

2014 Moving to Work Annual Plan

10.14.2013 Final Version





Boulder Housing Partners

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Boulder Housing Partners provides assistance to nearly 2,000 households through five housing programs. The agency's portfolio represents one-third of the affordable housing units in Boulder County. In 2009, BHP's Board of Commissioners endorsed a goal to make BHP the nation's first net-zero energy housing authority.

Boulder Housing Partners 2014 MTW Annual Plan

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Section I: Introduction

Short-Term and Long-Term Goals and Objectives

Boulder Housing Partners (BHP) became part of the Moving to Work Demonstration Program in 2012. This 2014 plan describes our plans for our third year in the demonstration.

When Congress created MTW in 1996, it clearly stated its objectives for the demonstration and Public Housing Agencies (PHAs) participating in it. These objectives are:

- . To reduce cost and achieve greater cost effectiveness in federal expenditures;
- . To give incentives to families with children whose heads of household are either working, seeking work, or participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- . To increase housing choices for low-income families.

These objectives form the centerpiece of BHP's MTW initiatives, along with two additional goals that are unique to Boulder's needs:

- Pilot a rent policy that will encourage self-sufficiency, assure accurate reporting of income and ensure that customers are not overly rent burdened; and
- Preserve, transform and revitalize our public housing.

Over the past two years, both BHP and our customers have experienced the potential of MTW flexibility to streamline process and reduce regulatory burden related to our customer experience. In 2012 we implemented:

- . Rent reform for elderly households and households with persons with disabilities;
- . Rent simplicity measures for all households;
- . Voucher reform for all households: elimination of the 40% cap on income and implementation of a flat utility allowance; and
- . Public housing conversion with the submission of a proposal to HUD to convert the balance of our public housing to conventional financing supported by project-based vouchers.

In the first six months of 2013, we:

- Simplified the Housing Quality Standard (HQS) Inspections schedule for all households;
- Began the phase-in period of eliminating Utility Reimbursement Payments for all households;
- Commenced a new Local Voucher Program in Partnership with Safehouse Progressive Alliance for Non-Violence; and
- Paved the way for BHP to use Replacement Housing Factor Funds for other Affordable Housing.

In 2014, our focus is two-fold: on simplifying the rent calculation for work-abled families, and converting our public housing to a Section 8 platform which will allow for substantial renovation and transformation of the asset. We are currently working on a proposal to HUD that will blend elements of the traditional public housing disposition program with the Rental Assistance Demonstration (RAD) program in order to address the needs of the entire public housing inventory. The goal for the 2014 Plan is to continue our vision of meeting the growing need for quality affordable housing that provides a strong focus on outcomes for our residents.

In our short experience, we have come to understand that MTW flexibility will allow us to truly become a strategic organization by allowing us the flexibility to evaluate our opportunities and our challenges and respond. Our 2014 Plan follows quite closely the strategy that we articulated in our application. This Plan provides detail on the following proposed activities:

- 2014 – 1: Rent Reform for Section 8 Housing Choice Voucher Work-Abled Families
- 2014 – 2: Rent Reform for Public Housing Work-Abled Families
- 2014 – 3: Elimination of Interim Recertifications for Elderly and Disabled Households
- 2014 – 4: Removal of the Flat Rent Option in Public Housing
- 2014 – 5: Changes in Occupancy Terms to the Woodlands Family Self-Sufficiency Program
- 2014 – 6: Rent Limits and Rent Reasonableness for Project-Based Voucher Projects

To frame our long-term thinking, Boulder Housing Partners continues to use five overarching MTW goals listed below. In addition BHP has developed the following principles that have guided our MTW plan. With MTW flexibility, BHP plans to be able to:

- Use federal housing resources as compelling tools to create positive change for families,
- Manage converted public housing as a real estate asset and a vital part of our community's infrastructure,
- Encourage the community, and our prospective customers, to perceive public housing as a place to Live, Learn, and Earn,
- Accelerate the shift of staff focus from paper to people,
- Complete the transformation of a public agency from bureaucratic to entrepreneurial,
- Accelerate changes in outcomes for families from tepid to catalytic,
- Enhance our role in the industry from thinkers to doers, and
- Provide a more complete continuum of housing choices.

The centerpiece of our vision for MTW flexibility hinges on receiving a positive response to the RAD/Public Housing Disposition application that was submitted to HUD in February 2012 and again in October 2013. Provided disposition is granted, we will be able to continue with the principles that are outlined above.

Our long-term goals and expectations are described below. The Moving to Work program has three statutory goals. BHP's program includes an additional two goals that better articulate our program, and are consistent with the statutory goals. Not every item listed below requires MTW flexibility. We include these items in order to tell a more complete story of what we are trying to achieve.

Goals in Year Three (2014) are also described in detail below in the discussion about proposed MTW Activities.

MTW Goal 1

Reduce cost and achieve greater cost effectiveness in federal expenditures

In 2012 and 2013 (Years 1 and 2), we:

1. Streamlined and simplified the rent calculation and re-certification process for elderly households and people with disabilities,
2. Simplified the process for income and asset verification for all households,
3. Implemented a 26.5% of rent with no deductions for elderly households and people with disabilities, replacing the complicated 30% of income-with-adjustments-to-rent system. Implemented a flat utility allowance,
4. Excluded income from assets with a value less than \$50,000 and disallowed participation for households with assets greater than \$50,000,
5. Created an MTW Resident Advisory Committee to assist us in longer-term thinking and program evaluation,
6. Structured our evaluation metrics and benchmarks,
7. Implemented an HQS inspection schedule that follows the recertification schedule, and
8. Completed our planning to implement a flat tiered rent program for families, including the design of a rent reform study (implementation in year 3).

In 2014 (Year 3), we plan to:

1. Implement rent reform for work-abled families in the Section 8 Housing Choice Voucher and Public Housing Programs that will reward increased income, remove penalties for reporting income and mirror the private market in order to facilitate and incent a transition from assisted housing to market rate housing. At the same time, we plan to conduct a research study in partnership with the University of Colorado to measure the impact of rent reform for residents and participants.

In 2015 and beyond (Years 4 – 10), we expect to:

1. Make standard documents more customer friendly

The focus will be the legal documents associated with the programs beginning with the lease and the HAP contract. Customers currently find the documents cumbersome and difficult to follow. The result is that they miss the key requirements and suffer the consequences.

2. Make the voucher program lease length more flexible

Many university towns, like Boulder, have a leasing season centered on the school year. This creates many situations in which a landlord is unwilling to sign a one-year lease.

3. Revise and simplify our portability policy

The industry has long discussed a variety of needed changes to the administration of portable vouchers. We would like to use MTW flexibility to experiment with a number of ideas that would make local administration more streamlined.

MTW Goal 2

Create incentives for families to work, seek work or prepare for work

In 2012 and 2013 (Years 1 and 2), we:

1. Streamlined and simplified the rent calculation and re-certification process for households with earned income,
2. Simplified the process for income and asset verification for all households,
3. Completed our planning to implement a flat tiered rent program for work-abled families in the Section 8 Program, and
4. Completed our planning for rent reform for the work-abled families in the Public Housing Program.

In 2014 (Year 3), we plan to:

1. Implement rent reform for work-abled families in the Section 8 and Public Housing Programs,
2. Complete planning for our resident mobility program, and
3. Complete planning for community center construction.

In 2015 and beyond (Years 4 – 10), we plan to:

- 1. Create a service delivery center at each of our family housing sites.**

With Public Housing conversion, BHP plans to create a community center at an additional three communities and expand the center we currently have at one of our communities. We believe that service delivery close to home is a more highly leveraged and effective platform.

- 2. Expand the staffing of our Resident Services program.**

With increased efficiencies created under MTW, our goal is to expand the staffing of our Resident Services Program so that every public housing resident is assigned a service coordinator and voucher households will begin to have access to the Resident Services Department

- 3. Expand the program that provides college tuition to BHP students participating in the 'I Have a Dream' program partnership.**

The I Have A Dream (IHAD) program continues to affirm its intention to place a classroom of "Dreamers" at every public housing site that can accommodate their classroom programming needs. In other words, if we build it, they will come. We are strongly committed to doing everything we can to make this opportunity available for the children and young adults of our communities.

- 4. Expand our Community Service and Section 3 programs to build social capital by greater involvement in the community.**

BHP residents who have long been out of the workforce need to update their skills and

experience and build networks in order to make re-entry possible and successful. We propose to expand our community service and Section 3 programs by developing a pre-employment training program.

5. Create a system to reward households for progress towards self-sufficiency.

BHP will work with residents to create a system that rewards their progress towards self-sufficiency and their efforts to make their home and neighborhood a better place to live. We will work with residents to create this system. We suggest that we model it after the Cornerstone Rental Equity program¹. This program matches many of the ideas we have about enhancing the benefits of renting a home and engaging residents in building equity.

6. Expand our current work with the Bridges Out of Poverty program.

The Bridges Out of Poverty model examines the sources and impact of generational poverty on families, reveals the hidden rules and norms of social class, and supports families as they learn how they can change their behavior to embrace a mental model of prosperity. BHP wants to use MTW to test the part of the theory that housing solutions will be compromised unless we are addressing the intrinsic beliefs that people hold about being poor.

