

*ELM CITY COMMUNITIES  
HOUSING AUTHORITY OF THE CITY OF NEW HAVEN*

*2014 MOVING TO WORK ANNUAL PLAN*



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***Board of Commissioners***

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# I. Introduction

## A. Overview of Agency's Goals and Objectives

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

This MTW Annual Plan states HANH/ELM CITY COMMUNITIES's MTW goals and objectives, our current status toward achieving these goals and objectives, and our planned activities and objectives for FY 2014 (October 1, 2013 to September 30, 2014).

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

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

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

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

HANH/ELM CITY COMMUNITIES's MTW program and flexibility includes, and is limited to, the following HUD programs: HANH/ELM CITY COMMUNITIES's Public Housing Program (LIPH Operating Fund subsidy), Public Housing Capital Fund Program (CFP formula grants), and Section 8 (Housing Choice Voucher) Program for vouchers on yearly ACC cycles.

According to the MTW Agreement, HANH/ELM CITY COMMUNITIES's MTW program does *not* include HUD grant funds committed to specific grant purposes, namely: HANH/ELM CITY COMMUNITIES's HOPE VI grants for Monterey Place, HANH/ELM CITY COMMUNITIES's HOPE VI grants for Quinnipiac Terrace/Riverview, any future HOPE VI Revitalization grants and other competitive grant funds awarded for specific purposes. These grant funded programs committed to specific purposes require HANH/ELM CITY COMMUNITIES to provide periodic reports to HUD. Although these grant funded programs are not included in HANH/ELM CITY COMMUNITIES's MTW program, HANH/ELM CITY COMMUNITIES has included information, where relevant, regarding these grant funded programs in this MTW Annual Plan for FY 2014.

HANH/ELM CITY COMMUNITIES's original MTW Agreement with HUD became effective retroactively to October 1, 2000. The initial seven-year term of HANH/ELM CITY COMMUNITIES's MTW status expired on

September 30, 2008. HUD proposed a new, revised MTW Agreement that would provide MTW status for 10 years. HANH/ELM CITY COMMUNITIES executed the Amended and Restated Moving to Work Agreement on May 2, 2008. The Amended and Restated MTW Agreement governs HANH/ELM CITY COMMUNITIES's MTW status through 2018. HANH/ELM CITY COMMUNITIES made the agreement available for public review and comment for a 30 day period and conducted a public hearing at the end of the review period. The public hearing was conducted on February 25, 2008. The HANH/ELM CITY COMMUNITIES Board of Commissioners approved the Amended and Restated MTW Agreement through Resolution No. 02-22/08-R on February 26, 2008.

HANH/ELM CITY COMMUNITIES's redevelopment plans require flexible use of Section 8 and 9 funds to develop affordable housing for families at or below 80% of AMI; therefore, HANH/ELM CITY COMMUNITIES has executed the Second Amendment to its Restated and Amended Moving to Work Agreement with HUD which clarifies such authority.

HANH/ELM CITY COMMUNITIES's MTW program is the product of an extensive planning process, conducted from 1998-2000, to establish long-term plans for improving our agency's operations and for transforming our public housing stock. During 2006-2007, HANH/ELM CITY COMMUNITIES engaged in a planning process in order to update and reinvigorate our agency's plans. As a result of this planning process, HANH/ELM CITY COMMUNITIES developed a Three-Year Strategic Plan for FYs 2007-2009. During 2009-2010, HANH/ELM CITY COMMUNITIES again engaged in a planning process to re-evaluate and provide continuity to the original Three-Year Strategic plan. The MTW planning process provides the agency with a mechanism for updating its long-term strategy on an annual basis by enabling HANH/ELM CITY COMMUNITIES to take stock of the progress of its on-going activities and by addressing new concerns by establishing new goals and objectives for FY 2014. The 2014 Annual MTW Plan sets forth a long-term vision for the agency for the next 10 years. The long-term vision for the agency centers on streamlining its processes to become more effective and innovative. The long-term vision also calls for the agency to enhance its efforts to promote the economic self-sufficiency of its residents and to increase the housing choices for them and its program participants, as well. The agency recognizes that its long-term viability rest with the economic well being of its residents and the variety of housing choices that it is able to provide them. The long-term vision also calls for the agency to develop relationships with local non-profit organizations to enhance the delivery of its programs, as well as looking to develop commercial ventures that will both expand housing choices in addition to making the agency more efficient.

HANH/ELM CITY COMMUNITIES's 2014 MTW Annual Plan was made available for public review on April 15, 2013 and a public hearing was held on May 15, 2013. On June 18, 2013, the Board of Commissioners passed Resolution #06-121/13-R approving the 2014 MTW Annual Plan.

The following chart summarizes HANH's Goals, Objectives and Initiatives. Numbered items represent MTW initiatives that are more fully described in Sections IV and V of the Plan.

<b>Goal</b>	<b>Increase Housing Choice</b>
	<b>Objective</b>
	<b>Preserve and Create Affordable Housing through Redevelopment Efforts</b>
	<b>Initiatives</b>
	<b>Moving to Work</b>
	NEW
	1.15 Development of Mixed Finance Development for Rockview Phase II Rental
	ON-GOING
	<i>non-numbered initiatives; require funding flexibility only</i>
	Dispose of former Rockview Development for development of NEW Rockview
	Dispose of Valentina Macri for creation of new supportive housing units for formerly homeless
	Dispose of Ribicoff Cottages and Extensions for redevelopment of Ribicoff
	Dispose of Farnam Court for redevelopment of Farnam
	Dispose of Valley Townhouses for redevelopment of Valley Townhouses

Dispose of South Genessee Park at McConaughy Terrace

Use of Legacy Attachment to Increase percent of Project Based Vouchers in any one development form 75% to 100%

- 1.1 Development of Mixed Use Development at 122 Wilmot Road- *FY2011*
- 1.2 Alternative Design Guidelines, TDC and HCC Waivers- *FY2009*
- 1.8 d. Farnam Court *FY2011*
- 1.9 Increased cap on Project Based Vouchers- *FY2012*

Major redevelopment efforts: *(non numbered; requires funding flexibility only)*

- a. William T. Rowe
- b. 122 Wilmot Road
- c. Brookside I and II

- 1.11 Increase the percentage of Housing Choice Voucher budget authority that is permitted to be project based from 20% to 25%
- 1.12 Development of Replacement Public Housing Units with MTW Black Grant Funds-*FY2013*
- 1.14 Redevelopment of 99 Edgewood Avenue k/n/a Dwight Gardens

Non-Moving to Work

Capital Fund Financing Program

**Objective Create Homeownership Opportunities**

**Moving to Work**  
NEW

Dispose of 7 Shelton St to non profit housing developer for creation of homeownership units *(non numbered; requires funding flexibility only)*

Non-MTW

Section Eight Home Ownership Program (SEHOP) *(non numbered; requires funding flexibility only)*

**Objective Preserve Affordable Housing through Modernization Efforts**

**Moving to Work**  
ON-GOING

Project Modernization -- *(non numbered; requires funding flexibility only):*

Envelope enhancements at Winslow-Celentano and Ruoppolo Manor; elevator upgrades at Crawford Manor; vacancy reduction agency wide; UFAS compliance agency wide; lead abatement at Farnam Courts; roof replacement at Waverly and Valley Townhouses; replacement/repair of on site sewer at Prescott Bush.

Non-MTW

NEW

Demolition of 5 units among the scattered site properties

ON-GOING

Demolition of 21 units at Westville Manor  
Rental Assistance Demonstration (RAD) projects: Westville Manor; Essex Townhouses; Crawford Manor; Farnam Court; Ribicoff Cottages and Extensions.

**Objective Prevent Homelessness**

**Moving to Work**

ON-GOING

- 1.5 Foreclosure Protection Program- *FY2009*
- 1.6 Expanded Housing -*FY2008*  
Community Re-Entry (*non numbered; requires funding flexibility only*)
- 1.7 Tenant Based Vouchers for Supportive Housing  
*FY2011*

Non-MTW

NEW

Homeless family Voucher Set-aside

ON-GOING

Project Based Voucher for Supportive Housing  
Supportive Housing Initiative with CT Department  
of Mental Health and Addiction Services

Family Reunification Voucher preference and set  
aside for homeless (or at risk of homelessness)  
families involved with Department of Children and  
Families

Project Longevity voucher preference and set aside  
for rehabilitated violent offenders returning to  
community

**Objective Assist Low Income Families to Access Housing in Areas of Opportunity**

**Moving to Work**

ON-GOING

Deconcentration of Poverty Initiative (*non  
numbered; requires funding flexibility only*)

**Goal**

**Increase Family Self Sufficiency**

**Objective Nurture Youth Residents and Equip them to Grow to be Self Sufficient Adults**

**Moving to Work**

NEW

Youth Initiative (*non numbered; requires funding  
flexibility only*)

**Objective Assist Work Eligible Adults Build Employment Skills**

**Moving to Work**

ON-GOING

- 2.1 Family Self Sufficiency Program *FY2004*
- 2.2 Promotion of Self Sufficiency/Earned Income  
Exclusion- *FY2008*
- 2.3 CARES Initiative- *FY2012*  
Section 3 Employment and Training (*non  
numbered; requires funding flexibility only*)  
Specialized Training Initiative (*non numbered;  
requires funding flexibility only*)

**Objective Support the Maintenance of Self Sufficiency**

**Moving to Work**

ON-GOING

Business Development Support Initiative (*non  
numbered; requires funding flexibility only*)  
SEHOP Capital Improvement Program (*non  
numbered; requires funding flexibility only*)

**Objective Support the Most Vulnerable Residents' Ability to Maintain Housing**

**Moving to Work**

ON-GOING

Resident Services for Families (*non numbered;  
requires funding flexibility only*)  
Resident Services for Elderly/Disabled Families  
(*non numbered; requires funding flexibility only*)

Supportive Services contracts in Elderly/Disabled Developments *(non numbered; requires funding flexibility only)*

Community re-entry program

**GOAL To reduce Costs and Achieve Greater Cost Effectiveness in Federal Expenditures**

**Objective Maximize the Impact of Federal Subsidy in Redevelopment Efforts**

**Moving to Work**

- |          |      |  |
|----------|------|--|
| NEW      | 1.13 | Creation of a commercial business venture at 122 Wilmot Road                                     |
| ON-GOING | 1.4  | Income Eligibility for HCV PBV units in Mixed Finance Developments-FY2012                        |
|          | 1.10 | Income Skewing for PBVs in Mixed Finance Developments -FY2012                                    |
|          |      | Use of Frozen/Fixed Utility Consumption <i>(non numbered; requires funding flexibility only)</i> |
| Non-MTW  |      | Regional provision of affordable housing services  |

**Objective Dispose of Non-Performing Assets**

**Moving to Work**

- |         |  |   |
|---------|--|---|
| NEW     |  | Dispose of Sheffield Manor <i>(non numbered; requires funding flexibility only)</i> |
| Non-MTW |  | Dispose of 620 Grand Ave (warehouse)  |

**Objective Reduce Administrative Burden on Residents/Participants/ Landlords and Staff**

**Moving to Work**

- |          |             |   |
|----------|-------------|---|
| NEW      | 3.5         | HCV Rent Simplification/Cost Stabilization Measures |
| ON-GOING | 3.1         | Rent Simplification -FY2008                         |
|          | 3.2 and 3.3 | Revised Inspection Protocol- FY2008                 |
|          | 3.4         | Mandatory Direct Deposit-FY2009                     |

**Objective Ensure Best Use of Limited Federal Resources**

**Moving to Work**

- |          |  |  |
|----------|--|--|
| ON-GOING |  | Local Asset Management Program <i>(non numbered; requires funding flexibility only)</i>  |
|          |  | Waive 60 Day Notice Requirement on New Utility Allowance Schedule in Newly Developed Mixed Finance Developments <i>(non numbered; requires funding flexibility only)</i> |
|          |  | Full Fungability of Funds for Development Purposes <i>(non numbered; requires funding flexibility only)</i>  |
| Non-MTW  |  | Research and Evaluation  |
|          |  | Energy Performance Contract  |

*B. Initiatives for FY 2014*

During FY 2014 HANH/ELM CITY COMMUNITIES proposes the following new MTW initiatives.

- Initiative 1.15: Development of Mixed Finance Development for Rockview Phase II Rental – the Authority has undertaken an aggressive modernization program which includes the submission of RADs applications including for Westville Manor. This initiative is part of the Westville RAD submission for the creation of replacement public housing units. Units removed from Westville Manor will be replaced at this site.
- Initiative 3.5: HCV Rent Simplification/Cost Stabilization Measures. Due to rising program costs and decreased federal funding HANH/ELM CITY COMMUNITIES proposes a number of streamlining

measures including (1) place unit inspections and rent increases on a biennial and triennial inspection schedule consistent with recertifications; and (2) exempt newly constructed PBV units at initial lease up from HQS inspections.

HANH/ELM CITY COMMUNITIES continues to make progress toward the following MTW initiatives:

***Increase housing choice:***

- Initiative 1.1: Development of Mixed Use Development at 122 Wilmot Road. HANH/ELM CITY COMMUNITIES's plans to redevelop this site as a mixed use facility up to 47 units of housing, commercial space and supportive services were completed during FY2013.
- Initiative 1.2: Design Guidelines, TDC and HCC Waivers. HANH/ELM CITY COMMUNITIES has implemented its revised design guidelines and will continue to use TDC and HCC alternatives that have been approved by HUD. HANH/ELM CITY COMMUNITIES will review its HCC and TDC limits during FY 2014 and annually thereafter to determine if they need to be adjusted based upon the methodology approved by HUD.
- **NO LONGER AN INITIATIVE 1.3.** Included in previous years' plan but HUD indicated no longer needs to be listed as an initiative. Numbering of subsequent initiatives is retained for comparison purposes. (Initiative 1.3: Fungability. HANH/ELM CITY COMMUNITIES will use its fungability under Attachment C of the Amended and Restated MTW Agreement to use funds awarded under Section 8(o) for development purposes.
- Initiative 1.4: Over Income Project Based Vouchers at Mixed Income Developments.
  - 15 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 1 rental.
  - 45 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 rental.
- HCV Initiatives.
  - Initiative 1.5: HCV Preference and set-aside Foreclosure protection program will continue during FY14
  - Initiative 1.6: Expanded Housing Opportunities will continue during FY14.
  - Initiative 1.7: Tenant Based Voucher supportive housing for the homeless. Supportive services married with tenant based vouchers are used to support the successful housing of formerly homeless families.
- Initiative 1.8: Farnam Courts Transformation Plan. HANH/ELM CITY COMMUNITIES has developed a comprehensive plan for the redevelopment of this site. These efforts will continue during FY2014 and HANH/ELM CITY COMMUNITIES will pursue all available funding opportunities including CHOICE, RAD and other HUD programs. The Authority was successful in obtaining 9% LIHTC for this development.
- Initiative 1.9: Increased Cap on PBV units from 75 percent to 100 percent in a mixed finance developments as previously approved will continue in FY14.
- Initiative 1.10: Establish income eligibility criteria for Housing Choice Voucher Program to enable HANH/ELM CITY COMMUNITIES to award project based vouchers for Mixed Finance developments for families of up to 80 percent of area median income (MTW agreement provides waiver for HANH/ELM CITY COMMUNITIES to establish its own income limits).
  - 15 Percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 1 Rental.
  - 45 Percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 Rental
- Initiative 1.11: Increase the percentage of Housing Choice Voucher budget authority that it is permitted to project-base from 20% up to 25%. This authorization will allow for the continued redevelopment efforts of the underperforming developments as well as increase housing choices for our residents.
- Initiative 1.12: Development of Replacement Public Housing Units with MTW Block Grant Funds - HANH/ELM CITY COMMUNITIES will use MTW block grant funds (which are drawn collectively from public housing Operating Funds and Capital Funds and Section 8 Housing Choice Voucher funds) to develop public housing units through a mixed-finance process. The units will be operated as public housing for purposes of admissions, continued occupancy, resident rights, and certain other rules. However, for purposes of providing ongoing operating assistance, HANH/ELM CITY

COMMUNITIES will use its MTW authority to design and fund a local program to develop replacement public housing units under a local housing assistance payments contract with the owner entity, with operating assistance being utilized in a manner similar to the project-based voucher program.

- Initiative 1.13: Creation of a commercial business venture at 122 Wilmot Road. This authorization allows for resources supporting the HANH/ELM CITY COMMUNITIES developments in the West Rock area.
- Initiative 1.14: - Redevelopment of 99 Edgewood Avenue k/n/a Dwight Gardens. HANH/ELM CITY COMMUNITIES will use MTW Block Grant funds to develop housing through a mixed finance process at a distressed 80 unit HUD foreclosed property.

#### *Increase family self sufficiency*

- Initiative 2.1: Enhanced Family Self –Sufficiency program has demonstrated marked success and will continue during FY14
- Initiative 2.2: Promoting Self-Sufficiency/Earned Income Exclusion initiative will continue during FY14 with some necessary revisions.
- Initiative 2.3: CARES Initiative- Self sufficiency initiative geared toward families residing in the newly redeveloped Brookside Phase 2 and Rockview Phase 1 Rental communities that introduces term limits, escrow accounts and self sufficiency support services. Brookside Phase 2 lease up occurred in FY 2013 and Rockview Rental 1 will begin in FY2014.

#### *Cost effective and efficient service delivery*

- Initiative 3.1: Rent simplification. HANH/ELM CITY COMMUNITIES's rent simplification program offers a standardized rent tier table with deductions included, alternate year recertification and alternate year inspections for high performing landlords. Due to Rent Simplification, LIPH and HCV residents are not required to come in for annual recertification interviews on an annual basis. This reduces administrative costs such as staff time and mailings. Customer service is improved for residents who do not have to come in and supply information to HANH/ELM CITY COMMUNITIES annually, unless it is a change initiated by them. HANH/ELM CITY COMMUNITIES has fully implemented its Rent Simplification initiative and conducted a review of it during FY2013. As a result of that review some revisions are being proposed for FY2014.
- Initiative 3.2: Alternative LIPH UPCS Inspections. HANH/ELM CITY COMMUNITIES conducts UPCS inspections on 20% of its inventory. MTW authorization is no longer required for this initiative and it has been closed out in the MTW 2012 report.
- Initiative 3.3: Revised Inspection protocols for HCV units. Alternative HCV unit inspections for high performing landlords reduce the administrative and staff costs for conducting inspections and it provides an incentive for landlords to ensure that the units are up to Housing Quality Standards. Additional streamlining is proposed in FY2014 to allow for self certification by landlords after a failed inspection. Landlords will be required to submit photos of repairs and invoices documenting the cost of repairs in lieu of an additional inspection. This will streamline the process and reduce administrative costs of additional inspections.
- Initiative 3.4: Mandatory Direct Deposit. Direct Deposit alleviates the cost to print paper checks and mailing costs associated with them and it guarantees that HAP payments will be electronically deposited a lot quicker than mailing a check to the landlord.

The following projects will commence and/or continue during FY2014 and requires MTW funding flexibility ONLY:

- Project Modernization. During FY13 the modernization projects included envelope enhancements to Winslow-Celantano and Ruoppolo Manor and elevator upgrades at Crawford Manor. Agency wide, HANH/ELM CITY COMMUNITIES is continuing to address long-term vacancies and modifying units for UFAS compliance. Additional phases of erosion control at Westville Manor will be addressed under the RAD conversion, which will also include kitchen, baths, flooring and heating system upgrades. FY14 Capital Fund improvements include LBP abatement at Farnam Courts, replacement of roofs at Waverly and Valley Townhouses and replacement and repair of on-site sewer lines at Prescott Bush.

- Vacancy Reduction. HANH/ELM CITY COMMUNITIES will continue to show improvement from the baseline FY08 vacancy rate of 10%. The FY14 vacancy rate is expected to be 5%.
- Supportive Services. All planned supportive service initiatives have been implemented and will continue during FY14 including:
  - Resident Services for Families,
  - Resident services for Elderly/Disabled,
  - Supportive Services Contracts in Elderly/Disabled buildings,
  - Section 3 Employment and Training
  - Re-Entry pilot program. Supportive services funding to support the needs of this population are funded through MTW funding flexibility, however, no other flexibilities are required.
- Deconcentration of Poverty -
  - Housing Choice Voucher: By providing participants with additional information to aid their housing search in areas of low-poverty, HANH/ELM CITY COMMUNITIES may facilitate participant's expanded housing search. HANH/ELM CITY COMMUNITIES utilizes real estate consultants to assist in the identification of units in areas of low poverty and link participants to these units. During FY14, this initiative will continue to be measured by assessing the lease up rates in areas of low poverty.
  - LIPH: Marketing initiatives for Higher Income Eligible families will continue during FY14.
- Family Self-Sufficiency Initiatives:
  - Specialized Training Opportunities for HANH/ELM CITY COMMUNITIES's FSS families. HANH/ELM CITY COMMUNITIES's Specialized Training program was implemented FY2010 and provides specialized training in areas where there are employment opportunities such as health care, auto mechanics, retail sales, entry level banking positions and customer service. This program will continue in 2014.
  - Business Development Support Program. HANH/ELM CITY COMMUNITIES provides educational, training, financial management and administrative support services, to assist HANH/ELM CITY COMMUNITIES Residents in the start up of new business ventures. Also, HANH/ELM CITY COMMUNITIES makes available back office support services to existing Resident Owned Businesses (ROBs), MBE, WBE, and other small Section 3 business concerns. This technical assistance will enhance the efforts of Resident Owned Businesses in becoming more technically proficient and innovative companies in offering comprehensive goods and services. HANH/ELM CITY COMMUNITIES's goal is to create three new Resident Owned Businesses during FY 2014.
  - SEHOP Capital Improvement Program. HANH/ELM CITY COMMUNITIES launched the Capital Improvement Program during FY2010 and will continue this program during FY2014. This program supports new homeowners with necessary capital improvements that arise after being in the home for a minimum of three years.
  - Youth Initiative. Provision of support to HANH/ELM CITY COMMUNITIES's families with children by providing additional youth support services, after school and summer programming, truancy prevention services and leadership development opportunities. During 2014, service expansion will include youth employment initiative and college access programs. Additionally, we will increase leadership opportunities to three additional developments and increase year-round employment opportunities.
  - Prison/Community Re-entry initiative. HANH/ELM CITY COMMUNITIES established a preference for LIPH units (a maximum of 12 units) for individuals returning to the community from prison who are engaged in community supportive services and job skills training. Residents receive case management services which will assist them in identifying needs and coordinating referrals and services. Individuals participating in program will be lease compliant i.e. pay rent on time and will not be a nuisance to other residents, During FY2013 residents were leased under this program bringing the total census to 12. As participants graduate the program, new residents will be admitted during FY14 to maintain program capacity and an additional four slots will be added.
- Development
  - Rental Assistance Demonstration (RAD) authorized by the Consolidated and Further Continuing Appropriations Act, allows for the conversion of assistance under the Public Housing, Rent Supplement, Rental Assistance (RAD), and Moderate Rehabilitation (Mod

Rehab) programs to long term, renewable assistance under Section 8. As provided in the Federal Register notice that HUD published on March 8, 2012, at 77 FR 14029, RAD has two separate components. RAD allows projects funded under the public housing and Mod Rehab programs to convert to long term Section 8 rental assistance contracts. During FY2013, HANH/ELM CITY COMMUNITIES received RAD awards from HUD for Essex Townhouses and Crawford Manor and applied for RAD assistance to convert Westville Manor, Farnam Courts, Ribicoff and Ribicoff Extension. Approvals for these applications are pending. Depending on the funding timeline redevelopment will occur during FY2014.

- Demolition of Five (5) Units among the Scattered Site Properties. The condition of these properties makes it cost prohibitive to restore them. HANH/ELM CITY COMMUNITIES intends to demolish five (5) units pursuant to 24 CFR 970 for “de minimis” demolition.
- Demolition of twenty-one (21) Units at Westville Manor. In furtherance of the revitalization of the West Rock Community, the Authority will demolish twenty-one (21) units to make for a viable healthy community at Westville Manor under the mixed finance regulations and section 18 of the Act. Westville Manor is planned for redevelopment under a pending RAD application with replacement housing being provided at the Rockview Phase II site.
- Major Redevelopment Efforts at West Rock (Brookside Homeownership Phase 2 and Rockview Phase 1 and Phase II Rental) and Initiative 1.8: Farnam Courts will include using the HANH/ELM CITY COMMUNITIES Alternative TDC, fungibility and using its authority to provide project based vouchers in excess of 25 percent of the units.

Finally, this report summarizes the following non-MTW initiatives to be undertaken by HANH/ELM CITY COMMUNITIES during FY2014:

#### NEW

- Homeless family voucher set- aside. HANH/ELM CITY COMMUNITIES will allocate 10 vouchers to be used for stabilization of homeless families.
- Regional provision of affordable housing services.

#### ON-GOING

- Section Eight Homeownership Program (SEHOP). HANH/ELM CITY COMMUNITIES continues its successful SEHOP program that assists LIPH and HCV residents and participants with achieving their homeownership goals.
- Supportive Housing Initiative with the State of CT Department of Mental Health and Addiction Services
- DMHAS Mental Health Transformation Grant. Providing housing to homeless individuals served through the State Department of Mental Health and Addiction Services.
- Income Targeting.
- Property Disposition. HANH/ELM CITY COMMUNITIES anticipates disposition of: Valentina Macri Courts, 7 Shelton, Sheffield Manor, Westville Manor, Crawford Manor, Essex Townhomes, South Genesee Park, Ribicoff Cottages and Extensions and Farnam Courts. Appropriate approvals have been or will be sought.
  - Valentina Macri Court Redevelopment – During FY2013, HANH/ELM CITY COMMUNITIES received HUD approval to dispose of the property to a private developer for the redevelopment of the property and, once completed, will provide 17 public housing units, eleven (11) of which will be designated as supportive housing for the homeless, while the remaining six (6) units will be designated for other low income families. Preference will be given to those residents of the former development and the HANH/ELM CITY COMMUNITIES site based waiting list.
  - 7 Shelton Avenue: The disposition of the 7 Shelton Avenue Property was secured through a negotiated sale for less than market value with Beulah Land Development Corporation, a not for profit housing development corporation, for the development of low income affordable housing units. During FY 2010, the disposition of 7 Shelton to Beulah Land Development Corporation was approved by HUD. HANH/ELM CITY COMMUNITIES has entered into an Option Agreement with Beulah Land Development for the purpose of developing nine (9) affordable home ownership units. The negotiated sale price will be paid on a pro-rata basis as each home is sold.

