES Program Voucher (CPV) as part of the CARES Program. Residents that opt to stay in public housing or a PBV unit will be given 72 months of rental assistance. After the 72 months have expired, residents who elect to stay in public housing or PBV units will be required to pay the Flat Rent (public housing) or Market rent (PBV), less prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt.

Example: if a family of four receives rental assistance (calculated as the difference between the Flat Rent and the TTP) and there are two adults and two children ages 12 and 15, and assuming that the prorated rental assistance for each member of the household is $200 per month, the family will have its rent increased by $400 per month after the end of the seven year period.

During the term, the prorated amount of assistance would continue for the child over the age of 18 if that child was enrolled in a minimum of 3 hours or 3 credits in secondary or vocational education. Assistance for residents who are deemed exempt from the program by the case manager and the needs assessment will also continue to receive assistance. ECC/HANH recognizes that there are individuals, who to no fault of their own, will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an ISP and case manager and show progress towards the goals of the plan will continue to be able to receive assistance as long as they continue to make progress towards their goals. Life happens and families may experience unforeseen circumstances such as a loss of job, downturn in the economy or an unforeseen family circumstance that will hinder them from entering the CARES Program.

Residents who elect to take the CPV option will be given up to two years to transition into the CARES Program and a total of six years (72 months) to reach self-sufficiency based upon their income and job readiness at the signing of their lease. The first two years will enable residents the time to meet the basic requirements of the program. At the end of the six-year (72 month) program, participating residents will no longer receive rental assistance.

ECC/HANH will determine the amount of assistance the family is eligible to receive over the term of the CPV assistance, and assistance will be adjusted annually for inflation (Exhibit A). In the third year of the program, an amount equal to the sum of the rental assistance that the family would have otherwise received in the final year will be deposited into a Resident Enrolled Escrow Fund (REEF).

For the duration of the program the funds in the REEF may be used to cover the following costs;

- a hardship (as defined under the Hardship Policy and Guidelines),
- purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted),
- start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted),
- purchase a computer,
- down payment on a home and/or enroll in higher education, subject to the approval of ECC/HANH.

If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance.

A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the President/Executive Director's office, the Vice President of Operations or designee, the Vice President of Housing Choice Voucher or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

The first step to self-sufficiency is encouraging families to seek affordable housing and manage their household expenses on a fixed income which will empower them to make their own choices. At the time of enrollment into the program, each family will sign a CARES Addendum and go through an assessment process where income, bedroom size, and family composition will be evaluated.

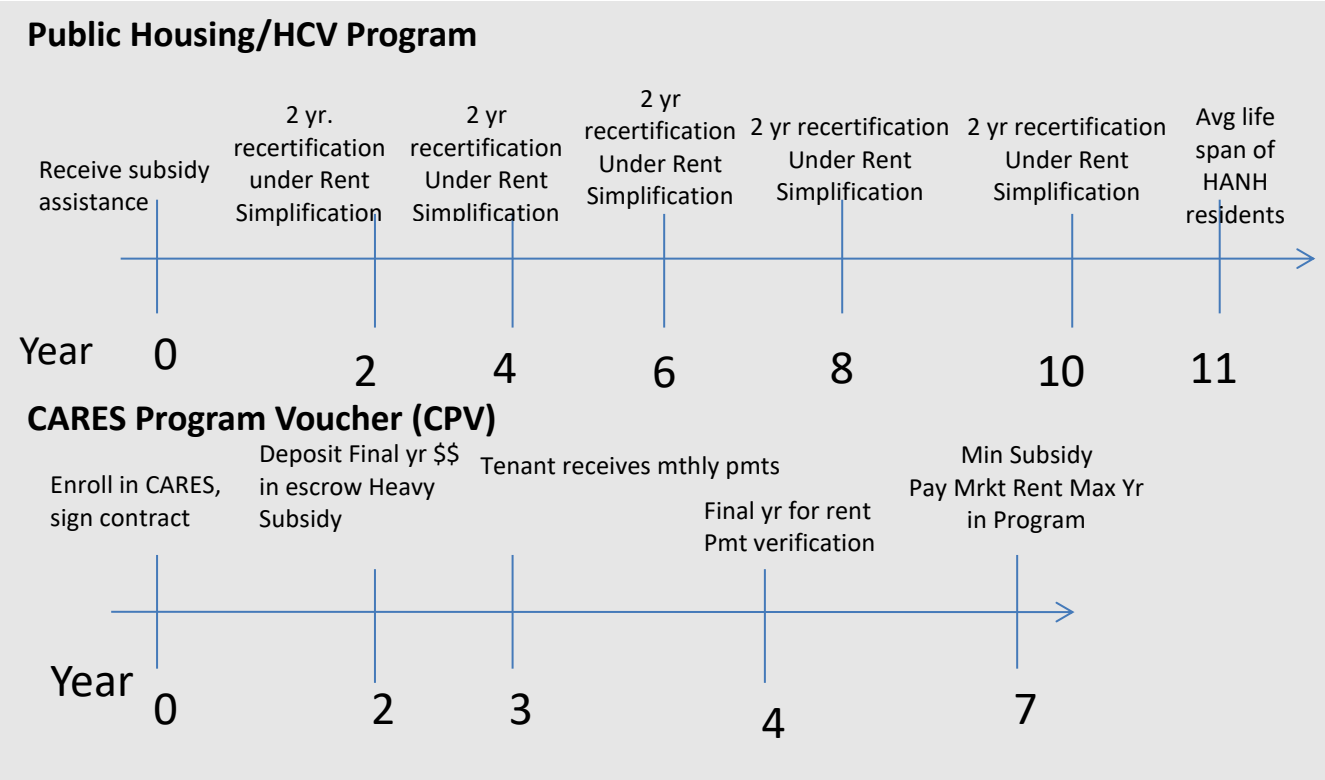
For the first 24 months of the program, residents who elect to enroll in the CARES Program will be required to live in Brookside II or Rockview I to receive the supportive services and management needed to allow them to become self-sufficient. During this time the monthly subsidy payments will be made directly to the landlord.

Beginning in year 3, the families will undergo a recertification to determine the monthly subsidy for the remaining four years in the CARES Program and the REEF income disallowance basis, be responsible for paying the landlord in full, and to provide ECC/HANH with payment receipts for 12 consecutive months to ensure compliance with the program.

The families will receive a pre-determined subsidy payment each month, instead of the traditional method of payments being made to the landlord, based on the assessment. ECC/HANH will do periodic reviews to make sure funds are being spent to cover housing costs; however, there are no income exclusions, deductions or utility allowances necessary since the HAP data already takes this information into account (Exhibit A).

Subsidy amounts paid to the families will be adjusted to reflect cost of living increases annually. These stepped requirements will eliminate the need for recertification and verification of income. The established subsidy payment schedule for the term of the program enables ECC/HANH to assist the families with the most support in the early years where it is needed. Providing this oversight and acceleration in subsidy in the early years of the program along with the development of the skills necessary for long-term self-sufficiency will increase the independence of the residents over time and result in a gradual declining need for subsidy.

**HCV 7 Year Cash Payment Schedule**




Additionally, participating residents will also establish Individual Development Accounts (IDA) if they elect to take the CPV option. ECC/HANH's contribution will be the resident's income disallowance portion to be contributed to the IDA based upon the initial Individual Services Plan and income verification process that is established by the families and a case manager at the time of lease up.

If a family's income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent. Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent.

For families enrolled in ECC/HANH's optional income disallowance, participants can elect to opt out of ECC/HANH's disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. ECC/HANH also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

ECC/HANH embarked on this CARES pilot program in the West Rock community to help promote economic self-sufficiency of the residents of this revitalized community as a stepping stone to a new paradigm in the affordable housing market for low-income families.

ECC/HANH believes that the comprehensive program discussed above, combined with the development of unassisted rental units, will be effective in achieving housing and economic transitions for a substantial numbers of West Rock families.

**Exhibit A - Housing Choice Voucher - HAP 7 Year Schedule**

| Family Size | | 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|---|---|
| Median Household HAP to Owner (9/10) | | 795 | 895 | 1000 | 1090 | 1147 | 1214 |
| Median Utility Allowance | | 122 | 292 | 357 | 362 | 425 | 430 |
| **Median Monthly Cash Payment Assistance** | | **917** | **1187** | **1357** | **1452** | **1572** | **1644** |
| Years in Program | Cost of Living Increase | Subsidy Value | | | | | |
| 1 Supportive Component Monthly | Lease up Year | 917.00 | 1,187.00 | 1,357.00 | 1,452.00 | 1,572.00 | 1,644.00 |
| **Annually** | | 11,004.00 | 14,244.00 | 16,284.00 | 17,424.00 | 18,864.00 | 19,728.00 |
| 2 Supportive Component **Monthly** | 3% | 944.51 | 1,222.61 | 1,397.71 | 1,495.56 | 1,619.16 | 1,693.32 |
| **Annually** | | 11,334.12 | 14,671.32 | 16,772.52 | 17,946.72 | 19,429.92 | 20,319.84 |
| 3 Tenant Based Component **Monthly** | 3% | 972.85 | 1,259.29 | 1,439.64 | 1,540.43 | 1,667.73 | 1,744.12 |
| **Annually** | | 11,674.14 | 15,111.46 | 17,275.70 | 18,485.12 | 20,012.82 | 20,929.44 |
| 4 Tenant Based Component **Monthly** | 3% | 1,002.03 | 1,297.07 | 1,482.83 | 1,586.64 | 1,717.77 | 1,796.44 |
| **Annually** | | 12,024.37 | 15,564.80 | 17,793.97 | 19,039.68 | 20,613.20 | 21,557.32 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 5 Tenant Based Component **Monthly** | 3% | 1,032.09 | 1,335.98 | 1,527.32 | 1,634.24 | 1,769.30 | 1,850.34 |
| **Annually** | | 12,385.10 | 16,031.75 | 18,327.79 | 19,610.87 | 21,231.60 | 22,204.04 |
| 6 Tenant Based Component **Monthly** | 3% | 1,063.05 | 1,376.06 | 1,573.13 | 1,683.27 | 1,822.38 | 1,905.85 |
| **Annually** | | 12,756.65 | 16,512.70 | 18,877.62 | 20,199.19 | 21,868.55 | 22,870.16 |
| 7 Tenant Based Component **Monthly** | 3% (Amount deposited into Escrow) | 1,094.95 | 1,417.34 | 1,620.33 | 1,733.76 | 1,877.05 | 1,963.02 |
| **Annually** | | 13,139.35 | 17,008.08 | 19,443.95 | 20,805.17 | 22,524.60 | 23,556.26 |
| Total Cash Assistance | | 84,317.73 | 109,144.11 | 124,775.53 | 133,510.74 | 144,544.69 | 151,165.05 |

**Program Steps**

Orientation

Prior to executing a lease to move to the revitalized development, the family must attend an orientation where they will be informed of the CARES program requirements, the availability of supportive services to enable them to fulfill their obligations under this program and the consequences of the failure to meet the requirements under this program.

**CARES Addendum to Replace HAP Contract – PBV Units**

Prior to lease up, families moving to West Rock will make their voluntary decision to enter into the CARES program. At the lease signing, a CARES Addendum to the lease agreement will be signed which will go into effect at the beginning of year three. This addendum will replace the HAP Contract as monthly rental payments will no longer be sent directly to the landlord and HAP contracts are between ECC/HANH and the landlord. A monthly cash payment will be sent directly to the resident per the CARES addendum between ECC/HANH and the resident.

**Needs Assessment**

Each family member will complete a needs assessment prior to lease up to establish a baseline of current educational levels, abilities, skills, interests, aptitude, and program goals. The subsidy amounts will be established based upon family composition, bedroom size, and household income during the assessment as well.

Upon completion and review of the assessment the families, along with a case manager, will create a comprehensive Individual Service Plan (ISP) that will consist of short-term and long-term goals in the aforementioned categories, as well as work and youth educational requirements under this program. It is important to note that those residents who do not meet the Eligibility/Threshold requirements under the CARES program and are categorized under one or more of the exemptions described in "5. Exemptions for Residents Residing in Public Housing or HCV units", will have the opportunity to reside in the development under the traditional Public Housing or HCV units

**Individual Services Plan (ISP)**
Once the assessment has been completed, the case manager and the family will develop an ISP that is designed to help the family meet the work requirement of this program within a 72-month timeframe. The plan must be completed within 90-days of moving into the new unit in the West Rock Community. The ISP will include the identified needs and agreed upon goals established during the needs assessment and be completed within 60-days after moving into the new rental unit.

Families who are enrolled in the program will have to participate in the HUD mandatory income disallowance program and to enroll in the optional CARES REEF disallowance program. If it is determined that the family cannot obtain or sustain earnings over a 72-month period at or above self-sufficient income levels to obtain a market rate unit or other affordable unit on their own, the case manager may determine that the person cannot meet the goals of the program and that person may be exempted from the CARES program. If deemed exempt, that person will be required to enroll and to remain enrolled in the ECC/HANH Family Self Sufficiency (FSS) Program. The ISP shall address the following areas of concern.

a. Family stability
b. Well-being
c. Education & training
d. Financial management
e. Employment & Career management

**Exemptions for residents remaining in Public Housing or Project Based Voucher Units**
There are exemptions to the program for not having to pay the Flat Rent/Market Rent but who elect to remain in Public Housing or PBV units in the West Rock development. Persons disabled or deemed unemployable and returning residents that have a right to return under the MOA between the former residents of Brookside and Rockview and ECC/HANH, will grandfather them in to return to the property and they will not be subject to the CARES program unless they voluntarily choose to.

Families that meet one or more of the following criteria are exempt from having to pay flat rent at the end of the 72 months:

- The adult is precluded from obtaining or maintaining employment due to domestic violence or other circumstance beyond his or her control; or
- The adult is employed and unable to pay their pro-rata share of the flat rent due to:
    - (1) a documented medical impairment that limits his/her work hours, or
    - (2) the need to care for a disabled or elderly member of the household; or
- The adult has a documented and substantive barrier to employment such as severe mental or physical health problems, one or more severe learning disabilities, domestic violence, or child who has serious physical or behavioral health problems; or
- Enrolled in a bona-fide employment or adult educational or literacy training program for a minimum of 16 hours per week or two full time classes.

If any adult in the family meets one of the following exemption criteria, the family is not subject to the CARES Program. A person is exempt if:

- He/she is incapacitated (as recognized by the Social Security Administration); or
- Age 50 or older; or
- Responsible for the care of an incapacitated family member; or
- A non-parent caretaker relative; or
- Caring for a child under the age of 2.9 (subject to include children at the time of initial move-in); or
- Pregnant, if a physician has certified that she is unable to work; or
- Unemployable (defined as "not able to hold or find a job")

An adult who believes that he/she is exempt under one or more of the aforementioned criteria must provide documentation to the ECC/HANH to support their position.