MTW Goal 3

Increase housing choices for low-income households

In 2012 and 2013 (Years 1 and 2), we:

1. Removed the cap on income spent on rent in the voucher program.

In 2014 (Year 3), we plan to:

1. Use MTW funding flexibility to create 31 newly constructed units of permanent supportive housing for chronically homeless individuals, and
2. Design a process to test mobility for residents from a Multi-Family Property with a Section 8 Project-Based Contract using Section 8 Housing Choice Vouchers.

In 2015 and beyond (Years 4 – 10), we expect to:

- 1. Increase the cap on project-basing vouchers to dedicate up to 60 vouchers for housing for individuals re-entering the community following homelessness or incarceration.**

BHP has seen the need to provide a supportive setting in which people can re-gain skills to live

¹ Cornerstone Renter Equity is a management system where residents have a stake in the property where they live by using their contributions to maintain and improve property values and rental income with compensating financial equity. Residents sign a contract with Cornerstone that enables them to earn up to \$10,000 in financial equity in ten years, provided they complete routine work assignments, attend management meetings, and fulfill lease commitments. Residents receive a monthly statement of their earnings, but they must stay in their homes for five years before their credits are vested and are eligible for cash payments. After becoming vested in the Renter Equity Fund, individuals may borrow up to 80% of the value of their credits for any reason.

more successfully in the community.

- 2. Use resources leveraged from the conversion of public housing, along with MTW flexibility, to create at least 100 new affordable units renting to families at 40% of the area median income.**

Another critical gap in the housing continuum is the lack of options for households ready to move off of federal housing subsidy. Using the flexibility provided to us under the MTW program we propose to increase our Boulder Affordable Rentals inventory by 24%.

- 3. Implement a damage claim for landlords participating in the voucher program.**

A key component of our MTW plan is to make the voucher program more attractive to private landlords. As part of a recruitment tool, we propose to use HAP funds to create a fund for damage claims.

- 4. Create a Section 8 homeownership program in partnership with the city of Boulder and Thistle Community Housing.**

Creation of a homeownership program may not require MTW flexibility, but doing so will round out the critical interventions that BHP can make in the housing ladder. We propose to partner with Thistle Community Housing because of their long track record of developing affordable homeownership opportunities. Thistle is Boulder's largest non-profit housing developer specializing in mixed-income homeownership opportunities and community land trust development.

MTW Goal 4

Pilot a rent policy that will encourage self-sufficiency, assure accurate reporting of income and ensure that customers are not overly rent burdened

In 2012 and 2013 (Years 1 and 2), we:

For elderly households and people with disabilities:

1. Adopted a simplified rent based on 26.5% of gross income,
2. Eliminated all deductions,
3. Excluded income from assets below \$50,000,
4. Began scheduling re-certifications so that they will occur every three years,
5. Eliminated third-party verifications except at admissions and for audited files,
6. Eliminated all interim increases, except for increases in unearned income, and
7. Limited to one the number of interim decreases.

For family households:

1. Excluded income from assets below \$50,000,
2. Eliminated third-party verifications except at admissions and for audited files,
3. Eliminated earned income disregard and interim recertifications for increases in income, and
4. Planned for the implementation of the flat tiered rent system for the work-able households.

In 2014 (Year 3), we will:

1. Implement a flat tiered rent system for work-abled families in the Section 8 program,
2. Implement a new rent structure based on percentage of income towards rent for the work-abled families in Public Housing, and
3. Implement a rent reform study to test the outcomes and effects of our rent reform.

In 2015 and beyond (Years 4 – 10), we plan to:

1. Continue to evaluate the rent reform study for the alternate rent strategies, and
2. Monitor and evaluate the new rent structures for all households.

MTW Goal 5

Preserve, transform and revitalize our public housing

In 2012 and 2013 (Years 1 and 2), we:

1. Simplified the process to project base vouchers, and
2. Submitted an application to HUD for Public Housing Disposition according to the rules found in Section 18

In 2014 (Year 3), we expect to:

1. We are assuming a successful Section 18/RAD approach to conversion and therefore 2014 will be a planning year for public housing conversion in which we finalize renovation plans, manage the entitlements for each property and begin to package the financing.

In 2015 and beyond (Years 4 – 10), we plan to:

- 1. Use MTW flexibility to project base 337 units in former public housing developments converted into a tax credit partnership.**

We are currently in the review process under the 2011 rules of the Section 18 disposition process. If we are successful in securing approvals to dispose of public housing, we will begin phased implementation and renovation in MTW Year 4 (2015).

- 2. Test three mobility options for families in the converted public housing properties: none, full and conditional.**

BHP wants to use MTW flexibility to test whether families who are able to move with vouchers will achieve greater outcomes than those whose mobility is limited.

Section II: General Housing Authority Operating Information

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

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

Attachment B

(II) General Housing Authority Operating Information

Annual MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

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

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
None	X	X	X	X	X	X	X	X	Type Noted *	X	X
Total Public Housing Units to be Added								0			

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other
If Other, please describe:

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
CO016333333 Family Sites	192	Approval requested under Public Housing Disposition/RAD
CO016777777 Eldery Sites	145	Approval requested under Public Housing Disposition/RAD
Total Number of Units to be Removed	337	

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

Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Walnut Place	80	Converted public housing property, 80 units for the elderly and persons with disabilities
Kalmia	53	Converted public housing property for mixed population
Lee Hill	31	Newly constructed housing for chronically homeless disabled individuals
Anticipated Total New Vouchers to be Project-Based	164	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year 253 Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year 253

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

Other Changes to the Housing Stock Anticipated During the Fiscal Year

No other changes are anticipated to be made during the 2014 Fiscal Year.

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

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

MTW renovation hard costs for PH renovation BHP has continued to defer capital work pending approval of the Section 18 disposition application. That includes retaining a significant portion of the CFP grant. We have over \$14.7 million of work in deferred maintenance and substantial renovation that will be prioritized if we do not get approval for Section 18 disposition from HUD which will use 100% of the remaining 2012 and all of the 2013 CFP funds and more.

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

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

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	330	330
Federal MTW Voucher (HCV) Units to be Utilized	608	608
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	938	938

* Calculated by dividing the planned number of unit months occupied/leased by 12.
 ** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.
 ***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

BHP is currently in compliance.

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

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	When all the PH units are converted under disposition, or RAD, a level of rehabilitation will be done at the properties, which will cause leasing issues during the actual rehab.
Section 8 HCV Program	Leasing issues may arise depending on funding that is actually provided under budget authority, as well as number of tenant protection vouchers received under disposition.

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units	Community wide for all of public housing	774	Closed	Yes
Federal MTW Housing Choice Voucher Program	Program specific for S8HCVP only (BHP conducts a lottery, not a wait list)	250 (still in lottery pool from 2013)	Closed	Yes
Federal MTW Housing Choice Voucher Program	Site-based for PBV Broadway East	386	Closed	Yes

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

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

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

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

N/A

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

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

Changes may occur in 2014, depending on conversion of the remaining public housing units. In the event that disposition of Public Housing or RAD conversion is approved, a Relocation Specialist will be in charge of relocating residents from current public housing units that will undergo renovation. Depending on the amount of renovation for each of the eight properties, the majority of relocations should be temporary and may include the use of hotels and vacant units. The current wait list for public housing would be depleted prior to converting to project-based voucher lists, or some other system.

Section III: Proposed MTW Activities

Activity 2014 – 1: Rent Reform for Section 8 Work-Abled Families

A. MTW Initiative Description

This activity's main objective is to simplify the rent calculation for those families participating in the Section 8 Housing Choice Voucher Program who are work-abled. Work-abled families are all households whose head of household, spouse, or co-head is not elderly (elderly is defined as 62 years of age or older) or a person with disabilities. Work-abled households living at the Woodlands Project-Based Voucher Community are exempt from this rent reform.²

Determining the rent portion for a work-abled Section 8 family will be a two-step process. Step one: Using the family size and gross income (without any deductions), the family will qualify in an income tier. Step two: The income tier and actual bedroom size of the unit where the family is living will determine the portion of rent the family will pay. In the case of a mixed-citizen family, a flat fee per ineligible family member will be added to the family's portion of the rent. The utility allowance will be deducted from the family's portion. (In the case of the utility allowance being greater than the rent amount, the family's portion will be equal to zero.) This amount will be deducted from the lower of the contract rent or payment standard for the voucher size for which they qualify. If contract rent is above the payment standard, the portion that is above the payment standard will be added to the family's portion of the rent.

The detailed elements included in rent reform are:

Flat Tiered Rent System

The flat tiered rent system consists of 10 income tiers. A family's applicable income tier is determined by gross annual income and family size. The tiers are based on area median income (AMI) and increase along with family size. Within an income tier, a family's rent burden is higher at the bottom and lower at the top. The tiers are designed so that rent burden is 30% for families in the middle of the tier.

Rent calculation becomes very simple. A family's rent is determined by locating the tier appropriate to their income and following it out to the appropriate bedroom size. This flat rent remains in place for however long the household's income remains within that tier.