- Sheffield Manor Disposition (51-55 Division) The Housing Authority has determined a need to dispose of the property known as Sheffield Manor, or 51-55 Division Street, in order to reduce capital costs. The HANH/ELM CITY COMMUNITIES has entered into an Option Agreement with Columbus House for proposed disposition for the purpose of developing housing for low-income persons.
- Disposition of Rockview Manor: Under the Mixed Finance Regulations and Section 18 the Authority requested and received approval for disposition of former Rockview Manor public housing site to Glendower, affiliate of Glendower and/or an affiliate of the developer of the Rockview Mixed Finance project. HANH/ELM CITY COMMUNITIES intends to develop up to 247 units of housing on the former Rockview site that was demolished in 2004. The requirements of the funding sources will help to determine the exact nature of the disposition. During FY2013, HANH/ELM CITY COMMUNITIES disposed of one of four parcels for the development of Rockview Phase 1 Rental.
- Submission of a Mixed Finance Disposition and Demolition Application for Ribicoff Cottages and Extensions: During FY2013, HANH/ELM CITY COMMUNITIES submitted a mixed finance disposition application for Ribicoff Cottages. Ribicoff is located at 200 Brookside Avenue and is adjacent to the redevelopment efforts ongoing at West Rock. In addition, the Authority applied for and received 9% LIHTC for the redevelopment.
- Submission of a Mixed Finance Disposition Application for Valley Townhouses: During FY2013, HANH/ELM CITY COMMUNITIES submitted a mixed finance disposition application for Valley Townhouses. Valley Townhouses is located at 210 Valley Street. In addition, the Authority applied for various financing, including but not limited to federal funding, LIHTC, HTCC, FHLB and any other source of funding available.
- Submission of a Mixed Finance Disposition and/or Demolition Application for Farnam Courts: During FY2013, HANH/ELM CITY COMMUNITIES submitted a disposition application for Farnam Courts to revitalize this development and intends to apply for various financing, including but not limited to federal funding, LIHTC, HTCC, FHLB and any other source of funding available. During FY2013, the Authority applied and received 9% LIHTC towards the redevelopment.
- Submission of a Disposition Application for the South Genesee Park at McConaughy Terrace: During FY2013, HANH/ELM CITY COMMUNITIES submitted a disposition application for the park located at McConaughy Terrace on South Genesee with the City of New Haven Parks Department in order to facilitate the completion of the on-site component of the Farnam Courts redevelopment efforts. This disposition was the first step in the process to swap park land with The DeLauro Playground which is currently owned by the City's Parks Department and is maintained through a license agreement by the Housing Authority. The South Genesee Park is owned by the Housing Authority and currently maintained by the City's Parks Department.
- Capital Fund Financing Program. HANH/ELM CITY COMMUNITIES has issued bonds for Brookside Phase 1 Rental under the CFFP.
- Energy Performance Contracting. HANH/ELM CITY COMMUNITIES has contracted with Ameresco, an Energy Service Company (ESCO) to perform an Investment Grade Energy Audit to pursue energy saving improvements agency-wide.. HANH/ELM CITY COMMUNITIES expects to begin implementing energy cost savings measures through an Energy Performance Contract in FY14.
- Mandatory Conversion analysis. HANH/ELM CITY COMMUNITIES has no units listed on HUD's current list of developments requiring mandatory conversion.
- Project Based Voucher Program. HANH/ELM CITY COMMUNITIES will continue to utilize its ability to project base vouchers to support goals of supportive housing, deconcentration of poverty and to support housing choice goals.
- CHOICE Neighborhood funding sought for Farnam Court redevelopment effort with on-site and off-site redevelopment efforts and supportive services.
- Research and Evaluation. HANH/ELM CITY COMMUNITIES has undertaken a research and evaluation study of its MTW program. This study began in FY 11 and will continue in FY14.
- Resident Opportunity and Self Sufficiency (ROSS) Grants. HANH/ELM CITY COMMUNITIES is the recipient of ROSS grants supporting supportive services in our family and elderly/disabled developments and supporting the Family Self Sufficiency Program.

- Tax Exempt Revenue Backed Bonds. HANH/ELM CITY COMMUNITIES has issued Tax Exempt Revenue Backed Bonds for the Farnam Courts Redevelopment and Ribicoff Cottages and Extensions redevelopment.
- Family Unification Tenant Based Vouchers – In order to assist children in danger of being placed in out-of-home care or children who cannot be returned from out-of-home care due to inadequate housing. HANH/ELM CITY COMMUNITIES established a preference on the housing choice voucher waitlist and entered into a Memorandum of Understanding with the State of Connecticut’s Department of Children and Families to identify families in need as well as provide the overall resources for supportive services.
- Project Longevity Tenant Based Voucher allocation – Facilitates the success of the city’s local crime reduction initiative by offering housing assistance to individuals engaged successfully in the Project Longevity initiative.
- Rental Assistance Demonstration (RAD) authorized by the Consolidated and Further Continuing Appropriations Act, allows for the conversion of assistance under the public housing, Rent Supplement, Rental Assistance (RAD), and Moderate Rehabilitation (Mod Rehab) programs to long term, renewable assistance under Section 8. As provided in the Federal Register notice that HUD published on March 8, 2012, at 77 FR 14029, RAD has two separate components. RAD allows projects funded under the public housing and Mod Rehab programs to convert to long term Section 8 rental assistance contracts. HANH/ELM CITY COMMUNITIES has been awarded RAD assistance to convert Essex Townhouses and Crawford Manor and applied for RAD assistance to convert Westville Manor, Farnam Courts, Ribicoff Cottages and Ribicoff Extension during FY2013. Approvals are pending. Depending on the funding timeline redevelopment will occur in FY2014.
- Capital Fund Financing Program. Section 9 (d) of the Act authorizes PHAs to use their Capital Fund Program to finance the development or renovation of public housing. Section 9 (1) (I) of the Act authorizes PHAs to use operating funds to pay debt service. Section 30 of the Act, subject to HUD approval, allows PHAs to mortgage their properties to secure financing. The regulatory guidance for using Capital Fund Program funds to repay debt is set forth in 24 CFR Part 905. In general a PHA may pledge up to 33 percent of its CFP funds and 50 percent (but use up to 100 percent) of its RHF to pay debt service. The regulatory guidance for Operating Funds to repay debt is set forth in 24 CFR Part 990.400. Under 990.400 PHAs are permitted to pledge cash flow from a project in excess of three months to pay debt service. Since HANH/ELM CITY COMMUNITIES is an MTW agency that uses its Capital, Operating and Housing Choice Vouchers funds for any of the purposes under any of these programs, HANH/ELM CITY COMMUNITIES proposed to use and pledge its excess HCV funds to pay debt service for the redevelopment of Brookside Phase I Rental pursuant to 24 CFR part 990.400. This plan was approved by HUD.
- Project Based Voucher Program. In its Administrative Plan, HANH/ELM CITY COMMUNITIES has established site and neighborhood standards to ensure that HANH/ELM CITY COMMUNITIES’s project based voucher program promotes statutory and local goals of deconcentrating poverty and expanding housing and economic opportunities. HANH/ELM CITY COMMUNITIES has set forth its PBV Goals in the Administrative Plan and has determined that the use of PBV’s shall serve to “increase housing choice for low income families”. HANH/ELM CITY COMMUNITIES’s existing project based vouchers program i.e. Fellowship Place, ALSO Cornerstone and Continuum of Care, Park Ridge Associates and Shartenberg developments was expanded in FY09 through the competitive award and the completion of Eastview Terrace which includes PBV. Of those awarded through the competitive process, contracts and lease up occurred during FY09 and FY10. Additional PBV lease ups occurred during FY12 related to the completion of the Quinnipiac Terrace Phase III, William T. Rowe and the Brookside Phase 1 Rental developments. During FY2013, 249 PBV units were anticipated: CUHO New Construction (8), Mutual Housing New Construction and Rehabilitation (20); Brookside Phase 2 (51) and 122 Wilmot Road (13); Downtown Redevelopment Affordable Housing (100); Supportive Housing for the Homeless (10);Rockview Rental Phase 1 (47).
- Elderly Designation HANH/ELM CITY COMMUNITIES has approval to designate 223 units as elderly only at the following developments: 122 Wilmot Road, Prescott Bush, Katherine Harvey, Constance Baker Motley, Newhall Gardens and Edith B. Johnson.
- Waive the 60 day notice requirement to residents of 24 CFR 982.517 of Utility Allowance Schedules for recently completed mixed finance developments. As HANH/ELM CITY COMMUNITIES completes major redevelopments there is a need to implement utility allowance schedules and there is not an existing resident population to notice. HANH/ELM CITY COMMUNITIES seeks to waive the

60 day Notice Requirement to residents of 24 CFR 982.517 of Utility Allowance Schedules in such situations. Non MTW approvals were sought during FY2012.

## II. General Housing Authority Operating Information

### A. Who we serve?

HANH/ELM CITY COMMUNITIES serves over 5000 families through its low income public housing and housing choice voucher programs. The vast majority of these families fall in the Extremely Low Income category with 83% of LIPH and 78% of HCV families in this income category. 27% of LIPH families and 33% of HCV families earn wages. Less than 5% of all families report no income. Approximately 82% of households in both programs range from 1 person to 3 person families. The following table summarizes the population demographics.

During the 2001 baseline year, HANH/ELM CITY COMMUNITIES served a total of 4,827 families. Current numbers reflect an increase of 467 families or 9% indicating that HANH/ELM CITY COMMUNITIES is increasing the number of families being served.

HANH Population Demographics					
	LIPH		HCV		Total
Total households	2123	40%	3171	60%	5294
Total individuals	4194	35%	7841	65%	12035
Average income	\$ 13,085.00		\$ 15,065.00		
Average TTP	\$ 296.00		\$ 344.00		
No income	87	4%	139	4%	
Extremely low income	1758	83%	2459	78%	
Very low income	264	12%	510	16%	
Low income	53	2%	166	5%	
Above low income	48	2%	36	1%	
Households with wages	569	27%	1034	33%	
Households with public assistance	244	11%	137	4%	
Households with social security	1266	60%	1329	42%	
Households with other non-wages	417	20%	539	17%	
Minority households	1466	69%	1847	58%	
Non-minority	657	31%	1324	42%	
Elderly families	594	28%	575	18%	
Disabled families	1171	55%	1184	37%	
1 member	1090	51%	1074	34%	
2 members	460	22%	722	23%	
3 members	289	14%	661	21%	
4 members	167	8%	412	13%	
5 members	71	3%	188	6%	
6 members	33	2%	73	2%	
7 members	9	0%	27	1%	
8+ members	4	0%	14	0%	

**B. Housing Stock Information**

As of September 30, 2013, HANH/ELM CITY COMMUNITIES’s LIPH inventory totals 2,436 units. This reflects a reduction of 529 units since the beginning of HANH/ELM CITY COMMUNITIES’s MTW status, when HANH/ELM CITY COMMUNITIES’s housing stock included 2,965 total units. However, as indicated above, HANH/ELM CITY COMMUNITIES serves more eligible families through its LIPH and HCV programs, and additionally has added affordable units through its mixed income developments. HANH/ELM CITY COMMUNITIES intends to remove 35 units at Essex Townhouses and 109 units at Crawford Manor through Rental Assistance Demonstration Program. The ACC units under Mixed Finance Projects are included as part of the agency’s MTW Program. The following table provides actual counts of units for FY2013.

HANH/ELM CITY COMMUNITIES has budget authority for 4,388 Housing Choice Vouchers. HANH/ELM CITY COMMUNITIES has leased 3,387 Housing Choice Vouchers. HANH/ELM CITY COMMUNITIES also administers 80 Single Room Occupancy (SRO) vouchers and 85 Veterans Administration Supportive Housing (VASH) vouchers for a total utilization of 3,552 vouchers

During FY2014 HANH/ELM CITY COMMUNITIES plans to add 112 additional project based vouchers and 48 tenant based vouchers. During FY14 HANH/ELM CITY COMMUNITIES anticipates adding 144 non-MTW RAD vouchers. This will bring the total voucher count to 3,856. (The RAD, SRO and VASH vouchers are not included in the MTW program).

<b><i>A. Housing Stock Information:</i></b>	
Number of public housing units at the beginning of the plan year:	HANH/ELM CITY COMMUNITIES has a public housing stock of 2,436 public housing units. This includes 1,140 site-based family units; 883 Elderly/Disabled units; 223 Elderly only units; 190 Scattered Site units.
General description of any planned significant capital expenditures by development(>30% of the Agency’s total budgeted capital expenditures for the fiscal year)	Planned capital expenditures for FY2014 by project are identified in section VII. <i>Sources and Uses of Funding, B. Planned Sources and Expenditures by Development, Capital Budget.</i> There are multiple capital projects to be undertaken; however, the projected cost per project does not meet the benchmark for planned significant capital expenditures.

Description of any new public housing units to be added during the year by development (specifying bedroom size, type, accessible features, if applicable);	30 Units at Rockview Phase 1 Rental will include: 21- 1 bedroom units, 8- 3 bedroom units and 1- 4 bedroom unit. 16 of the 77 units will be designated as supportive housing and eight units are accessible to physically handicapped individuals.
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<p>Number of public housing units to be removed from the inventory during the year by development specifying the justification for the removal.</p>	<p>It was anticipated that dispositions would occur at the following sites, but this did not transpire during FY2013. As such, the following dispositions will occur in FY14:</p> <ul style="list-style-type: none"> <li>• 17 units at Valentina Macri- disposition for redevelopment of a Mixed Finance Development under 24 CFR Part 941 Subpart F</li> <li>• Vacant land at Sheffield Manor – excess property</li> <li>• Land at 7 Shelton Avenue-disposition to non-profit entity for an affordable homeownership housing development.</li> </ul> <p>New Dispositions planned for FY14 include:</p> <ul style="list-style-type: none"> <li>• Demolition of 5 obsolete scattered site properties</li> <li>• Demolition of 26 units at Westville Manor as part of redevelopment plan</li> <li>• Rental Assistance Demonstration conversions are anticipated at Essex Townhouses (35 family units), Crawford Manor (109 elderly/disabled units)</li> </ul>
<p>Number of MTW Housing Choice Vouchers (HCV) units authorized;</p>	<p>HANH/ELM CITY COMMUNITIES has budgetary authority for 4,388 housing choice vouchers.</p>

<p>Number of non-MTW HCV units authorized; and</p>	<p>HANH/ELM CITY COMMUNITIES administers 80 Single Room Occupancy vouchers; and 85 VASH vouchers that are not included in the MTW program.</p> <p>RAD vouchers are anticipated to be added at Essex Townhouses (35 units) and Crawford Manor (109 units)</p>
<p>Number of HCV units to be project-based during the Plan year, including description of each separate project.</p>	<p>At the start of FY2014 HANH/ELM CITY COMMUNITIES anticipates having project based 483 units. During FY2014 the following additions are anticipated:</p> <p>47 PBV's at Rockview Phase 1 Rental consisting of 16, 2 bedroom units, 28, 3 bedroom units and 3, 4 bedroom units. Of the 77 units, 16 units will be designated as supportive housing units, while eight (8) units are accessible to the physically handicapped.</p> <p>50 PBV's awarded for downtown development providing affordable housing for families in 1 to 3 bedroom units in downtown New Haven in locations proximate to amenities, public transportation and in non-impacted neighborhoods.</p> <p>10 units for supportive housing/homelessness prevention for formerly homeless families.</p> <p>5 additional PBV's for Foreclosure Protection</p> <p>This is a total of 112 new PBVs bringing HANH/ELM CITY COMMUNITIES's total number of PBVs to 595 or 15.4% of its allocation. See detail in chart below.</p>

<i>B. Leasing Information, Planned</i>	<i>This information is estimated and may be subject to change during the Plan year.</i>
Anticipated total number of MTW PH units leased in the Plan year;	<p>HANH/ELM CITY COMMUNITIES expects to end FY2014 with an occupancy rate of 95% representing 2,230 leased units.</p> <p>Of HANH/ELM CITY COMMUNITIES's overall LIPH units, 40 are approved by HUD for non-dwelling use<sup>1</sup>; and 32 are approved offline for capital and litigation. This leaves an adjusted unit count of 2,348. HANH/ELM CITY COMMUNITIES achieved 95% occupancy during FY2013 and then dropped to 92% due to relocations associated with redevelopment efforts. HANH/ELM CITY COMMUNITIES plans to return to an occupancy rate of 95% during FY2014.</p> <p>HANH/ELM CITY COMMUNITIES's HUD Public Housing Occupancy Standardized Action Plan is attached as Appendix 6.</p>
Anticipated total number of non-MTW PH units leased in the Plan year;	HANH/ELM CITY COMMUNITIES does not have non-MTW PH units in inventory.
Anticipated total number of MTW HCV units leased in the Plan year;	HANH/ELM CITY COMMUNITIES expects to end FY2013 with 3,552 leased MTW units. During FY2014, HANH/ELM CITY COMMUNITIES will add an additional 112 project based units and 48 tenant based units for a total of 3,712 MTW HCV units. HANH/ELM CITY COMMUNITIES anticipates maintaining this lease up rate during FY2014.
Anticipated total number of non- MTW HCV units leased in the Plan year; and	<p>The agency anticipates 100% lease up rate for its 80 non-MTW SRO and 85 VASH vouchers.</p> <p>HANH/ELM CITY COMMUNITIES anticipates leasing 144 RAD vouchers during FY14.</p>

<sup>1</sup> 27 units are approved off line for administrative offices, self sufficiency activities and resident council offices. 13 are approved offline for employee and police officer housing.

<p>Description of anticipated issues relating to any potential difficulties in leasing units (HCV or PH).</p>	<p>No lease up issues are anticipated in the HCV program. MTW flexibility allows use of HCV funds for other approved purposes. HANH/ELM CITY COMMUNITIES's allocation of voucher funds anticipates 82% of funding allocation used for voucher payments and 18% of funding to be used for modernization, development activities and supportive services.</p> <p>During FY 2014, HANH/ELM CITY COMMUNITIES' development projects require use of HCV funds and HANH/ELM CITY COMMUNITIES reserves leaving funding for approximately 3,700 vouchers. HANH/ELM CITY COMMUNITIES anticipates lease up of 3,547 MTW vouchers during FY2014 or 96% utilization. No issues are anticipated in leasing these vouchers. No issues are anticipated in use of these funds.</p> <p>As the table in Appendix 4 details, the use of HCV funds for development purposes peaks in 2012 and decreases thereafter allowing for further HCV lease up.</p> <p>Completion of long term capital improvement projects will result in lease up of long vacant units at: McConaughy Terrace, Ruoppolo Manor, McQueeney Towers, Waverly Townhouses, Valley Townhouses, Winslow Celentano, Essex Townhouses, Crawford Manor, Westville Manor and Scattered Site Properties.</p>
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Housing Program & Type	Description	Current	Units to be Removed During FY 2014	Units to be Added During FY 2014	Planned FY2014
<b>Housing Choice Voucher</b>					
<b>Project Based Vouchers</b>					
Foreclosure Protection	Foreclosure Protection	15	0	5	20
PBV Fellowship I	100% Supportive Housing	18	0	0	18
PBV Fellowship II	100% Supportive Housing	5	0	0	5
PBV Also Cornerstone	100% Supportive Housing	4	0	0	4
PBV Norton Court	100% Supportive Housing	12	0	0	12
PBV Quinnipiac Terrace I	81 units 28% of units PBV	23	0	0	23
PBV Quinnipiac Terrace II	79 units 29% of units PBV	23	0	0	23
PBV Quinnipiac Terrace III	33 units 48% of units PBV	16	0	0	16
Park Ridge	100% Elderly/Disabled	60	0	0	60
Eastview Terrace	102 units 48% units PBV	49	0	0	49
West Village	52 Howe St- single Room Occupancy Units	13	0	0	13
Casa Otonal	12 PBV units for families	12	0	0	12
CUHO Existing	Scattered site PBV units for families	24	0	0	24
Frank Nasti Existing	Scattered site PBV units for families	11	0	0	11
Shartenberg (360 State St)	20 PBV units	20	0	0	20
CUHO New Construction	Affordable rental housing development for families	8	0	0	8
Brookside Phase I	101 affordable rental mixed; 50% units are PBV	50	0	0	50
Brookside Phase II	101 affordable rental mixed; 50% units are PBV	51	0	0	51
New Rowe Building	104 affordable mixed use, mixed finance development; 31% units are PBV	32	0	0	32
MHA New Construction	8 rehabilitation; 12 new construction affordable housing for families; 45.5% units are PBV	20	0	0	20
122 Wilmot Road	13 PBV for affordable housing for elderly in 1 and 2 bedroom accessible units; 28% units are PBV	13	0	0	13
Cedar Hill	Supportive housing for formerly homeless individuals	4	0	0	4
Downtown Redevelopment/affordable housing	Up to 100 PBVs for affordable housing for families in 1 to 3 bedroom units in downtown New Haven locations proximate to amenities, public transportation and in non-impacted neighborhoods	0	0	50	50
Supportive housing/Homelessness prevention	Up to 10 PBVs (or TBVs) for supportive housing for formerly homeless individuals and families	0	0	10	10
Rockview Phase I rental	77 units for affordable housing; 61% of units are PBV	0	0	47	47
<b>PBV Subtotal</b>		<b>483</b>	<b>0</b>	<b>112</b>	<b>595</b>

<b>Tenant Based Vouchers</b>					
Tenant Based Vouchers		2797	0	0	2797
DMHAS Supportive Housing First	10 vouchers for supportive housing for formerly homeless frequent users of behavioral health and corrections services	10	0	0	10
DMHAS Mental Health Transformation Grant FUSE	10 supportive housing vouchers for formerly homeless	10	0	0	10
Family Options-Homeless	15 supportive housing vouchers for homeless families	15	0	0	15
William T. Rowe relocation vouchers	Replacement Housing Vouchers	9	0	0	9
Family Unification Vouchers	12 vouchers for supportive housing for families involved with child protection agency Address housing needs of homeless individuals with case management	12	0	0	12
Permanent Enrichment		5	0	5	10
Foreclosure protection and/or supportive housing for homeless	Vouchers for families at risk fo homelessness	35	0	15	50
Brookside Homeownership Phase I	10 new homeownership vouchers	10	0	9	19
Project Longevity	Vouchers for City initiative targeting homeless former offenders	1		19	20
<b>TBV subtotal</b>		2904	0	48	2952
MTW Housing Choice Voucher					
<b>MTW voucher subtotal</b>		3387	0	160	3547
Non MTW Vouchers					
VASH vouchers	Supportive housing for homeless veterans	85	0	0	85
Single Room Occupancy	Vouchers for formerly homeless in SRO	80	0	0	80
Rental Assistance Demonstration	109 elderly/disabled units at Crawford Manor; 35 family units at Essex Townhouses	0	0	144	144
<b>Non MTW Voucher subtotal</b>		165	0	144	309
<b>Housing Choice Voucher Total</b>		<b>3552</b>	<b>0</b>	<b>304</b>	<b>3856</b>

<i>C. Waitlist Information</i>	
Description of anticipated changes in waiting lists (site-based, community-wide, HCV, merged);and	HANH/ELM CITY COMMUNITIES does not anticipate changes with its waiting list during FY2014.
Description of anticipated changes in the number of families on the waiting list(s) and/or opening and closing of waiting list(s).	<p>HANH/ELM CITY COMMUNITIES’s HCV waitlist has averaged 4,010 families during FY 2013. It is anticipated that the FY 2014 waitlist will be comparable.</p> <p>HANH/ELM CITY COMMUNITIES’s LIPH waitlists have averaged 6,000 families during FY 2014. It is anticipated that the FY 2014 waitlists will be comparable.</p>

### *Policies for Mixed Finance Developments*

HANH/ELM CITY COMMUNITIES’s public housing portfolio presently includes fifteen mixed finance developments: Monterey Place Phase 1, 2, 3, 4, 5 and 2R, Eastview Terrace Phase 1, William T. Rowe, Brookside Phase 1, Brookside Phase II, Rockview Phase 1 Rental, 122 Wilmot Road and Quinnipiac Terrace Phase 1, 2 and 3. The housing in all developments is owned and managed by private companies, according to management agreements, which have established their own policies for admissions and occupancy, according to the following guidelines:

The management agent of the mixed finance development must establish written policies for admissions and occupancy. The admissions and occupancy policies for the mixed finance development must be submitted to, and approved by HANH/ELM CITY COMMUNITIES.

The admissions and occupancy policies for the mixed finance developments must comply with HUD regulations and federal fair housing and civil rights requirements. The aforementioned mixed-finance developments have had their admissions and occupancy plans and policies set forth in previous MTW plans.

CARES – Brookside Phase II and Rockview Phase 1 Rental – the following preferences was approved by the HANH/ELM CITY COMMUNITIES Board of Commissioners via Resolution # 11-225/11-R and Resolution # 01-02/13-S respectively: The following modifications will be made to the HANH/ELM CITY COMMUNITIES ACOP specific to the Brookside Phase 2 and Rockview Phase 1 Rental Mixed Finance Development:

- An admission preference for “working families” for all PBV units;
- An admission preference for former and current West Rock residents for all ACC units will apply pursuant to the agreement between the Tenant Resident Council (“TRC”) for West Rock and the Developer and is as follows:
  - **First preference** –all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA) (7/17/1999) between TRCs of West Rock and HANH/ELM CITY COMMUNITIES by order of when people initially moved into the development,
  - **Second preference**—all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and HANH/ELM CITY COMMUNITIES,
  - **Third preference**—all residents of Westville Manor or Ribicoff\_Cottages at the time of the execution of the MOA between TRCs of West Rock and HANH/ELM CITY COMMUNITIES,
  - **Fourth preference**—applicants in accordance with all other preference set forth in the ACOP.

- In accordance with the MOA, all relocated residents that are in “good standing” as defined in the ACOP will be permitted to exercise their right to return.
- Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to families on the Authority’s transfer waiting list, then to families on the Authority’s accessible waiting list.
- Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.
- In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment any deal-specific management documents and this ACOP those documents shall control. Provided however that in all events notwithstanding anything in this addendum to the contrary the applicable public housing requirements shall control.
- Income tiering in accordance with the ACOP such that 100 percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income.
- Rent determination for returning families will continue to be done in accordance with HANH/ELM CITY COMMUNITIES’s Rent Simplification Policies under HANH/ELM CITY COMMUNITIES’s Alternative Rent Determination Policy.
- Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.
- Flat Rent determination for new families shall be done annually.
- CARES (Caring About Resident Economic Self-Sufficiency) as further defined in Exhibit C attached hereto.
- Definition of “Tenant in Good Standing” for “returning residents” who have preference are as follows
  - (i) HANH/ELM CITY COMMUNITIES deems a household not to be in good standing if HANH/ELM CITY COMMUNITIES has taken legal action against the household and has obtained an execution for possession, allowing it to evict the household. At this stage of the legal process, all rights to cure the lease violation have been exhausted, and so have the appeals processes through both the Housing Court and the Housing Authority’s internal grievance procedure;
  - (ii) Households which have reached court-stipulated agreements with the Housing Authority to cure lease violations (such as nonpayment of rent) are considered to be in good standing as long as they abide by the terms of the stipulated agreement;
  - (iii) Households which have received a pre-termination notice or notice to quit or are at any subsequent stage of eviction process are still considered to be in “good standing” for the purposes of the MOA until they have “exhausted all rights to cure and appeals”, this means that households under eviction remain in good standing until HANH/ELM CITY COMMUNITIES obtains an execution for eviction.