**Hardship Policy and Guidelines**

i. **Hardship Policy:**
Prior to imposition of any change in rent, the household will be provided with advanced notice as required by their lease and/or governing documents. Households that are notified of a rent increase will also be informed, in writing, of their ability to seek a waiver based on financial hardship provided that the hardship is related to extraordinary deductions or extraordinary cost of living (rent, utilities, medical expenses, child care expenses).

ii. **Hardship Criteria:**

The following criteria will trigger a review for consideration of a Hardship cash disbursement from the REEF.

Extraordinary Cost of Living:
In the CARES program, a hardship review will be conducted if the monthly total shelter costs (rent plus utilities), when combined with un-reimbursed monthly medical, disability, and dependent costs, exceeds forty percent (40%) of a household's monthly income (monthly income is defined as annual income divided by twelve).

Medical, Disabled Expenses of $6,000.00 or more:
In the CARES program, hardship review may be conducted if a household's total unreimbursed medical, disability, and dependent expenses of $6,000.00 or more per year. This includes the full cost of Medicare and private insurance.

Persons with disabilities always retain the right to request Reasonable Accommodations.

CARES Program Interim & Rent Hardship Rule During COVID19 and any similar pandemic or emergency affecting a significant number of families in the community:

CARES program will include an opportunity for families to request a rent adjustment during COVID19 and any similar pandemic or emergency affecting a significant number of families in the community. Families who experience a loss of income as a result of a natural disaster, local, state or national emergency such as COVID19 or the like, may have the opportunity to submit a request for interim rent change. The family must be able to provide documentation that proves that the loss of income is related to this a specific situation listed under this category.

In order to prevent the reprocessing of files when families go back to work during a time like this, the CARES coordinator 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 the amount prior to the decrease. 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.

The interim will allow for families to pay as little as the minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for $0 rent.

These individuals will meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent will then be modified accordingly based on the information collected.

If a family is unable to pay the minimum rent because of a financial hardship the family may be eligible for a temporary waiver from paying Minimum Rent.
A family may be exempt from Minimum Rent for 120 days when the family experiences a hardship as a result of COVID19 and other similar pandemic or national, state or local emergencies that affect a large number of families in the community.

There is no requirement to repay this rent during this type of circumstance, and no referral to FSS or community service will be required.

iii. **REEF Cash Disbursement Request Process:**

All REEF cash disbursement requests must originate with the household and must be submitted to the Property Manager or Occupancy Specialist/CARES Specialist within thirty (30) calendar days of the date of the rent adjustment notification or hardship event, whichever occurs first. It will be the responsibility of the household to complete an "Application for Hardship Waiver" form and to provide all documentation required to show eligibility.

Once the Property Manager or the Occupancy Specialist/CARES Specialist receives the required documentation, the information shall be forwarded to the Vice President of Operations.

At the applicant's option, the Hardship Review Committee shall include a public housing resident.

In cases of hardship based on income loss, the Hardship Review Committee shall consider whether or not the applicant has made a good faith effort to secure alternative income sources. In addition, the Committee shall consider whether or not the loss of income is due to circumstances beyond the applicant's control.

The Hardship Review Committee shall render a decision on the request and a written decision shall be forwarded back to the President/Executive Director for signature. The President/Executive Director may sustain or decline the recommendation of the Committee. After signature by the President/Executive Director, the Vice President of Operations or Vice President of Housing Choice Vouchers, as applicable, will inform the parties of the decision.

The written decision shall inform the parties as to the relief granted as well as the term of the relief. Households that disagree with the decision may request a grievance through the ECC/HANH grievance process. In cases where an appeal is sought, no action shall be taken by the ECC/HANH until the grievance process is completed.

iv. **Hardship Committee Remedies:**

The Hardship Review Committee will examine each family's circumstances on a case-by-case basis. The Hardship Review Committee has a choice of four remedies it can recommend as it deems appropriate. Depending on income, deductions and family circumstances the Committee may take action including, but not limited to:

- Give exceptional expenses cash payment from the REEF account for rent payments and un-reimbursed utility expenses due to job loss, not to exceed a 90-day period.
- Give exceptional expenses cash payment from the REEF account for medical expenses of $6,000 or more after all other options have been exhausted.
- Permanent exclusion from CARES due to a disability or other exemption listed under the definitions of exemptions above and re-entry into Public Housing or PBV units.
- Appropriate combination of remedies listed above.

The Hardship Committee shall require that all family, except elderly and disabled families reapply to the Hardship Committee after the end of the 90-day period for which the exceptional expenses cash payment is granted if the family wants the exemption to continue for more than 90 days.

**Cash Payments to Tenants**

As a result of implementing a CARES Addendum to the lease agreement, which will replace HAP contracts, residents who enroll and participate in the CARES Program will begin receiving a monthly cash payment to cover their rental payments and utility expenses. This is in lieu of receiving a utility allowance reimbursement and a direct rental payment to the landlord.

For the duration of the program the funds in the REEF may be used to cover the following costs;

- a hardship (as defined under the Hardship Policy and Guidelines),
- purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed $3,000 after all other options have been exhausted),
- start a small business (a onetime payment not to exceed $2,500 after all other options have been exhausted),
- purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of ECC/HANH.

If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance.

A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the President/Executive Director's office, the Vice President of Operations or designee, the Vice President of Housing Choice Vouchers or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

**Individual Development Accounts (IDA)**
Program participants must establish an Individual Development Account. The amount that the family must contribute toward this account will be determined by mutual agreement between the case manager and the individual.

ECC/HANH's contribution will be the resident's income disallowance portion as a contribution to the IDA based upon the initial Individual Service Plan and income verification process that is established by the families and a case manager at the time of lease up to move to West Rock. If a family's income increases, they can voluntarily deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that experience an increase in earned income will be allowed to exclude the increase from Annual Income for four years at 100 percent. ECC/HANH also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

**REEF Cash Deposit**
In addition to the traditional IDA account, which we are calling a REEF for delineation of the CARES Program; ECC/HANH will deposit an amount equal to 12 months of cash payments that would have otherwise been received in the final year of the program into the REEF account. This money will be available to access.

**CARES Income Disregard**
If a family's income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent.

Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent.

For families enrolled in ECC/HANH's optional income disallowance, participants can elect to opt out of ECC/HANH's disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. ECC/HANH also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

**Case Management**
All CARES program participants must enroll in ECC/HANH's FSS program. Case management is the key to any successful Community and Supportive Services Plan (CSSP). The case management model will be provided through a collaborative approach that will include a variety of specialized CSS Partners. The case manager will coordinate all case management, assist residents in assessing their needs and ensuring that required services are provided, and serve as the primary provider of these services. Other CSS Partners like the Connecticut Department of Social Services and the New Haven Board of Education may serve as case managers for specific residents like those on the Temporary Financial Assistance (TFA) or those enrolled in Early Childhood Learning Program with whom they maintain an existing and positive relationship.

The goal of case management is to ensure positive outcomes for the residents which may vary depending upon the resident being served. Expected outcomes of our case management activities include resident education, information, advocacy and empowerment. By collecting and analyzing

data through a web-based tracking system, the case manager can make decisions based upon sound and unbiased information. The case manager will be responsible for sharing information with the CSS Team and CSS Partners, government agencies, families, et al, while at the same time protecting the confidentiality and privacy of the residents. The CSS Team and CSS Partners will have access to this system to accurately and timely assess a resident's needs to measure his/her progress towards achieving his/her self-sufficiency goals. This is a critical component to successful case management.

**Progress Meetings**
The case management provider will conduct a minimum of two progress meetings each month, one of which shall be at the resident's apartment. The purpose of these meetings is to ensure that progress is being made towards economic self-sufficiency and to ensure a higher level of coordination of all services. Quarterly Review of Compliance with Individual Service Plans will be conducted, as well.

**Early Graduation from CARES Program**
Residents can graduate from the program earlier than the seven years allocated if they meet the income levels required to obtain a market rate unit or other affordable unit on their own. The case manager will give them an early assessment to ensure that self-sufficiency can be sustained. As incentive to accelerate out of the program early, residents will receive the final year subsidy bonus as a cash payment to use as they deem necessary.

**Coordination of Supportive Services Initiatives**
The supportive services that will link residents include but are not limited to, the following initiatives:

- Programs that help eliminate barriers to self-sufficiency.
- Educational activities that promote learning and serve as the foundation for young people from infancy through high school graduation, helping them to succeed in academia and the professional world. Such activities, which include early childhood education, after-school programs, mentoring, youth leadership development and tutoring, must be created with strong partnerships with public and private educational institutions.
- Adult educational activities, including remedial education, literacy training, tutoring for completion of secondary or postsecondary education, assistance in the attainment of certificates of high school equivalency, and English as a Second Language courses, as needed.
- Readiness and retention activities, which frequently are keys to securing private sector commitments to provide jobs.
- Employment training activities that include results-based job training, preparation, counseling, development, placement, and follow-up assistance after job placement.
- Programs that provide pre- apprenticeships in construction, construction-related, maintenance, or other related activities by providing GED classes and OSHA certifications to prepare for an entry-level, registered apprenticeship program. An entry-level, registered apprenticeship program is one that has been registered with a State Apprenticeship Agency recognized by the Department of Labor's (DOL).
- Training on topics such as parenting skills, consumer education, family budgeting, and credit management.
- Homeownership counseling so that, to the maximum extent possible, qualified residents will be ready to purchase new homeownership units when they are completed. The Family Self-Sufficiency program can also be used to promote homeownership, providing assistance with escrow accounts and counseling.

- Coordinating with health care providers or providing on-site space for health clinics, doctors, wellness centers, dentists, community health worker initiatives, and other health-related initiatives (e.g., With Every Heart Beat Is Life initiative, which is part of the National Heart, Lung, and Blood Institute's (NHLBI's) Educational Resources to Address Health Disparities initiative). etc., that will primarily serve the public housing residents.
- Substance and alcohol abuse treatment and counseling.
- Activities that address domestic violence treatment and prevention.
- Child care services that provide sufficient hours of operation to facilitate parental access to education and job opportunities, serve appropriate age groups, and stimulate children to learn.
- Transportation, as necessary, to enable all family members to participate in available CSS activities and to commute to their places of training and/or employment.
- Entrepreneurship training and mentoring, with the goal of establishing resident-owned businesses.

**Violations of the CARES Program**
Circumstances that constitute a violation of the CARES Program include but are not limited to the following:

- Misappropriation of funds;
- Fraudulent acts, as set forth in the ACOP and Administrative Plan respectively; and
- Non-compliance of CARES Program per the CARES Contract
- Any resident that is notified of a program violation will have the opportunity to appeal the claims being made against them as set forth in the aforementioned paragraph "5. Appeals Process".
- Any resident who is found in violation can receive disciplinary action up to and including termination of their lease agreement which can result in Mandatory Bar that states that residents can no longer receive subsidy rental assistance for 10 years.

**Appeal Process**
A family who receives an adverse finding from ECC/HANH regarding the CARES Program has the right to appeal to ECC/HANH under ECC/HANH's Grievance Process.

**Moves**
As outlined in the FY15 MTW Plan (Initiative 2.3), ECC/HANH initiated a policy to limit moves for CARES participants (those who elected to take the CPV option) unless an extraordinary situation exists. Limiting CARES moves to only extraordinary situations will allow participants to follow-through on the commitment they made at program entry and will give ECC/HANH data to evaluate the program as it was intended. Extraordinary situations could include moves to be closer to work, medical care, or full-time school, or to care for sick or disabled family member and will be evaluated by an ECC/HANH-appointed committee.

**Change in Amendment #1 of the MTW 2020 Plan:**
**CARES Program Interim & Rent Hardship Rule During COVID19 and any pandemic or National, State or Local emergency affecting a large number of families in the community.**

CARES program will include an opportunity for families to request a rent adjustment during COVID19 and any similar pandemic or emergency affecting a significant number of families in the community. Families who experience a loss of income as a result of a natural disaster, local, state or national emergency such as COVID19 or the like, may have the opportunity to submit a request for

interim rent change. The family must be able to provide documentation that proves that the loss of income is related to this a specific situation listed under this category.

In order to prevent the reprocessing of files when families go back to work during a time like this, the CARES coordinator 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 5th month) which would be an increase back to the amount prior to the decrease. 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.

The decrease in rent will reflect 30% of the total household income but will allow for families with total household incomes below $2500 annually, to pay as little as the minimum rent of $50 with the expectation that everyone pays something for housing. Residents who are unable to pay the minimum rent of $50 can request a hardship exemption for rent payments between $0 to $50 accordingly.

These individuals will meet with ECC/HANH Hardship Committee to determine the nature and length of the hardship and their rent will then be modified accordingly based on the information collected. If a family is unable to pay the minimum rent because of a financial hardship the family may be eligible for a temporary waiver from paying Minimum Rent.

A family may be exempt from Minimum Rent for 120 days when the family experiences a hardship as a result of COVID19 and other similar pandemic or National, State or Local emergency affecting a large number of families in the community. There is no requirement to repay this rent during this type of circumstance, and no referral to FSS or community service will be required. Retroactive adjustments do not apply to families in the CARES program as they are required to pay rent based on the 3rd year rent calculation.

CARES

Since implementation, 68 families have "graduated" from the CARES program by either successfully completing the 72-month time limit or successfully leaving the program prior to the end of the time limit.

At the end of the 72-months the CARES resident will no longer receive rental assistance and their rent will be adjusted to the Flat rent (public housing) or Market rent (PBV),

At the end of the 72-month the CARES resident also receives a lump sum of the equivalent to the subsidy payments in the final year of the program deposited into an escrow account (REEF) at year 3 and released upon graduation from CARES, whether they decide to move or stay and pay the Flat or market rent.

ECC/HANH has recently discovered that due to LIHTC rules and the rent cap on units based on AMI designation, some residents are not paying Flat or market rent and are paying a rent amount significantly less.

ECC/HANH seeks to propose a significant change (Amendment #2) as stated below, to address this issue.

**CARES Escrow**
Families with an escrow balance may request funds for emergency services and needs associated with the current pandemic and other similar emergencies affecting families in the community. Families may request access to their escrow savings separate from the already embedded request for escrow outlined in CARES. This request will not count toward the number of requests allowed, per family. In addition to the current list of allowable uses, requests can include items such as, but no limited to:

- Food insecurities
- Home necessities
- Rent
- Related Medical Expenses
- Utility payments
- Transportation related expenses

Requests may be approved at the discretion of ECC/HANH only after all resources, such as access to foodbanks, diaper banks, and other community resources have been exhausted. All requests will need to be reviewed by the CARES committee under an expedited version of the current escrow request approval process and must be reviewed and signed by the Director of CED or designee.