The model is based on gross annual income and is shown here:

² *Note: This flat tiered rent system will not be applied to the project-based voucher holders at Woodlands participating in the Family Self-Sufficiency Program. Their rent calculation, which currently includes an escrow account when income increases, will remain the same. The number of work-abled families in the Section 8 program is approximately 240 (excluding families at Woodlands).*

Income Tier Chart					
	Family Size				
Income Tier	1	2	3	4	5
1	\$ -	-	-	-	-
2	4,000	4,200	4,400	4,600	4,800
3	5,500	5,700	6,700	7,300	7,900
4	7,200	8,300	9,300	10,400	11,300
5	10,900	12,400	14,000	15,500	16,800
6	14,100	16,100	18,100	20,100	21,700
7	17,300	19,700	22,200	24,700	26,700
8	20,500	23,400	26,300	29,200	31,600
9	23,700	27,100	30,500	33,800	36,600
10	26,900	30,700	34,600	38,400	41,500
Income Tier	6	7	8	9	10
1	-	-	-	-	-
2	5,000	5,400	6,000	6,400	6,800
3	8,400	8,900	8,900	9,500	10,100
4	12,200	13,000	13,900	14,800	15,700
5	18,000	19,200	20,500	21,800	23,200
6	23,300	24,900	26,500	28,100	29,800
7	28,600	30,600	32,600	34,600	36,700
8	33,900	36,300	38,600	41,000	43,500
9	39,200	41,900	44,700	47,400	50,300
10	44,600	47,600	50,700	53,800	57,100

Rent Chart							
	Bedrooms						
Income Tier	0	1	2	3	4	5	6
1	\$ 120	120	125	130	140	160	180
2	120	130	145	160	200	225	255
3	155	175	195	215	255	290	330
4	230	260	290	325	380	430	485
5	315	360	400	450	510	575	650
6	390	450	500	560	640	725	820
7	475	540	600	675	775	875	990
8	550	630	700	800	900	1,015	1,145
9	630	730	825	915	1,050	1,185	1,340
10	780	840	1,070	1,120	1,200	1,355	1,530

Minimum rent

In this flat tiered rent system, the minimum rent would increase from the current amount of \$50 to between \$120 - \$180 per month depending on bedroom size. The lowest figure is based on 30% of the average Temporary Aid to Needy Families (TANF) monthly benefit amount.

Biennial recertifications

All families will be recertified and their rent will be calculated using the flat tiered rent system at

the same time, effective June 1, 2014. The recertification will then take place every other year. At recertification, rent would be based on:

1. current gross income if it is stable and predictable, or
2. past 2 years of gross income (annualized) if income is not stable or no income is currently being reported

Stable and predictable income is defined as income that is not temporary, expected to continue for the foreseeable future and not seasonal in nature. Example of stable income: a person is hired to work a specific number of hours earning a certain amount of money per hour. If the participant is reporting no income at recertification, they will be required to meet with their Section 8 Occupancy Specialist to determine if there are any benefits or services they may be eligible to receive.

No interim recertifications

Two key goals of our rent reform initiative are to, one, mimic the market and two, to incentivize and reward work by closing the loophole in which participants can strategically reduce income in order to receive a lower rent. All interim recertifications will be eliminated with the exception of changes in family composition or status. If the participant is claiming zero income at the biennial recertification, they would be subject to interim recertifications until at least one source of income has been reported that places them into income tier two.

Flat fee per ineligible family member

The current regulations associated with rent calculation require us to prorate the assistance if a family includes members who are not eligible for assistance. This calculation will be replaced with a flat fee of \$180 per ineligible family member per month. This amount will be added to the family's portion of the rent prior to determining the amount of assistance that the family will receive.

B. MTW Statutory Objective

This activity will:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures; and
2. Create incentives for families to work, seek work or prepare for work.

C. Anticipated Impacts

BHP anticipates this activity will:

- Streamline the recertification process for work-abled families
- Maintain a stable rent burden for families for two years
- Simplify the rent calculation, making it easier to understand and calculate
- Encourage participants to increase income
- Significantly reduce administrative time to allow Section 8 Occupancy Specialists to focus on connecting participants to other resources for which they may qualify
- Reduce the time and cost for participants to gather the documentation for recertification

Potential negative consequences include:

- Possible financial burdens to families who lose income during the period of time between recertifications. BHP will work with Emergency Family Assistance Association to develop a safety net program for these situations.
- Foregone HAP savings if resident income increases during the period of time between recertifications

D. Anticipated Schedule

BHP proposes to implement the flat tiered rent system for all households at the same time, effective June 1, 2014. For work-abled households currently on the program and who would have a recertification effective between January 1, 2014 and May 1, 2014, the rent would be recalculated using the information already obtained from the participant family, effective June 1, 2014.

For all those households who are new to the program as of January 1, 2014, the flat tiered rent system would apply from the date of new admission and no new recertification would be done June 1. The next recertification for new families would be scheduled for 2016.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Total cost of task (decrease)	Current staff hours required per recertification X number of recertifications (prior to implementation) x average of \$26 per hour	40% reduction over the two-year recertification period	All households will be recertified in 2014 and then not again until 2016. Results achieved by December 31, 2016.
Staff time savings	Current staff hours required per recertification X number of recertifications (prior to implementation)	40% reduction over the two-year recertification period	All households will be recertified in 2014 and then not again until 2016. Results achieved by December 31, 2016.
Increase in household income	Average household income at time of recertification in 2014	Increase of 2% in household income	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Full Time	Number of households employed full time at time of recertification in 2014	Number of residents employed full time expected to increase by 2%	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Part Time	Number of households employed part time at time of recertification in 2014	Number of residents employed part time expected to increase by 2%	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Student	Number of student households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Job Trainee	Number of job trainee households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2016

Increase in positive outcomes in employment status: Unemployed	Number of unemployed households at time of recertification in 2014	Number of unemployed residents expected to decrease by 2%	Results achieved by December 31, 2016
Number of households receiving TANF (decrease)	Number of TANF households at time of recertification in 2014	Number of residents receiving TANF expected to decrease by 2%	Results achieved by December 31, 2016
Number of households receiving services aimed to increase self-sufficiency	Number of households receiving services aimed to increase self-sufficiency at time of recertification in 2014	Number of households receiving services aimed at increasing self-sufficiency expected to increase by 2%	Results achieved by December 31, 2016

E. Data Source for Metric Data

BHP will be able to collect data to measure this activity from our financial and management reports using our in-house database. BHP will also use a process improvement approach to documenting time required in performing all the steps associated with our current rent calculation. We will use that information as the baseline from which to measure improvements.

Need/Justification for MTW Flexibility

F. Authorization Cited

Attachment C, Section D. 1. c: The Agency is authorized to define, adopt and implement a reexamination program that differs from current program requirements.

Attachment C, Section D. 2. a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differs from current program requirements.

G. Explanation for Authorization

MTW flexibility is needed in order to implement the flat tiered rent system, increase the minimum rent, conduct biennial recertifications, charge a flat fee per ineligible member, and eliminate interim recertifications except in certain cases.

Additional Rent Reform Activity Information

H. Impact Analysis

Based on our data modeling, this activity will impact work-abled families in the following areas:

Resident rent based on a percentage of income: – the tiers are formulated so that families in the middle of each tier would have a rent burden equal to 30%. As families move through the income tier, the rent burden is designed to decrease. When income is at the lower end of the tier, rent burden is highest. However, as income increases and rent stays the same, rent burden decreases. Rent burden within the tiers ranges from 48% (at the very low income tiers) to 22% (at the very high income tiers). The tiers allow for families to increase their earnings without immediately experiencing a corresponding increase in rent, thereby allowing families to keep the extra disposable income.

Minimum rent – By implementing a minimum rent of \$120 – 180 depending on bedroom size, based on 2012 data, we will increase the number of families paying a minimum rent from the current number of 24 to 39. However, 11 of these families will experience a rent decrease by basing their rent on the tiers. These 11 families currently have a rent portion (based on 30% of adjusted gross income) that is higher than the proposed minimum rents. By placing these families on the flat tiered rent system, their rent portion will actually decrease. All families who experience an increase in their out-of-pocket rent due to the new minimum rent amount will be granted a 12-month transition period.

Maximum rent increase – All work-abled families will begin the flat tiered rent system at the same time. Provided that all other factors contributing to the rent calculation remain the same (such as income, utility allowance, contract rent, unit size), households who will experience an increase of more than 7% in their out-of-pocket costs will have increase limited to 7% of their portion. Based on 2012 data, approximately 28% of the households will fall into this hardship category. This will be the hardship limit in 2014 at the time of system implementation. Prior to the second recertification under the new rent system in 2016, it will be determined if this hardship will continue.

Rent burden – overall average rent burden increases slightly, from 29.8% to 31%. Considering all of the program advantages and customer benefits in moving to a flat tiered rent, we believe this is reasonable as rent continues to be affordable, and the cost of the program is neutral. In the transition from the current rent calculation to the flat tiered system, rent burden cannot drop below 24%.

Proration factor – the flat fee per family member not eligible for assistance is \$180. By switching from the current system of prorating the amount of assistance (average cost per family per month is \$348) to adding a flat fee per ineligible member (average cost per family is \$317), we reduce the overall cost of mixed citizenship status by 9% and make it easier for families to understand the calculation.

Cost to the program – this model (using 2012 data) results in a slight increase to the cost of the program of approximately \$3,500 annually which is a 2% increase for the Section 8 work-abled population.

I. Hardship Case Criteria

Maximum rent increase – During the first recertification, all families will transition from rent based on a percentage of adjusted gross income (gross income minus deductions) to the flat tiered rent based on gross income (without deductions) and bedroom size. The families' portion of rent will not increase more than 7%, provided all other factors remain the same, including amount of income, contract rent, utility allowance, unit size, etc.