In addition, the policies governing the 122 Wilmot Road development were approved via Resolution 12-243/11-R and included the following: Thirteen (13) PBV units will be designated for the elderly with preference for former West Rock residents pursuant to the agreement between the Tenant Resident Council (“TRC”) for West Rock and the Developer and is as follows:

#### THE PREFERENCE SYSTEM

- a) An Admission preference does not guarantee admission.
- b) Preferences establish the order of applicants on the waiting list.
- c) Every applicant must still meet the Wilmot Crossing at West Rock’s Selection Criteria as set forth in the ACOP before being offered an apartment.
- d) Verification must be submitted in order to be given a preference.
- e) Preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer (prior to execution of a lease), have the oldest application date on the waiting list for the size and type of unit sought.
- f) An admission preference for the thirteen (13) Project Based Section 8 (PBV) units are set forth below:
  - a. The thirteen (13) PBV units are designed Elderly Only.
    - i. Preference for these 13 PBV units are as follows:
      1. First preference – all residents of Brookside at the time of the execution of the Memorandum of Agreement (MOA)

- (7/17/1999) between TRCs of West Rock and HANH/ELM CITY COMMUNITIES by order of when people initially moved into the development;
2. Second preference - all residents of Rockview at the time of the execution of the MOA between TRCs of West Rock and HANH/ELM CITY COMMUNITIES;
  3. Third preference - all residents of Westville Manor or Ribicoff Cottages at the time of the execution of the MOA between TRCs of West Rock and HANH/ELM CITY COMMUNITIES;
  4. Fourth preference - applicants in accordance with all other preference set forth in the ACOP.
- g) Within the aforementioned preferences, the following preferences will prevail:
- a. Displaced Persons as defined under Section II Housing Glossary Terms of the ACOP.
  - b. Documented victims of domestic violence, dating violence or stalking.
  - c. Local preference based on Income Targeting 24 CFR 960.202. The Owner and HANH/ELM CITY COMMUNITIES have agreed pursuant to the Regulatory and Operating Agreement.
- h) Accessible vacant units shall be offered first to former residents of West Rock with a disability that qualifies them for the units, in order of the preferences, then to a family on the Authority's transfer waiting list, then to the Authority's accessible waiting list.
- i) Returning residents that voluntarily accept a PBV unit will be provided with same transfer rights as other ACC residents.
- j) In the event of a conflict between the Declaration of Restrictive Covenants, the Regulatory and Operating Agreement, the Mixed Finance ACC Amendment, any deal-specific management documents and this ACOP, those documents shall control. Provided however, that in all events notwithstanding anything in this addendum to the contrary, the applicable public housing requirements shall control.
- k) Income tiering in accordance with the ACOP such that 100% percent of the public housing units shall be rented to households with annual income at or below 30 percent of area median income and that public housing units shall be leased to families with income above 30 percent of the area median income if households below 30% area median income are not available and eligible for occupancy so that vacant units are not unoccupied.
- l) Rent determination for returning families will continue to be done in accordance with HANH/ELM CITY COMMUNITIES's Rent Simplification Policies under HANH/ELM CITY COMMUNITIES's Alternative Rent Determination Policy.
- m) Rent determination for all new admissions shall be done in accordance with HUD regulations at 24 CFR Part 5.
- n) Flat Rent determination for new families shall be done annually.

### III. Non-MTW Related Housing Authority Information

#### A. Planned Uses of other HUD or Federal Funds

HANH/ELM CITY COMMUNITIES receives ROSS grants that are not included in the MTW block grant funding. The uses of the ROSS grants are detailed below.

- **Resident Opportunity and Self-Sufficiency (ROSS) grants -**

HANH/ELM CITY COMMUNITIES was awarded a ROSS grant for FY2014 in the amount of \$486,000 to fund three Resident Services Coordinators in HANH/ELM CITY COMMUNITIES's Family and Senior/Disabled developments.

Planned for FY 2014 ROSS grant expenditures are as follows:

Fund three (3) Resident Services Coordinators	\$414,000.00
Training	\$ 12,000.00
Administrative (Tenant supplies/ equipment)	\$ 60,000.00

#### B. Description of Non-MTW Activities Proposed by Agency

**Non-MTW Initiatives.** During FY2014, HANH/ELM CITY COMMUNITIES is pursuing the following non-MTW related initiatives. Separate approvals will be sought where necessary.

##### ***New Non-MTW Initiatives in FY2014***

- ***Homeless Family Voucher set-aside***

HANH/ELM CITY COMMUNITIES will set aside up to 25 vouchers for currently homeless families and families at risk of homelessness. These vouchers are committed as part of HANH/ELM CITY COMMUNITIES's commitment to ending homelessness in the City of New Haven and is consistent with the 10 Year Plan to End Homelessness.

- ***Regional Provision of Affordable Housing Services***

During FY 2012 and FY 2013 HANH/ELM CITY COMMUNITIES was sought after by other PHAs in the greater New Haven region to partner on the delivery of affordable housing services. For some PHAs, HANH/ELM CITY COMMUNITIES has taken over Executive operations and served as Executive Director. In another, HANH/ELM CITY COMMUNITIES has taken over full operations of its affordable housing portfolio. Finally, HANH/ELM CITY COMMUNITIES has been requested to direct and manage the development and redevelopment efforts at other PHAs. HANH/ELM CITY COMMUNITIES earns a management and/or developers fee for these activities.

##### ***On-going Non MTW Initiatives***

- ***Section Eight Homeownership Program.***

HANH/ELM CITY COMMUNITIES expanded its capacity to serve 150 total families in its Home Ownership Program. Each family may participate for up to 5 years and during their program enrollment, any incremental rent increases due to increased earned income are saved in escrow, on behalf of the family, which the family may use upon graduation for approved self-sufficiency purposes.

To date, 36 residents have purchased homes. During 2014, we expect an additional 4 residents to purchase homes.

- ***Supportive Housing Initiative with Department of Mental Health and Addiction Services.*** HANH/ELM CITY COMMUNITIES provides twenty (20) vouchers to participants receiving DMHAS' Intensive case management (ICM) services. Participants are screened by DMHAS and given preference on the supportive housing wait list. During FY2010 this initiative was implemented. In FY2011, 15 participants were leased up and FY2012 the remaining 5 were leased up. During 2013, there was one vacancy due to a lease termination. During 2014, one lease up is anticipated. The program will continue to provide intensive case management services to assist participants with maintaining housing. This program will continue during FY13.

- ***DMHAS Mental Health Transformation Grant -***

The Mental Health Transformation (MHT) Grant awarded DMHAS and its sub-recipient, Continuum of Care, Inc. funding to provide supportive services to individuals who are exiting homelessness and entering permanent housing. Permanent Supportive Housing is a housing model that has been shown to be effective in ending homelessness. An evaluation component will also be included in this project. This project will serve fifty (50) individuals per year.

The MHT is an approach to ending homelessness by providing permanent and independent housing along with supportive services as needed. The program provides supportive services to address mental health and substance use issues and illness management utilizing harm-reduction and trauma informed care models. A variety of services are provided to promote housing stability and individual well-being. The duration of services depends upon individual need. The MHT program serves adults in need of mental health or dual diagnosis treatment, who are homeless or are currently living in supportive housing programs. The MHT program offers a variety of supports assisting clients in managing their symptoms more effectively and overcoming challenges resulting from their illness. Accessing entitlements and help with budgeting, and integration of service providers are key components of the program. Case management in conjunction with the resident will develop individualized service plans based on resident preference and stated needs. An assigned staff member will assist in identifying each client's strengths, needs, abilities, and preferences. The service plan targets the utilization of cultural, rehabilitative, vocational, recreational, social, and emergency resources in the community. Appropriate support, staff-resident interaction, and counseling are provided through individual sessions with staff members.

The MHT Program offers daily living skills development, peer support services, in home health care, crisis intervention, relapse prevention, and wellness screenings. Services will vary according to individual client needs and may include different degrees or levels of service. Long range planning endeavors that help residents achieve their optimal level of autonomous functioning and successful residency in the community is the goal of the program.

HANH/ELM CITY COMMUNITIES will obligate five (5) vouchers and twenty (20) LIPH units for participants in the MHT program. Applications for these vouchers will be provided to individuals identified by Continuum of Care Case Management as being eligible to participate. Applicants for the vouchers must meet the same eligibility requirements as applicants the HANH/ELM CITY COMMUNITIES's supportive Housing Programs. For the twenty (20) LIPH units, there will be an admission preference for individuals exiting homelessness. During FY 2012 four LIPH units were leased and five leased in FY 2013. Of the eleven remaining units, four units will be leased during FY 2014. During FY 2013, four vouchers were utilized with one remaining to be utilized during FY 2014.

- ***Income Targeting.*** HUD's income targeting regulations require that least 40% of new admissions to the public housing program must be extremely low-income families (less than 30% of the area median). Housing authorities may be required to undertake affirmative measures to ensure that they comply with HUD's income targeting requirements. HANH/ELM CITY COMMUNITIES has provided demographic data regarding the income levels of current residents and waiting list applicants in a prior Section of this MTW Annual Plan. As this data indicates, the vast majority (85% or more) of HANH/ELM CITY COMMUNITIES's current residents and applicants are extremely low-income. HANH/ELM CITY COMMUNITIES's existing program already satisfies HUD's income targeting requirements, with well more than 40% of new admissions being extremely low income families, without HANH/ELM CITY COMMUNITIES taking any special measures. With over 85% of HANH/ELM CITY COMMUNITIES's residents at the extremely low-income level, this creates challenges in creating viable communities. The result becomes communities plagued by the social challenges of the extremely poor accompanied by the challenges of the financial viability of the property. HANH/ELM CITY

COMMUNITIES aggressively markets its properties to new populations in an attempt to further stratify the income mix of these developments while still satisfying the requirement to admit at least 75% very low income residents. HANH/ELM CITY COMMUNITIES's admission preferences have been programmed to draw families in accordance with this requirement. Additionally, HANH/ELM CITY COMMUNITIES seeks to increase the self sufficiency of the existing public housing residents through the FSS initiatives and resident support services discussed below. This initiative began implementation during FY12 and is planned to continue during FY14.

• ***Property Dispositions. HANH/ELM CITY COMMUNITIES intends to dispose of the following properties during FY2014:***

- 17 units at Valentina Macri- disposition for redevelopment of a Mixed Finance Development under 24 CFR Part 941 Subpart F – Approval for disposition received in November 2012 and awaiting final closing.
- Vacant land at Sheffield Manor – HANH/ELM CITY COMMUNITIES has entered into an Option Agreement with Columbus House for the purposes of developing housing for low income individuals.
- Land at 7 Shelton Avenue-disposition to non-profit entity for an affordable homeownership housing development.
- Five (5) obsolete units from the single family homes in the scattered Site Portfolio. 69 Rock Street, 44/46 Judith Terrace and 168 Beacon Street are planned for disposition pursuant to 24 CFR 970 for “de minimis” demolition.
- Disposition of Rockview Manor as part of the redevelopment efforts in the West Rock neighborhood. During FY2013, parcel one of four was disposed of to the Developer.
- Disposition of Ribicoff Cottages and Extensions as part of the redevelopment efforts in the West Rock neighborhood. Application was submitted during FY2013.
- Disposition of Valley Townhouses as part of a mixed finance disposition for the redevelopment and rehabilitation of this property.
- Disposition of Farnam Court as part of a mixed finance disposition for the redevelopment and rehabilitation of this property.
- Disposition of South Genessee Park at McConaughy Terrace as part of a swap of park land for the DeLauro Playground at Farnam Court which is being redeveloped.

• ***Capital Fund Financing Program***

HANH/ELM CITY COMMUNITIES issued bonds under the CFFP program to support the redevelopment of Brookside Phase I. HANH/ELM CITY COMMUNITIES anticipates defeasance of up to \$1,500,000 of the bonds in conjunction with its aggressive modernization program.

• ***HANH/ELM CITY COMMUNITIES to Implement ESCO:***

HANH conducted a competitive procurement and selected an Energy Savings Company. During FY2013, HANH entered into an ESCO contract with Ameresco, Inc. Ameresco completed an energy audit of HANH's properties. During FY2014, HANH intends to proceed with energy savings upgrades in selected developments. Appropriate HUD approvals will be sought prior to entering into an energy savings contract.

During FY2014 HANH intends to seek approval from the Office of Public Housing Programs to retain savings.

• ***Mandatory Conversion***

HANH/ELM CITY COMMUNITIES has no units listed on HUD's current list of developments requiring mandatory conversion.

• ***Project Based Voucher Program.***

In its Administrative Plan, HANH/ELM CITY COMMUNITIES has established site and neighborhood standards to ensure that HANH/ELM CITY COMMUNITIES's project based voucher program promotes statutory and local goals of deconcentrating poverty and expanding housing and economic opportunities. HANH/ELM CITY COMMUNITIES has set forth its PBV Goals in the Administrative Plan and has determined that the use of PBVs shall serve to “increase housing choice for low income families”. HANH/ELM CITY COMMUNITIES's existing project based vouchers program i.e. Fellowship Place, ALSO Cornerstone and Continuum of Care, Park Ridge Associates and Shartenberg developments was expanded in FY09 through the competitive award and the completion of Eastview Terrace which includes PBV. Of those awarded through the competitive process, contracts and lease up occurred during FY09 and FY10. Additional PBV lease ups occurred during FY12 related

to the completion of the Quinpiac Terrace Phase III, William T. Rowe and the Brookside Phase 1 Rental developments. The following 102 PBV units were added during FY2013: CUHO New Construction (8), Mutual Housing New Construction and Rehabilitation (20); Brookside Phase 2 (51) and 122 Wilmot Road (13); Supportive Housing for the Homeless (10). The following PBV's will be issued during FY14: Rockview Phase 1 Rental (47) and Downtown Redevelopment Affordable Housing (up to 100). During FY 14 it is anticipated that 112 new PBVs will be added.

- ***CHOICE Neighborhood***

HANH/ELM CITY COMMUNITIES's redevelopment efforts can be bolstered by funding under the CHOICE Neighborhood program and as such will continue to be sought for redevelopment efforts at Farnam Court.

- ***Research and Evaluation.*** HANH/ELM CITY COMMUNITIES has undertaken a research and evaluation study of its MTW program. This study began in FY 11 and will continue in FY14.
- ***ROSS Grants.*** Detailed above. This grant funding supports HANH/ELM CITY COMMUNITIES's supportive housing and resident services programming for families and elderly disabled residents and will continue during FY2014.
- ***Elderly Designation.*** HANH/ELM CITY COMMUNITIES has HUD approval for elderly designated housing at 223 units. Re-designation approval was submitted and granted in FY2013.
- ***Tax Exempt Revenue Based Bonds.*** HANH/ELM CITY COMMUNITIES issued Tax Exempt Revenue Backed Bonds for the Farnam Court redevelopment project and Ribicoff Cottages and Extensions redevelopment.
- ***Family Reunification Vouchers.*** HANH/ELM CITY COMMUNITIES continues its initiative to support the reunification or prevent out of home placements for children in families serviced by the child protection agency by making available vouchers for families at risk of homelessness.
- ***Project Longevity Vouchers.*** HANH/ELM CITY COMMUNITIES continues its initiative to reduce the cycle of recidivism and support the re-entry population by making vouchers available to individuals and families involved in the City's Project Longevity re-entry initiative.
- ***Rental Assistance Demonstration program.*** HANH/ELM CITY COMMUNITIES received RAD funding for the modernization of Essex Townhouses and Crawford Manor. Additional applications were submitted during FY2013 for Westville Manor, Farnam Court, Ribicoff Cottages and Extension.
- ***Waive the 60 Day Notice Requirement to residents for Utility Allowance Schedules for new residents of recently completed Mixed Finance Development.*** This approval has previously been granted and will continue during FY2014 for newly occupied redeveloped properties.

## IV. Long-Term MTW Planning

Description of the Agency's long-term vision for the directions of its MTW program, extending through the duration of the MTW Agreement

MTW Goal	Description of Long Term (10 Years) Strategic Plan
<p>1. Reduce cost and achieve greater cost effectiveness in Federal expenditure.</p>	<ul style="list-style-type: none"> <li>• Streamline administrative functions in LIPH and HCV program operations through transition to paperless systems and electronic files.</li> <li>• Continued process of streamlined administration of HCV program through introduction of HQS self certification program for model landlords.</li> <li>• Exploration of regional provision of housing authority services on a fee for service basis.</li> <li>• Disposition and/or conversion of remaining non-performing assets.</li> <li>• Continued investment in technological advances to reduce administrative burden and create model wired and wireless communities.</li> <li>• Continued investment in energy efficiency initiatives to improve the efficiency of HANH/ELM CITY COMMUNITIES's operations.</li> </ul>
<p>2. Give incentives to families with children whose heads of household are either working, seeking work or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self sufficient</p>	<ul style="list-style-type: none"> <li>• Develop transitional models of assistance that move families toward self sufficiency and away from subsidized housing in progressive steps.</li> <li>• Expansion of resident owned business initiatives leading to an increase in the number of HANH/ELM CITY COMMUNITIES contracts executed with such business enterprises and support for these businesses successfully competing for non-HANH/ELM CITY COMMUNITIES work.</li> <li>• Expansion of cost effective training programs and increase in number of residents participating in such.</li> <li>• Expansion of supportive services programming to provide needed supports to families as they move toward self-sufficiency. In the long term, on-site supportive services is critical to our effective management of Elderly/Disabled developments—perhaps equally important to security improvements—as more than 90% of our Elderly/Disabled waiting lists are persons with disabilities and, based on recent admissions, the majority have significant behavioral health disabilities.</li> <li>• Create linkages with local school system to support children's academic progress and attainment.</li> </ul>
<p>3. Increase housing choices for low income families</p>	<ul style="list-style-type: none"> <li>• Complete final revitalization effort of HANH/ELM CITY COMMUNITIES's LIPH housing stock through revitalization/redevelopment or disposition of remaining poor performing assets, e.g., Valentina Macri and Ribicoff Cottages and Extension.</li> <li>• HANH/ELM CITY COMMUNITIES will seek to address the housing crisis experienced by the otherwise eligible re-entry population by assisting with housing choices for individuals who are being serviced through a comprehensive service approach to re-entry.</li> <li>• Development of home ownership options (West Rock and Quinnpiac Terrace redevelopments)</li> </ul>

MTW Goal	Description of Long Term (10 Years) Strategic Plan
	<ul style="list-style-type: none"> <li>• Promotion of housing opportunities for income eligible local workforce through LIPH and HCV programs.</li> <li>• Promote development opportunities in non-HANH/ELM CITY COMMUNITIES developments through use of housing choice vouchers to create mixed income, mixed finance viable housing opportunities for participants.</li> </ul>

The following table summarizes HANH/Elm City Communities MTW Goals, Objectives and Initiatives.

<b>Goal</b>	<b>Increase Housing Choice</b>	
	<b>Objective</b>	
	<b>Preserve and Create Affordable Housing through Redevelopment Efforts</b>	
	<b>Initiatives</b>	
	<b>Moving to Work</b>	
	NEW	
	1.15	Development of Mixed Finance Development for Rockview Phase II Rental –FY2014
	ON-GOING	
	1.1	Development of Mixed Use Development at 122 Wilmot Road- FY2011
	1.2	Implement Local Total Development Cost (TDC) Limits and Hard Construction Cost (HCC) Limits: FY2009
	1.8	Farnam Courts Transformation Plan -FY2011
	1.9	Increase the Allowed Percentage of Project Based Units Under Section 18 of the Housing Act of 1937 from 75 percent to 100 percent - FY2012
	1.11	Increase the percentage of Housing Choice Voucher budget authority that is permitted to be project based from 20% to 25% -FY2013
	1.12	Development of Replacement Public Housing Units with MTW Black Grant Funds-FY2013
	1.14	Redevelopment of 99 Edgewood Avenue k/n/a Dwight Gardens- FY2011
	<b>Objective</b>	
	<b>Prevent Homelessness</b>	
	<b>Moving to Work</b>	
	ON-GOING	
	1.5	HCV Preference and set-aside for victims of Foreclosure- FY2009
	1.6	Promote Expanded Housing Opportunities for HCV Program -FY2008
	1.7	Tenant Based Vouchers for Supportive Housing for the Homeless-FY2011
<b>Goal</b>	<b>Increase Family Self Sufficiency</b>	
	<b>Objective</b>	
	<b>Assist Work Eligible Adults Build Employment Skills</b>	
	<b>Moving to Work</b>	
	ON-GOING	
	2.1	Family Self Sufficiency Program FY2004
	2.2	Promotion of Self Sufficiency/Earned Income Exclusion- FY2008
	2.3	CARES Initiative- FY2012
<b>GOAL</b>	<b>To reduce Costs and Achieve Greater Cost Effectiveness in Federal Expenditures</b>	
	<b>Objective</b>	
	<b>Maximize the Impact of Federal Subsidy in Redevelopment Efforts</b>	
	<b>Moving to Work</b>	
	NEW	
	1.13	Creation of a commercial business venture at 122 Wilmot Road –FY2013
	ON-GOING	
	1.4	Over Income Project Based Vouchers at Mixed Income Developments-FY2012

1.10 Establish Income Eligibility Criteria for HCV Program –*FY 2012*

**Objective Reduce Administrative Burden on Residents/Participants/ Landlords and Staff Moving to Work**

**NEW** 3.5 HCV Rent Simplification/Cost Stabilization Measures – *FY2014*

**ON-GOING** 3.1 Rent Simplification -*FY2008*

3.2 and 3.3 Revised Inspection Protocol- *FY2008*

3.4 Implement Mandatory Direct Deposit for Housing Choice Voucher Landlords-*FY2009*

## V. Proposed MTW Activities

### *Proposed 1.15. Development of Mixed Finance Development for Rockview Phase II Rental*

#### **A. Description**

The Authority has undertaken an aggressive modernization program which includes the submission of an application for RAD funding for several sites including for Westville Manor. This initiative is part of the Westville RAD submission for the creation of replacement public housing units. The Authority intends to demolish 26 units total at Westville Manor and will create these units at Rockview Phase II Rental.

Rockview Phase II Rental will rely on the MTW authorizations for alternative TDCs and commingling of funds.

#### **B. MTW Statutory Objective**

Section 204(a) of the 1996 Appropriations Act provides that public housing agencies that administer Section 8 and public housing shall have the flexibility to design and test various approaches for providing and administering housing assistance that increases housing choices for low-income families, reduces cost and achieves greater cost effectiveness in Federal Expenditures.

#### **C. Anticipated Impacts**

The impact of the completed project shall promote housing choice for low income families by reducing density therefore improving the quality of housing and making the development more marketable to low income families, anticipated reduction in crime and increase in occupancy of the surrounding neighborhood with new businesses and renewed sense of community, a faster lease-up and fewer turnovers.

#### **D. Baseline & Benchmarks**

The metrics for providing increased housing choices for low income families are as follows:

- number of units developed for extremely low; very low and low income families;
- number of people on waiting list
- number of turnovers
- At baseline, 0 units exist at Rockview Phase II Rental

#### **E. Data Collection on metrics & protocols**

Unit breakdown data will come from project development pro forma.

Unit lease up and turnover time will be tracked on an annual basis through the agency's data management system.

#### **F. Authorization Cited**

Attachment C.B.1 .b.ii permits HANH/ELM CITY COMMUNITIES to commingle any of its Section 8(o), Section 9(d) and Section 9(e) to use for any of the purposes under any of these statutes.

#### **G. Hardship Policy, if rent reform**

Amended and Restated Moving to Work Agreement, Attachment C, Section C.12 provides authorization for HANH to establish reasonable and modest design guidelines.

N/A

#### **H. Implementation Plan**

- Public Meetings regarding the submission of RAD application for Westville Manor – April 2013
- Submission of RAD application for Westville Manor – June 30, 2013

### *Proposed 3.5. -HCV Rent Simplification/Cost Stabilization Measures*

#### **A. Description**

The Authority enacted Rent Simplification measures consistent with approved Initiative 3.1 during FY2008. This initiative seeks to expand upon those streamlining measures. Under the current program, HANH/ELM CITY COMMUNITIES eliminated annual recertifications and implemented biennial and triennial recertifications. Despite that fact the participants were no longer required to be seen annually, HANH/ELM CITY COMMUNITIES continued to conduct annual unit inspections and allowed for annual rent increases. HANH/ELM CITY COMMUNITIES now seeks to place unit inspections and rent increases on a schedule consistent with recertifications. However, a HCV participant or landlord can request a Special inspection, if necessary, at any point that deficiencies are suspected.

Further HANH proposes a self certification process whereby for fails related to items that are not health and safety related for annual (biennial and triennial) inspections, landlords and participants will be able to self certify and submit documentation of correction of deficiencies.

These changes are sought to streamline the administrative process and create efficiencies and savings. History has demonstrated that the majority of all units inspected annually pass on the first inspection. It is reasonable to assume that given a high pass rate, the quality of the housing lends itself to less frequent inspections. All participants retain the right to request a Special Inspection at any time. Even anticipating special inspections, the number of inspections is expected to reduce significantly resulting in reduced inspection costs and programmatic savings.

Requests for rent increases currently are allowed annually. Of over 3,500 landlords, on average<sup>2</sup> 700 rent increases were requested and approved. This represents 20% of assisted units. This suggests that most landlords are not requesting annual increases and that requests are less frequent. Placing increases on a biennial or triennial schedule to coincide with the recertification process will streamline the process and create administrative efficiencies. This equates to 1 FTE administrative person. Additionally rent increases result in HAP increases of \$1 million annually. Placing increases on a schedule consistent with recertifications will reduce this amount by almost \$200,000 annually. Given the reductions to the HCV funding experienced in FY2013 and anticipated during FY2014, all attempts to generate savings while preserving subsidy for participants are essential.

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<sup>2</sup> Average for FY2011, 2012 and 2013.

<b>B. MTW Statutory Objective</b>	Section 204(a) of the 1996 Appropriations Act provides that public housing agencies that administer Section 8 and public housing shall have the flexibility to design and test various approaches for providing and administering housing assistance that that reduce cost and achieve greater cost effectiveness in Federal expenditures.
<b>C. Anticipated Impacts</b>	Biennial and triennial HQS inspections: Administrative savings; participant and landlord satisfaction. Biennial and triennial rent increases: Administrative savings; subsidy savings; some landlord dissatisfaction Self certification of correction of deficiencies not related to health and safety issues: Administrative savings; participant and landlord satisfaction, slight increase in requests for special inspections.
<b>D. Baseline &amp; Benchmarks</b>	<ul style="list-style-type: none"> <li>• At baseline 4,051 inspections are completed annually at a cost of 3 inspectors, 1 administrative assistant and 1 program clerk.</li> <li>• At baseline 700 rent increases requested and approved at a cost of \$1 million annually. Requires the equivalent of 1FTE to administer.</li> <li>• At baseline approximately 860 inspections are required due to a fail for items that are not health and safety related. The cost of these inspections is approximately \$61,000.00.</li> </ul>
<b>E. Data Collection on metrics &amp; protocols</b>	HANH/ELM CITY COMMUNITIES's MIS system, Emphasys Elite provides the ability to track number of inspections and rent changes. Savings will be tracked based upon staff hours required for tasks, reduced inspection costs and HAP payment trends. Number of self certifications will be tracked and associated savings. Number of special inspections will be tracked.
<b>F. Authorization Cited</b>	Attachment C.D.5 of the Amended and Restated MTW Agreement authorizes HANH/ELM CITY COMMUNITIES to develop and adopt a local policy designed to certify Housing Quality Standards.  Attachment C. C.11 and Section D.2 of the Amended and Restated MTW Agreement authorizes HANH/ELM CITY COMMUNITIES to develop alternative rent policies and term limits.
<b>G. Hardship Policy, if rent reform</b>	HANH/ELM CITY COMMUNITIES implemented a Hardship Policy as part of its Rent Simplification policy. No changes are required as a result of this proposal. Policy includes minimum rent exemptions and exemptions if families experience exceptional expenses. It establishes a Hardship Review Committee and documents remedies.
<b>H. Implementation Plan</b>	<ul style="list-style-type: none"> <li>• Landlord workshops and outreach via mailings will be conducted to educate landlords of new policies.</li> <li>• Participant workshops and outreach via mailings will be conducted to educate participants of new policies.</li> <li>• Staff training</li> <li>• Revised policies and protocols for inspections</li> <li>• Revisions to HANH/ELM CITY COMMUNITIES's Administrative Plan and governing documents</li> <li>• Revision of contract with inspection vendor</li> </ul>

## VI. On-Going MTW Activities

### Increased Housing Choice

#### 1.1 Development of Mixed Use Development at 122 Wilmot Road: proposed and approved in 2009 MTW Annual Plan

**A. Year Implemented**

FY2011

**B. Update**

The Authority purchased a site at 122 Wilmot Road that is slightly more than one acre. The structure was demolished. The Authority redeveloped the site as a mixed use facility with 9,186 square feet of commercial and community space and 47 units of housing with supportive services to allow elderly persons to age in place.