**CARES Significant Change MTW FY25 Amendment #2:**

ECC/HANH proposes an update for participants who successfully graduate from the CARES program, who choose to stay on site and pay Flat Rent (LIPH) or market rate rent (PBV).

- Upon completion of the 72 months, the resident will be re-evaluated and recertified accordingly.
- The resident will not receive the final payout escrow until the resident has moved out of the CARES unit and is receiving zero subsidy.

Resident escrow will be deducted as noted below

| | |
|---|---|
| Resident who stays in the unit for up to 6 months after graduation date | 0% will be deducted from escrow balance |
| Resident who stays 6 months to up to 1 year and 11 months after graduation date | 25% will be deducted from escrow balance |
| Resident who stays 2 years | 50% will be deducted from the escrow balance |
| Resident who stays 3 years | 75% will be deducted from escrow balance |
| Resident who stays 4 years | 100% will be deducted from escrow balance |

Residents staying over 4 years from graduation date will be terminated from the CARES program. All Residents will abide by the CARES program obligations until fully terminated from the program. All extensions will require a yearly update meeting with CED Supervisor or designee.

All graduation extensions must be approved by CED Director or designee.

# 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 Biennial or Triennial cert, the specialist enters EID dates in Elite, dating back to the date of when the 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 PIC submission 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. ECC/HANH 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 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.

| Tiered Amount of Expenses | Monthly Rent Reduction |
|---|---|
| $ 2,000 - $ 3,999 | $ 75 (equivalent to $3,000 deduction) |
| $ 4,000 - $ 5,999 | $ 125 (equivalent to $5,000 deduction) |
| $ 6,000 + | Hardship Review |

**Changes in Family Composition**
Residents are still required to get permission from the Housing Manager and the Vice President of Operations 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
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)

**On 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 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, 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 ECC/HANH 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.

**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 an 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 an 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 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.

**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 timeframe 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 received notice of the new policy on July 1, 2007 and the policy was effective 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 was used to integrate the two-year and three-year reexamination cycles. Initially in fiscal year 2008, all families were re-examined during the first year.

In the second year of the program (2009), two thirds of the elderly/disabled families were 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 were re-examined and one-half of the remaining non-elderly/non-disabled families.
Rent Simplification is was fully implemented by December 31, 2010.

**Low Income Public Housing (LIPH) Program**
**Rent Simplification Rent Tier Schedule**

| **Rent Tier** | | | | | | |
|---|---|---|---|---|---|---|
| **Income Range** | | | | | | |
| $0 | $2,499 | $50 | | $35,500 | $36,499 | $843 |
| $2,500 | $3,499 | $59 | | $36,500 | $37,499 | $867 |
| $3,500 | $4,499 | $83 | | $37,500 | $38,499 | $891 |
| $4,500 | $5,499 | $107 | | $38,500 | $39,499 | $914 |
| $5,500 | $6,499 | $131 | | $39,500 | $40,499 | $938 |
| $6,500 | $7,499 | $154 | | $40,500 | $41,499 | $962 |
| $7,500 | $8,499 | $178 | | $41,500 | $42,499 | $986 |
| $8,500 | $9,499 | $202 | | $42,500 | $43,499 | $1,009 |
| $9,500 | $10,499 | $226 | | $43,500 | $44,499 | $1,033 |
| $10,500 | $11,499 | $249 | | $44,500 | $45,499 | $1,057 |
| $11,500 | $12,499 | $273 | | $45,500 | $46,499 | $1,081 |
| $12,500 | $13,499 | $297 | | $46,500 | $47,499 | $1,104 |
| $13,500 | $14,499 | $321 | | $47,500 | $48,499 | $1,128 |
| $14,500 | $15,499 | $344 | | $48,500 | $49,449 | $1,152 |
| $15,500 | $16,499 | $368 | | $49,500 | Above | $1,176 |
| $16,500 | $17,499 | $392 | | | | |
| $17,500 | $18,499 | $416 | | | | |
| $18,500 | $19,499 | $439 | | | | |
| $19,500 | $20,499 | $463 | | | | |
| $20,500 | $21,499 | $487 | | | | |
| $21,500 | $22,499 | $511 | | | | |
| $22,500 | $23,499 | $534 | | | | |
| $23,500 | $24,499 | $558 | | | | |
| $24,500 | $25,499 | $582 | | | | |
| $25,500 | $26,499 | $606 | | | | |
| $26,500 | $27,499 | $629 | | | | |
| $27,500 | $28,499 | $653 | | | | |
| $28,500 | $29,499 | $677 | | | | |
| $29,500 | $30,499 | $701 | | | | |
| $30,500 | $31,499 | $724 | | | | |
| $31,500 | $32,499 | $748 | | | | |
| $32,500 | $33,499 | $772 | | | | |
| $33,500 | $34,499 | $796 | | | | |
| $34,500 | $35,499 | $819 | | | | |

**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 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 ECC/HANH 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 an 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 an 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 an 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.

**5. 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 President/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 LIPH REGULATIONS

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

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| | | | 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 |
| Business Income for Resident Owned Businesses | 24 CFR Part 5.609(b)(2) | The net income from the operation of a business or profession is included in determining annual income. | Exclude 100 Percent of any net income derived from the operation of a businesses; 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. |
| Earned Income Disallowance | 24 CFR Part 960.255 | 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 | 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 |

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| | | | 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. |
| Mandatory Deductions | 24 CFR Part 5.611 | (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 child care expenses necessary to enable a member of the family to be employed or to further his or her education. | Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions |
| Additional (Exception) Expenses Deductions | 24 CFR 5.611 | A PHA may adopt additional deductions from annual income. ECC/HANH had none | 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) |

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| Total Tenant Payment | 24 CFR 5.628 | (a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar:<br>(1) 30 percent of the family's monthly adjusted income;<br>(2) 10 percent of the family's monthly income;<br>(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<br>(4) The minimum rent, as determined in accordance with Sec. 5.630. | 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. |
| Hardship Provision for Exceptional Expenses | 24 CFR 5.611(2)) | A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions. | A family may be exempt from minimum rent as follows;<br>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<br>When the family would be evicted because it is unable to pay the minimum rent<br>When the income of the family has decreased because of changed circumstances, including loss of employment.<br>Family whose shelter expenses, plus un-reimbursed medical, childcare and |

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| | | | 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. |
| Minimum Rent | 24 CFR 5.630 | 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. | 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. |
| Utility Allowances and Reimbursements | 24 CFR 5.632(a) and (b) | Tenant Paid Utilities to be deducted from TTP to determine tenant rent. | No Change. ECC/HANH will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughy Terrace and all Scattered Site properties. |
| Annual Reexamination of Income and Family Composition | 24 CFR 960 Part 257 | Reexamination of income must occur every year, except every two years for elderly or disabled households. | 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 |

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| | | | 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. |
| Interim Reexaminatio n | 24 CFR 960 Part 257 | 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. | 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. |
| Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000 | 24 CFR 5.659 | 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. | 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.<br><br>Asset exclusion is raised to $50,000.00 and only self-certification will be required. |
| Determinatio n of Tenant Total Payment (TTP) | 24 CFR 5.628 | a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar:<br>(1) 30 percent of the family's monthly adjusted income;<br>(2) 10 percent of the family's monthly income;<br>(3) If the family is receiving payments for welfare | 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 Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed more than $50 during |

| Topic | Regulatory Provision | Current Policy | Alternative MTW Policy for Public Housing Program |
|---|---|---|---|
| | | 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 | 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.<br>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. |

# Appendix 5

## HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

## MOVING TO WORK SUFFICIENCY PROGRAM

## RENT SIMPLIFICATION PROCEDURES FOR THE SECTION 8 MTW VOUCHER PROGRAM

### 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.

- Year 1 -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.

- Year 2 -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.
- Year 3 -The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed $50.
- Year 4 -$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.

The transition period has been completed.

### 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 were 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 was 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 $50.00 as a result.

| Tiered Amount of Expenses | Monthly Rent Reduction |
|---|---|
| $ 2,000 - $ 3,999 | $ 75 (equivalent to $3,000 deduction) |
| $ 4,000 - $ 5,999 | $ 125 (equivalent to $5,000 deduction) |
| $ 6,000 + | Hardship Review |

**Changes in Family Composition**

Residents are still required to get permission from the Occupancy Specialist and the Vice President of Housing Choice Vouchers, 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 HCV Administrative Plan (Admin Plan) 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)

**As of 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.**

Rents are 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**

**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 President/Executive Director or his/her designee, the Vice President of Operations or his/her designee, the Vice President of Housing Choice Vouchers or his/her designee, and the 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 an ECC/HANH employee if the family experiences any one of the Criteria for Minimum Rent Exemption.

When a participant submits an application or an 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 non-payment 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 President/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 ECC/HANH 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(j) **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 985.507(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 tern 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 an 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 appt 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:

Families must have more than two qualifying dependents in order to qualify for additional Dependent Deductions

The Elderly/Disabled deductions shall not be used in determining Exceptional Expenses. Dependent deduction shall only be allowed for families with more than two dependents since the standard amount of this deduction has been included in the determination of the percentage used to calculate tenant rent.

| **Tiered Amount of Exceptional Expenses** | **Monthly Rent Reduction** |
|---|---|
| $ 2,000 - $ 3,999 | $ 75 (equivalent to $3,000 deduction) |
| $ 4,000 - $ 5,999 | $ 125 (equivalent to $5,000 deduction) |
| $ 6,000 + | Hardship Review |

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.

**Payment Standard Significant Change MTW FY25 Amendment #2:**

Effective FY25 ECC will allow annual rental increase by processing a rental increase request at the time of an annual reexamination or as an interim and to apply the current payment standards when processing interims for elderly/disabled households and any household that requests and receives a rent increase. This will allow for current FMRS to be used that reflect the current cost of housing in New Haven

Because elderly and disabled households are on a triennial reexamination schedule and other households are on a biennial reexamination schedule, the previous years' FMR used to determine their subsidy amount is outdated and does not reflect the current costs of housing in New Haven. Since there is no affordability constraint to the amount an owner can charge after the initial lease term, when an owner requests a rent increase between scheduled reexaminations, the participant is forced to make a decision between increasing their monthly rent burden or incurring expensive moving costs.

When processing the interim, ECC/HANH will be able to use the current payment standard in effect for that year, rather than the payment standard that was in effect at the time of the participant's last regular re-examination.

The goal of this activity is to decrease the financial burden on these households by allowing the ECC/HANH subsidy to keep pace with the market. This will decrease the number of families whose rent burden exceeds 30% of their adjusted monthly income. Currently 10% of ECC's leased units are families whose rent burden exceeds 10%.

ATTACHMENT C-1
EXCEPTION TO HCV REGULATIONS

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| Annual Income | 24 CFR Part 5.609(a)(4) | Any income derived from an asset, to which any member of the family has access. | 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. |
| Income Exclusion for Person Enrolled in FSS Program | 24 CFR Part 5.609(b)(1) | 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. | 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.<br><br>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. |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| Business Income for Resident Owned Businesses | 24 CFR Part 5.609(b)(2) | The net income from the operation of a business or profession is included in determining annual income. | 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.<br>50 percent exclusion during the second year; 25 percent exclusion the third year. |
| Earned Income Disallowance for Persons with Disabilities | 24 CFR Part 5.617(a) | 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;<br><br>employment of a family member, previously unemployed for one or more years prior to employment;<br>(2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or<br>(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. | Eliminated from HCV program |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| Mandatory Deductions | 24 CFR Part 5.611 | (1) $480 for each dependent;<br>(2) $400 for any elderly family or disabled family;<br>(3) The sum of the following, to the extent the sum exceeds three percent of annual income:<br>(i)Un-reimbursed medical expenses of any elderly family or disabled family; and<br>(ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities<br>(4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education. | Eliminate all mandatory deductions. |
| Additional (Exception) Expenses Deductions | 24 CFR 5.611 | None | 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 non-reimbursed utility expenses (except telephone). |
| Total Tenant Payment | 24 CFR 5.628 | Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: | 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 |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| | | (a) 30 percent of the family's monthly adjusted income;<br>(b) 10 percent of the family's monthly income;<br>(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<br>(d) The minimum rent, as determined in accordance with Sec. 5.630. | |
| Hardship Provision | 24 CFR 5.630(b) | 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. | A family whose shelter expenses, plus un-reimbursed 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. |
| Minimum Rent | 24 CFR 5.630 | $25.00 for HCV.<br>$50.00 for LIPH | HCV increased from $25.00 a month to $50.00 a month so that LIPH and HCV have |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
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| | | | same minimum rent amount. |
| Utility Allowances and Reimbursements | 24 CFR 5.632(a) and (b) | Tenant Paid Utilities to be deducted from TTP to determine tenant rent. | No change. Tenant paid utilities to be deducted from TTP to determine tenant rent. |
| Medical Deductions | 24 CFR 5.611(c) | | No longer applicable unless they exceed applicable threshold. |
| Annual Reexamination of Income and Family Composition | 24 CFR 982.516 | Reexamination of income must occur every year, except every two years for elderly or disabled households. | 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.<br><br>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. |
| Interim Reexamination | 24 CFR 982.516 | 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 | 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 |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
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| | | the family request. Currently, family must report any change in income that exceeds $200 or more a month. | certain changes in family composition or certain changes in family income.<br><br>A family, except for elderly or disabled, may only make one request for an interim for a hardship exemption each 12 months, unless one (1) household member is enrolled in the FSS program. |
| Verification of Wages, Salaries and Assets below $5,000 and Assets below $50,000 | 24 CFR 5.659 | 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:<br>(1) Reported family annual income;<br>(2) The value of assets;<br>(3) Expenses related to deductions from annual income; and<br>(4) Other factors that affect the determination of adjusted income. | 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. |
| Determination of Tenant Total Payment (TTP) | 24 CFR 5.628 | Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar:<br>(1) 30 percent of the family's monthly adjusted income;<br>(2) 10 percent of the family's monthly income;<br>(3) if the family is receiving | 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. |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| | | 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 | The increase in TTP during the third year of the Rent Simplification Policy shall not exceed $50 a month.<br><br>The increase in TTP during the fourth year of the Rent Simplification Policy shall not $75 a month.<br><br>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.<br>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 increases that result from changes in family composition or changes in family income. |
| Annual Inspections | 24 CFR Part 982.405(a) | ECC/HANH must inspect each unit annually during Section 8 assisted occupancy.<br>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 | 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; |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| | | §982.305(b)(2) concerning timing of initial inspection by the PHA.) | (1) failed an inspection, or<br>(2) the unit had a failed<br>inspection in the three |
| | | | years<br>prior to the implementation of the Rent Simplification Policy.<br><br>A unit must have three consecutive years without a failed inspection to qualify for the bi-annual inspection.<br><br>Units for which landlords are requesting increases in HAP payment will also be inspected prior to ECC/HANH granting any such increase. |
| Waiver of SEMAP Indicator | 24 CFR Part 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 is the determination of Annual Income. There will no longer be any Mandatory Deductions; therefore, a waiver of this Section is required by HUD. |

| Topic | Exceptions to HCV Program Regulations | Current Policy | Alternative MTW Policy for Housing Choice Voucher Program |
|---|---|---|---|
| Waiver of SEMAP Indicator | 24 CFR Part 985.3(m) | | 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. |
| Waiver of SEMAP Indicator | 24 CFR Part 985.3 (n) | | 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 |
| Portability procedures | 24 CFR Part 983.355 (c) (1) | 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. | |
| Waiver of Requirement to | 24 CFR 982.505 (3)(iii) | (iii) The PHA must provide the family with at least 12 months' notice that the payment standard | The PHA will notify families at the time of biennial or triennial |

| | | | |
|---|---|---|---|
| give 12 month notice to family about Payment Standard decrease | | is being reduced during the term of the HAP contract before the effective date of the change. | recertification that the payment standard may increase or decrease at the next reexamination based on the approve FMR at that time. |
| Waiver to allow a decrease in payment standard the effective date of the family's second regular reexamination following the effective date of the decrease in payment standard. | | 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. | The PHA will use the payment standard in effect on the date of reexamination whether it is a decrease or an increase. |