Minimum rent – During implementation, those families who experience an increase in their out-of-pocket rent due to the new minimum rent amount will be granted a 12-month transition period, provided that all other factors remain the same, including, but not limited to, amount of income, contract rent, utility allowance, unit size.

No interim recertifications – Exceptions will be made to this policy based on reasonable accommodation requests, as well as extenuating circumstances or situations, such as returning to school. Requests will be evaluated on a case-by-base basis.

J. Annual Reevaluation of Rent Reform Activity

This activity will be part of our rent study as required by our MTW Standard Agreement. The study will be conducted as a “within subjects” study, comparing the same set of subjects at time of implementation of the rent reform and then again two years later at the first recertification. The study will be designed and conducted by a research team from the University of Colorado who has contracted with BHP for this purpose.

K. Transition Period

As of January 1, 2014, all new admissions for work-abled households will have their rent portion calculated using this flat tiered rent system. All current households will have their rent portion change as of June 1, 2014.

Activity 2014 – 2: Rent Reform for Public Housing Work-Abled Families

A. MTW Initiative Description

This activity’s main objective is to simplify the rent calculation for those families living in the Public Housing Program who are work-abled. Work-abled families are all households whose head of household, spouse, or co-head is not elderly (elderly is defined as 62 years of age or older, or 50 and over in the case of Walnut Place residents) or a person with disabilities.³

Rent based on 26.5% of gross income

The rent for work-abled families in public housing will be based on 26.5% of gross income with no adjustments or deductions to income. In lieu of the current deductions for dependents and child care expense, rent will be based on a lower percentage of gross income (from the current 30% of adjusted gross income towards rent). This is the same rent calculation that was implemented for the elderly/disabled households in 2012. Currently, there is only one family in public housing who is claiming a child care expense deduction.

Minimum rent

In this rent structure, the minimum rent would increase from \$50 to \$120 per month. This new figure is based on 30% of the average Temporary Aid to Needy Families (TANF) monthly benefit amount.

³ Separate rent reform structures are being proposed for the Section 8 and Public Housing work-abled families. This was based on the make-up of the population (80% of the families in public housing are mixed citizen families whose lower subsidy burden is advantageous in public housing and this will continue under the rent reform proposed) and the confines of our rent study. Per our MTW Agreement, the rent policy should be “designed to encourage employment and self-sufficiency by participating families.” The goal of the study is to meet HUD’s purposes of evaluating the MTW demonstrations. (Please see Section VI for further information on the rent study.)

Biennial recertifications

To comply with our study design in which the same group will be compared against itself at different times, all families will be recertified using the new rent calculation at the same time, effective August 1, 2014. The recertification will then take place every other year. At recertification, rent would be based on:

1. current gross income if it is stable and predictable, or
2. past 2 years of gross income (annualized) if income is not stable or no income is currently being reported

Stable and predictable income is defined as income that is not temporary, expected to continue for the foreseeable future and not seasonal in nature. An example of stable income is a person hired to work a specified number of hours earning a certain amount of money per hour. If the resident is reporting no income at recertification, they will be required to meet with their property manager to determine if there are any benefits or services for which they may be eligible. They will also need to report any new sources of income until their portion of the rent (based on 26.5% of gross income) is equal or greater to \$120.

No interim recertifications

A goal of rent reform is to mimic the market and eliminate potential for participants to intentionally reduce income in order to receive a lower rent. All interim recertifications will be eliminated with the exception of changes in family composition or status. If the resident is claiming zero income at the biennial recertification, they would need to report an increase in income if obtained prior to their next recertification and rent would be calculated based on the new source of income.

Flat fee per ineligible family member

The current rent calculation requires us to prorate the assistance if a family includes members who are not eligible for assistance. This will be replaced with a flat fee of \$90 per ineligible family member per month.

B. MTW Statutory Objective

This activity will:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures; and
2. Create incentives for families to work, seek work or prepare for work.

C. Anticipated Impacts

BHP anticipates this activity will:

- Streamline the recertification process for public housing work-abled families
- Maintain a stable rent burden for families for two years
- Simplify the rent calculation, making it easier to understand and calculate
- Encourage residents to increase income
- Significantly reduce administrative time to allow property managers to focus on connecting residents to other resources and services for which they may qualify
- Reduce the time and cost for residents to gather the documentation for recertification

Potential negative consequences include:

- Possible financial burdens to families who lose income during the period of time between recertifications. BHP will work with Emergency Family Assistance Association to develop a safety net program for these situations
- Foregone rental income when income increases during the period of time between recertifications and rent is not recalculated

D. Anticipated Schedule

BHP proposes to put everyone on the rent reform structure at the same time, effective August 1, 2014. For work-abled households currently living in public housing and who would have a recertification effective between January 1, 2014 and July 1, 2014, the rent would be recalculated using the information already obtained from the family effective August 1, 2014.

For all those households who are new to the program as of January 1, 2014, the rent reform structure would apply from the date of new admission and no new recertification would be done June 1. The next recertification for these families would be scheduled for 2016.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Total cost of task (decrease)	Current staff hours required per recertification x X number of recertifications (prior to implementation) x average of \$26 per hour	40% reduction over the two-year recertification period	All households will be recertified in 2014 and then not again until 2016. Results achieved by December 31, 2016.
Staff time savings	Current staff hours required per recertification x X number of recertifications (prior to implementation)	40% reduction over the two-year recertification period	All households will be recertified in 2014 and then not again until 2016. Results achieved by December 31, 2016.
Increase in household income	Average household income at time of recertification in 2014	Increase of 2% in household income	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Full Time	Number of households employed full time at time of recertification in 2014	Number of residents employed full time expected to increase by 2%	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Part Time	Number of households employed part time at time of recertification in 2014	Number of residents employed part time expected to increase by 2%	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Student	Number of student households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2016
Increase in positive outcomes in employment status: Job Trainee	Number of job trainee households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2016

Increase in positive outcomes in employment status: Unemployed	Number of unemployed households at time of recertification in 2014	Number of unemployed residents expected to decrease by 2%	Results achieved by December 31, 2016
Number of households receiving TANF (decrease)	Number of TANF households at time of recertification in 2014	Number of residents receiving TANF expected to decrease by 2%	Results achieved by December 31, 2016
Number of households receiving services aimed to increase self-sufficiency	Number of households receiving services aimed to increase self-sufficiency at time of recertification in 2014	Number of households receiving services aimed at increasing self-sufficiency expected to increase by 2%	Results achieved by December 31, 2016

E. Data Source for Metric Data

BHP will be able to collect data to measure this activity from our financial and management reports using our internal database. BHP will also use a process improvement approach to documenting time required in performing all the steps associated with our current rent calculation. We will use that information as the baseline from which to measure improvements.

Need/Justification for MTW Flexibility

F. Authorization Cited

Attachment C, Section C. 4: The Agency is authorized to restructure the annual and interim review process in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided.

Attachment C, Section C. 11: The Agency is authorized to determine family payment, including total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rent in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ those in current statutes or regulations.

G. Explanation for Authorization

MTW flexibility is needed in order to eliminate deductions, base rent on 26.5% of gross income, charge a flat fee per ineligible family member, conduct biennial recertifications, and eliminate interim recertifications.

Additional Rent Reform Activity Information

H. Impact Analysis

Resident rent based on a percentage of income – to compensate for the elimination of dependent and child care deductions, the percentage of income towards rent decreases from 30% to 26.5%. This is the same percentage we use for the elderly/disabled households and allows for rent burden to remain essentially the same.

Minimum rent – currently we have two work-abled families in public housing whose income puts them at the minimum rent of \$50. Implementing a minimum rent of \$120 will cause five families to experience an increase in rent burden. These families will be granted a 12-month transition period and will be linked to a service coordinator to help with the transition and to

determine if there are any benefits or services available to them.

Rent burden – overall rent burden increases slightly, from 29.5% to 30.2%. Considering all the variables, we believe this is acceptable as the rent continues to be affordable, and cost of the program is neutral. Rent burden for fully eligible families remains below 25%, while rent burden for the mixed citizen families is 31.5%.

Maximum rent increase – the hardship policy will limit any increase to 7%. In this model, 58% of families experience an increase, while 42% experience a decrease. Among families experiencing an increase in rent, the average change is \$64 (3.5% of average income). Twenty-two of these families experience an increase because residents' portion of the rent will not be capped (see Activity 2014-3); however rent burden is 26.5% of gross income. Among families experiencing a decrease in rent, the average change is -\$61 (4.7% of average income). Across the entire population, the weighted average change in rent is an increase of \$11 which accounts for 1% of the average income.

Proration factor – the flat fee per ineligible family member is \$90. Under the current rent model, the average cost per family for having ineligible family members is \$192. Using a flat fee per member of \$90, the average cost per family is \$178, a decrease of 7%.

Cost of the program – for public housing, the cost of the program is measured by the difference in resident rental income between current and proposed rent structures. This structure is as close to net zero as possible and results in an increase of \$156 annually in our model using 2012 data.

I. Hardship Case Criteria

Maximum rent increase – The hardship policy for rent reform in public housing includes capping the maximum increase at 7% (unless rent burden is less than 26.5%) and connecting families at the minimum rent to resident services. Data analysis shows that 34% of current families qualify for the 7% maximum increase. The hardship cap will only be effective if all other variables stay the same, such as income and utility allowance.