The agency financed a portion of the cost of this project using an accumulation of Connecticut Housing Finance Authority Tax Credits, Private mortgage financing and investor equity. The development completed construction and obtained 100% occupancy during FY2013.

The residential site was completed and leased during FY 2013. HANH/ELM CITY COMMUNITIES began lease negotiations on the commercial portion during FY2013. It is anticipated that the commercial portion will be fully leased during FY 2014.

**C. Anticipated Change in Authorization**

No changes anticipated

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

#### 1.2. Local Total Development Cost (TDC) Limits: proposed and approved in 2009 MTW Annual Plan

**A. Year Implemented**

FY2010

**B. Update**

HANH/ELM CITY COMMUNITIES reviewed its TDC and HCC cap during 2012 to determine if they need to be adjusted based on the cost of development of comparable market rate units. It was determined that an adjustment would be required and submitted to HUD in the HANH/ELM CITY COMMUNITIES 2013 MTW Plan Amendment #3.

Metrics –

- number of Low Income units produced facilitating the use of Alternate TDC's
- Actual water and energy consumption.
- Amount of money leveraged for the development

Baseline: dollar amount leveraged at the Eastview Terrace development  
Reduction in energy consumption and utility costs compared to a control property during the base year (Valley and Waverly 2012).

**C. Anticipated Change in Authorization**

None

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

*(1.3. Fungability: proposed and approved in 2012 MTW Annual Plan- directed by HUD to eliminate in MTW Annual Plan for 2013 as it is not necessary to list as an initiative)*

#### ***1.4. Over Income for Brookside Phase 2 Rental for PBV: proposed and approved in 2012 MTW Annual Plan***

**A. Year Implemented** FY2012

**B. Update** This initiative was closed out in the 2012 MTW Annual Report solely because it is duplicative of the more inclusive initiative 1.10 “Define Income Eligibility for the PBV Program”

**C. Anticipated Change in Authorization** None

**D. Outside Evaluators**

#### ***1.5 HCV Preference and set-aside for victims of foreclosures: Proposed and approved in 2009 MTW Annual Plan***

**A. Year Implemented** 2008

**B. Update** New Haven, like many municipalities has faced a crisis related to mortgage foreclosures. The loss of property by a landlord often threatens the housing of the HCV participant. Vouchers under the Foreclosure Protection Program may be awarded to families whose housing is threatened because the property they are leasing goes into foreclosure and new owners who are purchasing a property in foreclosure. Tenants apply via the waitlist. Owners apply through the PBV RFP process where they need to provide operating budgets, proposed contract rents and construction/rehabilitation plans if applicable. The program is not designed for the landlord who is in foreclosure

Tenant based program: As an effort to protect vulnerable residents, HANH/ELM CITY COMMUNITIES established a preference for eligible HCV participants and applicants, up to 25 tenant based and/or project based vouchers annually, to prevent homelessness among this population. TBVs would be awarded by granting a preference on the HCV waitlist similar to families who are displaced due to governmental action.

Project based program: Further, HANH/ELM CITY COMMUNITIES set aside 25 vouchers for project based assistance to be used in conjunction with developer efforts to purchase a property from foreclosure and create affordable housing options. Developers were selected by the City of New Haven via a competitive procurement related to Neighborhood Stabilization awards. HANH/ELM CITY COMMUNITIES’s project based foreclosure vouchers can be competitively awarded to developers who were selected through the NSP.

During FY09 HANH/ELM CITY COMMUNITIES began accepting referrals for this program. During FY2010, 25 tenant based vouchers were awarded and applications for the project based vouchers were received. During 2011 HANH/ELM CITY COMMUNITIES revised the program such that 10 of the 25 project based were reallocated to a program for Supportive Housing for the Homeless. The remaining 15 may be used for either the foreclosure protection program and/or the supportive housing for homeless. During FY2012, HANH/ELM CITY COMMUNITIES awarded 32 tenant based vouchers and the 15 project based vouchers.

During FY2014 HANH/ELM CITY COMMUNITIES will continue to set aside TBV and/or PBV due to the demand and existing waitlist (up to 20).

**C. Anticipated Change in Authorization** No changes anticipated.

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**1.6 Promote Expanded Housing Opportunities for HCV Program: Proposed and approved 2004 MTW Annual Plan**

**A. Year Implemented** FY 2008

**B. Update** Under HANH/ELM CITY COMMUNITIES’s MTW Agreement with HUD, HANH/ELM CITY COMMUNITIES is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods. This includes reasonable policies for setting rents and subsidy levels for tenant-based assistance. During FY 2008, HANH/ELM CITY COMMUNITIES began to implement MTW Rent Standards that allow HANH/ELM CITY COMMUNITIES to approve exception rents in the following cases: Wheelchair accessible units; Large bedroom-size units, (4 bedrooms or larger); Expanded housing opportunities in neighborhoods with low concentrations of poverty; Housing opportunities in new development projects that include significant public investment to promote revitalization of neighborhoods; and Mixed-income housing opportunities that promote expanded housing opportunities and deconcentration of poverty.

In addition, HANH/ELM CITY COMMUNITIES approved budget-based rent increases for landlords who make major capital improvements in their property, including accessibility modifications. These initiatives will continue in FY 14. Requests for MTW Rent Standards will be reviewed on a case-by-case basis. Under no circumstances may HANH/ELM CITY COMMUNITIES approve an MTW Rent Standard above 150% without prior HUD approval. HANH/ELM CITY COMMUNITIES will reexamine its MTW Rent Standards monthly to ensure that HANH/ELM CITY COMMUNITIES does not exceed 120% of the FMRs in the mean Rent Standard, which includes HAP payments to landlords, tenant rent payments to landlords, and any utility allowance amounts.

**C. Anticipated Change in Authorization**

For clarification, under Section 8(o) (2) (C) of the Housing Act of 1937 as Amended, it states that for a family receiving project-based assistance, the rent that the family is required to pay shall be determined in accordance with section 3(a) (1), and the amount of the housing assistance payment shall be in accordance with subsection (c) (3) of this section which also pertains to the Tenant-based assistance rent payment standards. There is no delineation between Tenant-Based and Project-Based assistance when defining rent standards.

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**1.7 Tenant Based Vouchers for Supportive Housing for the Homeless: Proposed and approved in 2012 MTW Annual Plan**

**A. Year Implemented** 2011

**B. Update** Under HANH/ELM CITY COMMUNITIES’s MTW Agreement with HUD, HANH/ELM CITY COMMUNITIES is authorized to develop its own Leased Housing Program through exceptions to the standard HCV program, for the purposes of creating a successful program with stable landlords, high-quality properties, and mixed-income neighborhoods. In 2011 HANH/ELM CITY COMMUNITIES reallocated 10 of the existing 25 project based vouchers set aside for Foreclosure Protection to a Tenant Based Program for Supportive Housing for Homeless. Preference in the tenant selection process will be give to person and families that are homeless or are at risk of becoming homeless. Seven vouchers out of 10 were awarded in FY 2011. No further activity has occurred. HANH/ELM CITY COMMUNITIES will continue to enter in

Memoranda of Understanding with organizations that provide housing for homeless with supportive services. In 2012 HANH allocated five vouchers for homeless families enrolled in supportive services. Currently, all five vouchers are utilized

**C. Anticipated Change in Authorization**

No changes

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**1.8 Farnam Courts Transformation Plan: Proposed and approved in 2011 MTW Annual Plan**

- **Year Implemented**
- **Update**

2011

In previous funding rounds, the Authority applied for the Choice Neighborhoods Initiative Planning Grant. This grant will allow for a comprehensive approach to neighborhood transformation of Farnam Court and the Mill River area. To date, HANH/ELM CITY COMMUNITIES's applications have not been selected for funding.

HANH/ELM CITY COMMUNITIES will continue to apply for the Choice Neighborhoods Initiative Implementation Grant until such time as either we receive the Award or we find alternate means of funding.

If awarded, this grant will provide for up to \$30,000,000 in funding to transform Farnam Courts and the surrounding neighborhood. As one of the older, blighted developments in our portfolio, Farnam Courts is an ideal center focus towards initiating a transformation plan. The development sits on a little over one acre of land and has a highly dense population, housing 240 families and individuals.

Farnam Courts is located in a severely distressed neighborhood with higher than average vacancy rates and a higher than average concentration of extremely low-income persons. With Interstate I-91 abutting the northern boundaries and limited city streets within the community, Farnam is an attraction for crime and illegal drug transactions.

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

Metrics –

- number of Low Income units produced facilitating the use of Alternate TDC's
- Actual water and energy consumption.
- Amount of money leveraged for the development

- **Anticipated Change in Authorization** No changes.
- **Outside Evaluators** Progress on this initiative is included in the outside evaluation being conducted.

**1.9 Increase the Allowed Percentage of Project Based Units under Section 18 of the Housing Act of 1937 from 75 Percent to 100 Percent: Proposed and approved in 2012 MTW Annual Plan**

**A. Year Implemented** 2012

**B. Update**

Under Attachment D, HANH/ELM CITY COMMUNITIES is allowed to request community-specific authorization upon review by HUD or as a result of public comments and the public process. HANH/ELM CITY COMMUNITIES has completed a Project Needs Assessment of its entire portfolio. The PNA shows that over the next 20 years that HANH/ELM CITY COMMUNITIES’s needs will exceed available funds by a ratio of more than 3:1. In order to address this funding gap and to help assure the long-term viability of its portfolio, the Agency is using the PNA to determine an asset management strategy for each of its developments. Part of this strategy may include converting existing public housing to Project Based Assistance under Section 8(o) (13). We are going to dispose of properties under Section 18 of the Housing Act of 1937 prior to conversion to Project Based Vouchers.

HANH/ELM CITY COMMUNITIES conducted analysis of the feasibility of converting ACC units to Project Based Units using criteria similar to that set forth under Section 22. HANH/ELM CITY COMMUNITIES will increase its flexibility to allocate the number of units in a project from 75 percent as previously approved by HUD to 100 percent for the purpose of converting ACC units to PBV units under this initiative to include the developments of Valley, Ribicoff Cottages and Extensions, Farnam Courts and Fairmont Heights. The purpose is to provide cash flow to enable HANH/ELM CITY COMMUNITIES to borrow private funds for the purpose of rehabilitating aging developments in HANH/ELM CITY COMMUNITIES’s portfolio. HANH/ELM CITY COMMUNITIES also seeks to waive the requirement of one-year tenancy which will allow participants greater flexibility in housing options.

The mobility issue is addressed by allowing the tenants the option to vacate the development during rehabilitation with an option to return upon the completion of such rehabilitation and/or the convenience of using a Tenant Based Voucher to relocate permanently. We will provide all of the assistance and counseling as required under Section 18 or the Uniform Relocation Act, if applicable. Should the need arise, we would solicit for a consultant to assist with addressing any and all mobility impairments the tenant may have up to and including the transporting of the tenants to view possible locations for tenancy, et al.

Attachment C. Section D. (e) authorizes HANH/ELM CITY COMMUNITIES to determine the percentage of housing voucher assistance that it is permitted to project base. Section D (e) waives certain provisions of Section 8(o) (13) of the Act that prohibits the Agency from awarding not more than 25 percent of the dwelling units in any building with project based assistance. In those cases where project based units are needed to ensure viability of mixed finance projects, HANH/ELM CITY COMMUNITIES, under its 2010 Plan, received authorization to project base up to 75 percent of the units in the development provided the project leverages non-public housing authority investments and increases housing choices for low income families. HANH/ELM CITY COMMUNITIES continues to use its authorization to Project Based up to 100% of the units in a public housing development that is disposed of in connection with the submission of a Section 18 disposition application to HUD.

HANH/ELM CITY COMMUNITIES will limit the amount of project based units in non-

mixed finance projects to no more than 50% of the units in the project; provided, however, that the agency may project base up to 75 percent of the units in such project if the project will provide replacement units for public housing units lost as a result of demolition or disposition, if the project is undertaken in a area where significant investments are being made, if the project will help to reduce de-concentration of very low income families, or if the project is located in areas that provide increased access to transportation or employment opportunities. Under the prior MTW Demonstration Agreement, HANH/ELM CITY COMMUNITIES was specifically authorized to provide assistance up to 50 percent of the units in a project. This authorization has been essential with helping to promote increased housing opportunities, as well as, to leverage private funds.

One metric for mixed finance projects will be the amount for private debt leveraged for each units assisted in excess of the 25 percent cap. Metrics will be ratio of private debt leveraged to total project costs. Baselines will be amount of debt that would have been otherwise been leveraged at the 25 percent cap and the Number of Low Income Housing units produced and reduction in energy consumption and utility costs compared to a control property during the base year (Valley and Waverly 2008).

**C. Anticipated  
Change in  
Authorization**

No changes.

**D. Outside  
Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**1.10 Defining Income Eligibility for the Project Based Voucher Programs: proposed and approved in 2012 MTW Annual Plan**

**A. Year Implemented**

2012

**B. Update**

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

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

In order to promote housing choice, which includes developing communities that provides housing that serves a wide range of incomes and to reduce the cost of the program, the Authority will use the flexibility granted to it under Attachment C, Section C(3)(a) of the MTW Agreement to establish eligibility criteria under its Administrative Plan to require that no less than 40 percent of the project based vouchers awarded in any year to be awarded to families with incomes at or below 30 percent of the area median income, adjusted for family size. HANH/ELM CITY COMMUNITIES will award up to 15 percent of the PBV's allocated to for any mixed finance project to families with incomes between 50 and 80 percent of Area Median Income.

45 percent of PBV may be allocated to families with income between 50 and 80 percent AMI for Brookside Phase 2 Rental mixed finance development.

At baseline, no developments meet these criteria.  
During FY2012, HANH/ELM CITY COMMUNITIES leased Brookside Phase I utilizing this structure.  
During FY 2013, HANH/ELM CITY COMMUNITIES leased Brookside Phase II utilizing this structure.

***C. Anticipated Change  
in Authorization***

No changes.

***D. Outside Evaluators***

Progress on this initiative is included in the outside evaluation being conducted.

***1.11: Increase the percentage of Housing Choice Voucher budget authority that it is permitted to project-base from 20% up to 25%. (Proposed in MTW2013 Plan Amendment)***

- A. Year Implemented*** 2013
- B. Update*** During FY2013, the Authority project based 483 vouchers. During FY2014, the Authority anticipates adding an additional 112 vouchers for a total of 595. This is a total of 13.5%.
- C. Anticipated Change in Authorization*** No Changes
- D. Outside Evaluators*** Progress on this initiative will be included in the outside evaluation conducted by the Agency, as well as by the number of HCV's allotted to the redeveloped developments.

***1.12: Development of Replacement Public Housing Units with MTW Block Grant Funds – (Proposed in MTW2013 Plan Amendment)***

HANH/ELM CITY COMMUNITIES will use MTW block grant funds (which are drawn collectively from public housing Operating Funds and Capital Funds and Section 8 Housing Choice Voucher funds) to develop public housing units through a mixed-finance process. The units will be operated as public housing for purposes of admissions, continued occupancy, resident rights, and certain other rules. However, for purposes of providing ongoing operating assistance, HANH/ELM CITY COMMUNITIES will use its MTW authority to design and fund a local program to develop replacement public housing units that are funded in a manner that augments LIPH operating subsidy with MTW flexible funding.

- A. Year Implemented*** 2013
- B. Update*** During FY2014, the Authority anticipates utilizing this Authority for use for the development and implementation of mixed finance developments in conjunction with the RAD program.
- C. Anticipated Change in Authorization*** No changes.
- D. Outside Evaluators*** Progress on this initiative will be included in the outside evaluation conducted by the Agency, as well as by the number of ACC units developed.

***1.13: Creation of a commercial business venture at 122 Wilmot Road. (Proposed in MTW2013 Plan Amendment)***

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

Over the past decade Elm City Communities has spent hundreds of millions of dollars helping to revitalize many of our communities. To ensure the long-term success of these efforts it is important that the members of these communities join together to take steps to increase their assets since one of the major roadblocks to improving the quality of lives in our communities is the lack of assets and the lack of ownership of the assets in our communities by the members of these communities. The vision of this initiative will be **“Building Wealth in Our Communities”**

During FY2013, Glendower began this new initiative by providing for working capital to cooperative corporations through the purchase of shares which may also entail the making of loans to the cooperative corporations. These cooperative ventures will serve the West Rock community that includes the following HANH/ELM CITY COMMUNITIES developments: Brookside I, Brookside II, Rockview I, Ribicoff Cottages and Extension, Westville Manor, McConaughy Terrace, 122 Wilmot Road, Valley and Waverly Townhouses.

**A. Update**

Construction completion in June 2013.

Community outreach conducted to educate and ask those in the community to participate in the planning process. Five (5) community meetings beginning in April 2013 discussed the following:

- What is a cooperative?
- What are the benefits of joining a cooperative?
- How do I become a member of a cooperative?
- Are you interested in joining a Planning Committee?

Meeting locations were as follows:

- Resident Meeting at 295 Wilmot Road – April 23rd
- RAB Meeting during the month of April – April 24th
- ROB Meeting – Wednesday evening in April – May 8th
- Greater West Rock Area meeting at local Police substation – May 9th
- City Hall meeting room for Greater New Haven community input – May 16<sup>th</sup>

Type of Committees:

Establishment of three (3) steering committees focusing on the Planning, Finance and Membership aspects of creating cooperative ventures. The members will be established as a result of the various community meetings and the interest that we receive.

The first committee meeting was held on June 6, 2013.

Marketing:

In preparation for the community meetings and success of the anticipated participation, HANH/ELM CITY COMMUNITIES designed brochures of the two cooperative ventures that we are proposing along with the benefits they will bring to the communities along with information cards that people can fill out if they want to participate or just give a suggestion on. The key will be to brand the cooperatives as an extension of Elm City Communities, with the same colors and branding already established by the agency.

**B. Anticipated  
Change in  
Authorization**

None

**C. Outside  
Evaluators**

Progress on this initiative will be included in the outside evaluation conducted by the Agency, as well as by the number of commercial business ventures created at the 122 Wilmot Road development.

***1.14: Preserving Affordable Housing through Rehabilitation of Dwight Cooperative: (part of 2011 MTW Plan)***

For the purpose of preventing the loss of affordable housing, the Authority will partner with Glendower Dwight LLC to rehabilitate an 80-unit HUD foreclosed property into a mixed income development. This initiative was originally forecasted in the 2011 MTW Plan; however, the initiative as previously reported has changed. The City of New Haven issued an RFP for the purchase of the property and Glendower Dwight, LLC, an affiliate of The Glendower Group, Inc., the HANH/ELM CITY COMMUNITIES’s instrumentality will purchase and redevelop the property. The Authority will enter into a Development Services Agreement with The Glendower Group, Inc. and/or an affiliate thereof to rehabilitate the property which includes the submission of a Rental Assistance Demonstration application as part of the overall Farnam Courts Transformation Plan.

<b>B. MTW Statutory Objective</b>	Section 204(a) of the 1996 Appropriations Act provides that public housing agencies that administer Section 8 and public housing shall have the flexibility to design and test various approaches for providing and administering housing assistance that increases housing choices for low-income families.
<b>C. Anticipated Impacts</b>	Using the Agency’s authority to increase the supply of affordable housing in areas that promote de-concentration of poverty, provide housing in areas that are accessible to employment, schools, shopping and transportation, and help promote investments in areas where other significant investments are being made.
<b>D. Baseline &amp; Benchmarks</b>	<p>The metrics for increasing housing choices are as follows:</p> <ul style="list-style-type: none"> <li>• number of units developed and preserved for extremely low, very low and low-income families</li> </ul> <p>Baseline data for comparison:</p> <ul style="list-style-type: none"> <li>• 20 units occupied by extremely low; very low and low income families</li> </ul>
<b>E. Data Collection on metrics &amp; protocols</b>	Unit breakdown data will come from project development pro forma.
<b>F. Authorization Cited</b>	Section D.1.e and D.7 of Attachment C authorizes the Agency to set its own limit in spite of the 25 percent cap under Section 8(o) (13) of the Act.
<b>G. Hardship Policy, if rent reform</b>	N/A
<b>H. Implementation Plan</b>	<p>Submission of RAD Application by June 2013</p> <p>Obtain financing by March 2014</p> <p>Close by May 2014</p> <p>Begin construction by June 2014</p>

## *Increasing Family Self Sufficiency*

### *2.1 Family Self-Sufficiency Program: proposed and approved in 2004 MTW Annual Plan*

**A. Year** FY2007

**Implemented**

**B. Update**

HANH/ELM CITY COMMUNITIES's FSS program provides intensive counseling and case management services to help participant families achieve their self-sufficiency goals, according to each family's needs. In 2007, HANH/ELM CITY COMMUNITIES revised its FSS program to include additional services to assist residents in addressing a full range of barriers to achieving self sufficiency and employment. This change has allowed HANH/ELM CITY COMMUNITIES to provide much needed services to a larger number of LIPH and Section 8 residents. Service referrals focus on remedial education, literacy classes, GED preparation, vocational and financial management, job skills/ employability, etc. Further HANH/ELM CITY COMMUNITIES has invested in Computer/Learning Labs which offer services that assist families in their move toward self-sufficiency. Finally, HANH/ELM CITY COMMUNITIES has created a "Specialized Training" program which offers training in fields where there are employment opportunities i.e.: healthcare, auto mechanics, etc. This training should provide the skills necessary for residents to obtain employment or increase their earnings

	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
<b>Referrals to FSS</b>	175	181	193	385
<b># completing job skills training</b>	25	32	35	73
<b>Enrolled in FSS classes</b>	138	168	192	172
<b>% enrolled in FSS that increased income</b>	58%	68%	23%	26%
<b>Average income of FSS participants</b>	\$18,526	\$19,038	\$25,743.00	\$20,924.00
<b>% enrolled who increased credit score</b>	47%	54%	48%	63%
<b>Average credit score of FSS participants</b>	587	660	603	590

**C. Anticipated Change in Authorization**

No changes

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**2.2 Promoting Self-Sufficiency/Earned Income Exclusion: proposed and approved in 2008 MTW Annual Plan**

**A. Year Implemented** FY2008

**B. Update**

HANH/ELM CITY COMMUNITIES believes promoting self-sufficiency is most effectively accomplished through helping residents to access services and supports and incentivizing increased earnings and savings. Within that context, HANH/ELM CITY COMMUNITIES’s MTW Rent Simplification Program includes an Incremental Earnings Exclusion for families who participate in HANH/ELM CITY COMMUNITIES’s Family Self Sufficiency Program (FSS). Incremental Earnings Exclusion is phased increases in earned income over the five year term of a family’s participation in the FSS program.

For example HANH/ELM CITY COMMUNITIES will exclude from the determination of annual income 100% of any incremental earnings from wages or salaries earned by any family member during the first year. During Year 2, HANH/ELM CITY COMMUNITIES will exclude 75% of incremental earning; Year 3 50% is excluded and during Year 4 25% will be excluded. Beyond that, no further earnings are excluded.

	2009	2010	2011	2012
% enrolled in FSS that increased income	58%	68%	23%	26%
Average income of FSS participants	\$18,526	\$19,038	\$25,743	\$20,924.00
% enrolled who increased credit score	47%	54%	48%	63%
Average credit score of FSS participants	587	660	603	590

**C. Anticipated Change in Authorization**

No changes

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

### **2.3. Caring About Resident Economic Self Sufficiency (CARES) Pilot Program: *proposed and approved in 2012 MTW Annual Plan***

**A. Year** FY2012

**Implemented**

**B. Update**

As an MTW Agency, HANH/ELM CITY COMMUNITIES is permitted to implement new pilot programs to promote HUD's mission to promote self-sufficiency throughout public housing agencies. HANH/ELM CITY COMMUNITIES has developed a pilot self-sufficiency plan that encompasses HUD's continued mission to increase self sufficiency among residents and promote accountability. The C.A.R.E.S. Program (Caring About Resident Economic Self-Sufficiency) introduces the concept of term limits into the public housing and Section 8 programs administered by HANH/ELM CITY COMMUNITIES. The program will be offered to all returning and new residents to the West Rock Development beginning with Brookside Rental Phase 2. MTW flexibility is used to fund the required social service component of this program. Please note that all former residents of Brookside and Rockview retain their right to return regardless of their desire to enroll in the CARES Pilot. During FY 2013, CARES was implemented in the Brookside Phase II Rental Development. During FY 2014, CARES will be implemented at Rockview Phase 1 Rental development.

At baseline, no families were enrolled.

Cost efficiency:

Amount of subsidy per family enrolled in CARES compared to control group (Brookside Phase 1) of comparable families.

Length of time families are subsidized.

Flat rent collected

Housing choice:

The number of persons participating in the program that transition to market rate and other affordable housing units.

Number of units leased by former CARES recipients in census tracts that represent deconcentration of poverty.

Self Sufficiency:

The number of work eligible adults who are employed;

The number of work eligible adults who retain a job for 6 months.

Average income of households.

The number of families participating in the program;

The number of individual service plans created;

Number of families determined to be exempt.

Hardships requested and granted.

HANH/ELM CITY COMMUNITIES will collect a sample of families not participating in the program and use this sample as a control group. HANH/ELM CITY COMMUNITIES's Evaluation Consultant will statistically select families that meet the demographic and income criteria of the CARES families but who live in other mixed finance developments such as Brookside Phase I, Monterey, Quinnciac Terrace or Eastview for comparison. Families will be selected who show a similar desire for advancement such as Family Self Sufficiency participants.

**C. Anticipated  
Change in**

No changes

**Authorization**

**D. Outside**

Progress on this initiative is included in the outside evaluation being conducted.

## *Evaluators*

## *Increasing Cost Effectiveness and Efficiency*

### *3.1 Rent Simplification: proposed and approved in 2008 MTW Annual Plan (Revised for 2014 Plan)*

**A. Year** FY2008

**Implemented**

**B. Update**

As an MTW agency, HANH/ELM CITY COMMUNITIES is authorized to develop and test alternate policies for more effective administration of its housing programs. HANH/ELM CITY COMMUNITIES's MTW authority permits HANH/ELM CITY COMMUNITIES to develop and test alternate policies for establishing the rent contributions of families in the public housing and Section 8 (HCV) program. During FY 2007, HANH/ELM CITY COMMUNITIES undertook an extensive planning process for establishing alternative rent policies. A primary purpose is to reduce the administrative burden of the recertification and rent calculation process. Our planning process included more than a dozen meetings with TRCs and public housing residents, a broadly-noticed meeting for Section 8 participants, which more than 300 families attended, regular ongoing consultation with the Resident Advisory Board, and regular ongoing consultation with New Haven Legal Assistance. It also included extensive data analysis of the effects of MTW Rent Simplification Program on existing public housing residents and Section 8 participants. HANH/ELM CITY COMMUNITIES's Rent Simplification program began in FY2008 and is now fully implemented.