**Housing Choice Voucher (HCV) Program**
**Rent Simplification Rent Tier Schedule**

| | | | | | | |
|---|---|---|---|---|---|---|
| **Income Range** | | | | | | |
| $0 | $2,499 | $50 | | $34,500 | $35,499 | $819 |
| $2,500 | $3,499 | $59 | | $35,500 | $36,499 | $843 |
| $3,500 | $4,499 | $83 | | $36,500 | $37,499 | $867 |
| $4,500 | $5,499 | $107 | | $37,500 | $38,499 | $891 |
| $5,500 | $6,499 | $131 | | $38,500 | $39,499 | $914 |
| $6,500 | $7,499 | $154 | | $39,500 | $40,499 | $938 |
| $7,500 | $8,499 | $178 | | $40,500 | $41,499 | $962 |
| $8,500 | $9,499 | $202 | | $41,500 | $42,499 | $986 |
| $9,500 | $10,499 | $226 | | $42,500 | $43,499 | $1,009 |

| | | | | | | |
|---|---|---|---|---|---|---|
| $10,500 | $11,499 | $249 | | $43,500 | $44,499 | $1,033 |
| $11,500 | $12,499 | $273 | | $44,500 | $45,499 | $1,057 |
| $12,500 | $13,499 | $297 | | $45,500 | $46,499 | $1,081 |
| $13,500 | $14,499 | $321 | | $46,500 | $47,499 | $1,104 |
| $14,500 | $15,499 | $344 | | $47,500 | $48,499 | $1,128 |
| $15,500 | $16,499 | $368 | | $48,500 | $49,449 | $1,152 |
| $16,500 | $17,499 | $392 | | $49,500 | Above | $1,176 |
| $17,500 | $18,499 | $416 | | | | |
| $18,500 | $19,499 | $439 | | | | |
| $19,500 | $20,499 | $463 | | | | |
| $20,500 | $21,499 | $487 | | | | |
| $21,500 | $22,499 | $511 | | | | |
| $22,500 | $23,499 | $534 | | | | |
| $23,500 | $24,499 | $558 | | | | |
| $24,500 | $25,499 | $582 | | | | |
| $25,500 | $26,499 | $606 | | | | |
| $26,500 | $27,499 | $629 | | | | |
| $27,500 | $28,499 | $653 | | | | |
| $28,500 | $29,499 | $677 | | | | |
| $29,500 | $30,499 | $701 | | | | |
| $30,500 | $31,499 | $724 | | | | |
| $31,500 | $32,499 | $748 | | | | |
| $32,500 | $33,499 | $772 | | | | |
| $33,500 | $34,499 | $796 | | | | |
| | | | | | | |

# Appendix 6

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, but it is also 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[12] 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).

[12] 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[13] 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[14] in grades 5 through 12 are success-ready, meaning students have hope[15], are engaged[16], and their well-being[17] 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)[18] feel high school graduates are prepared for college, and less than 20% (2 in 10)[19] 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;[20] written communications tops the list of applied skills found lacking in high school and college graduates alike.[21]

**Poverty rate in New Haven is too high (population ≥ 25 years)** [22]
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[23]

*The average earning for a high school dropout is $22,165*

*The average earning for a high school graduate is $33,137*

*The average earning for a college graduate is $55,722*

*42.2% of residents aged 25 years and over have a high school diploma / equivalent or less*

*The average earning for an ECC/HANH family is $14,091*

[13] 2013 Gallup poll of more than 600,000 students in grades 5 through 12 from school districts across the country
[14] Ibid.
[15] Student *hope* is defined by how students view their future. It's their belief that they can, and will, succeed at school and beyond.
[16] Student *engagement* is defined by the non-cognitive engagement—paying attention in class, how students feel, overall behavior, etc.
[17] Student *well-being* is defined by how students evaluate their lives and the extent to which they report positive daily experiences.
[18] 2013 Phi delta Kappa/Gallup poll
[19] 2013 Phi delta Kappa/Gallup poll
[20] http://arts.gov/sites/default/files/ToRead.pdf
[21] http://arts.gov/sites/default/files/ToRead.pdf
[22] http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_S1701.
[23] http://datacenter.kidscount.org/data#CT

| ECC/HANH Believes School Partnerships | Leverage opportunities for ECC/HANH to Address Mutual Challenges and Concerns as Part of ECC/HANH Believes | ECC/HANH Interventions and Strategies | Indicators |
|---|---|---|---|
| **Common Ground High School** | • Coordinate with school to identify child-level needs<br>• Individualized case management for students and families | • Homework help and tutoring<br>• Attendance assistance<br>• Technology assistance<br>• Whole-family evaluations<br>• Mental health support for students and families | • Academic increase on state standardized tests<br>• Decrease in Ds and Fs<br>• School attendance increase<br>• School discipline decrease<br>• Number of students graduating<br>• Number of students matriculating to college<br>• Number of students graduating from college |
| **Wintergreen Interdistrict Magnet School (WIMS), an ACES K-8 school** | • Coordinate with school to identify child-level needs<br>• Individualized case management for students and families | • Homework help and tutoring<br>• Attendance assistance<br>• Whole-family evaluations<br>• Mental health support for students and families | • Academic increase on state standardized tests<br>• School attendance increase<br>• School discipline decrease<br>• Number of students matriculating to 9th grade |
| **Lincoln Bassett pre-K-6 School (Partnership w/ ConnCAT in discussion for SY 2015-16)** | • Coordinate with school to identify child-level needs<br>• Increased supports for students and families | • Homework help and tutoring<br>• After school enrichment, Coding program for grades 5-6<br>• Parent engagement<br>• Parent supports | • Academic increase on state standardized tests<br>• Number of students matriculating to 7th grade |
| **New Haven Public Schools** | • Coordinate with school to identify child-level needs<br>• Increased enrollment in schools of choice | • Youth Stat<br>• TBD | • TBD |

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| **Adult Education (In partnership w/ existing work and Project MORE in discussion for SY 2015-16)** | • Coordinate with school to identify student-level needs<br>• Coordinate with school to identify family-level needs | • Attendance assistance<br>• Whole-family evaluations<br>• Mental health support for students and families<br>• Parent engagement<br>• Parent supports<br>• Family supports | • School attendance increase<br>• Number of students age 17-30 receiving GED<br>• Number of formerly incarcerated students age 17-30 completing GED |
| **ECC/HANH Believes Programs** | **Leverage Opportunities that Addresses Challenges and Concerns as Part of ECC/HANH Believes** | **ECC/HANH interventions and Strategies** | **Indicators** |
| **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<br>• Use housing authority developments to support high quality out of school enrichment programs<br>• Raise awareness among parents about out-of-school academic programs<br>• Leverage role as Housing Authority to drive quality programs | • Dinner Pilot during standardized testing window ***AGR**<br>• After school program w/ ConnCAT: for 40 kids in Grades 5-8 ***AGR**<br>• After school program w/ Solar Youth: for 86 kids in Grades k-12 ***AGR**<br>• After school program w/ BGCNH: for 125 kids in Grades k-8 ***AGR**<br>• After school program w/ Leap for Kids: for 20 kids in Grades k-12 ***AGR**<br>• Nonprofit Evaluations ***AGR**<br>• Homework Clubs @ every site ***AGR**<br>• Computer Labs @ every site ***AGR**<br>• Middle College for remediation: Wilbur | • Increase in student participation in community programs and improved quality of community programs<br>• Percent of 12th graders receiving a high school diploma<br>• Increase in 12th grade cohort<br>• Academic increase on state standardized tests<br>• Decrease in Ds and Fs<br>• School attendance increase<br>• School discipline decrease<br>• Number of students graduating<br>• Number of students matriculating to college<br>• Number of students graduating from college |

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| | | Cross, Coop, and NHA ***AGR**<br>• Technology for blended learning and flipped classrooms ***AGR** | |
| **Access to High-Quality Early Learning and High-Quality Childcare**<br><br>***ECC/HANH Believes Flagship Program***<br><br>**<u>POINT</u>: Karen DuBois-Walton** | • Leverage role as Housing Authority to encourage more youth to read, especially at an early age with parents<br>• Leverage role as Housing Authority to advocate for the importance of high-quality early learning<br>• Leverage role as Housing Authority to advocate for the importance of high-quality early childcare<br>• Leverage role as Housing Authority to advocate and change policies that support parents and families w/ OEC<br>• Leverage role as Housing Authority to advocate and change policies that support parents and families w/ DOT | • Summer Read Program ***AGR, PFE**<br>• Early learning and literacy campaign ***AGR, PFE**<br>• Regulation and/or legislation changes to Care 4 Kids ***AGR**<br>• Regulation and/or legislation changes to public transportation ***AGR** | • Percent of 2–5-year-olds that enroll in quality early learning programs<br>• Percent of 2–5-year-olds that complete quality early learning programs<br>• Pre-K Oral Language assessment<br>• Percent of students entering Kindergarten age-level expectations in all 6 areas: social-emotional, physical, cognitive, language, literacy, math |

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| **Parent and Family Engagement in Children's Education** | • 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.<br>• Demonstrate cultural competency and offer translation services to parents and families with limited English-speaking abilities<br>• Educate parents on the importance of school and classroom stability | • Parent Support Network ***PFE**<br>• Summer BBQs ***PFE**<br>• Sports League ***PFE**<br>• Parent workshops and trainings ***PFE, AGR**<br>• Parent Ambassadors ***PFE**<br>• Facts for Families ***PFE**<br>• Text 4 Education ***PFE, AGR** | • Attendance of parents in school sponsored events and conferences<br>• Stable numbers of Parent Ambassadors<br>• Increase numbers of parents who attend workshops and/or trainings<br>• Increase numbers of parents who have leadership opportunities around the city<br>• Increase numbers of parents who have leadership opportunities within their child's school and influence on decision making at their school or district |

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| **Student Attendance, Truancy, and Discipline**<br><br>***ECC/HANH Believes Flagship Program***<br><br>**<u>POINT</u>: Latoya Mills** | • Leverage role as Housing Authority to improve student attendance<br>• Leverage role as Housing Authority to improve student truancy<br>• Leverage role as Housing Authority to reduce student discipline | • Direct case management work w/ NHPS students through Youth Stat ***AGR, PFE**<br>• Direct case management work w/ identified ECC/HANH students attending NHPS ***AGR, PFE**<br>• Homework help ***AGR**<br>• Whole-family evaluations ***AGR, PFE**<br>• Mental health support for students and families ***AGR, PFE** | • School attendance increase<br>• School discipline decrease<br><br>• Decrease in chronic absence, defined as missing 10% or more of the school year<br>• Percent of K-5 students missing fewer than 10 days<br>• 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) |
| **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<br>• Leverage role as Housing Authority to create postsecondary avenues<br>• Leverage role as Housing Authority to provide adult relationships through youth employment<br>• Leverage role as Housing Authority to | • NHP informational sessions for parents ***PSO, AGR, PFE**<br>• NHP informational sessions for students ***PSO, AGR**<br>• NHP applications for 8th graders ***PSO, AGR, PFE**<br>• PSAT and SAT supports ***PSO, AGR**<br>• ECC/HANH apprenticeship program ***PSO, AGR**<br>• Afterschool job shadow program ***PSO, AGR**<br>• Student Training and Employment Program (STEP) ***PSO, AGR**<br>• Graduation gift ***PSO, AGR, PFE**<br>• Youth Leadership Council (YLC) and | • Percent of eligible students that complete the New Haven Promise application<br><br>• Percent of graduating college bound students that complete the FAFSA<br><br>• Developmental assets data (savings)<br><br>• Increase in percent of seniors that take the PSAT and SAT<br><br>• Percent of students receiving New Haven Promise awards<br><br>• Percent of graduates that enroll in postsecondary college or technical school<br><br>• Percent of students at state universities, community colleges, and technical colleges enrolling in pre-college and/or remedial coursework<br><br>• Percent of students continuing past the first year of postsecondary |

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| | celebrate youth<br>• Provide supports for completion of a postsecondary degree or credential | STEP alumni group ***PSO, AGR** | • Percent of students that graduate from 2- and 4-year colleges and universities |
| **College Week**<br><br>***ECC/HANH Believes Flagship Program***<br><br>**<u>POINT</u>: Latoya Mills** | • Leverage role as Housing Authority to avail students of the fact that postsecondary is a viable option for after high school graduation<br>• Offer support during academic transitions: middle to high; high to post-secondary; post-secondary to employment and self-sufficiency<br>• Offer support during the winter break when school is not in session | • 5 days of intensive supports during winter break for grades 9-12 that is geared toward postsecondary ***PSO, AGR, PFE**<br>• Early years will be large groups; if there is more interest it will be separated into grade cohorts ***PSO, AGR, PFE**<br>• Student Ambassadors ***PSO, AGR** | (Same as above) |

| System issues that need to be addressed |
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| • **MOUS, Data Sharing Agreements, Consent Forms, and FERPA** |
| • **Culture of high expectations and excellence at ECC/HANH**<br>• **Moving to Work status** |
| • **Start-up funds**<br>• **Financial sustainability** |
| • **Culture change among academic, community and stakeholder partners**<br>• **Sustainable social capital between schools and families** |

# Appendix 7

## POLICIES FOR MIXED FINANCE DEVELOPMENT

**NON-MTW ACTIVITY**

Policy is entered in the plan to inform the public of Policies of Mixed Finance Development

ECC/HANH's public housing portfolio included 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.