Minimum rent – During implementation, for those families who experience an increase in their out-of-pocket rent due to the new minimum rent amount will be granted a 12-month transition period, provided that all other factors remain the same, including amount of income, utility allowance, unit size, etc.

No interim recertifications – Exceptions will be made to this policy based on reasonable accommodation requests, as well as extenuating circumstance, such as a household member who wishes to return to school and needs to reduce their income. Requests will be evaluated on a case-by-base basis.

J. Annual Reevaluation of Rent Reform Activity

This activity will be part of our rent study as required by our MTW Standard Agreement. The study will be conducted as a “within subjects” study, comparing the same set of subjects at time of implementation of the rent reform and then again two years later at the first recertification. The study will be designed and conducted by the University of Colorado Research team who has contracted with BHP for this purpose.

K. Transition Period

As of January 1, 2014, all new admissions into public housing for work-abled households will have their rent portion calculated using this rent structure. All current households will have their rent portion change as of August 1, 2014 using the new rent structure.

Activity 2014 – 3: Elimination of Interim Recertifications for Elderly Households and Persons with Disabilities

A. MTW Initiative Description

This activity's main objective is to allow for households which are elderly (defined as 62 or over, with the exception of residents living in public housing at Walnut Place where the age is 50 or over) or persons with disabilities to be able to increase their income by keeping any increases they receive, regardless of the source. In Activity 2012-2, these households were allowed to keep increases in income, but only when it was associated with a source of income that had already been reported and used in the calculation for their rent. This will apply to all elderly and disabled households in the Section 8 and Public Housing programs

At the time of the regularly scheduled recertification (which is based on a triennial cycle), current income will be used to calculate the household's portion of the rent. If there is a loss of income after the recertification, households will be able to request one interim decrease per year during the three-year cycle.

At recertification, rent would be based on:

1. current gross income if it is stable and predictable, or
2. past 2 years of gross income (annualized) if income is not stable or no income is currently being reported (or since their last interim recertification)

Stable and predictable income is defined as income that is not temporary, expected to continue for the foreseeable future and not seasonal in nature. Example of stable income: a person is hired to work a specific number of hours earning a certain amount of money per hour. If the resident or participant is reporting no income at recertification, they will be required to meet with their Section 8 Occupancy Specialist or property manager to determine if there are any benefits or services they may be eligible to receive.

B. MTW Statutory Objective

This activity will:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures; and
2. Create incentives for the elderly and persons with disabilities to work, seek work or prepare for work.

C. Anticipated Impacts

BHP anticipates that this activity will:

- Allow households with persons with disabilities to increase their income and experiment with how many hours they can work within their limitations without having to continually report changes in income to BHP

- Streamline the recertification process for these families
- Encourage residents and participants to increase income
- Significantly reduce administrative time to allow occupancy specialists and property managers to focus on connecting residents and participants to other resources and services for which they may qualify
- Reduce the time and cost for residents to gather the documentation for interim recertifications

Potential negative consequences include:

- Foregone rental income and reduced housing assistance payments when income increases during the period of time between recertifications and rent is not recalculated

D. Anticipated Schedule

This will be effective on January 1, 2014 with approval of the 2014 MTW Annual Plan.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Total cost of task (decrease)	Current staff hours required per recertification x X number of recertifications (prior to implementation) x average of \$26 per hour	40% reduction over the two-year recertification period	Effective 1/1/14 for all households. Results achieved by December 31, 2017 as some households are on triennial recertification.
Staff time savings	Current staff hours required per recertification x X number of recertifications (prior to implementation)	40% reduction over the two-year recertification period	Effective 1/1/14 for all households. Results achieved by December 31, 2017 as some households are on triennial recertification.
Increase in household income	Average household income at time of recertification in 2014	Increase of 2% in household income	Results achieved by December 31, 2017
Increase in positive outcomes in employment status: Full Time	Number of households employed full time at time of recertification in 2014	Number of residents employed full time expected to increase by 2%	Results achieved by December 31, 2017
Increase in positive outcomes in employment status: Part Time	Number of households employed part time at time of recertification in 2014	Number of residents employed part time expected to increase by 2%	Results achieved by December 31, 2017
Increase in positive outcomes in employment status: Student	Number of student households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2017
Increase in positive outcomes in employment status: Job Trainee	Number of job trainee households at time of recertification in 2014	No change anticipated	Results achieved by December 31, 2017
Increase in positive outcomes in employment status: Unemployed	Number of unemployed households at time of recertification in 2014	Number of unemployed residents expected to decrease by 2%	Results achieved by December 31, 2017

E. Data Source for Metric Data

BHP will rely on our operating data base for financial information.

Need/Justification for MTW Flexibility

F. Authorization Cited

Attachment C, Section C. 4.: The Agency is authorized to restructure the annual and interim review process in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided.

Attachment C, Section C. 11: The Agency is authorized to determine family payment, including total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rent in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations.

Attachment C, Section D. 1. c: The Agency is authorized to define, adopt and implement a reexamination program that differs from current program requirements.

Attachment C, Section D. 2. a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differs from current program requirements.

G. Explanation for Authorization

MTW flexibility is needed in order to eliminate interim recertifications.

H. Additional Rent Reform Activity Information

This section is not applicable for this activity.

Activity 2014 – 4: Removal of Flat Rent Option for all Public Housing Households

A. MTW Initiative Description

The main objective of this activity is to ensure that the limited resource of public housing operating subsidy is applied equitably for all public housing residents and families are not being over-subsidized. This activity will remove the option for residents to pay the flat rent if their portion of the rent based on their income exceeds the flat rent, allowing for all families to pay 26.5% of gross income towards rent. This portion of the activity will apply to all households in public housing (both work-abled and elderly/disabled households).

B. MTW Statutory Objective

This activity will:

1. Increase housing choices for low-income households.

C. Anticipated Impacts

BHP anticipates this activity will:

- Reduce wait time for applicants

Potential negative consequences include:

- Remove opportunities for households to save money by maintaining a rent burden less than 26.5%

D. Anticipated Schedule

Beginning in 2014 with the implementation of rent reform for work-abled families, no family will be given the option to choose the flat rent. For elderly and disabled public housing families, the option will be removed at their next regularly scheduled recertification (they are currently on a triennial recertification cycle). Households will receive a minimum of six month's notice.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
PHA rental revenue in dollars (increase)	Public Housing rental revenue at time of recertification in 2014	Increase to Public Housing rental revenue by \$135,000	Results achieved by December 31, 2016

E. Data Source for Metric Data

BHP will be able to collect data to measure this activity from our financial and management reports using our internal database.

Need/Justification for MTW Flexibility

F. Authorization Cited

Attachment C, Section C. 11: The Agency is authorized to determine family payment, including total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rent in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations. The Agency is authorized to adopt and implement term limits for its public housing assistance.

G. Explanation for Authorization

MTW flexibility is needed in order to allow for all residents to pay rent based on 26.5% of gross income.

Additional Rent Reform Activity Information

H. Impact Analysis

In the data analysis, 22 of the 135 public housing work-abled families' rent will increase because their portion is more than the flat rent. The average impact to these families is an increase of

\$154 which amounts to an increase of 5% of average income. Of the 195 elderly/disabled households, three of the households will experience an increase in their portion of the rent at their next regularly scheduled recertification. The average increase for these three households is \$147, or an increase of 6% of average income. The rent burden for all families will be 26.5%.

I. Hardship Case Criteria

Time limit –Exceptions can be made for individual families based on medical issues, schooling or employment situations. Exceptions can be requested by the family with each request reviewed on a case-by-case basis.

J. Annual Reevaluation of Rent Reform Activity

This activity will be reviewed every time the situation occurs to determine if changes are needed to the activity.

K. Transition Period

This will be in effect for all public housing residents at the time of the regularly scheduled recertification, which for the elderly and disabled households will be on a triennial recertification. For the work-abled families, it will be in effect at their annual effective August 1, 2014.

Activity 2014 – 5: Changes in occupancy terms for the Woodlands Family Self-Sufficiency Program

A. MTW Initiative Description

The main objective of this activity is to facilitate and encourage families participating in the Family Self-Sufficiency (FSS) Program at Woodlands to move through BHP's housing continuum. BHP built the Woodlands Community in 1995 in partnership with Boulder County Housing Authority (BCHA). BHP provides housing assistance through the Section 8 Vouchers that are project-based at the community. BCHA provides case management services through the FSS Program and is funded through HUD. Families are selected first to participate in the FSS program and then receive housing assistance by living at Woodlands. While in the program, the case management services focus on education and employment with the goal of families being self-sufficient within five years. In year four, the emphasis is on graduating from the program and seeking housing options outside of Woodlands.

For participants to receive maximum benefit from the program and the community at Woodlands, BHP proposes to allow participants who live there to request the next available voucher and move no sooner than three years of successful participation in the program. Exceptions would include job offers in a different location, access to schooling that would require a move, or extenuating circumstances to be determined on a case-by-case basis.

In order to continue the movement through the housing continuum and the momentum that is created while participating in the program, participants who successfully graduate from the program will be required to move from Woodlands once they successfully graduate from the program, and allow them to leave with the next available voucher (if needed by the family).