HANH/ELM CITY COMMUNITIES implemented its Rent Simplification Policy on January 1, 2008 with all families being recertified under the new system. HANH/ELM CITY COMMUNITIES utilizes EIV for all third party verifications. In FY09 HANH/ELM CITY COMMUNITIES implemented the alternate year recertification cycle with families recertified every two years and elderly and disabled families recertified every three years. Rent simplification includes the following aspects:

- i. Two and three year recertification cycles. Positive impacts related to less frequent recertifications are expected in administrative savings, resident/participant satisfaction and reduced need for interim recertifications. HANH/ELM CITY COMMUNITIES notifies residents of the flat rent option and community service requirements on a cycle consistent with recertifications. However, residents/participants may request flat rent at any time outside of the recertification cycle if so desired.
- ii. Simplified Rent Tier that incorporates deductions. Positive impacts are expected in administrative savings, simplified process for residents/participants and fewer recertification appointments. Also, rent tiers have been built to minimize impact on residents during initial years and to phase in rent increases over time. Residents will not experience an overwhelming rent burden, yet will be incentivized to increase their earnings over time as their rent gradually increases. Impact on income, hardship and minimum rent participation will be tracked.
- iii. Exceptional expenses. Excessive resources are dedicated to verifying deductions for child care, medical and disability allowances. Third party verifications of these amounts are difficult to accomplish and the agency more often than not relies upon second and first party verifications of these deductions. Obtaining verification data also places an undue burden on the resident. To simplify this process, HANH/ELM CITY COMMUNITIES will eliminate standard deductions for these amounts for elderly, disabled and non-elderly households. Households with exceptional expenses may request a rent reduction. This includes large families (with more than two children). It also includes families with excessive medical, disability assistance, or childcare expenses. The amounts of expense are set in

\$1,000.00 tiers. This allows HANH/ELM CITY COMMUNITIES to move away from verifying every last dollar. Residents are not required to provide documentation of every dollar of expense; rather, residents need only provide documentation sufficient to meet the appropriate tier. The amount of monthly rent reduction is established at the mid-range of the tier. Households with exceptional expenses will receive a direct reduction of the monthly rent. However, no tenant's rent will be reduced below a rent of \$50.00 as a result.

<b>Tiered Amount of Expenses</b>	<b>Monthly Rent Reduction</b>
\$ 2,000 - \$ 4,000	\$ 75 (equivalent to \$3,000 deduction)
\$ 4,000 - \$ 6,000	\$ 125 (equivalent to \$5,000 deduction)
\$ 6,000 +	Hardship Review

iv. Minimum Rent of \$50. HANH/ELM CITY COMMUNITIES established a minimum rent of \$50 with the expectation that everyone pays something for their housing. There are residents who are unable to pay the minimum rent and they can request a hardship. These individuals meet with HANH/ELM CITY COMMUNITIES staff to determine the nature and length of the hardship and their rent is then modified based on information collected. In order to move these residents towards self sufficiency they are referred to the Family Self-Sufficiency program. HANH/ELM CITY COMMUNITIES anticipates positive impact on resident's move toward self sufficiency for the lowest earning families as they are incentivized to enroll in FSS. FSS enrollment rates will be tracked.

MTW Mixed Finance ACC units may either utilize the standard rent determination process as defined in 24 CFR Part 5 or HANH/ELM CITY COMMUNITIES's Alternative Rent Simplification policy as set forth herein the MTW Plan.

Year	HCV annual income	HCV average TTP	#HCV annual recertification	LIPH annual income	LIPH average TTP	#LIPH annual recertifications
2007	\$14,175	\$332	3,588	\$12,410	\$292	1,872
2008	\$14,661	\$322	2,947	\$13,100	\$275	1,514
2009	\$15,423	\$348	1,888	\$13,425	\$305	1,009
2010	\$15,554	\$347	1,373	\$14,239	\$306	891
2011	\$14,766	\$336	945	\$14,367	\$328	425
2012	\$15,065	\$344	1,280	\$13,085	\$296	688

Year	HCV households with no income	HCV households with employment income	LIPH households with no income	LIPH households with employment income
2007	144	1257	80	589
2008	124	1260	56	616
2009	137	1189	67	606
2010	134	1108	78	558
2011	161	1075	75	534
2012	139	1034	87	569

All incomes, previous deductions, rents and subsidies were recorded for each resident/participant prior to transition to rent simplification. All families on minimum rent must enroll in FSS (with the exception of Elderly/Disabled families). This percent is tracked. This provides the baseline data against which change is measured. This database also provides the baseline rents that are compared to ensure that no resident/participants rent increases beyond the approved levels during years 1 through 5 of the implementation. Additionally, personnel costs were documented at the start of the implementation.

Under rent simplification, HANH/ELM CITY COMMUNITIES recipients experienced a rent increase while still not exceeding the rent burden percentage established of 28.5%. HANH/ELM CITY COMMUNITIES has determined that the simplified rent process has resulted in no increased rent burden, resulted in personnel (administrative) savings and reduced errors in rent calculation.

Upon implementing rent simplification, HANH/ELM CITY COMMUNITIES was able to reduce staffing related to this program. HANH/ELM CITY COMMUNITIES's administrative savings related to personnel savings from FY08 equaled \$133,000 annually.

During FY 2014 HANH/ELM CITY COMMUNITIES anticipates recertifying 1,411 HCV families and 430 LIPH families.

This initiative will continue in FY2014 with the modifications outlined here and in Appendix 5.

1. EID/FSS income exclusion is clarified such that it is clear that families receive the Federal EID for the equivalent of 24 months over a 48 month period. At the conclusion of that period of eligibility, families enrolled in FSS program can receive additional incremental earnings exclusion equal to 50% for the first 12 month period after conclusion of the Federal EID period and 25% for the next 12 months. Families must be enrolled in the FSS program to receive the additional exclusions. Families not eligible for the Federal EID may exclude 100% of incremental earnings in year 1; 75% in year 2; 50% in year 3 and 25% in year 4.
2. The alternative recertification cycle led to the unintended result of many families being subject to unreported income sanctions. HANH/ELM CITY COMMUNITIES's policy is being further amended to note that earnings of any amount that are due to increased earnings in the period in between the two and three year recertification cycles do not have to be reported. Rent recalculations occur prospectively at the next recertification. Addition of household members that impact the income of the household must be reported during an interim recertification. It is anticipated that this will significantly reduce the number of interim recertifications processed and incentivize greater income by removing the disincentive.
3. HANH/ELM CITY COMMUNITIES will annualize the calculation of earnings for seasonal employees and will not offer interim recertifications during periods of seasonal unemployment.
4. Minimum rent and hardship exemption clarifications are made in the revised policy to comply with agreements reached with local advocates that align the program with federal regulations.

***C. Anticipated  
Change in  
Authorization***

No changes

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**3.2 LIPH Public Housing UPCS Inspection: proposed and approved in 2008 MTW Annual Plan**

*(MTW Authorization no longer required and final data was reported in 2012 MTW Report)*

**3.3 Housing Choice Voucher HQS Inspections: proposed and approved in 2008 MTW Annual Plan**

**A. Year Implemented**

FY2011

**B. Update**

HUD previously approved HANH/ELM CITY COMMUNITIES's alternative MTW Voucher Program. This authorized HANH/ELM CITY COMMUNITIES to implement alternate inspection procedures, in which property owners with a history of successful inspections will be subject to HQS inspections every two years, rather than annually. HANH/ELM CITY COMMUNITIES's alternate inspection policy will alter only the current requirement that 100% of units are re-inspected annually. HANH/ELM CITY COMMUNITIES does not intend to alter policies requiring pre-inspection of every unit prior to lease-up. Nor does HANH/ELM CITY COMMUNITIES intend to alter policies related to quality control inspections or enforcement of HQS.

HANH/ELM CITY COMMUNITIES's MTW Agreement provides authority for HANH/ELM CITY COMMUNITIES to develop and test alternative methods for administering its Section 8 (HCV) program.

Under this proposal HANH/ELM CITY COMMUNITIES will continue to conduct initial HQS inspections of 100% of proposed units, as well as follow-up Quality Control inspections of approximately 10% of these units. If inspections identify a health and safety deficiency, it must be corrected within 24 hours. When inspections identify other HQS deficiencies, these must be corrected within 30 days or HANH/ELM CITY COMMUNITIES will abate the landlord's rent. Quality Control inspections are performed in-house by HANH/ELM CITY COMMUNITIES staff.

HANH/ELM CITY COMMUNITIES's routine inspections are performed, under contract, by the City of New Haven's Livable City Initiative (LCI) division, which is the City agency responsible for building code inspections and other monitoring. HANH/ELM CITY COMMUNITIES's Section 8 (HCV) department includes staff who have been HQS certified so that HANH/ELM CITY COMMUNITIES can assist by conducting inspections in-house.

During FY 2008 through 2010, HANH/ELM CITY COMMUNITIES incurred the costs of 3 FTE inspectors to inspect 100% of units.

During FY2011, HANH/ELM CITY COMMUNITIES renegotiated its contract to provide inspections needed under the revised and approved inspection protocol. The Authority saved \$34,000 in inspection costs as a result of requiring fewer inspections.

This \$34,000 in savings continued during FY2013 and HANH expects to save

\$68,000. during FY14.

During FY13 the HCV program experience significant funding reductions. As such, HANH/ELM CITY COMMUNITIES proposes additional streamlining of the inspection program. Streamlining is outlined in Proposed Initiative 3.5.

**C. Anticipated Change in Authorization**

No changes.

**D. Outside Evaluators**

Progress on this initiative is included in the outside evaluation being conducted.

**3.4 Implement Mandatory Direct Deposit for Housing Choice Voucher Landlords: proposed and approved in 2009 MTW Annual Plan**

**A. Year Implemented**

FY2010 (this initiative has been authorized since FY2010, however by error of omission it was not listed in the FY2012 MTW Annual Plan. The item has been included in the current plan.)

**B. Update**

Implementation of this initiative will reward landlords with timely and accurate HAP payments. This increases efficiency while easing HANH/ELM CITY COMMUNITIES's burden to accurately administer 1,300 HAP payments to landlords. This initiative minimizes landlord complaints on non-payment of HAP payments and reduces administrative costs of administering the program.

At baseline, HANH/ELM CITY COMMUNITIES served over 1,300 landlords and approximately 634 had authorized agreements for direct deposits, which is about 49%. A baseline cost to process a check is \$7.50.

Goal: HANH/ELM CITY COMMUNITIES seeks to increase direct deposit utilization to 100%. All new owners are required to enter in Direct Deposit Agreements.

HANH/ELM CITY COMMUNITIES implemented a mandatory Direct Deposit Program during FY2010 in which all new landlords are enrolled in direct deposit.

At the end of FY10, HANH/ELM CITY COMMUNITIES had 889 of the 1,320 landlords or 67% enrolled.

The cost to process one check equals \$7.50. The increase in enrollment during FY 2011 saved an additional \$21,780 annually.

At the end of FY2011, HANH/ELM CITY COMMUNITIES had enrolled 918 of 1,321 landlords or 69%.

The cost to process one check equals \$7.50. FY 2011 savings equaled \$24,390 annually.

At the end of FY2012, HANH/ELM CITY COMMUNITIES had enrolled 935 of 1329 landlords or 70%.

The cost to process one check equals \$7.50. FY 2012 savings equaled \$25,560 annually.

Data for FY13 is not available at the time of the drafting of this MTW Annual Plan.

HANH/ELM CITY COMMUNITIES will continue to outreach to landlords during FY14 to discuss the benefits of direct deposit.

***C. Anticipated Change  
in Authorization***

No changes.

***D. Outside Evaluators***

Progress on this initiative is tracked by HANH/ELM CITY COMMUNITIES.

## VII. Sources and Uses of Funding

### Planned Sources and Uses of MTW Funds

#### Sources

Rent	\$4,628,738
Operating Subsidy	\$16,000,000
Capital Grants	\$4,527,546
Other Revenue (1)	\$303,497
HCV Subsidy	\$54,964,605
MTW Transfer - Prior Year Reserves	\$10,817,581
Total Sources	<u>\$91,241,967</u>

#### Uses

LIPH	\$21,953,420
HCV Administration	\$2,721,260
Community and Economic Development Salaries/Administrative (MTW Funded)	\$725,000
COCC Deficit - does not include Supportive Services	\$1,120,909
HCV HAP Expenses	\$38,400,000
Project Based Vouchers	
<i>Brookside Phase 1 Rental</i>	\$615,000
<i>William T Rowe</i>	\$480,000
<i>Val Macri</i>	\$189,000
<i>Mutual Housing - New Units</i>	\$300,000
<i>CUHO</i>	\$100,800
<i>Foreclosure</i>	\$225,000
<i>Brookside Phase 2 Rental</i>	\$543,012
<i>Quinnipiac Terrace Phase 3</i>	\$248,124
<i>122 Wilmot Road</i>	\$202,296
<i>Eastview Terrace</i>	\$664,440
<i>360 State (Shartenburg)</i>	\$218,100
<i>CUHO New Construction</i>	\$77,600
<i>Frank Nasti (Existing)</i>	\$277,709
<i>Mutual Housing -Existing</i>	\$97,800
<i>Quinnipiac Terrace Phase 1</i>	\$428,001
<i>Quinnipiac Terrace Phase 2</i>	\$367,816
<i>Casa Otonal</i>	\$383,808
<i>Howe Street</i>	\$102,168
Total Project Based and Other Vouchers	\$5,520,674
Supportive Housing- MTW Initiatives	
<i>Family and Youth Coordinator</i>	\$78,400
<i>Eastview Terrace Youth Services</i>	\$182,000
<i>McQueeney Supportive Services</i>	\$153,000
<i>Crawford Manor Supportive Services</i>	\$219,000
<i>Ruoppolo Manor</i>	\$95,000
<i>Robert T. Wolfe</i>	\$147,500
<i>William T. Rowe</i>	\$78,000
<i>Winston Celentano</i>	\$138,000
<i>Fairmont</i>	\$138,000
	\$1,228,900

Capital Projects - MTW Initiatives, using CFP and MTW Funds		
<i>Agency Wide UFAS Compliance</i>	\$100,000	
<i>Agency Wide Vacancy Reduction</i>	\$490,000	
<i>Agency Wide Property Damage Repairs</i>	\$150,000	
<i>Prescott Bush – Emergency on site sewer repair and replacement</i>	\$250,000	
<i>Ruoppolo Manor - Façade Improvements &amp; AE Design Services</i>	\$1,118,700	
<i>Valley Townhouses Roof Replacements</i>	\$150,000	
<i>McQueeney AE Design Services</i>	\$250,000	
<i>Westville Manor AE Design Services</i>	\$200,000	
<i>Crawford Manor Elevator Improvements &amp; AE Design Services</i>	\$450,000	
<i>Fairmont Heights AE Design Services</i>	\$250,000	
<i>Essex Townhouses AE Design Services &amp; Exterior Improvements</i>	\$433,500	
<i>Farnum Courts Lead Based Paint Encapsulation</i>	\$45,000	
<i>Fulton Park Exterior Improvements</i>	\$500,000	
<i>Winslow-Celentano EIFS Installation and window replacement</i>	\$298,611	
<i>AMP Environmental Remediation Work</i>	\$100,000	
<i>McQueeney Sidewalks</i>	\$75,000	
<i>LEAP Building Roof Replacement</i>	\$276,000	
<i>Software for Work Order Hand Held PCs</i>	\$28,480	
<i>IQC A/E Boroson</i>	\$75,000	
<i>IQC A/E O’Riordan Migani</i>	\$75,000	
<i>IQC A/E Zared</i>	\$75,000	
<i>IQC A/E Environmental Eagle</i>	\$75,000	
<i>IQC A/E Environmental Environmed</i>	\$150,000	
<i>IQC A/E Fuss &amp; O’Neill</i>	\$75,000	
<i>Capital projects Contingency</i>	\$550,000	\$6,240,291

Development Projects - MTW Initiatives, using CFP and MTW Funds		
<i>Farnam Courts/Fair Haven</i>	\$1,441,950	
<i>Dwight</i>	\$958,000	
<i>Brookside 1 Rental – Bond Repayment</i>	\$300,723	
<i>Essex</i>	3,300,000	
<i>Brookside 2 Homeownership</i>	\$917,189	
<i>Rockview - I &amp; II Rental</i>	\$2,212,848	
<i>Crawford</i>	\$723,000	
<i>Rockview HO</i>	\$438,750	
<i>Ribicoff Cottages and Ext</i>	\$890,850	
<i>Westville Manor</i>	\$2,148,203	<u>\$13,331,513</u>
Total Uses		<u>\$91,241,967</u>
Surplus/(Deficit)		\$0

(1) Other Revenue – Laundry Machine Income, Cell Phone Towers, etc.

*Planned Sources and Uses of Non-MTW Funds*

**FY 2014 Draft Budget**

<i>A. Planned Sources and Uses of Other HUD or Federal Funds</i>		
<b><u>Sources</u></b>		
CSS Endowment Accounts		\$400,000
ROSS Grants		\$414,000
S8 Mod Rehab Program		\$547,800
S8 VASH Program		\$298,622
RHF Grants		\$1,214,765
Total Non-MTW Sources		<u>\$2,875,187</u>
<b><u>Uses</u></b>		
Supportive Housing (ROSS/CSS) - Salaries/Administrative		\$814,000
S8 Mod Rehab Program HAP Expenses (Pg ??)		\$547,800
S8 VASH Program HAP Expenses (pg ??)		\$298,622
CFFP Bond Repayment		\$1,214,765
Total Non-MTW Uses		<u>\$2,875,187</u>
Net Surplus/ (Deficit)		<u>\$0</u>

- *Planned sources and uses of State or local funds*

During FY2013, the HANH/ELM CITY COMMUNITIES was allocated 9% Low Income Housing Tax Credits for the Fair Haven and Ribicoff Cottages and Extension Development.

- Fair Haven (includes Chatham Street and Eastview Phase 2) - \$1,616,367 awarded – equity raised \$15,678,760
- Ribicoff Cottages - \$1,251,609 awarded - equity raised \$ 12,265,765

- *Planned vs. Actual Use of COCC*

***FY2014 Draft Budget***

**Sources**

Management Fees	\$2,021,343
Bookkeeping Fees	\$ 431,820
Capital Administration	\$ 257,777
Developer Fee	\$1,175,000
Fee For Service - Legal, Vacancy Crew, Planning and Development	<u>\$1,116,991</u>
MTW transfer	<u>\$1,120,909</u>
Total COCC Sources	<u>\$6,123,840</u>

**Uses**

Administrative and Operating Costs	\$5,448,840
Development Expenses	<u>\$ 675,000</u>
Total COCC Uses	<u>\$6,123,840</u>

Net Surplus/ (Deficit)	<u><u>\$0</u></u>
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The budget is balanced with a transfer of MTW funding. Some of the expenses in the budget are directly or indirectly tied to MTW initiatives and do not have a separate funding source. There are also costs that exceed our other funding sources and currently require a MTW transfer. In FY2014, HANH is identifying and working towards implementing additional funding sources to cover these costs, such as initiatives undertaken during FY2013 to provide property management services to other entities.

- *Deviations from Cost Allocation or Fee-For-Service Approach*

New Haven Housing Authority follows the HUD guidelines for Fee-For-Service charges to the projects. All centrally provided maintenance and front-line administrative functions are performed as fee-for-service, based on market prices for services actually received. We document the reasonableness of the rates charged and the services performed.

• *Single-Fund flexibility- MTW Fundability- Planned Sources and Expenditures by Development*

*D. Description of How Fundability is Planned to be Used*

Planned HANH/ELM CITY COMMUNITIES and Non-HANH/ELM CITY COMMUNITIES Sources and Uses for Non-Operating/HAP Activities by Development

	<b>FY 2014 Project Total</b>	<b>ROSS</b>	<b>Capital Grants</b>	<b>Developer Fees</b>	<b>Other</b>	<b>MTW</b>	<b>State Tax Credit</b>	<b>City of New Haven</b>	<b>Tax Credit Equity</b>	<b>DECD</b>	<b>Bank Loan</b>	<b>Other</b>
<b>Community and Economic Development</b>												
Supportive Housing Salaries/Administrative	\$1,539,000	\$414,000			\$400,000	\$725,000						
Family and Youth Coordinator	\$78,400					\$78,400						
Eastview terrace Youth Services	\$182,000					\$182,000						
McQueeney Supportive Services	\$153,000					\$153,000						
Crawford Manor Supportive Services	\$219,000					\$219,000						
Ruopplo Manor	\$95,000					\$95,000						
Robert T. Wolfe	\$147,500					\$147,500						
William T. Rowe	\$78,000					\$78,000						
Winslow Celentano	\$138,000					\$138,000						
Fairmont	\$138,000					\$138,000						
<b>Total CED</b>	<b>\$2,767,900</b>	<b>\$414,000</b>			<b>\$400,000</b>	<b>\$1,953,900</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Capital Projects</b>												
Agency Wide UFAS Compliance	\$100,000		\$100,000									
Agency wide vacancy reduction	\$490,000		\$490,000									
Agency wide property damage repairs	\$150,000					\$150,000						
Prescott Bush – emergency on site sewer repair and replacement	\$250,000		\$250,000									
Ruoppolo Manor – façade Improvements & AE Design Services	\$1,118,700		\$1,118,700									
Valley Townhouses Roof Replacements	\$150,000		\$150,000									
McQueeney AE Design Services	\$250,000		\$250,000									
Westville Manor AE design Services	\$200,000		\$200,000									
Crawford Manor Elevator Improvements & AE Design Services	\$450,000		\$450,000									
Fairmount Heights AE Design Services	\$250,000		\$250,000									
Essex Townhouses AE Design Services	\$433,500		\$433,500									
Farnum Courts Lead Based Paint	\$45,000		\$45,000									

Encapsulation												
	<i>FY 2014 Project Total</i>	<i>ROSS</i>	<i>Capital Grants</i>	<i>Developer Fees</i>	<i>Other</i>	<i>MTW</i>	<i>State Tax Credit</i>	<i>City of New Haven</i>	<i>Tax Credit Equity</i>	<i>DECD</i>	<i>Bank Loan</i>	<i>Other</i>
<b>Capital Projects- Continued</b>												
Fulton Park Exterior Improvements	\$500,000		\$500,000									
Winston Celentano EIFS Installation and Window Replacement	\$298,611		\$298,611									
AMP Environmental Remediation Work	\$100,000		\$100,000									
McQueeney Sidewalks	\$75,000					\$75,000						
LEAP Building Roof Replacement	\$276,000					\$276,000						
Software for Work Order Handhelds PCs	\$28,480		\$28,480									
IQC A/E Boroson	\$75,000		\$75,000									
IQC A/E O'Riordan Migani	\$75,000		\$75,000									
IQC A/E Zared	\$75,000		\$75,000									
IQC A/E Environmental Eagle	\$75,000		\$75,000									
IQC A/E Environmental Enviromed	\$150,000		\$150,000									
IQC A/E Fuss & O'Neill	\$75,000		\$75,000									
Capital projects Contingency	\$550,000		\$550,000									
<b>Total Capital Programs</b>	<b>\$6,240,291</b>	<b>\$0</b>	<b>\$5,739,291</b>	<b>\$0</b>	<b>\$0</b>	<b>\$501,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Development</b>												
Development expenses	\$300,723					\$300,723						
Farnam Courts/Fair Haven	\$3,009,826					\$1,441,950		\$1,567,876				
Dwight	\$958,000					\$958,000						
Brookside 1 Rental CFFP Bond	\$1,515,488		\$1,515,488									
Essex	\$3,300,000					\$3,300,000						
Ribicoff Cottages and Extension	\$2,117,426					\$890,850		\$1,226,576				
Brookside 2 Homeownership	\$917,189					\$917,189						
Rockview - I & II Rental	\$2,212,848					\$2,212,848						
Crawford	\$723,000					\$723,000						
Rockview HO	\$438,750					\$438,750						
Westville Manor	\$2,148,203					\$2,148,203						
<b>Total Development Projects</b>	<b>\$17,641,453</b>	<b>\$0</b>	<b>\$1,515,488</b>	<b>\$0</b>	<b>\$0</b>	<b>\$13,331,513</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2,794,452</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>COCC Operating Deficit Funding</b>	<b>\$ 1,120,909</b>					<b>\$ 1,120,909</b>						
<b>Total Sources</b>	<b>\$27,551,553</b>	<b>\$414,000</b>	<b>\$7,254,779</b>		<b>\$400,000</b>	<b>\$16,907,322</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2,794,452</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

### *MTW Initiatives Requiring MTW Funding Fungibility Only*

#### *Modernization/Capital Improvement Program*

HANH/ELM CITY COMMUNITIES ambitious modernization program is made possible by the funding flexibility of the MTW program and enables improvements listed in the above table at the following developments: McConaughy Terrace; Ruoppolo Manor; McQueeney Towers; Waverly Townhouses; Valley Townhouses; Winslow Celentano; Essex Townhouses; Crawford Manor; Ribicoff Cottages and Extensions; Valentina Macri, Westville Manor and various vacancy reduction and UFAS compliance initiatives agency-wide. It also supports the architect/engineering services required by these activities and the abatement testing, remediation and monitoring associated costs. During FY13 the project at Winslow Celentano and Scattered Sites were completed except for 20-24 Westminster which is on-going and is expected to be completed in the Spring of 2013. During FY13 the project at Fulton Park was deferred until a future date due to capacity issues. Vacancy Reduction initiatives have allowed HANH/ELM CITY COMMUNITIES to continue to show improvement from the baseline FY08 vacancy rate of 10%. HANH/ELM CITY COMMUNITIES closed FY13 with a vacancy rate of 5%.

#### *Supportive Services/Community and Economic Development Initiatives*

HANH/ELM CITY COMMUNITIES offers a full array of self sufficiency initiatives that require flexibility in the use of HANH/ELM CITY COMMUNITIES's dollars to fund staff and contractual costs associated with mental health and substance abuse services provided on site in HANH/ELM CITY COMMUNITIES's mixed population developments; supportive services in HANH/ELM CITY COMMUNITIES family, elderly and mixed population developments; support for development of resident owned businesses; Section 3 employment and training; job skills training; education support; specialized job training program; SEHOP capital improvement program; youth initiative and the community re-entry program.

*Community Re-entry Program-* HANH/ELM CITY COMMUNITIES established a preference for LIPH units (a maximum of 12 units) for individuals returning to the community from prison who are engaged in community supportive services and job skills training. Residents receive case management services which will assist them in identifying needs and coordinating referrals and services. Individuals participating in program will be lease compliant i.e. pay rent on time and will not be a nuisance to other residents, During FY2011 12 residents were leased under this program. As participants graduate the program, additional residents can be housed. Two new residents were leased during FY 12 to maintain program capacity of 12. During FY2013, two were evicted due to recidivism which left two vacancies. Units were re-leased during 2013. As participants graduate the program, new residents will be admitted during FY14 to maintain program capacity and an additional four slots will be added.

#### *Income Targeting/Deconcentration of Poverty*

*Housing Choice Voucher:* By providing participants with additional information to aid their housing search in areas of low-poverty, HANH/ELM CITY COMMUNITIES may facilitate participant's expanded housing search. HANH/ELM CITY COMMUNITIES utilizes real estate consultants to assist in the identification of units in areas of low poverty and link participants to these units. During FY 2012, this initiative continued and 7 participants were housed in areas of low poverty. HANH/ELM CITY COMMUNITIES does not have the total number for FY2013 at this time, but anticipates it will be greater than 7.