It currently includes only William T. Rowe, Brookside Phase 1, Brookside Phase II, Rockview Phase 1 Rental, and Quinnipiac Terrace Phase 1, 2 and 3. All other developments have successfully been converted to RAD.

The housing in the 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 ECC/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**

ECC/HANH may permit or require a transfer in emergencies, such as severe medical needs, upon approval of the President/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 ECC/HANH'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.

## Appendix 8

### Significant Amendments to 2023 MTW Plan as Required Under the Rental Assistance Demonstration Program for 60 Day Milestone

Rental Assistance Demonstration (RAD) authorized by the Consolidated and Further Continuing Appropriations Act, allows for the conversion of assistance under the public housing, Rent Supplement, Rental Assistance (RAD), and Moderate Rehabilitation (Mod Rehab) programs to long term, renewable assistance under Section 8. As provided in the Federal Register notice that HUD published on March 8, 2012, at 77 FR 14029, RAD has two separate components. RAD allows projects funded under the public housing and Mod Rehab programs to convert to long term Section 8 rental assistance contracts.

ECC/HANH applied for and received a RAD assistance portfolio award to convert Essex Townhouses, Westville Manor, Crawford Manor, Farnam Courts, Ribicoff Cottages and Ribicoff Cottages Extension, Townhomes at Eastview Terrace (EVT), 122 Wilmont Crossing, McConaughy Terrace, McQueeney Towers, Fairmont Heights, Ruoppolo Manor and Winslow Celentano. ECC/HANH received approval for the remaining developments on January 29, 2014 for aggregate total of 1330 RAD units. The authority requested and HUD has approved a swap of assets under its portfolio award. As such, the RAD award will be as follows upon approval: Ribicoff Cottages and Ribicoff Extensions, Farnam Courts, Eastview Terrace Phase 1, Wilmont Crossing, McQueeney, Fairmont, Ruoppolo Manor, Celentano, Wolfe, Prescott Bush, Waverly, Valley, Constance Baker Motley, Newhall Gardens, Katherine Harvey, Fulton Park, and Stanley Justice. ECC/HANH has also been awarded a RAD for the conversion of Westville Manor.

ECC/HANH applied for private activity tax exempt bonds from the State of Connecticut during FY 2017 and FY 2018 and applied for 9% Low Income Housing Tax Credit in FY2017, FY 2018, FY2020, and FY 2022 as well. ECC/HANH also applied for financing from FHA in 2017, FY 2018, FY 2019, and FY 2022 as well. Elm City Communities submitted an application for and received approval for the conversion of Westville Manor and may submit an application for the conversion for Crawford Manor. Essex Townhomes are no longer a part of the RAD portfolio award.

Previously, ECC/HANH received four CHAPs dated January 29, 2014 for the following developments:

- PIC Development CT004000074 Town Homes at Eastview Terrace
- PIC Development CT004000078 Wilmont Crossing
- PIC Development CT004000003 Ribicoff Cottages
- PIC Development CT004000014 Farnam Courts

ECC/HANH received four CHAPs dated March 27, 2015 for the following developments:

- Monterey 1C
- Monterey Place Phase 2R
- Monterey 1B

Subsequent to the receipt of the CHAPs cited above, ECC/HANH received 10 additional CHAPs dated July 19, 2016 for the following developments:

- PIC Development CT004000005 Waverly Townhouses
- PIC Development CT004000006 Katherine Harvey Terrace

- PIC Development CT004000007 Newhall Gardens
- PIC Development CT004000008 Prescott Bush Mall
- PIC Development CT004000009 Constance B. Motley
- PIC Development CT004000011 Charles T. McQueeney
- PIC Development CT004000012 Winslow Celentano Apts
- PIC Development CT004000013 Robert T. Wolfe
- PIC Development CT004000015 Matthew Ruoppolo Manor
- PIC Development CT004000021 Waverly Townhouses

Subsequent to the receipt of these CHAPs, ECC/HANH received:

- A modified many-to-one CHAP dated July 26, 2017 that consolidated Katherine Harvey Terrace, Newhall Gardens, Prescott Bush and Constance Baker Motley into a single CHAP for the conversion of 144 units
- A modified CHAP for 71 dated December 21, 2017 that combined Stanley Justice with Waverly and Fulton Park and segregated 40 units at Valley from Waverly into a separate CHAP.
- A new CHAP for the conversion of 142 at Westville Manor dated May 2, 2017
- A 40-unit CHAP for Waverly B (Valley Townhomes) which included an 8 unit CAT for the development of offsite units at the to be developed Westville Manor.

Most recently, ECC/HANH received a CHAP for the following Project:

- PIC Development CT0040000021 St Anthony phase 2 known as Multi-Family Scattered Site consisting of 88 units.

Within 60 days of the CHAP issuance, PHAs must submit:

- The significant amendment to its Annual/Five Year Plan. See section 1.5E and Attachment 1D of the RAD Notice.

- The PHA's decision whether the project will convert its assistance to PBV or to PBRA. For conversions to PBV, where the PHA does not administer a Housing Choice Voucher program, the PHA must submit a signed letter from a voucher agency evidencing their willingness to administer the PBVs.

The information set forth below are the items that must be covered in a PHAs Significant Amendment request or MTW's revision to the MTW plan:

1. **Description of the Units to be Converted**

During FY2014, ECC/HANH received notice on January 29, 2014 of its award of a RAD for Ribicoff Cottages and Ribicoff Cottages Extensions. Below, pursuant to

Attachment 1D: Requirements for RAD-Specific Significant Amendment submissions are the details concerning Ribicoff Cottages and Extension, Farnam Courts and Wilmot Crossing and Eastview Terrace. It is anticipated that Farnam Courts will be separated into up to four separate CHAPs as set forth below. It should also be noted that Ribicoff Cottages, a 4 Percent Low Income Tax Credit

component and a 9 Percent LIHTC component, was converted during FY 2015. Westville Manor will be redeveloped utilizing off-site parcels and in multiple phases.

The following units have been or will be converted under the RAD Portfolio Award:

| A Description of Units to be Converted | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Development Name | Type | 0 | 1 | 2 | 3 | 4 | 5 | Total Bedroom |
| Ribicoff Cottages & Exts | Elderly/ Disabled | 16 | 84 | | | | | 100 |
| Farnam Courts | Family | | 7 | 134 | 71 | 23 | | 235 |
| Eastview Terrace | Family | | 19 | 31 | 3 | | | 53 |
| Wilmot Crossing | Elderly/ Disabled | | 32 | 2 | | | | 34 |
| McQueeney | Elderly/ Disabled | 127 | 22 | | | | | 149 |
| Fairmont Heights | Elderly/ Disabled | 43 | 55 | 0 | | | | 97 |
| Matthew Ruoppolo Manor | Elderly/ Disabled | 71 | 32 | 1 | | | | 104 |
| Winslow Celentano | Elderly/ Disabled | 32 | 32 | | | | | 64 |
| C.B. Motley | Elderly | 8 | 37 | | | | | 45 |
| Katherine Harvey | Elderly | | 17 | | | | | 17 |
| Fulton Park | Family | | | | 12 | | | 12 |
| Stanley Justice | Family | | | | 8 | | | 8 |
| Newhall Gardens | Elderly | | 26 | | | | | 26 |
| Prescott Bush | Elderly | 22 | 27 | 7 | | | | 56 |
| Robert T. Wolfe | Elderly/ Disabled | 77 | 13 | 2 | | | | 92 |
| Valley | Family | | | 8 | 16 | 13 | 3 | 40 |
| Waverly | Family | | | 21 | 20 | 10 | | 51 |
| Westville Manor | Family | | 15 | 46 | 60 | 14 | 7 | 142 |
| Monterey 1B | Family/ Elderly | 85 | 83 | 26 | 14 | 2 | | 210 |
| Monterey 1C | Family | | 7 | 20 | 12 | 3 | | 42 |
| Monterey 2R | Family | | 8 | 15 | 3 | 2 | | 28 |
| McConaughy Terrace | Family | | 10 | 148 | 28 | 10 | | 196 |
| St Anthony II | Family | | | | 88 | | | 88 |

## 2. Any Changes in the Number of Units that are Proposed to be Converted

The changes below set forth the proposed changes in the number of units that are being proposed as part of the conversion. The chart also shows the proposed changes in the bedroom distribution of each RAD development in the portfolio award. Note that all of the housing types for all RAD developments will remain unchanged with the exception of Ribicoff Cottages and Extension. Ribicoff Cottages is currently an Elderly/Disabled development. After conversion, it will be both Family and Elderly/Disabled. There will be 95 RAD units after conversion at the development. 55 will be Family and 40 will be Elderly/Disabled.

| Proposed Changes in Number of Units | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Development Name | Census Tract | Type | 0 | 1 | 2 | 3 | 4 | 5 | Total Bedroom |
| Ribicoff Cottages & Exts | 1413 | Elderly/ Disabled | | 45 | 45 | 12 | 3 | | 106 |
| Farnam Courts | 1421 | Family | | 24 | 125 | 65 | 14 | | 228 |
| McQueeney | 1420 | Elderly/ Disabled | 127 | 22 | | | | | 149 |
| Fairmont Heights | 1427 | Elderly/ Disabled | 43 | 54 | 0 | | | | 97 |
| Matthew Ruoppolo Manor | 1424 | Elderly/ Disabled | 71 | 32 | 1 | | | | 104 |
| Winslow Celentano | 1422 | Elderly/ Disabled | 32 | 32 | | | | | 64 |
| Robert T. Wolfe | 1402 | Elderly/ Disabled | 77 | 13 | 2 | | | | 92 |
| Valley | 1412 | Family | | | 8 | 16 | 13 | 3 | 40 |
| Waverly | 1408 | Family | | | 21 | 20 | 10 | | 51 |
| McConaughy Terrace | 1421 | Family | | 10 | 148 | 28 | 10 | | 196 |
| St Anthony's II | 1426 | Family | | | | 88 | | | 88 |

3. Changes in Policies that Govern Eligibility, Admission, Selection and the Occupancy of Units After Conversions

Occupancy at ECC/HANH's Low Income Housing Tax Credit RAD development shall be governed by the guidelines outlined in Chapter 19, Section 4 of the agency's Administrative Plan, which reads as follows:

Applicants who will occupy units with PBV/RAD assistance must be selected according to the corresponding Admission and Continued Occupancy Plan (ACOP) and/or Housing Choice Voucher Administrative Plan for each development. Once those Waiting Lists have been exhausted, the development will establish a site based PBV/RAD Waiting List.

The table below summarizes the Waiting List preferences that have been established for certain developments at the time the development activities were approved. As additional RAD/PBV developments are brought online, the table will be updated accordingly.

Note: For LIHTC or RAD/PBV units with accessible features, selection will be given to existing residents, with a Reasonable Accommodation preference, who need an accessible unit and then to applicants on the ECC/HANH Accessible Waiting List.

| **Development** | **Waiting List Selection** |
|---|---|
| Eastview Terrace I RAD | 1) Eastview Terrace Right to Return Residents<br>2) Eastview Terrace I Public Housing Waiting List<br>3) HCV Waiting List<br>4) Eastview Terrace RAD Site Based Waiting List |
| Eastview Terrace PBV | 1) HCV Waiting List<br>2) Eastview Terrace PBV Waiting List |
| Farnam Courts Onsite and Off-Site (Fair Haven Eastview and Chatham) | 1) Farnam Right to Return Residents<br>2) Farnam Public Housing Waiting List<br>3) HCV Waiting List<br>4) Fair Haven RAD Site Base Waiting List |
| Wilmont Crossing RAD | 1) West Rock Right to Return Residents<br>2) Wilmont Crossing Public Housing Waiting List<br>3) HCV Waiting List<br>4) Wilmont Crossing Site Based Waiting List |
| Wilmont Crossing-PBV | 1) HCV Waiting List<br>2) Wilmont Crossing Site Based Waiting List |
| Ribicoff/Twin Brook – RAD | 1) Ribicoff Right to Return Residents<br>2) Returning West Rock Residents<br>3) Public Housing Site Based Waiting Lists<br>4) HCV Waiting List<br>5) Twin Brook Site Based Waiting List |
| Westville Manor | 6) Westville Manor Right to Return Residents<br>7) Returning West Rock Residents<br>8) Public Housing Site Based Waiting Lists<br>9) HCV Waiting List<br>1) Westville Manor Site Based Waiting List |

| | |
|---|---|
| C.B. Motley | 1) Motley Right to Return Residents (if applicable)<br>2) Motley Site Based Wait List<br>3) HCV Waiting List<br>4) Motley RAD Site Based Waiting List |
| Katherine Harvey | 1) K Harvey Right to Return Residents (if applicable)<br>2) K Harvey Site Based Wait List<br>3) HCV Waiting List<br>4) Harvey RAD Site Based Waiting List |
| Newhall Gardens | 1) Newhall Right to Return Residents (if applicable)<br>2) Newhall Site Based Wait List<br>3) HCV Waiting List<br>4) Newhall RAD Site Based Waiting List |
| Monterey Place-RAD | 1) Current Monterey LIPH Wait List<br>2) HCV Wait List<br>3) Monterey RAD Site Based Wait List |
| Prescott Bush | 1) Bush Right to Return Residents (if applicable)<br>2) Bush Site Based Wait List<br>3) HCV Waiting List<br>4) Bush RAD Site Based Waiting List |
| Stanley Justice Landing - RAD | 1) Stanley Justice Right to Return Residents (if applicable)<br>2) Scattered Site Based Wait List<br>3) HCV Waiting List<br>4) Stanley Justice RAD Site Based Waiting List |
| Fulton Park - RAD | 5) Fulton Park Right to Return Residents (if applicable)<br>6) Scattered Site Based Wait List<br>7) HCV Waiting List<br>8) Fulton Park RAD Site Based Waiting List |
| 76 Glen Haven - RAD | 1) 76 Glen Haven Right to Return Residents (if applicable)<br>2) Scattered Site Based Wait List<br>3) HCV Waiting List<br>4) 76 Glen Haven Site Based Waiting List |

| | |
|---|---|
| McQueeney Towers - RAD | 1) McQueeney Towers Right to Return Residents (if applicable)<br>2) McQueeney Towers LIPH Wait List<br>3) HCV Waiting List<br>4) McQueeney Towers RAD Site Based Waiting List |

| | |
|---|---|
| Winslow Celentano - RAD | 1) Winslow Celentano Right to Return Residents (if applicable)<br>2) Winslow Celentano LIPH Wait List<br>3) HCV Waiting List<br>4) Winslow Celentano RAD Site Based Waiting List |
| Robert T Wolfe - RAD | 1) Robert T. Wolfe Right to Return Residents (if applicable)<br>2) Robert T. Wolfe LIPH Wait List<br>3) HCV Waiting List<br>4) Robert T Wolfe Site Based Waiting List |
| Matthew Ruoppolo Manor - RAD | 1) Matthew Ruoppolo Manor Right to Return Residents (if applicable)<br>2) Matthew Ruoppolo Manor LIPH Wait List<br>3) HCV Waiting List<br>4) Matthew Ruoppolo Manor Site Based Waiting List |
| Fairmont Heights - RAD | 1) Fairmont Heights Right to Return Residents (if applicable)<br>2) Fairmont Heights LIPH Wait List<br>3) HCV Waiting List<br>4) Fairmont Heights RAD Site Based Waiting List |
| Valley | 1) Valley Right to Return Residents (if applicable)<br>2) Valley Site Based Wait List<br>3) HCV Waiting List<br>4) Valley RAD Site Based Waiting List |
| Waverly | 1) Waverly Right to Return Residents (if applicable)<br>2) Waverly Site Based Wait List<br>3) HCV Waiting List<br>4) Waverly RAD Site Based Waiting List |

| | |
|---|---|
| McConaughy Terrace | 1) McConaughy Terrace Right to Return Residents (if applicable)<br>2) McConaughy Terrace Site Based Wait List<br>3) HCV Waiting List<br>4) McConaughy Terrace RAD Site Based Waiting List |
| St Anthony 2 (Multi-family Scattered Sites) | 1) St. Anthony 2 Right to Return Residents (if applicable)<br>2) St. Anthony 2 Site Based Wait List<br>3) St. Anthony 2 Waiting List<br>4) St. Anthony 2 RAD Site Based Waiting List |