B. MTW Statutory Objective

This activity will:

1. Increase housing choices for low-income households.

C. Anticipated Impacts

BHP anticipates this activity will:

- Reduce wait time for applicants

Potential negative consequences include:

- Increased pressure on families who will need to move upon graduation

D. Anticipated Schedule

This activity will be in effect for all Woodlands participants upon approval of the 2014 MTW Annual Plan. Exceptions based on reasonable accommodation due to a disability can be made depending on the circumstances.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Average applicant time on wait list in months (decrease).	2012 average waitlist time was 10.3 months	Average waitlist time expected to decrease by 1 month	To be reported annually as it occurs
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	None	Number of households expected to move to a better unit and/or neighborhood expected to be 7	To be reported annually as it occurs

E. Data Source for Metric Data

BHP and BCHHS FSS Program staff will monitor the requests to move, as well as the successful graduations, using internal housing software systems.

Need/Justification for MTW Flexibility

F. Authorization Cited

Attachment C, Section D, 2. d.: The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration.

Attachment C, Section D, 1. g.: The Agency is authorized to establish its own portability policies.

G. Explanation for Authorization

MTW flexibility is required in order to allow for minimum occupancy limits prior to requesting the next available voucher and to set the maximum occupancy limit at this project-based voucher site.

Additional Rent Reform Activity Information

This section is not applicable for this activity.

Activity 2014 – 6: Rent Limits and Rent Reasonableness for Project-Based Voucher Projects

A. MTW Initiative Description

This activity's main objective is to reduce cost, eliminate redundancy and increase efficiency by allowing the Housing Authority to establish appropriate rent limits in project-based voucher projects and conduct its own rent reasonableness procedures for setting rents at Project-Based Voucher (PBV) Communities where the developer is required, or has chosen, to conduct a market study. This would apply to all projects where BHP will project base vouchers.

BHP will establish reasonable rents for the PBV sites using data gathered from the following sources:

1. First priority: a market study that has been prepared as a requirement of the Low Income Housing Tax Credit (LIHTC) program. These studies are extensive, well-researched and provide a high level of detail about rents in comparable units. In BHP's experience a LIHTC market study provides a broader range of information than a traditional rent reasonable study.
2. Second priority: a review of the proposed rents compared to Fair Market Rents and the Payment Standard;
3. Third priority: a review of Market Comps and average rents in the area based on local surveys that are current at the time of setting rents.

With these three sources of data, a BHP team that is not associated with the proposed project, in the event that the petitioner is BHP, will review the proposed rents and assure that the rents do not exceed 10% of the range established as reasonable for each bedroom size. Amenities and services provided at the project will be considered as part of the evaluation process.

Reasonable will be defined as the lower of:

- . An amount determined by BHP based on the research and criteria above, not to exceed 110% of the applicable fair market rent;
- . The reasonable rent; or
- . The rent requested by the owner.

While this activity is proposed for all future PBV LIHTC projects, in 2014 this activity will specifically be used to set the rents at 1175 Lee Hill, a 31-unit permanently supportive housing site for the chronically homeless. This community is modeled after the Housing First model, where housing is established first and case management services are provided to ensure the success of the residents.

B. MTW Statutory Objective

This activity will:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures; and
2. Increase housing choices for low-income families.

C. Anticipated Impacts

BHP anticipates that this activity will:

- Eliminate the current redundancy between procuring a market study and a rent reasonableness study
- Eliminate the cost of procuring two studies, when one study can answer the rent reasonableness question
- Create efficiency in the process of setting rents by using data that is easily accessible

Potential negative consequences include:

- Establishing or allowing a rent that is not reasonable for the product or the market

D. Anticipated Schedule

Vouchers are anticipated to be project-based at 1175 Lee Hill upon completion of construction, currently anticipated for August 2014.

Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Total cost of task (decrease)	\$6,000	Cost expected to decrease by \$6,000 to \$0 for each project	December 31, 2014 for Lee Hill

E. Final Projected Outcome

We expect that this project will save time and money and will increase housing choices by allowing a voucher rent to exceed the LIHTC standards when reasonable and appropriate. In a high cost market like Boulder's, with land cost contributing to almost half of the total development cost, and when services provided are extraordinary, it can be appropriate to approve a voucher rent. Anything that BHP can do with MTW flexibility to facilitate the production of more affordable housing is essential. This activity will help.

F. Data Source for Metric Data

BHP will rely on our operating data base for financial information.

Need/Justification for MTW Flexibility

G. Authorization Cited

Attachment C, Section D. 7.: The Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leasing housing assistance.

Attachment C, Section D. 2. c.: The Agency is authorized to develop a local process to determine rent reasonableness that differs from the currently mandated program requirements.

H. Explanation for Authorization

We expect that this project will save time and money and will increase housing choices by allowing a voucher rent to exceed the LIHTC standards when reasonable and appropriate. In a high cost market like Boulder's, with land cost contributing to almost half of the total development cost, and when services provided are extraordinary it can be appropriate to approve a voucher rent. Anything that BHP can do with MTW flexibility to facilitate the production of more affordable housing is essential. This activity will help.

I. Additional Rent Reform Activity Information

This section is not applicable for this activity.

Section IV: Approved MTW Activities

Implemented

Activity 2012-2 – Rent simplification specifically for elderly households and people with disabilities

The main objective of this activity was to simplify the rent calculation for elderly households and persons with disabilities who are living on a fixed income. This activity focuses on four areas: 1) rent based on 26.5% of gross income; 2) triennial recertifications; 3) income disregard and 4) a limit on interim decreases. This activity was approved and implemented in 2012.

Activity 2014-3 will eliminate all interim recertifications. All other aspects of this activity remain in effect.

Activity 2012-3 – Rent simplification specifically for family households

This activity aims to simplify the rent calculation for family households by eliminating all interim increases, eliminate earned income disregard, and planning for a flat tiered rent system. This activity was approved and implemented for 2012.

Activities 2014-1 and 2 eliminate all interim recertifications. Planning for a flat tiered rent system is now completed and included as Activity 2014-1. Elimination of earned income disregard remains in effect.

Activity 2012-4 – Rent simplification for all households

The goal of this activity was to implement a series of changes to simplify the income and asset verification process for all families. This activity was first identified and approved for 2012 and included allowing households to provide asset and income documentation; exclude income from assets and allow for self-certification of assets that total \$50,000 or less; and limit asset totals to \$50,000 or less upon admissions to the public housing and Section 8 program. This activity was approved and implemented for 2012.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2012-5 – Eliminate the 40% of income cap in the voucher program

The goal of this activity was to provide more rental choices to Section 8 voucher holders with their voucher by eliminating the 40% of income towards rent cap when they initially lease up. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2012-6 – Implement a flat utility allowance for the voucher program

This activity's main objective was to increase voucher holder's ease of understanding of the rent calculation and how utilities affect the maximum contract rent allowed. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2013-1 – Housing Quality Standards Inspection Schedule

The main objective of this activity was to replace Activity 2012-7. This activity aligns the HQS inspection with the recertification schedule. In 2013, for all households who are elderly or a person with disabilities, the inspection schedule now follows the recertification schedule which is conducted every three years. In 2014, when Activity 2014-1 is implemented, inspections for the work-abled family households will line up with the recertification schedule. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2013-2 – Eliminate Utility Reimbursement Payments

The focus of this activity was to ensure that all public housing residents and Section 8 participants are contributing towards their rental payment (or at a minimum to ensure that residents and participants are not receiving payment to live on housing assistance). Households who received a utility reimbursement payment (URP) in April 2013 will continue to receive one through March 2014, unless there is a change in their circumstances that removes the URP. No new instances of URP were allowed after April 1, 2013.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2013-3 – Local Voucher Program in Partnership with Safehouse Progressive Alliance for Nonviolence

This activity focuses on continuing BHP's partnership with Safehouse Progressive Alliance for Nonviolence (SPAN). The activity allows for eight families who are victims of domestic violence to receive housing assistance through BHP and case management services through SPAN. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or metrics in 2014.

Activity 2013-4 – Use of Replacement Housing Factor Funds for other affordable housing

This activity allows BHP to use Replacement Housing Factor (RHF) Funds to build other affordable housing units. In 2014, BHP will use RHF Funds at 1175 Lee Hill, a 31-unit community for chronically homeless using the Housing First model. Construction is expected to begin in October 2013.

BHP does not anticipate any changes to the activity or metrics in 2014.

Not Yet Implemented

BHP does not have any approved activities that have not yet been implemented.

On Hold

Activity 2012-1 – Allow BHP to commit project-based vouchers to cover 100% of the units at converted public housing developments

This activity was first identified and approved for 2012. In February 2012, BHP submitted a disposition application for 100% of our public housing units. The activity includes the flexibility to waive the 20% cap

on project-based vouchers, define excepted units and create a local project-based voucher program for former public housing sites. As of October 14, 2013, BHP continues to work with HUD using current programs to dispose of all public housing units and convert them to project-based voucher communities using Section 18 or RAD. No additional vouchers were project based in 2012. The flexibility under this activity has not yet been applied.

BHP does not anticipate any changes or modifications to this activity, nor are different authorizations needed from what was initially proposed.

Closed Out

Activity 2012-7 – Implement a landlord self-certification system for HQS inspections for the voucher program

This activity was not implemented. When the activity was written, the objective was to reduce the frequency of inspections for those participants and landlords who were in compliance with HQS inspections and had been for the past year or more. When it came time to implement the activity, it became apparent that the responsibility of certifying to the standards would put a burden on the landlords, as well as the agency to ensure that landlords were completing the forms and returning them. The activity was re-written and approved in the 2013 MTW Annual Plan under Activity 2013 – 1. The new activity will allow the inspection cycle to follow the recertification schedule.