*Low Income Public Housing:* HUD's income targeting regulations require that least 40% of new admissions to the public housing program must be extremely low-income families (less than 30% of the area median). HANH/ELM CITY COMMUNITIES's new admissions to LIPH consisted of 81% residents in the Extremely Low income category and 91% in the very low income category. Housing authorities may be required to undertake affirmative measures to ensure that they comply with HUD's income targeting requirements. HANH/ELM CITY COMMUNITIES has provided demographic data regarding the income levels of current residents and waiting list applicants in other sections of this MTW Annual Report. As this data indicates, the vast majority (80% or more) of HANH/ELM CITY COMMUNITIES's current residents and applicants are extremely low-income. HANH/ELM CITY COMMUNITIES's existing program already satisfies HUD's income targeting requirements, with well more than 40% of new admissions being extremely low income families, without HANH/ELM CITY COMMUNITIES taking any special measures. With over 80% of HANH/ELM CITY COMMUNITIES's residents at the extremely low-income level, this creates challenges

in creating viable communities. The result becomes communities plagued by the social challenges of the extremely poor accompanied by the challenges of the financial viability of the property. During FY10 HANH/ELM CITY COMMUNITIES planned to aggressively market its properties to new populations in an attempt to further stratify the income mix of these developments while still satisfying the requirement to admit at least 75% very low income residents. HANH/ELM CITY COMMUNITIES's admission preferences have been programmed to draw families in accordance with this requirement. Additionally, HANH/ELM CITY COMMUNITIES seeks to increase the self sufficiency of the existing public housing residents through the FSS initiatives and resident support services discussed below.

Income targeting has been successfully initiated at the following developments: Eastview Terrace, the New Rowe and Brookside Phase I. The percentage of extremely low income residents in HANH/ELM CITY COMMUNITIES's traditional developments is 83%. The percentage in HANH/ELM CITY COMMUNITIES's mixed finance development 69%. HANH/ELM CITY COMMUNITIES's efforts will continue to focus on diversification of income for residents at traditional developments.

#### *Family Self-Sufficiency Initiatives:*

- Specialized Training Opportunities for HANH/ELM CITY COMMUNITIES's FSS families. HANH/ELM CITY COMMUNITIES's Specialized Training program was implemented FY2010 and provides specialized training in areas where there are employment opportunities such as health care, auto mechanics, retail sales, entry level banking positions and customer service. This initiative continued in FY2012. Four were accepted in the program, three actually enrolled in training programs:
  - a) EMT Training Program – was graduated December FY 2013
  - b) Certified Nurses' Aide Program. Was graduated New Haven Adult Education Program. And completed State Board Examination in FY 2013
  - c) 1 enrolled in Gateway Community College with a major in Nursing (RN). Will graduate approximately 2015.Four additional residents have been enrolled in program and attend classes during FY 2014
- Business Development Support Program – HANH/ELM CITY COMMUNITIES provides educational, training, financial management and administrative support services, to assist HANH/ELM CITY COMMUNITIES Residents in the start up of new Business ventures. Also, HANH/ELM CITY COMMUNITIES makes available back office support services to existing Resident Owned Businesses (ROBs), MBE, WBE, and other small Section 3 business concerns. This technical assistance enhanced the efforts of Resident Owned Businesses in becoming more technically proficient and innovative companies in offering comprehensive goods and services. HANH/ELM CITY COMMUNITIES's goal was to create three new Resident Owned Businesses during FY 2012. Two (2) new businesses were launched. During FY 2013 there was a total of eight ROBS. During FY 2014, the goal is to launch three additional ROBS
- SEHOP Capital Improvement Program. HANH/ELM CITY COMMUNITIES launched the Capital Improvement Program during FY2010 and it continues. This program supports new homeowners with necessary capital improvements that arise after being in the home for a minimum of three years. Twenty-three (23) homeowners participate in the program.

#### *Redevelopment Initiatives:*

HANH/ELM CITY COMMUNITIES has one of the most ambitious redevelopment programs and it is made possible through MTW funding flexibility. Projects additionally are made possible through the HANH/ELM CITY COMMUNITIES Alternative TDC and its authority to provide project based vouchers in excess of 25 percent of the units. Currently, the following major redevelopments are underway:

#### *William T. Rowe Redevelopment: - Completed*

William T. Rowe at 904 Howard Ave. is a 172 unit, high rise development that houses elderly and disabled residents. Having determined its obsolescence, HANH/ELM CITY COMMUNITIES has undertaken a redevelopment effort for this property. Construction started in FY 2010 and was completed in FY 2012.

### *122 Wilmot Road – Under Construction*

The 122 Wilmot Road development is one of the first phases of the \$200 million West Rock Master Plan, a plan for the revitalization of two Public Housing sites in the West Rock neighborhood of New Haven. The Wilmot Road site is the only off-site component of the West Rock plan at the present time. The West Rock Master Plan is the result of a years-long planning process involving collaboration with community residents, community organizations and city officials that aims to rejuvenate a formerly blighted neighborhood, replacing 491 units of distressed Public Housing with over 500 units of mixed-income affordable rental and homeownership units, along with resident service facilities and commercial space. The 122 Wilmot Road site is an off-site parcel purchased by HANH/ELM CITY COMMUNITIES with an option to ground-lease by the Glendower Group, Inc., or its affiliate, on what once stood a small distressed strip mall, which has since been demolished.

The development consist of a 47-unit elevator building consisting of 34 ACC units of which 26 are designated as elderly housing, 4,261 gross square feet of program and management space that will house the Supportive Services Program for the development, educational and recreational facilities for the building residents, 13 project-based voucher units, and 9,186 gross square feet of commercial space. The single four-storey structure will consist of 41 one-bedroom units and six (6) two-bedroom units.

*West Rock Revitalization (Brookside Phase I, Brookside Phase II and Rockview Phase I):* HANH/ELM CITY COMMUNITIES received approval of HUD to dispose of the Brookside property in FY 2010. HANH/ELM CITY COMMUNITIES requested approval of disposal of Rockview in FY 2012.

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

The project will be carried out in multiple phases. The revitalization of the Brookside site will consist of two rental phases and one homeownership phase. The revitalization of the Rockview site will be carried out in two rental phases and two homeownership phases. The estimated cost of the revitalization of all three sites is \$150-\$200 million.

HANH/ELM CITY COMMUNITIES has partnered with Michaels Development Company, a nationally known developer of affordable housing with a large portfolio, to redevelop the Rockview and Brookside public housing sites. Brookside, Rockview and the commercial space located at 122 Wilmot Road have all been demolished. During FY 2010, construction began on the infrastructure necessary for the Brookside rental and homeownerships phases.

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

### *Brookside Phase I Description - Completed*

The phase for which RHF funds will be used is Brookside Phase I Rental. The phase will consist of 101 family units in two-story townhouse structures. The projected subsidy mix is 50% Public Housing and 50% Project-based Section 8, with all units also being Low Income Housing Tax Credit units under Section 42. The units are a mix of one-, two-, three and four-bedroom units, including 14 handicapped-accessible units.

The projected cost of the phase is approximately \$45.5 million. In addition to the \$1,215,076 in RHF Funds for which reprogramming was requested, approximate projected sources for the redevelopment include \$1.6 million in 4% Low Income Housing Tax Credits generating \$12.6 million in investor equity, \$11.6 million in CFFP, \$4.4 million in CFRC, \$3.5 million in infrastructure funds from the City of New Haven, 5 million in MTW, \$402,770 in state tax credits, and \$201,257 in deferred developer fee.

HANH/ELM CITY COMMUNITIES conveyed the land under a long-term ground lease to the ownership entity, which will be a limited liability company consisting of the developer as managing member and the tax credit investor as investor member. HANH/ELM CITY COMMUNITIES will have the right to replace the developer as managing member following completion and stabilization of the development.

The Brookside site is vacated and all structures have been demolished. The infrastructure was initiated during FY2010.

FY2010:

Submitted application for HOPE VI – 11/19/10

Application for CFFP submitted to HUD – 2/10/10

Updated RHF Plan for Use of 2007, 2008 and 2009 approved by HUD in FY 2010

Disposition Application submitted to HUD and approved in FY 2010

FY2011:

Phase I Closing - 09/30/10

Construction Start- Fall 2010

FY2012

Construction Completion - FY2012

***Brookside Phase II and Rockview Phase I Rental:***

HANH/ELM CITY COMMUNITIES is in the midst of a redevelopment of the West Rock neighborhood which includes two former public housing developments- Brookside and Rockview. During FY2009 and 2010, HANH/ELM CITY COMMUNITIES initiated the following phases: Brookside I Rental, Brookside II Rental and Brookside Homeownership. During FY2012, HANH/ELM CITY COMMUNITIES commenced Brookside Phase II consisting of 100 units. Construction was completed during FY2013. During FY2013 Rockview Phase 1 Rental consisting of 77 units which is a part of the overall West Rock Revitalization Plan began construction. Ten percent of these units will be UFAS compliant. Units will be a combination of row house and walk-up type development. Construction of these units will provide employment and contracting opportunities for Section 3 employers.

HANH/ELM CITY COMMUNITIES sought HOPE VI funding for this development and submitted a HOPE VI application during FY2011. The Authority was not granted HOPEVI funding for this project.

The Legacy Amendment was approved in June 2010. Financing is expected to be obtained by October 2011. Construction closing is anticipated by June 2012 and construction should begin by July 15, 2012.

***Fungability: Implemented: FY2007 (clarified and included as an initiative in 2012 MTW Plan)***

HANH/ELM CITY COMMUNITIES will use its fungability under Attachment C of the Amended and Restated MTW Agreement to use funds awarded under Section 8(o) for development purposes for Brookside Phase I Rental, Brookside Phase 2 Rental, Rockview Phase 1 Rental, and 122 Wilmot Road. The use of fungibility, allows HANH/ELM CITY COMMUNITIES's to produce housing for a broader range of income residents and broader range of housing types.

Measures of success of this initiative include the range of housing types produced and range of incomes that occupy these types of housing. To date we have completed Quinnipiac Terrace Phase III Rental which encompasses 17 ACC, 16 PBV; Eastview Terrace which encompasses 102 units, with 14 units above 50% of the AMI or 13.7%. Brookside Phase 1 Rental which encompasses 101 units with 50 units above 50% AMI or 50% of the units. Brookside Homeownership allowed for the completion of 6 units. William T. Rowe, encompasses 26 market rate units out of the 104 or 25% of the units are market rate.

***Rental Assistance Demonstration (RAD)***

Rental Assistance Demonstration (RAD) authorized by the Consolidated and Further Continuing Appropriations Act, allows for the conversion of assistance under the public housing, Rent Supplement, Rental Assistance (RAD), and Moderate Rehabilitation (Mod Rehab) programs to long term, renewable assistance under Section 8. As provided in the Federal Register notice that HUD published on March 8, 2012, at 77 FR 14029, RAD has two separate components. RAD allows projects funded under the public housing and Mod Rehab programs to convert to long term Section 8 rental assistance contracts.

HANH/ELM CITY COMMUNITIES applied for RAD assistance to convert Essex Townhouses, Westville Manor, , Crawford Manor, Farnam Courts, Ribicoff Cottages and Ribicoff Extension, during FY2013. Approvals were received for Essex Townhouses and Crawford Manor during FY2013. Other approvals are pending. It is anticipated that HANH/ELM CITY COMMUNITIES will apply for 4% bonds from CHFA during FY2013 and may apply for 9% bonds during FY2014.

Once the units are converted a resident will have the right to return without any additional screening. When the resident returns to the unit and the rent increases by more than 10% or \$25.00 the rent increase will be phased in over a five year period.

<i>Development</i>	<i>Type</i>	<i>0 Bedroom</i>	<i>1 Bedroom</i>	<i>2 Bedroom</i>	<i>3 Bedroom</i>	<i>4 Bedroom</i>	<i>5 Bedroom</i>
<i>Crawford Manor</i>	<i>Elderly/Disabled</i>	<i>52</i>	<i>52</i>	<i>5</i>			
<i>Essex Townhouses</i>	<i>Family</i>			<i>14</i>	<i>13</i>	<i>8</i>	
<i>Westville Manor</i>	<i>Family</i>			<i>35</i>	<i>71</i>	<i>28</i>	<i>17</i>
<i>Valley Townhouses</i>	<i>Family</i>			<i>8</i>	<i>16</i>	<i>13</i>	<i>3</i>
<i>Ribicoff Cottages and Extension</i>	<i>Elderly/Disabled</i>	<i>16</i>	<i>84</i>				
<i>Farnam Court</i>	<i>Family</i>		<i>7</i>	<i>137</i>	<i>72</i>	<i>24</i>	
<i>Total</i>		<i>68</i>	<i>143</i>	<i>199</i>	<i>172</i>	<i>73</i>	<i>20</i>

## VIII. Administrative

A.

### Board Resolution Approving This FY 2014 MTW Annual Plan

To: Board of Commissioners  
From: Karen DuBois-Walton, Ph.D., Executive Director  
Date: June 18, 2013  
RE: Approval of MTW Annual Plan for FY 2014

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ACTION:	Recommend that the Board of Commissioners adopt Resolution Number <u>06-121/13-R</u> .
TIMING:	Immediately.
DISCUSSION:	<p>In 1997, Congress authorized HUD to approve up to 30 public housing authorities as Moving to Work (MTW) pilot programs. On November 20, 2000, the Board approved the submission of a MTW application. HUD subsequently granted MTW status and signed an agreement with HANH on September 28, 2001, which is retroactive to October 1, 2000.</p> <p>HUD and the MTW agencies worked to develop the Restated and Amended MTW Agreement which continues the demonstration project through the end of the agency's fiscal year 2018. The HANH Board of Commissioners approved Resolution #02-22-08-R on February 26, 2008 authorizing the execution of the Amended and Restated MTW Agreement. The Amended and Restated MTW Agreement was executed on May 2, 2008.</p> <p>As a MTW agency, HANH is required, in lieu of the one year five year Housing Agency Plan, to provide an Annual MTW Plan and an Annual MTW Report. The MTW Annual Plan for FY 2014 was made available for public review on April 15, 2013. A public hearing was held on May 16, 2013. At this time HANH submits for Board approval the MTW Annual Plan for Fiscal Year 2014. We request the Board's authorization for the Executive Director to submit to the U.S. Department of Housing and Urban Development (HUD) the MTW Annual Plan for FY 2014 and all related or required certifications and HUD forms, of which the attached document is a part, and all necessary documentation and submissions of the Plan.</p>
FISCAL IMPACT:	None.
STAFF:	Renée Dobos, Chief Operating Officer

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

**Resolution Number: 06-121/13-R**

**APPROVING HANH'S MTW ANNUAL PLAN FOR FY 2014**

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) has granted Moving to Work (MTW) status to the Housing Authority of the City of New Haven (HANH); and

WHEREAS, HUD has signed a Restated and Amended MTW Agreement with HANH, which will be generally beneficial to the operations of the Housing Authority; and

WHEREAS, a requirement of the MTW Deregulation Demonstration program is for HANH to submit an Annual MTW Plan.

NOW, THEREFORE, BE IT RESOLVED THAT THE BOARD OF COMMISSIONERS hereby authorizes the Executive Director to submit to the U.S. Department of Housing and Urban Development (HUD) the Moving to Work Annual Plan for FY 2014 and all related or required certifications and HUD forms, of which this document is a part, and all necessary documentation and submissions for the receipt of public housing operating, Section 8, and Comprehensive Grant Program funds, and make the following certifications and agreements with HUD in connection with the submission of the Plan and implementation thereof.

1. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 30 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
2. 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.
3. The PHA will affirmatively further fair housing by examining their 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.
4. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
5. The PHA will comply with the Architectural Barriers Act of 1968 and 24CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
6. 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.
7. The PHA has submitted with the Plan a certification with regard to a drug free workplace required by CFR Part 24, Subpart F.
8. The PHA has submitted with the Plan a certification 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.
9. 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.
10. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

11. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities. In accordance with 24 CFR Part 58.
12. 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.
13. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
14. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
15. 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).
16. 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.
17. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present on June 18, 2013.



Karen DuBois-Walton  
Secretary-Executive Director

6.18.13

Date

REVIEWED:  
BERCHEM, MOSES & DEVLIN, P.C.  
GENERAL COUNSEL

By:   
Rolan Joni Young-Smith, Esq.  
A Senior Partner

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

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
Certifications of Compliance

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning \_\_\_\_\_, 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.

New Haven Housing Authority  
PHA Name

CT004  
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)

Erick Chomas  
Name of Authorized Official

Chairman  
Title

[Signature]  
Signature

11/1/13  
Date

\*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. Descriptions of Agency Directed Evaluations of Demonstration

HANH/ELM CITY COMMUNITIES has contracted with an outside evaluator to assess HANH/ELM CITY COMMUNITIES’s MTW program and the effectiveness of MTW initiatives.

C. Performance and Evaluation Report for Capital Fund activities not included in the MTW Block Grant –RHF funds

HANH/ELM CITY COMMUNITIES intended to use the FY 07, 08 and 09 funds for development of a Phase 1 of the Brookside revitalization project and the William T. Rowe project, as well as to either accumulate these funds for these projects. FY 2010RHF funds will be used to pay debt services of the CFFP Financing as set forth under 24 CFR Part 990.440. Part 990.400 permit PHAs to pledge up to 50 percent of RHF funds to repay debt associated with the development of replacement units. Both the Brookside Phase I and New Rowe projects have been completed during FY2012.

The RHF grants and grant amounts to be reprogrammed and the requested revised obligation and expenditure deadlines are as follows:

Grant	Total Grant Amount	Increment	New Obligation Deadline	New Expenditure Deadline
CT26R00450107	\$541,850	1 <sup>st</sup>	10/12/10	10/12/12
CT26R00450207	\$568,890	2 <sup>ND</sup>	10/12/10	12/12/12
CT26R00450108	\$871,883	1 <sup>st</sup>	10/12/10	12/12/12
CT26R00450208	\$177,216	2 <sup>nd</sup>	10/12/10	10/12/12
CT26R00450109	\$896,759	1 <sup>st</sup>	09/14/12	09/14/14
CT26R00450209	\$154,619	2 <sup>nd</sup>	09/14/11	09/14/13
CT26R00450409	\$403,299	3 <sup>rd</sup>	04/01/12	04/01/14
<b>Total</b>	<b>\$3,614,516</b>			

**Five Year RHF Plan for FY 2010 - FY 2014**

HANH/ELM CITY COMMUNITIES’s Replacement Housing Factor Funds (RHF) 5 Year Plan to accumulate FY 2007, FY 2008, and FY 2009 was previously approved by HUD in 2010. The 2012 MTW Plan set forth our RHF Plan for FY 2010-2014. RHF for FY 2010 through FY 2021 will be used for repayment of debt service on the CFFP Bonds for the Brookside Phase I Rental.

**Description of Projects**

***Brookside Phase 1 Rental - Completed***

Brookside Phase 1 Rental development contains 101 affordable rental units in 28 rental buildings and includes a management/maintenance building with a community meeting room. All of the units will be tax credit eligible units whose residents will be qualified in accordance with Section 42 of the Internal Revenue Code. Of the 101 affordable rental units, 50 units will be public housing units that benefit from public housing operating subsidy in accordance with a mixed finance amendment to the Annual Contribution Contract. The administration of the operating subsidy will be described in a regulatory and operating agreement between the Owner and Authority. Of the remaining 51 units, 50 will benefit from project based Section 8 subsidy in accordance with a Housing Assistance Payment contract between the Owner and the

Authority. The public housing units will be distributed throughout the sites and will not be concentrated. One unit will be a qualified non-income generating unit set aside for the maintenance supervisor.

***William T. Rowe - Completed***

To address the issue facing this development, HANH/ELM CITY COMMUNITIES selected Trinity Rowe, LP, to develop a 104 unit mixed finance development. The development will be constructed on parcels previously owned by the Yale New Haven Hospital. In exchange for these parcel, the Authority will convey the Rowe property to YNH once the new development has been constructed. The newly constructed development will consist of a nine story elevator Mixed Population building. Forty six units will be public housing, 32 will be project based and 26 units will be unassisted. The unit mixed will consist of 56 one-bedroom apartments and 48 two bedroom apartments. The public housing mix will consist of 30 one bedroom apartments and 16 two-bedroom apartments. The redeveloped property will also contain program space for residential supportive services and on the ground floor there will be 2,500 square feet of commercial space. The property will include an on-site management office, as well.

***122 Wilmot Road – Completed in FY13***

The 122 Wilmot Road development is one of the first phases of the \$200 million West Rock Master Plan, a plan for the revitalization of two Public Housing sites in the West Rock neighborhood of New Haven. These two sites, Brookside and Rockview, are demolished and the first phase of construction on the Brookside site, directly adjacent to 122 Wilmot Road, is in progress. The Wilmot Road site is the only off-site component of the West Rock plan at the present time. The West Rock Master Plan is the result of a years-long planning process involving collaboration with community residents, community organizations and city officials that aims to rejuvenate a formerly blighted neighborhood, replacing 491 units of distressed Public Housing with over 500 units of mixed-income affordable rental and homeownership units, along with resident service facilities and commercial space. The 122 Wilmot Road site is an off-site parcel purchased by HANH/ELM CITY COMMUNITIES with an option to ground-lease by the Glendower Group, Inc., or its affiliate, on what once stood a small distressed strip mall, which has since been demolished.

The development consist of a 47-unit elevator building consisting of 34 ACC units of which 26 are designated as elderly housing, 4,261 gross square feet of program and management space that will house the Supportive Services Program for the development, educational and recreational facilities for the building residents, 13 project-based voucher units, and 9,186 gross square feet of commercial space. The single four-storey structure will consist of 41 one-bedroom units and six (6) two-bedroom units.

The projected total development costs of \$17,919,159 was funded with projected permanent financing of \$5,093,000 in investor equity generated from a projected \$1,594,804 in conventional permanent debt, and \$192,195 in deferred developer fees. HANH/ELM CITY COMMUNITIES as sponsor is committing approximately \$8,261,905 in CFFP to the project. \$2,777,255 of HANH/ELM CITY COMMUNITIES's equity may be replaced by funding that has been applied for from the State of Connecticut's Department of Economic and Community Development (DECD) and/or funding to be applied for from the Affordable Housing Program of Federal Home Loan Bank Boston (FHLBB).

**CFFP Financing**

RHF funds for FY 2010 through 2021 will be used, pursuant to 24 CFR Part 990.440, to provide security for repayment of debt for the development of replacement units at the site. Part 990.400 permit PHAs to pledge up to 100 percent of these funds to repay debt associated with the development of replacement units at Brookside Phase 1 Rental and 122 Wilmot Road.

*Documentation of Public Hearing and Public Comment Period*

Housing Authority of New Haven  
Public Hearing 2014 Moving to Work Annual Plan  
Wednesday, May 15, 2013 @ 4:00 pm  
360 Orange Street, New Haven, CT 06511

Attendance:

Karen DuBois-Walton, HANH  
Jennifer Bowlan, HANH  
Rayn Ruggerio, HANH  
Demetria McMillian, HANH  
Karen Coleman, HANH  
Laura Vega, HANH  
Shenae Draughn, HANH  
Greg Harbolis, HANH  
Michael Southam, HANH  
Catherine Hawthorne, HANH  
Frank Emery, HANH  
Sandra Haywood, HANH  
Sheila Allen Bell, HANH  
Claude Stanberry, HANH  
Tim Albaitis, HANH  
Nydia Rivera, HANH  
Monica Wolfork, HANH  
Chris Cevetillo, HANH  
Daniel Ramos, HANH  
Evelise Riberio, HANH  
Renee Dobos, HANH  
Margarita Pagan, HANH  
Marta Vega, HANH  
Dale DiBenedetto, HANH  
Candice Boyle, HANH  
Benjamin Gold, HANH  
Gary Hogan, HANH  
Gayatri Rana, HANH  
Asia Williams, HANH  
Stewart Battle, HANH  
Tim Regan, HANH  
Lee Purvis, HANH  
Brigitta Henderson, HANH

Meeting started at 4:00 P.M. by Karen DuBois-Walton.

Karen DuBois-Walton read the legal notice aloud which stated the reason the meeting was being called.

**NOTICE OF PUBLIC HEARING FOR THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN 2014 MOVING TO WORK ANNUAL PLAN**

Section VI B of the Authority's Moving to Work Agreement (the "Agreement") requires that before the Agency can file its Approved Annual Moving to Work Plan to the U.S. Department of Housing and Urban

Development (the “HUD”) it must conduct a public hearing, consider comments from the hearing on the proposed amendments, obtain approval from the Board of Commissioners, and submit the amendments to HUD.

Pursuant to said Section VI B, the Authority will conduct a public hearing on **Wednesday, May 15 2013 at 4:00 PM, in the Board of Commissioners Conference Room at 360 Orange Street, New Haven, CT 06511** to receive comments and recommendations. A copy of the Plan will be available for review starting **April 15, 2013** on the Authority’s website at [www.elmcitycommunities.com](http://www.elmcitycommunities.com), or can be picked up at the front desk in the main lobby area at 360 Orange Street. You are invited to provide written comments addressed to HANH/ELM CITY COMMUNITIES MTW 2014 Plan, Attn: Brigitta Henderson, P.O. Box 1912, New Haven, CT 06509-1912.

Any individuals requiring reasonable accommodations to participant in the hearing may call Teena Bordeaux, Reasonable Accommodations Coordinator for HANH/ELM CITY COMMUNITIES at 498-8800 extension 1507 or at the TDD Number 497-8434.

At 4:04 pm the meeting was then opened to take public comments.

**Public Comments:**

**Renee Dobos, COO: Mandatory Interim Reexaminations Policy**

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

- Change in family composition that affects the bedroom size of two degrees or more.
- The addition of a family member 18 years of age or older.
- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.

**Removing the bullet that states the following:**

- Increase in family income of that causes a family to move from one income tier to another with a high rent schedule, provided the increase is expected to last 90 days or more.

**If HANH/ELM CITY COMMUNITIES grants an exceptional expense deduction for any family and there is a change then the family must report that change to HANH/ELM CITY COMMUNITIES.**

**Optional Interim Reexaminations Policy**

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

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

Interim rents remain in place until the next scheduled reexamination. **Adding to the plan:** If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled annual certification date. **Removing from the plan:** or until the household experiences an increase or decrease in income equal to or greater than \$200.00 per month, whichever comes first.

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

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

DuBois-Walton: Thank you; are there any other public comments?

**Evelise Ribeiro, Housing Choice Voucher Director:**

1. This \$34,000 in savings continued during FY2013 and HANH expects to save \$68,000 during FY2014. On page 50 of the plan
2. To date, 36 residents have purchased homes. During 2014, we expect an additional 4 residents to purchase homes. On page 23 of the plan
3. At baseline approximately 860 inspections are required due to a fail for items that are not health and safety related. The cost of these inspections is approximately \$61,000.00. On page 31 of the plan
4. Seven vouchers out of 10 were awarded in FY 2011. No further activity has occurred. HANH/ELM CITY COMMUNITIES will continue to enter in Memoranda of Understanding with organizations that provide housing for homeless with supportive services. In 2012 HANH allocated five vouchers for homeless families enrolled in supportive services. Currently, all five vouchers are utilized. On page 35 of the plan

**And introducing:**

**Proposed 3.5. -HCV Rent Simplification/Cost Stabilization Measures**

**A. Description**

The Authority enacted Rent Simplification measures consistent with approved Initiative 3.1 during FY2008. This initiative seeks to expand upon those streamlining measures. Under the current program, HANH/ELM CITY COMMUNITIES eliminated annual recertifications and implemented biennial and triennial recertifications. Despite that fact the participants were no longer required to be seen annually, HANH/ELM CITY COMMUNITIES continued to conduct annual unit inspections and allowed for annual rent increases. HANH/ELM CITY COMMUNITIES now seeks to place unit inspections and rent increases on a schedule consistent with recertifications. Further, HANH/ELM CITY COMMUNITIES's aggressive redevelopment program has led to the creation of over 300 additional units of housing funded through the project based voucher program. Over 350 additional units are planned in the next few years. These newly constructed units are subject to numerous inspections and must be inspected by the same City entity that performs our HQS inspections in order to receive a Certificate of Occupancy. Still, current procedure requires additional HQS inspection prior to lease up. This is costly and inefficient. HANH/ELM CITY COMMUNITIES proposes to eliminate the requirement for an HQS inspection on newly constructed PBV units at initial lease up. Finally, HANH proposes a self certification process whereby for fails related to items that are not health and safety related for annual (bi-annual and triennial) inspections, landlords and participants will be able to self certify and submit documentation of correction of deficiencies.