**Local Preferences [24 CFR 982.207; HCV p. 4-16]**

Preferences at this project will comply with ECC/HANH's Administrative Plan, **Chapter 17 Project-Based Vouchers** which states:

ECC/HANH will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families for "excepted units," mobility impaired persons for accessible units).

**Local Preferences [24 CFR 982.207; HCV p. 4-16]**

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

The following standard HCV preferences apply to all LIHTC/PBV/RAD developments and will apply for Waiting List selection.

Preferences apply to the below families in the stated order. Waiting List selection and Resident transfers to LIHTC developments must comply with the LIHTC income guidelines.

1. Displaced by Government Action, including displacement from ECC/HANH public housing units undergoing demolition/disposition, if such action is under a Uniform Relocation Act (URA); displacement including from buildings condemned for health and safety reasons, and including displacement as the result of a local natural disaster and/or commendation of a property or dwelling for health and safety reasons and displacement as defined by the US Department of Housing and Urban Development as the result of a natural disaster or an emergency defined event resulting in the displacement of persons needing housing assistance.

2. Reasonable Accommodation for disability issues under the Fair Housing Act for residents currently residing in an ECC/HANH public housing unit who require an accessible unit as a reasonable accommodation where ECC/HANH is unable to accommodate the need through the transfer to another ECC/HANH public housing unit.

3. Claiming protections under the Violence Against Women Act (VAWA), including families residing in an ECC/HANH public housing unit where no suitable alternative unit is available;

3. In a documented Witness Protection Program;

4. Currently residing in an ECC/HANH public housing unit where dwelling unit is damaged to the extent that conditions are created which are hazardous to life, health, or safety of the occupants and the transfer to another public housing unit is not available, where necessary repairs cannot be made within a reasonable time, or a unit does not meet the needs of the family.

5. Currently residing in an ECC/HANH public housing unit, who are in a situation involving crime and safety, where transfer of a current Low Income Public Housing family to another public housing development does not meet the needs of ECC/HANH public housing residents due to other situations involving crime and safety; and

6. For individuals and families who meet the HUD definition of homeless and are direct referrals from the Coordinated Access Network (CAN) for project-based developments with homeless requirements.

ECC/HANH's preferences will be structured to give preference to families who need the supportive services offered at a particular development.

**Admission Preferences for RAD Project Based Voucher Units**

Only elderly families may be admitted to units or buildings covered by a HUD approved Elderly Housing Designation Plan prior to date of conversion to project based rental assistance. The buildings and units covered by a HUD-approved elderly housing designation plan are set forth below.

When there are insufficient Elderly families on the waiting list, Near Elderly families (head or household or spouse ages 50 to 61) may receive a priority for this type of unit if the approved Plan for designation so specified.

The Owner must give preference to Elderly families and Disabled families equally in determining priority for admission to following development that were classified as Mixed Population developments prior to conversion: Charles McQueeney, Fairmont Heights, Ruoppolo Manor, Robert T. Wolfe, and Winslow Celentano. The owner must provide preference for the Elderly for the following units and unit mix at Elderly Designated developments.

**Elderly Designated Unit Mix Prior to Conversion to Project-based Rental Assistance**

| NUMBER OF BEDROOMS | 0 | 1 | 2 | 3 | 4 | 5 | 6 | TOTAL |
|---|---|---|---|---|---|---|---|---|

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Prescott Bush | 20 | 25 | 5 | 0 | 0 | 0 | 0 | 50 |
| Katherine Harvey Terrace | 0 | 12 | 0 | 0 | 0 | 0 | 0 | 12 |
| Newhall Gardens | 0 | 23 | 0 | 0 | 0 | 0 | 0 | 23 |
| C.B. Motley | 8 | 34 | 0 | 0 | 0 | 0 | 0 | 42 |
| 122 Wilmot | | 25 | 1 | | | | | 26 |
| **TOTAL** | 28 | 119 | 6 | 0 | 0 | 0 | 0 | 153 |

The Owner may not establish a limit on the number of Elderly families or Disabled families who may be accepted for occupancy in a development that was Mixed Population development prior to conversion. In selecting Elderly families and Disabled families to occupy units in mixed population developments, the owner must first offer units that have special accessibility features for persons with disabilities to families who include persons with disabilities who require the accessibility features of such units (see §§ 8.27 and 100.202 of this Part 24 CFR title)."

**Waiting Lists for Converted Units**

The Owner shall use the ECC/HANH site-based waiting for each developments list used by it prior to conversion for the selection of occupants post-conversion, except for units that have special accessibility features for persons with disabilities who require the accessibility features of such units (see §§ 8.27 and 100.202 of Part 24 CFR)."

Occupants of units with accessibility features shall be selected from (1) a current occupant of another unit of the same project, or comparable projects under common control, having disabilities requiring the accessibility features of the vacant unit and occupying a unit not having such features, or, if no such occupant exists, then (2) to an eligible qualified applicant on the Agency wide Accessible Waiting List having a disability requiring the accessibility features of the vacant unit.

With respect to units where preference for occupancy shall be to the elderly or to the elderly and disabled on an equal basis, the Authority shall transfer each site-based waiting list to the owner and the Owner shall manage each list in accordance with the Authority-approved resident selection plan. The Owner shall select occupants from these lists until all applicants on these lists shall have been either offered a unit, withdrawn or removed, or rejected for admission. The Owner shall maintain its site-based waiting list once these requirements have been met.

4. **Transfer of Assistance at Time of Conversion**

Only three RAD projects have been identified as including a Transfer of Assistance: Farnam Courts RAD project where up to one hundred forty-eight (148) of the 228 RAD, PBVs will be transferred to other properties as shown in the table above, Westville Manor where 62 units will be transferred offsite to Rockview 2, and Valley Townhomes (Waverly Townhomes B) where 8 units will be transferred offsite,

### 5. Indication of Compliance with Voluntary Compliance Agreement

July 9, 2007, ECC/HANH entered a Voluntary Compliance Agreement (VCA) regarding complying with federal and state accessible standards. Compliance with the VCA will not be negatively impacted by the conversion activities.

### 6. All Other Required Information

ECC/HANH will post the revisions to the MTW Annual Plan as required by ECC/HANH's Amended and Restated Moving to Work Agreement. ECC/HANH will include all comments received and addressed prior to finalizing these Significant Amendments.

### 7. MTW Fungibility

In addition to St Anthony II, ECC/HANH has used its MTW Fungibility to provide assistance to the 12 previous housing developments that follow with the number of LIPH/RAD units in parenthesis: East View Terrace 1 (102), Quinnipiac Terrace 3 (33), William Rowe (78), Brookside 1 (100), Brookside 2 (101), Wilmont Crossing (47), Rockview 1 (77), Ribicoff 9% (44), Ribicoff 4% (51), Farnam Fair Haven (57), Farnam Courts onsite (174), Rockview 2 (62). We estimate that the average assistance per unit will be $400.00 for a total monthly assistance of $129,200.00. With an average estimated voucher payment of $ 980.00 per month/per family providing assistance to the 411 ~~323~~ RAD units would be the equivalent of 132 vouchers. ECC/HANH's baseline number of units for which it must maintain service is 4,827 units. Currently, ECC/HANH serves 5,436 units; therefore, using our fungibility to assist these RAD units will not negatively impact our ability to meet our continuing service level requirements.

### 8. Reduction in the Capital Budget as a Result of RAD Conversion

ECC/HANH will include language specifying the reduction of Capital Fund Budget grants as a result of converting the ACC units to RAD.

a. Current Capital Fund Grant associated with the developments that have been converted or will be converted to RAD is as follow:

| DEVELOPMENT NAME | ESTIMATED REDUCTION IN CFP |
|---|---|
| Ribicoff Cottages & Extensions | $127,927 |
| Farnam Courts | $305,746 |
| McQueeney Towers | $178,976 |
| Fairmount Heights | $119,736 |
| Matthew Ruoppolo | $128,377 |
| Robert T. Wolfe | $110,612 |
| Fulton | $17,761 |
| Newhall Gardens | $32,968 |
| C.B. Motley | $57,231 |
| Prescott Bush | $69,596 |
| Winslow Celentano | $78,785 |
| Valley | $63,765 |
| Waverly | $81,301 |
| Stanley Justice | $12,355 |
| Westville Manor | $256,712 |
| Eastview Terrace Phase 1 | $41,450 |
| Wilmont Crossing | $20,393 |

| | |
|---|---|
| Monterey Phase 1B | $194,489 |
| Monterey Phase 1C | $33,217 |
| Monterey Phase 2R | $22,331 |
| McConaughy Terrace | $599,181 |
| St Anthony II (88 Units Scattered Site Multifamily) | $155,364 |

ECC/HANH defeased bonds in 2018 to ensure it would meet its 2 to 1 CFP to debt service requirements debt service payments up to 2020 and 3 to 1 after 2020. This most recent defeasance included the assumption that Waverly Townhouses AMP, which includes 92 units and two separate developments known as Waverly Townhomes and Valley Townhomes, would be converted and the CFP funding not included in the defeasance calculation. Note that the defeasance analysis only assumes an annual CFP allocation of $1.1 million through 2025.
ECC/HANH is currently completing an updated feasibility analysis to ensure that debt service rations are maintained past the conversion of McConaughy Terrace and St Anthony's 2 (Scattered Site Multi-family).

9. **St Anthony's II/Scattered Site Multifamily Development**

ECC/HANH has applied for and received a RAD award for St. Anthony's II aka Scattered Site Multifamily AMP to convert these Low Income Public Housing units to RAD project-based Vouchers in January 2022.

St. Anthony's II aka Scattered Site Multifamily are a series of scattered site multifamily dwellings located in the Fair Haven East neighborhood and located within Census Tracts 1426 and 1427. These various locations were acquired by ECC/HANH in the 1990s early 2000s to provide family units in non-impacted census tracts. All 88 units consist of 3-bedrooms each. Under this RAD conversion, ECC/HANH, through its development instrumentality The Glendower Group, will complete a mixed finance substantial rehabilitation of these units that will include new roofs, exterior siding, windows, kitchens, windows, baths, flooring and other interior upgrades. The level of upgrades required was not feasible if these units remained in the LIPH program.

As part of this conversion, please note that it will not include any permanent relocation as proposed interior work can be completed on a short-term basis. In addition, there will be no changes to the bedroom mix and no reduction of units.

ECC/HANH has received a CHAP dated December 2021 which included 88 units within the larger St Anthony's II AMP PIC Development CT0040000021. The separate site locations are detailed below.

| Development | Address | LIPH Units | AMP Number | Year Built | Total Acreage | # of Bldgs |
|---|---|---|---|---|---|---|
| David Echols Ct | 23 Chamberlain St, Apts A-J | 10 | CT0040000021 | 1994 | **0.56** | 2 |
| Kingswood I | 1378 Quinnipiac | 4 | CT0040000021 | 1998 | **0.8** | 4 |
| Kingswood II | 56 Kingswood | 8 | CT0040000021 | 1999 | **2.18** | 8 |
| St. Anthony I | 1361 Quinnipiac Ave, Apts A-L | 12 | CT0040000021 | 1997 | **1.06** | 6 |
| St. Anthony II | 1363 Quinnipiac Ave, Apts A-P | 16 | CT0040000021 | 1998 | **2.38** | 8 |
| Cornell Scott Ridge | 425 Eastern Street, Apts A-P | 32 | CT0040000021 | 2000 | **1.66** | 16 |
| 63-73 Fulton St | 63-73 Fulton Street | 6 | CT0040000021 | 2008 | **0.74** | 3 |
| | | 88 | | | | |

Within 60 days of the CHAP issuance, PHAs must submit:

- The significant amendment to its Annual/Five Year Plan. See section 1.5E and Attachment 1D of the RAD Notice.

The PHA's decision whether the project will convert its assistance to PBV or to PBRA. For conversions to PBV, where the PHA does not administer a Housing Choice Voucher program, the PHA must submit a signed letter from a voucher agency evidencing their willingness to administer the PBVs. *Note that St. Anthony's II/Scattered Site Multifamily will convert to PBV.*

The information set forth below are the items that must be covered in a PHAs Significant Amendment request or MTW's revision to the MTW plan:

### Description of the Units to be Converted

**During FY 2022, ECC/HANH received notice in December 2021 of RAD awards for St. Anthony's II/Scattered Site Multifamily development. As noted above, this is a conversion of the public housing operating subsidy to PBV Section 8. As part of this conversion there is no change to the bedroom mix, no permanent relocation, and no loss of units and does not include a Transfer of Assistance. The housing units will change ownership from ECC/HANH to its instrumentality, The Glendower Group, to allow for completion of a mixed finance LIHTC development to provide the funding to rehabilitate 88 units.**

### Any Changes in the Number of Units That Are Proposed as Part of the Conversion

As part of the conversion of the public housing subsidy to RAD PBV at *St. Anthony's II/Scattered Site Multifamily will convert*, there are no changes to the number of units, bedroom mix or housing type.