Section V: MTW Sources and Uses of Funds

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

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

Attachment B

(V) Sources and Uses of Funds

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	1,331,000
70600	HUD PHA Operating Grants	5,917,000
70610	Capital Grants	355,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	500
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	100,000
70000	Total Revenue	7,703,500

Attachment B

1

Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	942,000
91300+91310+92000	Management Fee Expense	428,000
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	44,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	322,000
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	807,000
95000 (95100+95200+95300+95500)	Total Protective Services	25,000
96100 (96110+96120+96130+96140)	Total insurance Premiums	86,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	124,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	84,500
97100+97200	Total Extraordinary Maintenance	0
97300+97350	Housing Assistance Payments + HAP Portability-In	4,486,000
97400	Depreciation Expense	543,000
97500+97600+97700+97800	All Other Expenses	0
90000	Total Expenses	7,891,500

Describe the Activities that Will Use Only MTW Single Fund Flexibility

The 2011 CFP funds will be used on the measurement project, the 2012 CFP funds will be used for operations, and the 2013 CFP funds will be used for Predevelopment work on the Public Housing Disposition Measurement project.

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes

No

Is the PHA implementing a local asset management plan (LAMP)?

Yes

No

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

Yes

No

PHAs should provide a brief summary of any changes in the Local Asset Management Plan in the body of the Plan.

Section VI: Administrative

A. Board Resolution

**RESOLUTION #18
SERIES OF 2013**

**ANNUAL MOVING TO WORK PLAN CERTIFICATIONS OF COMPLIANCE
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 2014, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or 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 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.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.

8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Boulder Housing Partners CO016
PHA Name PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Adopted this 14th day of October, 2013.

(SEAL)



Angela McCormick
Chair, Board of Commissioners
Housing Authority of the City of Boulder

ATTEST:



BETSEY MARTENS
Executive Secretary

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

B. Public Review

This 2014 MTW Annual Plan was made public for review from September 10, 2013 through October 14, 2013. The Plan was posted to our website. Two public hearings were held on September 23, 2013 at the main office of Boulder Housing Partners. A total of 12 public housing residents and Section 8 participants attended. Comments were all positive with no suggestions for changes.

Prior to writing the draft Plan, 11 meetings were held with interested stakeholders. These meetings were held to discuss the proposed changes and solicit comments and suggestions. There was a meeting held at each of the eight public housing sites. Two meetings were held for Section 8 participants. One meeting was held with our partner agencies. A total of 194 people were in attendance (157 were public housing residents, 33 Section 8 participants, and 4 partners). These meetings were held between July 22 and August 6, 2013 (with the exception of the partner meeting which was held on June 14, 2013).

In November 2012, BHP began the discussion with MTW Resident Advisory Committee (RAC) regarding different types of rent structures. In January 2013, BHP held two MTW RAC meetings to further narrow down the different types of rent structures. Twenty-one people participated in January. In May 2013, separate meetings were held for MTW RAC members based on the program in which they were participating. The rent structure for each program (which are proposed in this Plan) was discussed in detail at these meetings. Eighteen residents and participants attended in May.

C. Agency-Directed Evaluation of the Demonstration

BHP is working in partnership with the University of Colorado (CU) to develop the rent controlled study to evaluate the effects of the rent reform structures that will be put into place in 2014.

The proposed approach to the study, as authored by the research team at CU, is as follows:

1. Purpose of the Study

As part of its MTW Agreement, BHP proposes two interventions: designing and adopting a new rent model, and promoting resident services. With these interventions, BHP aims to meet MTW program objectives by:

- Increasing the proportion of working households
- Increasing average income from employment
- Decreasing the number of staff hours in recertification process related to income changes
- Decreasing the number of paybacks due to unreported increases in income

By initiating an experimental study in Boulder, Colorado, the effects of the proposed interventions on Public Housing and Section 8 Voucher program households' economic self-sufficiency will be evaluated.

2. Research Questions

Four main questions will be asked:

- (1) To what extent did the new rent model increase the proportion of working households?
- (2) To what extent did the new rent model and access to resident services increase the proportion of working households?
- (3) To what extent did the new rent model increase households' average income from employment?
- (4) To what extent did the new rent model and resident services increase households' average income from employment?

Boulder Housing Partners is expecting that the new rent model will yield an increase of 2% in number of working families and an increase of 2% in average earned income.

In addition to earned income, dependence on public subsidies and private actors will be assessed to measure the change in Moving-to-Work participants' economic self-sufficiency. Other household outcomes, such as rent burden, childcare expenses and placement issues, mobility (private and public transportation), level of education and school performance, access to resources, access to food, health status, participation in community and social support networks, and personal and job skills may also be evaluated.

3. Research Design

To assess household impacts of its two proposed MTW interventions (rent reform for the Section 8 and Public Housing work-abled families), BHP will examine how and to what extent a new rent model will affect Section 8 MTW household outcomes. In addition, it will assess possible impacts of the selective, site-specific introduction of improvement in resident services for public housing residents.

In the research design, the new rent model and the improvement in resident services function as independent variables. The dependent variables (household outcomes) include:

- earned income from employment
- employment status
- rent burden
- childcare expenses and placement issues
- mobility (private and public transportation)
- level of education / school performance
- access to resources (legal, financial, etc.)
- access to food
- health status
- participation in community and social support networks
- personal and job skills

The selection of the preferred method depends on several considerations, including the available population in a community, or sample size that can be drawn from a population.

Statistical power analysis helps researchers understand how large a sample is needed to enable statistical judgments that are accurate and reliable. Estimating the required sample size before an experimental study is important because if sample size is too low, the experiment will lack the precision to provide reliable answers to the questions it is investigating. If sample size is too large, time and resources will be wasted, often for minimal gain. Statistical power analysis helps researchers to estimate the required sample size.

Ideally, the research design would include a treatment group and a control group, not exposed to any intervention with data collection at baseline and after implementation of the interventions (or some variation thereof that could include phased introduction of the interventions). Realistically, the size and composition of BHP's resident population make a different research design more appropriate. Splitting the total resident population of 398 households into treatment and control groups would produce numbers too small for meaningful statistical analysis. This size limitation is exacerbated by the certainty of a less than 100% initial response rate.⁴ Response rates will decline further in subsequent data collection, made more problematic due to annual attrition of about 10% resulting from resident turnover. Research has shown that BHP would need a minimum of 800 households to participate in a control study to have the ability to produce meaningful data; BHP has a total population of 398 households eligible for the study.

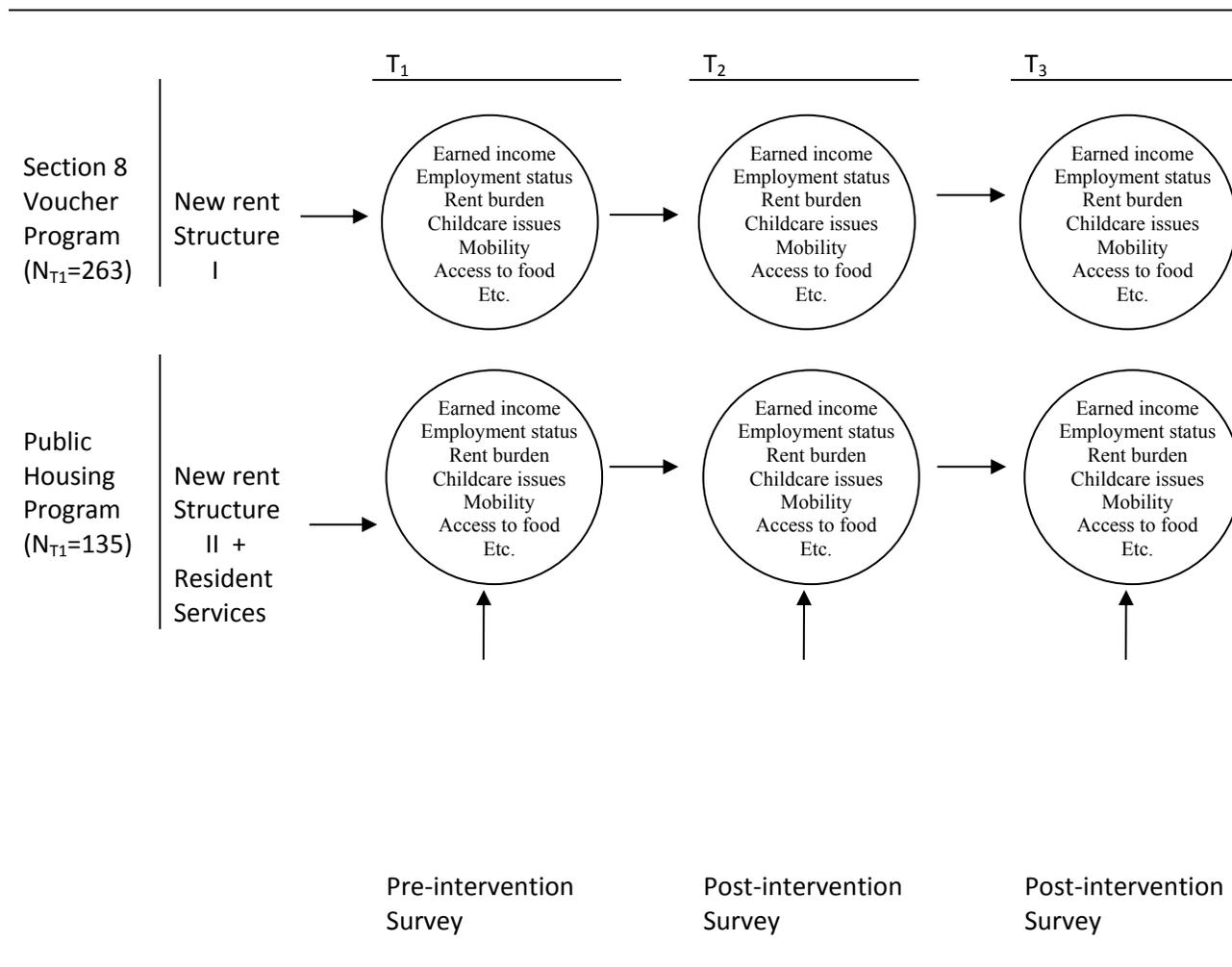
As to composition, BHP's resident population includes two distinct groups: households in public housing (N=135) and households with housing choice vouchers (N=263). The former live in spatial clusters and include significantly more Latino households, creating two distinctly different subpopulations. If households from across both subpopulations would be randomly assigned to treatment and control groups, the analysis would need to partial out confounding influences, associated with subpopulation characteristics and not arising from the intervention. Doing so would require statistical techniques that assume a larger number of households. Alternatively, each of the two subpopulations of an already small total resident population each could be split into a treatment and a control group. However, also this scenario would produce numbers too small for meaningful analysis.