These changes are sought to streamline the administrative process and create efficiencies and savings. History has demonstrated that the majority of all units inspected annually pass on the first inspection. It is reasonable to assume that given a high pass rate, the quality of the housing lends itself to less frequent inspections. All participants retain the right to request a Special Inspection at any time. Even anticipating special inspections, the number of inspections is expected to reduce significantly resulting in reduced inspection costs and programmatic savings.

Requests for rent increases currently are allowed annually. Of over 3,500 landlords, on average<sup>[1]</sup> 700 rent increases were requested and approved. This represents 20% of assisted units. This suggests that most landlords are not requesting annual increases and that requests are less frequent. Placing increases on a biennial or triennial schedule to coincide with the recertification process will streamline the process and create administrative efficiencies. This equates to 1 FTE administrative person. Additionally rent increases result in HAP increases of \$1 million annually. Placing increases on a schedule consistent with recertifications will reduce this amount by almost \$200,000 annually. Given the reductions to the HCV funding experienced in FY2013 and anticipated during FY2014, all attempts to generate savings while preserving subsidy for participants are essential.

DuBois-Walton: Thank you and at this time I will close the public hearing.

The meeting was adjourned at 4:15pm.

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<sup>[1]</sup> Average for FY2011, 2012 and 2013.

## Appendix 1

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

<b>HUD HCC 2013</b>								
		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Detached		\$ 96,195	\$ 122,916	\$ 144,239	\$ 170,801	\$ 200,549	\$ 219,593	\$ 237,542
Row House		\$ 78,165	\$ 102,750	\$ 121,542	\$ 148,120	\$ 176,091	\$ 194,147	\$ 211,074
Walk Up		\$ 71,663	\$ 97,219	<b>\$ 123,709</b>	\$ 161,949	\$ 201,180	\$ 226,579	\$ 251,643
Elevator		\$ 81,545	\$ 114,163	\$ 146,781	\$ 195,708	\$ 244,635	\$ 277,253	\$ 309,871
<b>HUD HCC FACTORS</b>								
		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Detached		-33.31%	-14.78%	16.60%	18.42%	39.04%	52.24%	64.69%
Row House		-35.69%	-15.46%	-1.75%	21.87%	44.88%	59.74%	73.66%
Walk Up		-42.07%	-21.41%	0.00%	30.91%	62.62%	83.16%	103.42%
Elevator		-44.44%	-22.22%	0%	33.33%	66.67%	88.89%	111.11%
<b>HANH/ELM CITY COMMUNITIES HCC 2013</b>								
		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Detached		\$ 145,318	\$ 185,685	\$ 217,896	\$ 258,023	\$ 302,962	\$ 331,731	\$ 358,846
Row House		\$ 118,081	\$ 155,221	\$ 183,609	\$ 223,759	\$ 266,014	\$ 293,290	\$ 318,861
Walk Up		\$ 108,259	\$ 146,866	\$ 186,882	\$ 244,651	\$ 303,915	\$ 342,285	\$ 380,149
Elevator		\$ 109,828	\$ 153,759	\$ 197,690	\$ 263,587	\$ 329,483	\$ 373,414	\$ 417,346
<b>HUD TDC 2013</b>								
		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Detached		\$ 168,342	\$ 215,103	\$ 252,419	\$ 298,901	\$ 350,961	\$ 384,288	\$ 415,699
Row House		\$ 136,788	\$ 179,813	\$ 212,699	\$ 259,210	\$ 308,159	\$ 339,757	\$ 369,380
Walk Up		\$ 125,410	\$ 170,134	\$ 216,490	\$ 283,411	\$ 352,064	\$ 396,513	\$ 440,376
Elevator		\$ 130,472	\$ 182,661	\$ 234,850	\$ 313,133	\$ 391,416	\$ 443,605	\$ 495,794

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

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

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

## Appendix 2

### *Local Asset Based Management:*

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

- HANH/ELM CITY COMMUNITIES developed a program wherein Excess Operating Reserves are funded from the General Fund Account and will be used to cover deficits through a journal voucher once per year to ensure that the transfer of funds from the General Fund to a project to cover any operating deficits are reflected on the income and expense statement of the project.
- HANH/ELM CITY COMMUNITIES uses property level management accounting and budgeting for direct costs incurred by each property.
- Each project is charged a management fee of \$63.29 per unit per month, bookkeeping fee of \$7.50 per unit per month, asset management fee of \$10 per unit per month and other fees that are reasonable and appropriate for services carried out by the Central Office Cost Center.
- The cost of vacant unit turnovers will be charged to projects based on the fee schedule for turnovers set forth in the third party unit turnover contract which was obtained through competitive procurement.
- Cost of legal services will be fee for service basis by charging the project for actual services performed by staff and outside counsel for direct services. These fees are derived and based on a comparison of legal fees paid to outside attorneys that were competitively procured and GSA/Connecticut State rates for attorneys and support staff.
- Planning and Development services will be fee for service basis by charging the project for actual services performed by staff and outside counsel for direct services. The fees for architectural type work and related performed by staff are developed based on fees set forth in third party contracts for work of the same nature that was obtained through the competitive procurement process and the GSA Schedule.
- An indirect cost approach is used for the cost of implementing the CFP; leasing; centralized wait list; resident services supervisory staff and rent collection all of which are pro rated based upon the number of ACC units or percentage of time charged to a project.
- Security costs will be allocated based upon fee schedule set forth in the third party security contract.

Proceeds from the CFP, energy performance contracts and other similar sources to support project operations are not reflected in the operating statements for each project. The COCC operates on the allowable fees and other permitted reimbursements from its LIPH and HCV programs, as well as revenues generated from non-public housing programs. HANH/ELM CITY COMMUNITIES systematically reviews information regarding the financial, physical and management performance of each project and identifies non-performing assets. All non-performing assets will have a management plan that includes a set of measurable goals to address. During FY2009, HANH/ELM CITY COMMUNITIES conducted an updated Physical Needs Assessment for each project. The work was completed in FY2010 and was fully reported in the FY10 report.

Finally, HANH/ELM CITY COMMUNITIES has implemented a Risk Management Program in accordance with §990.270.

*Appendix 3*



HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

MOVING TO WORK SUFFICIENCY PROGRAM

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

PROCEDURES FOR PUBLIC HOUSING/HCV  
PROGRAM

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## **1. Goals and Objectives of the Program**

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

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

## **2. Eligibility/Threshold Requirements**

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

- a. All adult members of the household 18 year of age or over must execute a CARES Addendum to the Standard PHA or HCV Lease Agreement;
- b. Be current in all lease obligations to HANH/ELM CITY COMMUNITIES;
- c. Be a resident in “good standing” as defined in the ACOP;
- d. Have been employed at least 12 months out of the prior 36 months before applying for the CARES program;
- e. Have a GED or High School diploma or be capable of obtaining such GED or High School diploma within 24-months of applying for program. Applicants for the program that do not have a GED or High School diploma must show progress towards meeting this goal;
- f. Enroll in the Authority’s FSS Program; and
- g. Open an IDA account

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

### **3. Program Overview**

Brookside and Rockview families will be given the options, at lease up, to stay in a public housing program or reside in a Project Based Voucher (PBV) unit or to accept a Tenant Based CARES Program Voucher (CPV) as part of the CARES Program. Residents that opt to stay in public housing or a PBV unit will be given 72 months of rental assistance. After the 72 months have expired, residents who elect to stay in public housing or PBV units will be required to pay the Flat Rent (public housing) or Market rent (PBV), less prorated assistance for household members who are seniors, 18 years of age or under, disabled or otherwise exempt. Thus, if a family of four receives rental assistance (calculated as the difference between the Flat Rent and the TTP) and there are two adults and two children ages 12 and 15, and assuming that the prorated rental assistance for each member of the household is \$200 per month, the family will have its rent increased by \$400 per month after the end of the seven year period. During the term, the prorated amount of assistance would continue for the child over the age of 18 if that child was enrolled in a minimum of 3 hours or 3 credits in secondary or vocational education. Assistance for residents who are deemed exempt from the program by the case manager and the needs assessment will also continue to receive assistance. We recognize that there are individuals who to no fault of their own will not be able to achieve self-sufficiency on their own. Non-exempt individuals who have an ISP and case manager, and show progress towards the goals of the plan will continue to be able to receive assistance as long as they continue to make progress towards their goals. Life happens and families may experience unforeseen circumstances such as a loss of job, downturn in the economy or an unforeseen family circumstance that will hinder them from entering the CARES Program.

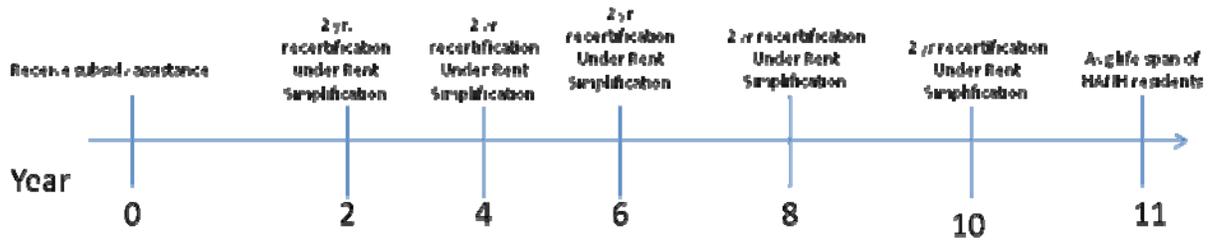
Residents who elect to take the CPV option will be given up to two years to transition in to the CARES Program and a total of seven years to reach self sufficiency based upon their income and job readiness at the signing of their lease. The first two years will enable residents the time to meet the basic requirements of the program. At the end of the seven year program, participating residents will no longer receive rental assistance. HANH/ELM CITY COMMUNITIES will determine the amount of assistance the family is eligible to receive over the term of the CPV assistance, and assistance will be adjusted annually for inflation (Exhibit A). In the third year of the program, an amount equal to the sum of the rental assistance that the family would have otherwise received in the final year will be deposited into a Resident Enrolled Escrow Fund (REEF). For the duration of the program the funds in the REEF may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed \$3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed \$2,500 after all other options have been exhausted), purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of

HANH/ELM CITY COMMUNITIES. If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance. A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the Executive Director's office, the Director of Operations or designee, the Service Center Director or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

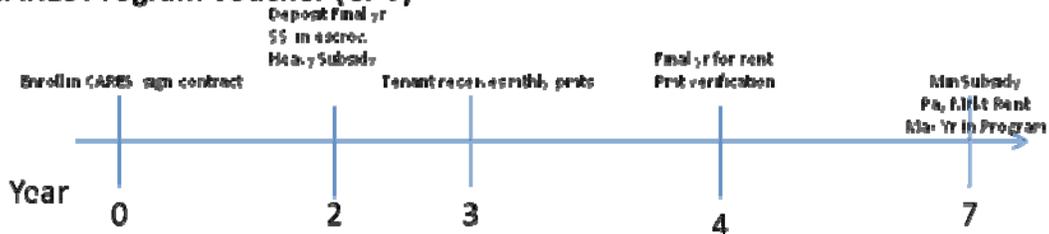
The first step to self-sufficiency is encouraging families to seek affordable housing and manage their household expenses on a fixed income which will empower them to make their own choices. At the time of enrollment into the program, each family will sign a CARES Addendum and go through an assessment process where income, bedroom size, and family composition will be evaluated. For the first 24 months of the program, residents who elect to enroll in the CARES Program will be required to live in the newly redeveloped West Rock community to receive the supportive services and management needed to allow them to become self-sufficient. During this time the monthly subsidy payments will be made directly to the landlord. Beginning in year 3, the families will undergo a recertification to determine the monthly subsidy for the remaining five years in the CARES Program and the REEF income disallowance basis, be responsible for paying the landlord in full, and to provide HANH/ELM CITY COMMUNITIES with payment receipts for 12 consecutive months to ensure compliance with the program. The families will receive a pre-determined subsidy payment each month, instead of the traditional method of payments being made to the landlord, based on the assessment. HANH/ELM CITY COMMUNITIES will do periodic reviews to make sure funds are being spent to cover housing costs; however, there are no income exclusions, deductions or utility allowances necessary since the HAP data already takes this information into account (Exhibit A). Subsidy amounts paid to the families will be adjusted to reflect cost of living increases annually. These stepped requirements will eliminate the need for recertification and verification of income. The established subsidy payment schedule for the term of the program enables HANH/ELM CITY COMMUNITIES to assist the families with the most support in the early years where it is needed. Providing this oversight and acceleration in subsidy in the early years of the program along with the development of the skills necessary for long-term self-sufficiency will increase the independence of the residents over time and result in a gradual declining

need for subsidy.

### Public Housing/HCV Program



### CARES Program Voucher (CPV)



Additionally, participating residents will also establish Individual Development Accounts (IDA) if they elect to take the CPV option. HANH/ELM CITY COMMUNITIES’s contribution will be the resident’s income disallowance portion to be contributed to the IDA based upon the initial Individual Services Plan and income verification process that is established by the families and a case manager at the time of lease up. If a family’s income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent. Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent. For families enrolled in HANH/ELM CITY COMMUNITIES’s optional income disallowance, participants can elect to opt out of HANH/ELM CITY COMMUNITIES’s disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

HANH/ELM CITY COMMUNITIES is embarking on this CARES pilot program in the West Rock community to help promote economic self-sufficiency of the residents of this revitalized community as a stepping stone to a new paradigm in the affordable housing market for low income families. We believe that the comprehensive program discussed above, combined with the development of unassisted rental units, will be effective in achieving housing and economic transitions for a substantial numbers of West Rock families.

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

Family Size		1	2	3	4	5	6
Median Household HAP to Owner (9/10)		795	895	1000	1090	1147	1214
Median Utility Allowance		122	292	357	362	425	430
<b>Median Monthly Cash Payment Assistance</b>		<b>917</b>	<b>1187</b>	<b>1357</b>	<b>1452</b>	<b>1572</b>	<b>1644</b>
Years in Program	Cost of Living Increase	Subsidy Value					
1 Supportive Component <b>Monthly</b>	Lease up Year	917.00	1,187.00	1,357.00	1,452.00	1,572.00	1,644.00
		<b>Annually</b>	11,004.00	14,244.00	16,284.00	17,424.00	18,864.00
2 Supportive Component <b>Monthly</b>	3%	944.51	1,222.61	1,397.71	1,495.56	1,619.16	1,693.32
<b>Annually</b>		11,334.12	14,671.32	16,772.52	17,946.72	19,429.92	20,319.84
3 Tenant Based Component <b>Monthly</b>	3%	972.85	1,259.29	1,439.64	1,540.43	1,667.73	1,744.12

<b>Annually</b>		11,674.14	15,111.46	17,275.70	18,485.12	20,012.82	20,929.44
4 Tenant Based Component <b>Monthly</b>	3%	1,002.03	1,297.07	1,482.83	1,586.64	1,717.77	1,796.44
<b>Annually</b>		12,024.37	15,564.80	17,793.97	19,039.68	20,613.20	21,557.32
5 Tenant Based Component <b>Monthly</b>	3%	1,032.09	1,335.98	1,527.32	1,634.24	1,769.30	1,850.34
<b>Annually</b>		12,385.10	16,031.75	18,327.79	19,610.87	21,231.60	22,204.04
6 Tenant Based Component <b>Monthly</b>	3%	1,063.05	1,376.06	1,573.13	1,683.27	1,822.38	1,905.85
<b>Annually</b>		12,756.65	16,512.70	18,877.62	20,199.19	21,868.55	22,870.16
7 Tenant Based Component <b>Monthly</b>	3% (Amount deposited into Escrow)	1,094.95	1,417.34	1,620.33	1,733.76	1,877.05	1,963.02
<b>Annually</b>		13,139.35	17,008.08	19,443.95	20,805.17	22,524.60	23,556.26
Total Cash Assistance		84,317.73	109,144.11	124,775.53	133,510.74	144,544.69	151,165.05

## Program Steps

### 1. Orientation

Prior to executing a lease to move to the revitalized development, the family must attend an orientation where they will be informed of the CARES program requirements, the availability of supportive services to

enable them to fulfill their obligations under this program and the consequences of the failure to meet the requirements under this program.

## **2. CARES Addendum to Replace HAP Contract**

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

## **3. Needs Assessment**

Each family member will complete a needs assessment prior to lease up to establish a baseline of current educational levels, abilities, skills, interests, aptitude, and program goals. The subsidy amounts will be established based upon family composition, bedroom size, and household income during the assessment as well. Upon completion and review of the assessment the families, along with a case manager, will create a comprehensive Individual Service Plan (ISP) that will consist of short-term and long-term goals in the aforementioned categories, as well as, work and youth educational requirements under this program. It is important to note that those residents who do not meet the Eligibility/Threshold requirements under the CARES program and are categorized under one or more of the exemptions described in “5. Exemptions for Residents Residing in Public Housing or HCV units”, will have the opportunity to reside in the development under the traditional Public housing or HCV units

## **4. Individual Services Plan (ISP)**

Once the assessment has been completed, the case manager and the family will develop an ISP that is designed to help the family meet the work requirement of this program within a 72-month timeframe. The plan must be completed within 90-days of moving into the new unit in the West Rock Community. The ISP will include the identified needs and agreed upon goals established during the needs assessment and be completed within 60-days after moving into the new rental unit. Families who are enrolled in the program will have to participate in the HUD mandatory income disallowance program and to enroll in the optional CARES REEF disallowance program. If it is determined that the family cannot obtain or sustain earnings over a 72-month period at or above self-sufficient income levels to obtain a market rate unit or other affordable unit on their own, the case manager may determine that the person cannot meet the goals of the program and that person may be exempted from the CARES program. If deemed exempt, that person will be required to enroll and to remain enrolled in the Authority’s Family Self Sufficiency (FSS) Program. The ISP shall address the following areas of concern.

- a. Family stability

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

**5. Exemptions for residents remaining in Public Housing or Project Based Voucher Units**

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

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

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

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

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

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

## **6. Hardship Policy and Guidelines**

### **i. Hardship Policy:**

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

### **ii. Hardship Criteria:**

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

#### **Extraordinary Cost of Living:**

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

#### **Medical, Disabled Expenses Greater than \$6,000.00:**

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

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

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

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

Once the Property Manager or the Occupancy Specialist receives the required documentation, the information shall be forwarded to the Director of Operations.

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

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

The Hardship Review Committee shall render a decision on the request and a written decision shall be forwarded back to the Executive Director for signature. The Executive Director may sustain or decline the recommendation of the Committee. After signature by the Executive Director, the Director of Operations or Service Center Director, as applicable, will inform the parties of the decision. The written decision shall inform the parties as to the relief granted as well as the term of the relief. Households that disagree with the decision may request a grievance through the HANH/ELM CITY COMMUNITIES grievance process. In cases where an appeal is sought, no action shall be taken by the HANH/ELM CITY COMMUNITIES until the grievance process is completed.

iv. **Hardship Committee Remedies :**

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

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

:

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

#### **7. Cash Payments to Tenants**

As a result of implementing a CARES Addendum to the lease agreement, which will replace HAP contracts, residents who enroll and participate in the CARES Program will begin receiving a monthly cash payment to cover their rental payments and utility expenses. This is in lieu of receiving a utility allowance reimbursement and a direct rental payment to the landlord. For the duration of the program the funds in the REEF may be used to cover the following costs; a hardship (as defined under the Hardship Policy and Guidelines), purchase of a vehicle to attain or maintain employment (a onetime payment not to exceed \$3,000 after all other options have been exhausted), start a small business (a onetime payment not to exceed \$2,500 after all other options have been exhausted), purchase a computer, down payment on a home, and/or enroll in higher education, subject to the approval of HANH/ELM CITY COMMUNITIES. If the funds deposited in the REEF are fully expended prior to the final year of the program, there would be no available funds in the final year but if the funds deposited into the REEF have not been used by the end of the program term of rental assistance, it will be refunded to the resident as a bonus for program compliance. A CARES oversight committee will be created to review the requests of the participants to use the REEF funds will consist of the Executive Director's office, the Director of Operations or designee, the Service Center Director or designee, a WRIC elected representative, a representative from Workforce Alliance Board, and a representative from the Department of Social Services.

#### **8. Individual Development Accounts (IDA)**

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

#### **9. REEF Cash Deposit**

In addition to the traditional IDA account, which we are calling a REEF for delineation of the CARES Program; HANH/ELM CITY COMMUNITIES will deposit an amount equal to 12 months of cash payments

that would have otherwise been received in the final year of the program into the REEF account. This money will be available to access

#### **10. CARES Income Disregard**

If a family's income increases, they can deposit the difference between the increase in income and the monthly rental payment into their REEF account. Families that enroll in the CARES Program that experience an increase in year three (in CARES) in earned income will be allowed an optional exclusion from the increase from Annual Income for the five years at 100 percent. Families already receiving the HUD mandatory income disallowance can, at the time of enrollment in the CARES program, stop receiving those benefits and begin with a new basis with the CARES REEF disallowance at 100 percent. For families enrolled in HANH/ELM CITY COMMUNITIES's optional income disallowance, participants can elect to opt out of HANH/ELM CITY COMMUNITIES's disallowance and enter the CARES REEF program. The REEF disallowance will establish a new baseline when they enter the program and continue for five additional years or to the end of the CARES program, whichever comes first. The Authority also provides the same Optional Income Exclusion for any increase in income earned by a Resident Owned Business.

#### **11. Case Management**

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

The goal of case management is to ensure positive outcomes for the residents which may vary depending upon the resident being served. Expected outcomes of our case management activities include resident education, information, advocacy and empowerment. By collecting and analyzing data through a web based tracking system, the case manager can make decisions based upon sound and unbiased information. The case manager will be responsible for sharing information with the CSS Team and CSS Partners, government agencies, families, et al, while at the same time protecting the confidentiality and privacy of the residents. The CSS Team and CSS Partners will have access to this system to accurately and timely assess a resident's needs to measure his/her progress towards achieving his/her self-sufficiency goals. This is a critical component to successful case management.

## **12. Progress Meetings**

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

## **13. Early Graduation from CARES Program**

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

## **14. Coordination of Supportive Services Initiatives**

The supportive services that will link residents include but are not limited to, the following initiatives:

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

- Homeownership counseling so that, to the maximum extent possible, qualified residents will be ready to purchase new homeownership units when they are completed. The Family Self-Sufficiency program can also be used to promote homeownership, providing assistance with escrow accounts and counseling.
- Coordinating with health care providers or providing on-site space for health clinics, doctors, wellness centers, dentists, community health worker initiatives, and other health-related initiatives (e.g., With Every Heart Beat Is Life initiative, which is part of the National Heart, Lung, and Blood Institute’s (NHLBI’s) Educational Resources to Address Health Disparities initiative).etc., that will primarily serve the public housing residents.
- Substance and alcohol abuse treatment and counseling.
- Activities that address domestic violence treatment and prevention.
- Child care services that provide sufficient hours of operation to facilitate parental access to education and job opportunities, serve appropriate age groups, and stimulate children to learn.
- Transportation, as necessary, to enable all family members to participate in available CSS activities and to commute to their places of training and/or employment.
- Entrepreneurship training and mentoring, with the goal of establishing resident-owned businesses.

**15. Violations of the CARES Program**

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

- a. Misappropriation of funds;
- b. Fraudulent acts, as set forth in the ACOP and Administrative Plan respectively;  
and
- c. Non-compliance of CARES Program per the CARES Contract

Any resident that is notified of a program violation will have the opportunity to appeal the claims being made against them as set forth in the aforementioned paragraph “5. Appeals Process”.

Any resident who is found in violation can receive disciplinary action up to and including termination of their lease agreement which can result in Mandatory Bar that states that residents can no longer receive subsidy rental assistance for 10 years.

**16. Appeal Process**

A family who receives an adverse finding from HANH/ELM CITY COMMUNITIES regarding the CARES Program has the right to appeal to HANH/ELM CITY COMMUNITIES under the Authority’s Grievance Process.

## Appendix 4

<b>PBV</b>	<b>2011</b>	<b>2011 MTW Expenditure</b>	<b>2011 Voucher cost</b>	<b>2012</b>	<b>2012 MTW Expenditure</b>	<b>2012 Voucher cost</b>	<b>2013</b>	<b>2013 MTW Expenditure</b>	<b>2013 Voucher cost</b>
<b>Currently under HAP</b>	253		\$37,605,888.00	290		\$ 43,131,168.00	385		\$41,617,800.00
<b>HANH overhead</b>		\$1,000,000.00							\$ 7,100,000.00
<b>PreDevelopment Loans</b>		\$ 400,000.00			\$ 460,000.00				
<b>Shartenberg</b>		\$ 101,977.00		20		\$ 180,000.00			
<b>CUHO New Construction</b>				8		\$ 81,600.00			
<b>Brookside Phase I</b>				50	\$ 5,221,820.00	\$ 630,000.00			
<b>Brookside Phase II</b>					\$ 2,865,219.00		51	\$ 955,073.00	\$321,300.00
<b>Brookside Homeownership</b>		\$ 833,333.33			\$ 833,333.33			\$ 833,333.33	
<b>Rowe</b>	32	\$5,032,685.00	\$404,304		\$ 5,032,685.00				
<b>QT3</b>	5	\$ 1,591,909.00	\$56,136						
<b>Mutual Housing</b>							20		\$84,000.00
<b>122 Wilmot Road</b>					\$ 3,375,000.00		13	\$ 1,125,000.00	\$31,200.00
<b>Rockview Phase I</b>								\$ 678,212.00	
<b>Rockview Phase II</b>									
<b>Downtown</b>									
<b>Dwight</b>									
<b>Farnam</b>									

<b>PBV</b>	<b>2011</b>	<b>2011 MTW Expenditure</b>	<b>2011 Voucher cost</b>	<b>2012</b>	<b>2012 MTW Expenditure</b>	<b>2012 Voucher cost</b>	<b>2013</b>	<b>2013 MTW Expenditure</b>	<b>2013 Voucher cost</b>
<b>Ribicoff</b>									
<b>Eastview/Chatham</b>									
<b>Cedar Hill</b>							4		\$12,800.00
<b>Frank Nasti</b>							8		\$8,400.00
<b>Essex RAD</b>									
<b>Crawford RAD</b>									
<b>Westville Manor RAD</b>									
<b>Scatter Sites RAD</b>									
<b>Total PBV</b>	290	\$8,959,904.33	\$38,066,328.00	368	\$17,788,057.33	\$44,022,768.00	481	\$3,591,618.33	\$49,175,500.00
<b>Number of Vouchers HANH would otherwise be able to issue for HCV based upon the use of MTW funds for redevelopment</b>									
<b>Percentage of Total Budget Authority</b>									
<b>Adjusted HCV Baseline</b>									
<b>Percentage of Allocation</b>									

<b>PBV</b>	<b>2014</b>	<b>2014 MTW Expenditure</b>	<b>2014 Voucher cost</b>	<b>2015</b>	<b>2015 MTW Expenditure</b>	<b>2015 Voucher cost</b>	<b>2016</b>	<b>2016 MTW Expenditure</b>	<b>2016 Voucher cost</b>
<b>Currently under HAP</b>			\$2,940,800.00			\$47,129,504.00			
<b>HANH overhead</b>			\$7,178,000.00			\$ 7,258,340.00			
<b>PreDevelopment Loans</b>									
<b>Shartenberg</b>									
<b>CUHO New Construction</b>									
<b>Brookside Phase I</b>									
<b>Brookside Phase II</b>									
<b>Brookside Homeownership</b>									
<b>Rowe</b>									
<b>QT3</b>									
<b>Mutual Housing</b>									
<b>122 Wilmot Road</b>									
<b>Rockview Phase I</b>	47		\$ 444,150.00						
<b>Rockview Phase II</b>									
<b>Downtown</b>	50		\$ 315,000.00						
<b>Dwight</b>					\$825,000.00				
<b>Farnam</b>		\$ 7,164,000.00		84	\$7,164,000.00	\$ 529,200.00		\$ ,716,000.00	
<b>Ribicoff</b>		\$ 1,500,000.00		70	\$ 3,500,000.00	\$ 672,000.00			

<b>PBV</b>	<b>2014</b>	<b>2014 MTW Expenditure</b>	<b>2014 Voucher cost</b>	<b>2015</b>	<b>2015 MTW Expenditure</b>	<b>2015 Voucher cost</b>	<b>2016</b>	<b>2016 MTW Expenditure</b>	<b>2016 Voucher cost</b>
<b>Eastview/Chatham</b>		\$ 2,800,000.00		47		\$ 592,200.00			
<b>Cedar Hill</b>									
<b>Frank Nasti</b>									
<b>Essex RAD</b>		\$ 2,296,594.00							
<b>Crawford RAD</b>		\$ 723,704.00							
<b>Westville Manor RAD</b>					\$ 3,495,702.00				
<b>Scatter Sites RAD</b>									
<b>Total PBV</b>	97	\$14,484,298.00	\$50,877,950.00	201	\$ 11,489,000.00	\$ 6,181,244.00	0	\$16,716,000.00	0
<b>Number of Vouchers HANH would otherwise be able to issue for HCV based upon the use of MTW funds for redevelopment</b>									
<b>Percentage of Total Budget Authority</b>									
<b>Adjusted HCV Baseline</b>									
<b>Percentage of Allocation</b>									

*Appendix 5*



*HOUSING AUTHORITY OF THE CITY OF NEW HAVEN*

*MOVING TO WORK SUFFICIENCY PROGRAM  
RENT SIMPLIFICATION PROCEDURES FOR THE PUBLIC  
HOUSING PROGRAM*

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## **Public Housing Program Rent Simplification**

HANH/ELM CITY COMMUNITIES believes there is a better way to administer essential housing programs, one that encourages long-term self-sufficiency for both the program participants as well as the agency.