### Changes in Policies that Govern Eligibility, Admission, Selection and the Occupancy of units after Conversions

As part of the RAD conversion, the property will receive RAD Project Based Vouchers for all residents currently receiving public housing operating subsidy. For new admissions to the now RAD units, ECC/HANH will qualify applicants in accordance with the PBV program requirements as detailed in is Administrative Plan. Concurrently, applicants will be qualified for Low Income Housing Tax Credit (LIHTC) program requirements in accordance with the property's Tenant Selection Plan. This Tenant Selection Plan has been in place prior to the RAD conversion and does not represent a change in the admissions policy. Residents will continue to have the same rights as they currently have as public housing residents.

### Transfer of Assistance at time of Conversion

**There will not be a Transfer of Assistance at St. Anthony's II/Scattered Site Multifamily.**

### Indication of Compliance with Voluntary Compliance Agreement

July 9, 2007, ECC/HANH entered a Voluntary Compliance Agreement (VCA) regarding complying with federal and state accessible standards. All requirements have been met.

## 10. MTW Fungibility

ECC/HANH will use its MTW Fungibility to provide a permanent loan to assist with the redevelopment of the property for the 88 units at St. Anthony's II/Scattered Site Multifamily that are converting from the Low Income Public Housing operating subsidy to PBV Section 8. Current proposed rents are below FMR though above the established RAD rents for CT0040000021 which will require a small PBV MTW overhang that will be determined during the closing process.

## 11. In Accordance with 24 CFR Part 903 –

**As part of the Public Notice informing the public of these Significant Amendments, ECC/HANH will include language specifying the reduction of Capital Fund Budget grants as a result of converting the ACC units to RAD.**

**Current Capital Fund Grant associated with St. Anthony's II/Scattered Site Multifamily is currently $155,364 annually. The RAD conversion will impact existing CFFP to facilitate the RAD conversion because the Bond Indenture for CFFP Bonds requires that the amount of units of the ECC/HANH not fall below 5% of the baseline units. Bonds were defeased in 2018 and ECC/HANH estimates that it will not fall below the 5% threshold through 2025 and that additional defeasance is not necessary as a result of the conversion of St. Anthony's II/Scattered Site Multifamily. To assure ECC/HANH remains compliant, we are completed an updated defeasance study to review the impacts of the McConaughy Terrace and St. Anthony's II/Scattered Site Multifamily removal from the LIPH portfolio**

## 12. All Other Required Information

ECC/HANH will post the revisions to the MTW Annual Plan as required by HANH's Amended and Restated Moving to Work Agreement. ECC/HANH will include all comments received and addressed prior to finalizing the Significant Amendments.

### 13. Cap on Mobility Transfer Voucher Related to RAD Conversion

**No impact anticipated.**

## Appendix 9

## Initiative 2.13F – Sponsored Based Housing Program (previously 4.11F)

**Program Overview**
According to the HUD, 2020 Annual Homeless Assessment Report (AHAR) to Congress, approximately 34,000 people under the age of 25, experienced homelessness and are on their own as an "unaccompanied youth" and 90% of them were young adults, between the ages of 18 and 24. In Connecticut, on any given day, approximately 150 young adults, between the ages of 18-24 are experiencing homelessness.
(1) United States Interagency Council on Homelessness

ECC/HANH has identified a need to provide flexible models of housing to assist service providers who service unhoused youth and young adults ages 18 to 24. ECC/HANH seeks to offer sponsor-based housing models using MTW flexibility and broader use of funds to design a program where ECC/HANH provides the sponsor (a community-based provider) with funding to support the housing needs of this population outside of the traditional HCV model. The sponsor will provide housing through either housing owned and operated by the sponsor or in properties that are master leased by the sponsor.

ECC/HANH will select the sponsor-based housing through one of the following means:

- ECC/HANH may issue a public solicitation for sponsor-based providers
- ECC/HANH may piggy-back off of a local or state issued solicitation for housing funds to support housing for this designated population
- ECC/HANH may select a sponsor through a non-competitive process when neither of the first two options yield sufficient potential partners

Per Notice PIH-2011-45 (HA) this initiative is a Local Non-traditional use of HCV funding. This activity will be implemented under the category, Rental Subsidy Programs. ECC/HANH use MTW funds to provide a rental subsidy to a 3rd party Social Service entity who will manage the intake and administration of the subsidy program.
The sponsor-based program is a partnership with a Social Service Agency that will provide supportive services to individuals and the funding only will be issued to the Social Service Agency by ECC/HANH to support the housing operating needs. The Social Service Agency is responsible for all aspects of the process to include determine eligibility to the program, obtaining all necessary documentation from the young adults, providing the housing, providing the supportive services and completing an exit strategy.

**Goals and Objectives of the Program**
The primary goal of the program is to prevent and end youth homelessness by building comprehensive systems of care for these young people, aged 18-24 and providing temporary transitional housing.

The objective is to ensure that youth experiencing homelessness receive the temporary shelter and assistance needed to quickly obtain permanent housing. The average amount of time that the youth will stay in the program is 60 - 90 days.

This pilot program will assist the Social Service Agency in also learning what types of early intervention and strategies can be done to end youth homelessness while at same time assist individuals who are experiencing homelessness.
In addition to obtaining stabilized housing, the goal is to focus on educating and engaging young people to learn how to take initiative, problem-solve, etc., by demonstrating compassion within productive activities.

The objective is to help the youth develop and grow.
ECC/HANH supports this initiative and **HUD's Core Principles of Housing First for Youth:**

- **Immediate access to permanent housing with no preconditions**: Youth should be provided with access to safe and secure permanent housing that meets their needs as quickly as possible.
- **Youth choice and self-determination**: Housing First is a person-centered approach that promotes choice regarding housing and service options, while maintaining high expectations for youth.
- **Individualized and youth-driven supports**: All youth are different. Once housed, the level of service offered will depend on the unique needs and choices of the youth. Non-time limited supports provide a practical, person-centered approach that assists in helping youth maintain their housing independently.
- **Persistent engagement**: Staff should utilize an assertive style of case management, and continuously attempt to engage youth, even if youth are resistant to services.

The temporary housing assistance and the supportive services provided will assist the youth in dealing with and overcoming their issues/reasons that led them to homelessness and assist them on the path to self-sufficiency, where they will be able to lead productive lives.

**Target Population**
The target population are 18–24-year-old individuals that are experiencing homelessness or fleeing domestic violence situations (HUD categories 1 and 4). These individuals are "literally homeless" or at risk of becoming homeless, meaning that their housing situation cannot be resolved through referrals to services outside of the crisis response system. The young adults will be selected through the local Coordinated Access Network (CAN) shelter prioritization protocol that is specific to young adult crisis programs.

**Project details**
The Sponsored Based Housing Program is a short-term crisis housing program that will provide the young people with a safe and welcoming place to stay and will assist them with meeting their basic needs and obtaining permanent housing. Opportunities for family connections or reconnections and linkages to community resources will be provided.

The crisis housing settings may range from a congregate shelter, shared apartments, multi-bedroom homes, among other options. The facility must include privacy in showers, bathrooms (including at least one private, gender-neutral bathroom with shower), and sleeping areas. There will also be sufficient lockable storage capacity for personal belongings.

The youth will have their own locked closet for safe storage. They will also have access to the on-site computer lab for job search, resume writing, social media, etc.
The facility will be staffed 24 hours a day, 7 days a week. The young people will receive additional assessments, be able to explore housing options, and create plans for the future.

There will be daily workshops to include:

- Life and apartment living skills
- Benefits acquisition
- Discussion on legal issues

There will be a range of services and supports including:

- Access to Health/dental care
- Access to Mental health/SA assessments
- Case management
- Counseling
- Family mediation
- Education/life/job skill assessment, instruction and support
- Support assessing and accessing housing options
- Assistance accessing government benefits (SNAP/TANF/health insurance); driver's licenses, non-driver's IDs, birth certificates; etc.
- Access to food and clothing banks, basic health screening/health referrals
- Transportation

**Eligibility/Participation Requirement**
Eligible young adults are only accepted from a referral through the CAN dynamic prioritization process, serving the most vulnerable youth.

The CAN will conduct an assessment to determine those individuals who are "literally homeless" or at risk of becoming homeless, meaning that their housing situation cannot be resolved through referrals to services outside of the crisis response system, and will schedule an intake appointment for the individual.

Literally homeless is defined as an individual living in a place not meant for human habitation, is in an emergency shelter, transitional housing, or a safe haven or is fleeing or attempting to flee domestic violence, dating violence, sexual assault or stalking; and has no other residence; and lacks the resources or support networks to obtain other permanent housing.

Once the intake appointment is scheduled, it is recommended that the applicant bring with them any documentation that they have to determine eligibility in the program, including birth certificates, social security cards, photo IDs and any income documentation, if applicable.

The CT CAN has a minimal screening criteria. The goal is to provide housing and services regardless of perceived or actual barriers (i.e., substance use, no or low income, domestic violence history, sexual

orientation, gender identity or expression, resistance to receiving services, mental health, and criminal record) and are limited to only that screening criteria required by funding contracts.

The intake appointment is an opportunity for the CAN staff to determine the appropriate level of service that is needed to resolve the immediate crisis:

- diversion,
- prioritization and referral to an emergency shelter, or
- connection to outreach.

During the Assessment process, CAN staff should attempt to divert the young adult to utilize available services to resolve their housing crisis. The diversion techniques are used to help the young adult to recognize and access resources, such as family and community supports, that may be immediately available to them.

Applicants must be screened for diversion and admitted to the sponsored based program only if no other options (such as staying safely with friends or family) are available. Applicants must be literally homeless.
If the youth is unable to be diverted, they may be offered the next available shelter bed placement in the sponsored based program.

The sponsored based program serves only participants that are in an emergency shelter and unsheltered locations, including those who have been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and who were residing in an emergency shelter or unsheltered location immediately before entering that facility.

NOTE:
The priorities for Service in the Sponsored Based Program are:

- Not able to be diverted OR currently slated for Permanent Supportive Housing PSH
- young adults 18-24

The program will prioritize participants with income below 30% of area median income (AMI).

**Sponsor Based Program Requirements**

The Social Service Agency will receive referrals of homeless youth who have been screened for eligibility by the Coordinated Access Program (CAN). The referrals will be sent to the Social Service Agency based on confirmed eligibility and space availability. The youth may be housed immediately and will sign the Participation Agreement.

The Social Service Agency will collect all necessary documents and will create a file for each participant. The youth may need to be housed immediately and it will be beneficial for the participant and the program that there will not be any administrative delays in providing shelter and assistance for the homeless youth. Also, the young person may not have documentation with them, and the Social Service Agency will work with them to obtain the necessary documentation. Therefore ECC/HANH will not meet with the participant, to collect any documentation.

The Social Service Agency will forward the Participation agreement and back up documentation to ECC/HANH. ECC/HANH will maintain a file for each participant for documentation and audit purposes.

The intake and administration of the Program will be conducted by the Sponsored Based Program Agency, so ECC/HANH will not need to meet with the participant to collect any information.

The file documentation will include:

1) The Participation Agreement
2) Any source documents or certifications. The homeless youth may not have immediate access to documents such as identification, social security cards and birth certificates, due to various circumstances in being homeless, so the Social Service will send an eligibility certification in pace of any missing documents
3) Self-certifications that the room/space has been inspected and is in safe, decent and sanitary condition in lieu of an inspection conducted by ECC/HANH due to the rapid turnover. The initial Housing quality standard (HQS) inspection will be conducted at the start of the program and on an annual basis on the anniversary date.
4) An assessment of the services that will be provided to the particular youth
5) A goal assessment document

The Sponsored Based Program Agency will also do the following.

- Assist young adults with following through on service linkages made during the CAN intake appointment
- Ensure that the young adults are successfully connected to all appropriate resources as quickly as possible
- Assess their goals for any additional referrals that may be needed
- Provide assistance in connecting with employment programs and other resources that can assist them in obtaining and maintaining housing stability
- Guide the youth through housing response system process
- Connect with youth's potential natural supports such as immediate or extended family, when deemed appropriate by youth and assess under what conditions they could serve as permanent/temporary housing
- Connect the youth to any mediation services and/or providing mediation when other resources are not available
- When youth are interested, connect the young adults experiencing homelessness to one another, in an attempt to have them "pair up" to increase the potential for shared living arrangements with 2+ youth who have income
- Assist the youth with applying for YHDP Diversion Funds and approve local use of Rapid Exit funds as needed for young adults to achieve housing stability
- If the young adult still requires an additional housing intervention to obtain permanent housing, assist them with the application process, obtain the necessary documentation and coordinate with the case manager to ensure a smooth transition if necessary
- Assist the youth in searching for a permanent apartment
- Assist in obtaining any educational goals

The Sponsored Based Program Agency will advise when a new participant has entered the program, and when a participant has exited the program and a space/bed becomes vacant.

The Sponsored Based Program Agency will submit an exit report detailing the progress of the participant, the reason for the exit, i.e if the participant was successful in completing the program and has been able to move on to a situation where they are no longer homeless or if they left for some other reason. They will also advise if the participant was terminated from the program and if an appeal was requested and the outcome of the hearing decision.
The Sponsored Based Program Agency will subsequently submit a new file when the room/space becomes occupied again.

**Participation Requirements**
The young adults must also be compliant while in the Sponsored Based Program and to be committed to specific goals, including the following.

- Applicants must be able to be safely maintained in the program, including not posing any danger to themselves or to other participants
- Utilizing the services in the community that are offered
- Actively working to end their housing crisis, i.e housing search, family reunification strategies
- Actively, looking for employment, if unemployed
- If employed, going to work and being compliant with job rules and procedures

**Hardship Process**
The program will prioritize participants with income below 30% of area median income (AMI). Recent data showed that over 53% of the young adults who participated in the CAN process had no income and the remaining 47% had income that ranged from less than $100 to slightly over $2000 per month.

Since the program is Sponsored Based Transitional Housing, run like an overnight shelter, for young adults who are "literally homeless" or at risk of becoming homeless, requiring payment of 30% income may be a barrier to achieving the goals of finding a permanent job and permanent housing. The Sponsored Based Agency will not request any fees or payments from the participants. The income that they have can be saved for permanent housing and other costs.