Therefore, the logical research design involves a within-subjects experiment. This approach examines an assumed relationship between, for example, rent burden and earned household income, by manipulating an independent variable (e.g., rent paid), and comparing dependent variable values (e.g., job earnings), resulting from independent variable changes, with known baseline conditions. Control groups as in between-subjects experiments are not needed because each household at Time 1 is compared with itself at Time 2 and Time 3 (see **Figure 4**).

⁴ Even with personal follow-up visits, past studies have reported significant non-response rates. Typical examples of the proportion of public housing residents participating in survey research are:

- 2% (Hynes et al. 2000)
- 53% (Bennett et al. 2007)
- 56% (phone survey; Digenis-Bury et al. 2008)
- 62% and 79% (personal interviews with return visits; Cora et al. 2007)
- 65% (mail survey with follow up phone calls), 58% (Goetz 2010).
- 85% (personal interviews; Kleit 2003)
- 91% (survey with follow up visits to qualify for MTO; Ludwig et al. 2001)

Figure 4: Visualization of within-subjects research design



From an ethical perspective, another advantage of the within-subjects design is that it avoids the thorny issue of having to withhold from (control group) households an intervention that is expected to benefit residents.

BHP plans to target Section 8 households for rent reform. Public housing households will also experience some rent reform, as well as improved resident services in select projects, enabling an exploration of impacts through comparison over time and with projects that will not see a change in resident services⁵.

4. Data Collection and Analysis

A mixed-method approach, using quantitative and qualitative methods, will be used to collect and analyze primary data from MTW participants and BHP staff:

⁵ The number of households in these comparisons will be too small for statistical analysis, but qualitative data can nonetheless provide valuable insights to guide further program development

Data sources	Data collection Instruments
MTW households	<ul style="list-style-type: none"> * Questionnaires * Focus groups * Interviews
MTW program staff	<ul style="list-style-type: none"> * Interviews * Secondary (archival) data

Questionnaires for Measuring MTW Households’
Economic Self-Sufficiency

A baseline questionnaire survey will be administered to all sample members (MTW households) immediately before adopting the new rent model and starting the resident services. The same questionnaire will be administered to MTW households at the end of year 2 to measure the affect of the proposed interventions on their economic self-sufficiency. Questionnaire surveys have been the most common technique for assessing individual’s self-sufficiency (see, for example, Abt Associates Inc. et al., 2006; Gowdy and Pearlmutter, 1993; Pinsoneault, 2006; Ramey, 2010; Women’s Foundation of Genesee Valley, 2004). This method was chosen particularly due to its potential for the researchers to help them compare pre- and post-cases in a reliable manner.

D. Annual Statement/Performance and Evaluation Report (HUD 50075.1)

Part I: Summary		
PHA Name: Boulder Housing Partners	Grant Type and Number Capital Fund Program Grant No: CO06P016501-11 Replacement Housing Factor Grant No: CO06R16501-11 Date of CFFP:	FFY of Grant: 2011 FFY of Grant Approval: 2011

Type of Grant
 Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no:)
 Performance and Evaluation Report for Period Ending: 09/30/2013 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds	0			
2	1406 Operations (may not exceed 20% of line 21) ³	79,234	79,234	\$48,459.25	\$48,459.25
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	39,617	39,617	\$28,186.81	\$28,186.81
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	22,457	0		
8	1440 Site Acquisition	0			
9	1450 Site Improvement	0			
10	1460 Dwelling Structures	254,860	0		
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration		277,317	\$205,220.65	\$205,220.65
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary						
PHA Name: Boulder Housing Partners		Grant Type and Number Capital Fund Program Grant No: CO06P016501-11 Replacement Housing Factor Grant No: CO06R016501-11 Date of CFFP:			FFY of Grant:2011 FFY of Grant Approval: 2011	
Type of Grant						
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)		
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 09/30/2013			<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
18a	1501 Collateralization or Debt Service paid by the PHA	0				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	0				
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant:: (sum of lines 2 - 19)	396,168	396,168	281,866.71	281,866.71	
21	Amount of line 20 Related to LBP Activities	0				
22	Amount of line 20 Related to Section 504 Activities	0				
23	Amount of line 20 Related to Security - Soft Costs	0				
24	Amount of line 20 Related to Security - Hard Costs	0				
25	Amount of line 20 Related to Energy Conservation Measures	0				
Signature of Executive Director			Date		Signature of Public Housing Director	
					Date	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: Boulder Housing Partners			Grant Type and Number Capital Fund Program Grant No: CO06P016501-11 CFFP (Yes/ No): No Replacement Housing Factor Grant No: CO06R016501-11			Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CO016333333 Kalmia	General Renovation including siding, windows, roofs, gutters, interiors, parking lot repairs	1460	54	356,551	0			
PHA Wide--1406	Kitchen Renovations--AC Backflow Preventers Playground Renovation--Diagonal Court Bathroom Remodel--Arapahoe Court Electrical Outlet Upgrade--Manhattan Kitchen Renovations--Diagonal Court Replace Roof Ventilator--Walnut Place Replace HVAC in Common Area-- Walnut Place Permanent Soccer Goal Installation-- Diagonal Court	1406	0	0	\$79,234	\$48,459.25	\$48,459.25	All projects complete.
PHA Wide--Admin	Administrative Fees	1410		39,617	39,617	28,186.81	28,186.81	On-going
Move to Work	Emergency Elevator Repairs at Walnut Place Solar Snow Guards at Manhattan, Kalmia, Iris/Hawthorne Certified Needs Assessments, Appraisals- -predevelopment for all public housing site renovation work Principle and Interest Payment on QECB for Energy Performance Contract Program and Salary Cost Associated with Move to Work Program Furniture for Northport Community Room	1492			277,317	205,220.65	205,220.65	On-going

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		
PHA Name: Boulder Housing Partners \$355,006	Grant Type and Number Capital Fund Program Grant No: CO06P01650112 Replacement Housing Factor Grant No: CO06R01650112 Date of CFFP: 03-05-2012	FFY of Grant: 2012 FFY of Grant Approval: 2012

Type of Grant
 Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no:)
 Performance and Evaluation Report for Period Ending: 9/30/2013 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$35,500		0	0
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$319,506		0	0
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
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Part I: Summary						
PHA Name: Boulder Housing Partners		Grant Type and Number Capital Fund Program Grant No: CO06P01650112 Replacement Housing Factor Grant No: CO06R01650112 Date of CFFP: No			FFY of Grant:2012 FFY of Grant Approval: 2012	
Type of Grant						
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)		
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2013				<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
18a	1501 Collateralization or Debt Service paid by the PHA					
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant:: (sum of lines 2 - 19)					
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Activities					
23	Amount of line 20 Related to Security - Soft Costs					
24	Amount of line 20 Related to Security - Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					
Signature of Executive Director			Date			
Signature of Public Housing Director			Date			

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		
PHA Name: Boulder Housing Partners \$355,006	Grant Type and Number Capital Fund Program Grant No: CO06P01650113 Replacement Housing Factor Grant No: CO06R01650113 Date of CFFP:	FFY of Grant: 2013 FFY of Grant Approval: 2013

Type of Grant
 Original Annual Statement **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no: _____)**
 Performance and Evaluation Report for Period Ending: **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$35,500		0	0
5	1411 Audit				
6	1415 Liquidated Damages				
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8	1440 Site Acquisition				
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Part I: Summary						
PHA Name: Boulder Housing Partners		Grant Type and Number Capital Fund Program Grant No: CO06P01650113 Replacement Housing Factor Grant No: CO06R01650113 Date of CFFP: No			FFY of Grant:2013 FFY of Grant Approval: 2013	
Type of Grant						
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)		
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report				
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
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Signature of Executive Director			Date		Signature of Public Housing Director	
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