### **Rent Simplification: Equity & Efficiency**

**The proposed system rewards families who increase their incomes, and provides them with more opportunities to save while easing HANH/ELM CITY COMMUNITIES's burden of administering these housing programs.**

### **Everyone Should Contribute**

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

### **Fiscal Equity for HANH/ELM CITY COMMUNITIES**

Rent Simplification is forecast to be revenue-neutral. In other words, the implementation of Rent Simplification will not increase the amount of rental revenue to the HANH/ELM CITY COMMUNITIES.

### **Approvable Method**

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

### **Measurable Reduction in Administrative Time**

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

### **Transition to Avoid Hardships**

HANH/ELM CITY COMMUNITIES has devised a system that is not only revenue neutral for the organization, but will not result in any undue hardship to our families. There will be a transition period of one year from the current income based rent determination process to the new income tiered rent determination process. No family will have an increase in Total Tenant Payment (TTP) during the first year they are subject to the requirements of this Rent Simplification Policy. Please note that this hold harmless provision does not apply to increases in TTP that result from an increase in family annual income above the amount earned in the reporting period immediately preceding the family being subject to Rent Simplification. No family shall be subject to an increase in TTP of greater than \$25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed \$50; \$75 a month during the fourth year; and \$100 a month above the monthly TTP in the year immediately following the implementation of Rent Simplification.

## **Asset Exclusion**

Asset exclusion is raised to \$50,000.00. Increasing the asset exclusion amount allows residents to accumulate more assets before they are calculated as income. Families will self certify that they do not have assets in excess of \$50,000.00.

## **Earned Income Disallowance**

The Federal Earned Income Disregard (EID) will continue to be implemented. The maximum amount of time a family can be enrolled in the Federal EID is 24 months. After the 24 months have been exhausted, the family may elect to participate in the Family Self Sufficiency (FSS) program for the remaining 24 months so long as any family member is enrolled in FSS. Both programs combined cannot exceed 48 months. When the family joins the FSS program 50% of incremental earnings are excluded for 12 additional months after the end of receiving EID for 24 months and 25% for another 12 months for a total for 48 months of income disallowance. The optional income disregard provided under this paragraph is limited to lifetime eligibility of 48 months/

For families who do not receive the Federal EID, it may choose to enroll directly into the optional FSS Earned Income Disregard so long as any member of the household is enrolled in FSS Program. Incremental earnings from wages or salaries are excluded in the first 12 months; 75 percent in the second 12 months; 50% in the third 12 months; and 25% in the fourth 12 months. A family is limited to 96 months of eligibility for this optional EID. This will allow more families to enter and benefit from the program. In no event shall the family receive the FSS exclusion and the Federal EID during the same time period.

## **Other Exclusions**

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

## **Family Self Sufficiency (FSS) Income Exclusion**

The average income of our public housing residents is approximately \$12,000.00 per year. In order to promote long-term sustainable economic self-sufficiency of the residents, all families that enroll in the FSS program who are members of Very Low Income families will have all incremental earnings and benefits from any qualified Federal, State or Local employment training program training of a family member (including programs not affiliated with the local government) excluded from the determination of Annual Income so long as the family member is enrolled in HANH/ELM CITY COMMUNITIES's FSS Program.

Additionally, any incremental earning by any family member while enrolled in the FFS Program will be excluded from the determination of Annual Income. At the conclusion of the FSS Program or termination from the Program, the family member will have their rent re-determined.

In addition to expanding the scope of the existing exclusion to include Federal and State programs, an optional exclusion will be provided to cover the incremental increases and wages and salaries so long as that family member is enrolled in the HANH/ELM CITY COMMUNITIES FSS Program.

There is not a requirement that these increases in rental income must go into an escrow account. Families will be permitted to retain these additional earnings.

## **Annualized Income Calculation**

Prospective and past income may be used to calculate resident rents, especially for families with irregular or sporadic employment histories. For families with income of less than \$5,000.00 we will accept a self-certification. For families earning more than \$5,000.00 of wages and salaries we want pay stubs covering the most recent four weeks of employment or

a W-2 or 1099 within 180 days of the effective date of recertification. We must complete EIV or other UIV as required by HUD.

**Annual Reexaminations**

Reexaminations are currently conducted every year for non-elderly households and every two year for elderly and disabled households. HANH/ELM CITY COMMUNITIES spends on average three hours per annual reexamination. HANH/ELM CITY COMMUNITIES must perform more than 3,200 LIPH reexaminations every year. This is inordinately time consuming and an exceedingly complex process. Under Rent Simplification, annual reexaminations will occur every two years for non-elderly households and every three years for elderly and disabled households. These changes will allow families who experience increases in income to retain all of their increased earnings between annual reexaminations. Note that families with individuals who are subject to the eight hour community services requirement will be reviewed annually for all household members exempt from having to meet the community services requirement. During the first year all families will be recertified. This process will be phased in over a three-year period.

**Deductions for Exceptional Expenses**

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

Households with exceptional expenses may request a rent reduction. This includes large families (with 4 or more children). It also includes families with high medical expenses, disability assistance expenses, or childcare expenses.

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

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

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

<b>Tiered Amount of Expenses</b>	<b>Monthly Rent Reduction</b>
\$ 2,000 - \$ 4,000	\$ 75 (equivalent to \$3,000 deduction)
\$ 4,000 - \$ 6,000	\$ 125 (equivalent to \$5,000 deduction)
\$ 6,000 +	Hardship Review

*In all cases where a tenant provides verifiable proof that excess expenses or shelter and excess expenses exceed 40% of income HANH/ELM CITY COMMUNITIES will, at a minimum, calculate a rent that will not exceed 40% of the tenant’s income.*

**Changes in Family Composition**

Residents are still required to get permission from the Housing Manager and the Director of Housing, Management to add anyone to a household and to report changes in family composition. A family's rent is recalculated if the addition or subtraction of a household member results in an income change of more than \$200.00 per month.

## **Mandatory Interim Reexaminations Policy**

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

- Change in family composition that affects the bedroom size of two degrees or more.
- The addition of a family member 18 years of age or older.
- Change in family composition that causes the family to move from one income tier to another with a higher rent schedule.

**expense deduction for any family and there is a change then the family must report that change to HANH/ELM CITY COMMUNITIES.**

## **Optional Interim Reexaminations Policy**

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

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

Interim rents remain in place until the next scheduled reexamination. If a family experiences an increase in income it is not necessary for the family to report this increase in income until the next scheduled annual certification date.

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

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

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

To reduce the administrative burden associated with the verification of income HANH/ELM CITY COMMUNITIES will amend its Admission and Continued Occupancy (ACOP) to specify that:

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

- Self-certification of all sources of Annual Income shall be required in all cases.
- For families with total assets of less than \$50,000.00 a self-certification of said assets shall be required.

### **Income Tiered Rents Calculated within \$1,000 Bands**

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

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

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

### **Minimum Rents and Flat Rents**

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

All residents at a rent of \$50.00, except for the elderly and persons with disabilities, are referred to the Family Self Sufficiency (FSS) Program for job or benefit counseling. Families may still choose the existing Flat Rent option for public housing.

### **Zero Income Households**

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

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

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

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

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

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

### **Criteria for Hardship Exemption From Minimum Rent Requirement**

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

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

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

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

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

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

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

## **5. Hardship Review Committee**

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

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

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

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

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

The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:

- (a) that HANH/ELM CITY COMMUNITIES has received an Application for Exemption from Minimum Rent,
- (b) that HANH/ELM CITY COMMUNITIES will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,
- (c) that there can be no eviction for non-payment of rent during the suspension period;
- (d) the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and
- (e) that, with the exception of elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

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

1. If the Committee determines that *the hardship is of a temporary nature (the hardship is expected to last less than 90 days)*, at the end of the 90-day period, the resident’s rent will be reinstated to the minimum rent retroactively to the

initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with HANH/ELM CITY COMMUNITIES for any back rent that is due and owing to HANH/ELM CITY COMMUNITIES.

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

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

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

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

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

1. If the hardship exemption is determined to be temporary:
  - (a) that a temporary hardship exemption was granted;
  - (b) the effective dates of the exemption;
  - (c) the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and
  - (d) that the resident has a right to enter into a reasonable repayment agreement with HANH/ELM CITY COMMUNITIES for the minimum rent that was suspended and is now owing to HANH/ELM CITY COMMUNITIES.

2. If the hardship exemption is determined to be long-term:
  - (a) that a long-term hardship exemption was granted;
  - (b) whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place;
  - (c) that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and
  - (d) that the resident must notify HANH/ELM CITY COMMUNITIES within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.
  
3. If the hardship is determined to be non-existent:
  - (a) that a hardship exemption was denied;
  - (b) the reason for such determination; and
  - (c) the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to HANH/ELM CITY COMMUNITIES.

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

### **Mixed Families**

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

### **Fraud Prevention**

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

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

### **Rent Simplification Implementation - Public Housing**

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

2008 and for all new lease-ups and residents requesting interim reexaminations after January 1, 2008.

A staggered approach is used to integrate the two-year and three year reexamination cycles.

- Initially in fiscal year 2008, all families will be re-examined during the first year.
- In the second year of the program (2009), two thirds of the elderly/disabled families will be re-examined and one half of the non-elderly/non-disabled families.
- In the third year of the program (2010), one third on the elderly/disabled families will be re-examined and one-half of the remaining non-elderly/non-disabled families.

Rent Simplification is expected to be fully implemented by December 31, 2010.

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*Low Income Public Housing (LIPH) Program*

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*Rent Simplification Utility Allowance Schedule*

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Utility Allowance

Income Range		
\$0	\$2,499	\$50
\$2,500	\$3,499	\$59
\$3,500	\$4,499	\$83
\$4,500	\$5,499	\$107
\$5,500	\$6,499	\$131
\$6,500	\$7,499	\$154
\$7,500	\$8,499	\$178
\$8,500	\$9,499	\$202
\$9,500	\$10,499	\$226
\$10,500	\$11,499	\$249
\$11,500	\$12,499	\$273
\$12,500	\$13,499	\$297
\$13,500	\$14,499	\$321
\$14,500	\$15,499	\$344
\$15,500	\$16,499	\$368
\$16,500	\$17,499	\$392
\$17,500	\$18,499	\$416
\$18,500	\$19,499	\$439
\$19,500	\$20,499	\$463
\$20,500	\$21,499	\$487
\$21,500	\$22,499	\$511
\$22,500	\$23,499	\$534
\$23,500	\$24,499	\$558
\$24,500	\$25,499	\$582
\$25,500	\$26,499	\$606
\$26,500	\$27,499	\$629
\$27,500	\$28,499	\$653
\$28,500	\$29,499	\$677
\$29,500	\$30,499	\$701
\$30,500	\$31,499	\$724
\$31,500	\$32,499	\$748

\$32,500	\$33,499	\$772
\$33,500	\$34,499	\$796
\$34,500	\$35,499	\$819
\$35,500	\$36,499	\$843
\$36,500	\$37,499	\$867
\$37,500	\$38,499	\$891
\$38,500	\$39,499	\$914
\$39,500	\$40,499	\$938
\$40,500	\$41,499	\$962
\$41,500	\$42,499	\$986
\$42,500	\$43,499	\$1,009
\$43,500	\$44,499	\$1,033
\$44,500	\$45,499	\$1,057
\$45,500	\$46,499	\$1,081
\$46,500	\$47,499	\$1,104
\$47,500	\$48,499	\$1,128
\$48,500	\$49,449	\$1,152
\$49,500	Above	\$1,176

*HARDSHIP WAIVER POLICY AND GUIDELINES*

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

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

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

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

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

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

**2. Criteria for Hardship Exemption From Minimum Rent Requirement**

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

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

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

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

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

A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in HANH/ELM CITY COMMUNITIES's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in

the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program.

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

### **3. Initiation of Hardship Exemption Review**

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

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

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

### **4. Notification of the Right to a Hardship Exemption**

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

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

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

### **5. Hardship Review Committee**

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

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

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

When a resident submits an application or a HANH/ELM CITY COMMUNITIES employee submits an application on behalf of a resident, HANH/ELM CITY COMMUNITIES will

suspend the minimum rent requirement commencing on the first of the month following the date of the application for a period of 90 days.

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

The Hardship Review Committee shall send a letter to all resident families who have applied for hardship exemption from minimum rent stating:

- (f) that HANH/ELM CITY COMMUNITIES has received an Application for Exemption from Minimum Rent,
- (g) that HANH/ELM CITY COMMUNITIES will suspend the minimum rent requirement for 90 days effective as of the first of the next month and the effective dates of the 90 day suspension,
- (h) that there can be no eviction for non-payment of rent during the suspension period;
- (i) the date for a meeting with the resident to discuss the hardship exemption request, giving the resident family at least ten days advance notice of such meeting and informing the resident that he or she may have one opportunity to reschedule the meeting; and
- (j) that, with the exception of elderly and disabled families, the resident family has been referred to the FSS program and will not be able to receive a hardship exemption in excess of 90 days without enrolling in the program.

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

1. If the Committee determines that ***the hardship is of a temporary nature (the hardship is expected to last less than 90 days)***, at the end of the 90-day period, the resident's rent will be reinstated to the minimum rent retroactively to the initial date of suspension. The resident will have an opportunity to enter into a reasonable repayment agreement with HANH/ELM CITY COMMUNITIES for any back rent that is due and owing to HANH/ELM CITY COMMUNITIES.
2. If the Committee determines that the ***hardship is of a long-term nature (the hardship is expected to last more than 90 days)***, the tenant shall be exempt from the minimum rent requirement from the first of the month following the date of the application for exemption from the minimum rent until such time that the hardship no longer exists.

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

Except for Elderly or Disabled families, no tenant shall be exempt from the minimum rent requirement for more than 90 days during a one year period unless at least one member of the family who is 18 years of age or older enrolls

and actively participates in HANH/ELM CITY COMMUNITIES's FSS Program for job or benefit counseling. Such family member(s) shall enroll in the FSS Program within 30 days from the date of the Application for Exemption from Minimum Rent.

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

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

4. If the hardship exemption is determined to be temporary:
  - (e) that a temporary hardship exemption was granted;
  - (f) the effective dates of the exemption;
  - (g) the basis for the decision to grant a temporary hardship exemption, including that a long-term exemption was denied and the reason that such long-term exemption was denied; and
  - (h) that the resident has a right to enter into a reasonable repayment agreement with HANH/ELM CITY COMMUNITIES for the minimum rent that was suspended and is now owing to HANH/ELM CITY COMMUNITIES.
5. If the hardship exemption is determined to be long-term:
  - (e) that a long-term hardship exemption was granted;
  - (f) whether the long-term exemption is permanent or subject to periodic review and, if subject to periodic review, when such review will take place;
  - (g) that all non-elderly, non-disabled residents are required to comply with FSS requirements as a condition of the receipt of a long-term exemption; and
  - (h) that the resident must notify HANH/ELM CITY COMMUNITIES within 10 days if the hardship ceases to exist because the resident has obtained a source of income sufficient to pay (at least) the minimum rent.
6. If the hardship is determined to be non-existent:
  - (d) that a hardship exemption was denied;
  - (e) the reason for such determination; and
  - (f) the terms and conditions on which the resident family must pay back the minimum rent that was suspended and is now owing to HANH/ELM CITY COMMUNITIES.

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

#### **6. Termination of Long-Term Exemptions**

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

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

The Executive Director may waive any or all of these requirements in cases where he/she determines that the hardship conditions are likely to be permanent.

# PUBLIC HOUSING RENT SIMPLIFICATION SUMMARY

## EXCEPTIONS TO LIPH REGULATIONS

### Exceptions to Regulations for Public Housing Program

Topic	Regulatory Provision	Current Policy	Alternative MTW Policy
Annual Income	24 CFR Part 5.609(a)(4)	Any income derived from an asset to which any member of the family has access	Excludes asset from the determination of annual income to the extent the amount does not exceed \$50,000.
	5.609(c)(8)(x11)	Adoption assistance payments for any child in excess of \$480.00 received.	All income earned by fulltime student will be excluded who is over 18. Students who are HOH or spouse are not excluded.  All income earned by a family from adoption assistance will be excluded.
Income Exclusion for Person Enrolled in FSS Program	24 CFR Part 5.609(b)(1)	Incremental earnings and benefits resulting in any family member from participation in a qualifying <b>State or local employment training</b> programs (including training programs not affiliated with a local government) and training of a family member as resident management staff.	Exclude 100 percent of any incremental earnings from wages or salaries earned by any family member so long as the household is enrolled in the FSS Program, not to exceed 5 years. During the 12 months of enrollment in FSS program 100 percent; 75 percent in the second 12 months; 50 percent in the third 12 months; and 25 percent in the fourth 12 months; A family's eligibility to receive this optional income disallowance is limited to a total of 96 months. In addition, for families that qualify and receive the federal EID, the total number of months that a family may receive the optional income disallowance provided for under this subparagraph and under the Federal Earned Income Disregard (EID) may not exceed 48 months. In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving the federal EID as set forth in 24 CFR Part 5.617.  Additionally, the current exclusion covering incremental earnings of any family participating in a state or local program will be expanded to include any qualifying <b>federal</b> program so long as a family member is enrolled in the FSS Program.
Business Income for Resident Owned Businesses	24 CFR Part 5.609(b)(2)	The net income from the operation of a business or profession is included in determining annual income.	Exclude 100 Percent of any net income derived from the operation of a businesses; provided the business qualifies as a <b>resident owned business</b> under 24 CFR Part 963.5. During the first year of enrollment in FSS program 100 percent; 75 percent in the second year; 50 percent in the third year; 25 percent in the fourth year; 0 percent exclusion thereafter.
<b>Earned Income Disallowance</b>	<b>24 CFR Part 960.255</b>	Incremental income earned by a family member, provided the increase in income is the result (1) of employment of a family member was previously unemployed for one or more years prior to employment; (2) increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or (3) result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families	HANH/ELM CITY COMMUNITIES will continue to implement the Earned Income Disregard (EID). The maximum amount of time a family may participate in the program combined with the Family Self Sufficiency Program (FSS) is 48 months. After 24 months, when the EID is exhausted, the family member may enter the FSS Program and 50% of their earnings may be excluded. They will then continue to exclude 25% in the fourth year and 0% thereafter. This will allow more families to enter and benefit from the program.  In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving EID

as set forth in 24 CFR Part 5.617. In addition, the total number of months that a family may receive the exclusion provided for under this subparagraph and under the EID may not exceed 48 months.

Mandatory Deductions	24 CFR Part 5.611	<p>(1) \$480 for each dependent; (2) \$400 for any elderly family or disabled family; (3) The sum of the following to the extent the sum exceeds three percent of annual income: (i) Un-reimbursed medical expenses of any elderly family or disabled family; and (ii) reimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities</p> <p>(4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.</p>	Eliminate the outlined mandatory deductions under this part. These deductions will be considered as Exceptional Expense Deductions
Additional (Exception) Expenses Deductions	24 CFR 5.611	A PHA may adopt additional deductions from annual income. HANH/ELM CITY COMMUNITIES had none	Families with verifiable deductions in excess of \$2,000 will be allowed to request that these additional expenses be used in determining TTP. These verifiable deductions must exceed \$2,000 and shall be the sum of (1) Mandatory Deductions determined in accordance with Section 5.611 (2), plus non-reimbursed utility expenses ( except telephone and cable)
Total Tenant Payment	24 CFR 5.628	<p>(a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar:</p> <p>(1) 30 percent of the family's monthly adjusted income;</p> <p>(2) 10 percent of the family's monthly income;</p> <p>(3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or</p> <p>(4) The minimum rent, as determined in accordance with Sec. 5.630.</p>	The Total Tenant Payment (TTP) will be based upon (1) income-tiered TTP structure or the minimum TTP \$50 for a family with income of up to \$2,500 annually.
Hardship Provision for Exceptional Expenses	24 CFR 5.611(2))	A PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.	<p>A family may be exempt from minimum rent as follows;</p> <ul style="list-style-type: none"> <li>(i) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program, including a family that includes a member who is a non-citizen</li> <li>(j) When the family would be evicted because it is unable to pay the minimum rent</li> <li>(k) When the income of the family has decreased because of changed circumstances, including loss of employment.</li> </ul> <p style="text-align: right;">Family whose shelter expenses,</p>

			plus un-reimbursed medical, childcare and disability expenses exceed 40 percent of annual income or whose medical, childcare or disability expenses exceed \$6,000 annually may seek a deduction in rent for exceptional expenses.
Minimum Rent	24 CFR 5.630	A family may be exempt from minimum rent of \$50.00 as follows: (i) When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a non-citizen; (ii) When the family would be evicted because it is unable to pay the minimum rent; (iii) When the income of the family has decreased because of changed circumstances; (iv) a death has occurred in the family's household; (v) any other circumstances to be considered by the PHA to be reason to waive the minimum rent requirement.	A family may only receive one hardship exemption from the minimum rent requirement during a twelve month period, unless a tenant is elderly, disabled, or is enrolled in HANH/ELM CITY COMMUNITIES's Family Self Sufficiency Program. The minimum rent requirement may be waived more than once during a twelve month period if at least one adult member of the household enrolls in the Family Self Sufficiency Program (the "FSS Program"). Elderly and disabled families are not required to enroll in the FSS Program. [
Utility Allowances and Reimbursements	24 CFR 5.632(a) and (b)	Tenant Paid Utilities to be deducted from TTP to determine tenant rent.	No. Change. HANH/ELM CITY COMMUNITIES will pay all utilities except for electricity at Westville Manor, Fairmont Heights, McConaughy Terrace and all Scattered Site properties.
Annual Reexamination of Income and Family Composition	24 CFR 960 Part 257	Reexamination of income must occur every year, except every two years for elderly or disabled households.	Reexamination of income will occur every three years for Elderly and Disabled families and every two years for all other families. Annual update of changes in family composition for persons 18 years of age and older that are added or subtracted from the family. HANH/ELM CITY COMMUNITIES will do UIV and submit a 50058 annually. Additionally the Community Service requirement will be reviewed annually for all household members who are not disabled, working less than 30 hours per week or enrolled in classes under the FSS program.
Interim Reexamination	24 CFR 960 Part 257	A family may request an interim reexamination of family income because of any changes since the last examination. The owner must make the interim reexamination within a reasonable time after the family request. Currently, family must report any change in income that amounts to \$200 or more a month.	A family can request only three interim re-examinations each 12 months with the exceptions of those conditions where they are required to report certain changes in family composition or certain changes in family income. A family, except for elderly or disabled or a family enrolled in FSS may make <b>one</b> request for an <b>interim</b> for a hardship exemption each 12 months.
Verification of Wages, Salaries and Assets below \$5,000 and Assets below \$50,000	24 CFR 5.659	The owner must obtain and document in the family's file third party verification of the following factors, or must document in the file why third party verification was not available : (1) Reported family annual income; (2) The value of assets; (3) Expenses related to deductions from annual income; and (4) Other factors that affect the determination of adjusted income.	Only a self-certification will be required for income up to and including \$5,000.00. For income above \$5,000.00 two most recent pay stubs or a W-2 or 1099 dated within 90 days of effective date of re-examination. HANH/ELM CITY COMMUNITIES will continue to conduct EIV or UIV.  Asset exclusion is raised to \$50,000.00 and only self certification will be required.

Determination of Tenant Total Payment (TTP) 24 CFR 5.628

a) Determining total tenant payment (TTP). Total tenant payment is the highest of the following amounts, rounded to the nearest dollar: (1) 30 percent of the family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is so designated; or (4) The minimum rent

TTP based upon income-tiered approach. No family shall be subject to an increase in TTP of greater than \$25.00 a month during the second year that the family is subject to the Rent Simplification Policy. The increase in TTP during the third year the family is subject to Rent Simplification shall not exceed more than \$50 during the third year; \$75 a month during the fourth year; and \$100 a month above the monthly TTP in the year immediately preceding the implementation of Rent Simplification. The families TTP after the fifth year shall be whatever amount is determined under Rent Simplification.

- These limitations on rent increase shall only apply to increases in TTP that result from the imposition of Rent Simplification and not for increases that result from changes in family composition or changes in family income.

## Appendix 6

### Public Housing Occupancy Standardized Action Plan

#### Public Housing Occupancy Standardized Action Plan

Field Office/HUB Name:	Hartford		
PHA Code & Name	CT004 the Housing Authority of the City of New Haven		
Date Plan Created	3/13/2012	Date Plan Last Updated	4/26/2013
Date of last PHA Contact		Method(s) of PHA Contact	Dobos - 203.498.8800 x 1003

PHA Information			
ACC Unit Count	2333	Actual Occupancy	2145
Occupancy Rate			
Could Be Occupied	188	PIC status validated	
Status Change Request			

#### Description of PHA Plan to reduce vacancies

The Housing Authority of the City of New Haven has expended significant and vital resources in turning units over for occupancy. Identified maintenance workers dedicated to turning units in house as well as various contracts are procured to deliver units that exceed the scope of in house maintenance staff. HANH/ELM CITY COMMUNITIES has reached a milestone of 93% Occupancy which has adhered to. Occupancy is a number one metric for the agency.

Responsible PHA official	Renee Dobos	Responsible FO Official	Brian Schlosna
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