**Transition Process**
The main goal of the sponsored based program is to act as a springboard to quickly get young adults experiencing homelessness back into a permanent housing situation. The focus on that transition will be:

- Set expectations with clients to actively work on housing plan from first day in shelter.
- All residents will be offered assistance to locate to permanent housing immediately upon entering the sponsored based program
- Housing groups or individual sessions will be held to assist the program participants.
- Additional case management will be offered for those who cannot exit shelter quickly and/or may have additional service needs.
- Make connections to community supports
- Placement on the Regional Housing Registry waiting list
- Assist landlord negotiations, lease signing, etc.
- Provide continued access to community supports to prevent returning to homelessness

The Program outcomes include:

- Increased immediate safety and well-being.
- Reunification/strengthened connections with families.
- Positive, fulfilling relationships with peers, adults, and the community.
- Increased social/emotional well-being and self-sufficiency.
- Leadership and community engagement-participation in programs including youth led/supported activities
- Strengthened life/employment skills at time of exit.
- Engaged in academic continuation/completion and/or living wage employment at time of exit.
- Exit the program to safe, sustainable permanent housing.

**Housing Quality Standards (HQS) Inspections**

Due to the fact that this is transitional housing, and the participants will be rotating out on a monthly basis, ECC/HANH will conduct an initial HQS inspection when the program is initiated and will conduct an annual inspection of the property on the anniversary date. The provider will provide an HQS self-certification form with the Intake packet that is submitted, when a new participant enters the program.

**Termination/Appeals Process**

The goal is to not terminate anyone from the program, but to assist them to successfully exit the program. However, there may be circumstances that warrant termination from the program, i.e.

- Safety concerns due to the behavior or lifestyle of the young person
- Expiration of the time limit to participate in the program, including any applicable extensions
- Non-compliance with the participation requirements

In the case of a pending termination, the participant will be notified, by the sponsored based agency, in writing of the pending termination with the reason for the decision.

The participant will have an opportunity to respond in writing of their request to appeal the decision to terminate.

Once the appeal request has been received, an appeals hearing will be scheduled, with a hearing panel.

The hearing panel will consist of individuals who were not involved in the decision to terminate.

During the appeals process, the participant's slot will be placed on hold, until a final decision is rendered.

Once the hearing panel hears the appeal request, a decision will be made. If the decision is to reinstate, the participant will be reinstated immediately, and no further action is needed.

If the decision is to terminate, that decision will be final, and the participant will no longer be a part of the program. However, the participant can file a grievance through the Coordinated Access Program (CAN), following the grievance and appeals policies, www.ctbos.org.

**Types of assistance**
The Social Service Agency will partner with other agencies in the educational system, child welfare and the juvenile and criminal justice system and will make sure that the youth are connected to these services within the community as well as family/relative or other natural support. They will be directed to employment opportunities and will be given the tools to learn interview and job skills, living and relationship skills and continued education.

The Social Service Agency will also assist the youth with searching for an apartment based on where they wish to live and negotiating with landlords to obtain scattered-site, private-market units and assisting with the lease agreement between the youth and landlord. The Social Service Agency will build relationships with landlords in order to provide options to youth who may have barriers and to mitigate issues before they escalate.

If the young person shows signs of destabilization, the Social Service Agency must refer the young person back to the CAN for further case conferencing before entering longer-term supportive housing.

The feedback and data gained from this pilot program will be critical in establishing further tools and programs to assist the youth.
The Social Service Agency will provide appropriate housing for up to 60 – 90 days, unless a situation warrants a longer stay.

**Information to be submitted to ECC/HANH**

The Social Service Agency will enter into a Service Provider Assistance Payment (SPAP) Agreement with ECC/HANH. The SPAP will be in place of the HAP contract and will include the following information:

1) Details of the goal of the Program
2) Time period of the payment contract
3) The services to be provided, supportive and otherwise
4) The selection policy and procedures
5) The resources that are available to the youth
6) The monthly fee per room/bed
7) A commitment and certification to maintain a safe, decent and sanitary environment

The Social Service Agency and the participant will sign a Participation Agreement and will include the following information:

1) Statement that they have been selected and eligible to participate in the program
2) The time span that the participant will remain in the room
3) A summary of the goals of the program
4) A statement of compliance with the program
5) Occupancy rules

**Fee/Payment**

The Social Service Agency will be paid a monthly flat fee.
Under the traditional HCV program, a resident would pay 30% of their income towards rent. In this model, the participant will not pay any rent portion while they are in the facility.

Payment under this initiative will be tied to the 0-bedroom payment standard for the area. As participants are one of the most vulnerable populations and are not expected to have income, and given the short duration of the housing support, no tenant rent portion is anticipated. Prior to ECC/HANH executing a payment contract with the Sponsored based housing provider, ECC/HANH will conduct a subsidy layering review based upon the operating budget pro forma to ensure that the property is not being over subsidized. Adjustments to the percentage of payment standard will be made accordingly.
It is expected that the maximum annual exposure for ECC/HANH in year one may be approximately $207,360, depending on the 0-bedroom payment standard for that year.

i.e., $864 (current 0-bedroom payment standard) x 20 participants x 12 months = $207,360

If rent was collected from the participant, we would possibly pay $12,000 less in an annual payment contract. ($195,360)

This is due to the fact that statistics show that the average annual income for most homeless youth, age 18 -24 is between $0 - $2000. If the participants were in the ECC/HANH HCV Rent Simplification program, their rent portion would be $50.

This would be offset by the reduced administrative cost in processing the Minimum rent recertification and conducting Hardship hearings for a 3-month period, which is the average period that the youth may stay in the transitional housing setting.

**Reporting**

The Social Service Agency will provide a quarterly report to the Director of Community and Economic Development to include the metrics in the MTW 50090 format.

1) Housing Choice 1 - Additional units of housing made available
2) Self Sufficiency 5- Households assisted by services that increase self sufficiency
3) Self Sufficiency 8 – Households transitioned to self sufficiency

**Y2Y New Haven**

ECC/HANH has identified its first sponsor-based housing provider. Y2Y New Haven is a sponsor-based voucher program in partnership with Youth Continuum and the Y2Y Network. It is a student-led, gender inclusive, 12 bed overnight transitional program for young adults (18-24) who are experiencing homelessness in Greater New Haven.

Y2Y New Haven is a pilot program and will build on the youth-to-youth model used by Y2Y Harvard Square, the nation's first student-run overnight program for young adults.

The uniqueness of that model is that is run by the peers of the homeless youth, who work side by side with professionals, who will be able to relate to them.

Y2Y New Haven's model focuses on providing young adults who are homeless, with a safe, vibrant and welcoming transitional environment with support to get out of homelessness and opportunities for self-sufficiency.
As part of the 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 and 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

Advocacy and Leadership Development

- Career development programming
- On-site social enterprise business with direct job opportunities and training for youth
- Enrichment based activities

Case management services will be provided by the Y2Y Network. The Community and Economic Development department of ECC/HANH will be the lead in communicating with the Y2Y staff regarding case management services.

## Appendix 10

## Amendment to 2024 MTW Plan Faircloth to RAD Conversions

HUD has developed a new path for Public Housing Authorities (PHAs) to leverage their existing public housing by using "Faircloth Authority" to create new federally assisted housing through the Rental Assistance Demonstration (RAD). "Faircloth-to-RAD" conversions will help PHAs and their partners more readily access financing for the development of new deeply affordable units.

In an effort to explore new development opportunities, ECC/HANH anticipates using "Faircloth Authority", to convert new housing to RAD by project-basing Faircloth vouchers for properties not currently within the ECC portfolio. The use of these vouchers will use the Faircloth-to RAD model. These conversions will be completed through mixed finance transactions.

ECC/HANH will develop public housing units with a pre-approval to convert a property to a long term Section 8 contract following construction. Under the Faircloth-to-RAD conversion process, units are developed as public housing with preapproval and then converted to RAD through a streamlined process. The non-portfolio developments may include projects being carried out by The Glendower group acting as a sole developer or in party with private co-developer.

There is current Federal authority to provide rental assistance for approximately 227,000 units nationwide. As of May 7, 2021, ECC/HANH has 1,101 Faircloth available units.

ECC/HANH is currently planning to develop 344 LIPH units and then convert them to PBVs using Faircloth authority.

ECC/HANH plans to use:

**St. Luke's Redevelopment – 55 units (33 Faircloth units)**

ECC/HANH through its instrumentality The Glendower Group, seeks to partner with a community-based developer, St. Luke's Development Corporation to redevelop multiple adjacent commercial parcels along Whalley Avenue into a mixed-use development that will include commercial/retail space and market and affordable units. St. Luke's Development Corporation (SLDC) has acquired parcels located at 117-125 & 129 Whalley, 10-12 Dickerman, and 34-36 Sperry.

The project's parcels are in a newly designated "opportunity zone," where certain investments will be eligible for preferential federal tax treatment. The Project shall consist of approximately 55 residential units and appurtenant commercial or retail space. The St Luke's Whalley Avenue Development Project will include the demolition of the commercial structures located at 117-125 and 129 Whalley Ave. and raze a multi-family building over ground floor commercial/retail space with a lower-level buildout for community access and use.

This mixed income project will contribute to promote healthy lives, a strong community and robust economy. Residents of the Whalley Avenue building will have easy access to area amenities providing them the opportunity to participate in social activities and services available in their community. The pedestrian-friendly layout of the project will offer increased traffic to new and existing businesses leasing the commercial space, and the new building will improve curb appeal as it becomes the gateway to one of New Haven's most active commercial districts.

Elm City Communities will provide up to 55 project-based vouchers utilizing flexibilities previously approved under MTW Plans. The Glendower Group, ECC's development instrumentality, will act as co-developer and will assist in the planning, implementation, and management of the property.

ECC/HANH currently has HUD approval for the conversion of 33 units under Faircloth to RAD

ECC/HANH has identified the following funding sources and have submitted applications to the State DOH, Community Investment Fund (CIF), and FHLB AHP. A Construction Manager (CM) was selected in the second quarter of FY23.

ECC/HANH anticipates closing in the fourth quarter of FY2024.

**Newhallville Community Development - 61 units (48 Faircloth units)**

The Glendower Group, Inc. is partnering with Newhallville Community Development, LLC to develop a long-vacant parcel located at 201 Hazel Street, New Haven, CT. The site is approximately 1.5 acres and is zoned as a RM-2 District High Middle Density. The development plans include up to 62 rental units with a rental mix of one, two and three bedrooms incorporating "universal design" features for safe and accessible living for residents of all ages. The development will be 80% affordable and include the use of RAD/Faircloth vouchers while 20% will be market rate. The location is a primarily residential section of New Haven. The general usage in the vicinity is residential with neighborhood retail and shops.

The property borders the Farmington Canal Heritage Trail, which is a popular walking and biking trail system which connects to the New Haven central business district as well as commercial areas in the adjacent Town of Hamden. Historically, the site was occupied by the General Ice Cream Corp and the Sealtest Milk Division through the 1960's. In the 1980's the site was occupied by various

commercial and industrial tenants. All buildings were demolished in the 1990's and the property has been vacant since.

The Glendower Group procured and contracted with an architect in FY 2023. In FY 2024 Glendower anticipates procuring a Construction Manager at Risk and submitting 4% LIHTC and conventional lending funding applications with closing anticipated for the first quarter of FY 2025.

Glendower will own this development post-completion. The redevelopment will be completed using either 4% or 9% LIHTCs among other sources of funds.

**West Ridge/Queach – 62 units (38 units Faircloth units)**

Developed by the Queach Corporation, West Ridge Apartments will provide apartments for elderly and/or young disabled (18 years and older) households. The mixed-use aspect of the building is envisioned to include a commercial gallery/studio space. Fourteen of the 65 units will be supportive housing for intellectually disabled clients of the CT Department of Developmental Services. An additional 38 units will receive project-based Section 8 rental subsidies. The Housing Authority of New Haven will provide the 38 project based rental subsidies. The development will include 62 one-bedroom units, 2 two-bedroom units, 1 three-bedroom unit, a community room and on-site laundry room. The proposed development was awarded FY23 9% Low Income Housing Tax Credits from the Connecticut Housing Finance Authority.

**Clock Factory – 110 units (88 Faircloth units)**

The Glendower Group, Inc., is in the process of purchasing, with the goal of redeveloping The New Haven Clock Company Factory located at 133 Hamilton Street, New Haven, CT (the Project). This site is 1.9 acre in a historical industrial complex that consist of ten interconnected brick buildings. The property is on the National Register of Historic Places and is an historically significant complex.

Glendower proposes to redevelop this complex into approximately 110 mixed-income residential units, including approximately 88 RAD Faircloth units. The property is located in the Mill River neighborhood and is in close proximity to Glendower's Mill River redevelopment. It is anticipated that this property will be redeveloped using Low Income Housing Tax Credits, Historic Tax Credits, private financing, and MTW Authority. Planning will take approximately 1 year with construction scheduled to begin in FY2027. The redevelopment will be completed using Historic Tax Credits and either 4% or 9% LIHTCs among other sources of funds. The Purchase and Sales Agreement contemplates an acquisition cost of $4,500,000.

**16 East Grand Ave – 40 units (32 RAD Faircloth units)**

This development site has been purchased by The Glendower Group. The development will include approximately 40 total units including 32 RAD Faircloth units. Glendower will own this development post-completion. The redevelopment will be completed using either 4% or 9% LIHTCs among other sources of funds.

The property is comprised of approximately 1.23 acres and is currently vacant with all prior structures having been demolished and debris removed. The property is adjacent to the tidal Quinnipiac River

and any architectural design must be completed in recognition of flood zone requirements, including dry access requirements. It is anticipated that State of Connecticut, Low Income Housing Tax Credits, private financing, and MTW authority will be the sources of funding. The site is located within an historic district. The future development must be designed in a manner that is sensitive to and compatible with the local historic district.

The design will include first floor commercial uses. In addition, this development will create housing that is physically designed to promote the long-term wellness of residents by encouraging walkability and commercial uses that serve both the neighborhood and development residents.
This site was purchased for $1,420,000 using MTW flexibility.

**State and George Street – 170 units (60 Faircloth units)**
ECC/HANH through its instrumentality The Glendower Group, partnered with a private developer, LMXD to develop a mixed-use mixed-income market and affordable housing development. Glendower and LMXD responded to an RFP issued by the City of New Haven and was selected as the preferred developer. The Project shall consist of approximately one-hundred and seventy residential units. To assist in the development of this affordable housing development, Elm City Communities will provide approximately sixty Faircloth RAD and/or Project Based vouchers.

**Griswold – 276 Units (45 Faircloth units)**
ECC/HANH and its instrumentality, The Glendower Group, partnered with Heritage River Village Development, LLC ("HRVD") to develop a mixed-income mixed-use market and affordable housing development. The redevelopment will be multi-phased that will yield approximately 276 mixed-income rental units, a YMCA and commercial space. Phase I will produce commercial space and approximately 56 rental units, with 45 being Faircloth and/or PBV.