

MOVING TO WORK APPLICATION



NOVEMBER 2023

WEST HARTFORD HOUSING AUTHORITY



Table of Contents

(1) Vision for the West Hartford Housing Authority's Local MTW Program	2
(2) Plan for Future Community/Resident Engagement	5
(3) PHA Operating and Inventory Information	5
(4) Plan for Local MTW Program	9
(5) Proposed Use of MTW Funds	13
(6) Evidence of Significant Partnerships	13

Vision for PHA's Local MTW Program

The West Hartford Housing Authority is pleased to submit this application for the MTW Demonstration Program. We believe that our participation in MTW will help us further our mission. As described below, the West Hartford Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory objectives of the MTW Demonstration Program:

- Reduce costs and achieve greater cost-effectiveness in federal expenditures;
- Give incentives to families with children where the head of household is working, seeking work, or preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

We have a vision where WHHA can maximize the number of households served through the voucher program and making changes to the voucher program to make it more efficient to operate, more likely to increase the self-sufficiency of its participants, and more likely to attract and retain landlords and housing providers. WHHA has a vision to create locally designed programs which address the challenges we see in the Town of West Hartford, CT. Our vision focuses on the three MTW statutory objectives: cost effectiveness, self-sufficiency and housing choice.

WHHA's Moving to Work application looks at improving client lives to help meet their needs, improving service access and solutions, creating administrative relief, and providing better benefits for those qualifying households. MTW changes and flexibility will enable the West Hartford Housing Authority to further its partnerships with other agencies and state governments to provide stable and affordable housing opportunities and solutions to existing barriers.

WHHA seeks to reduce the administrative and regulatory burden for WHHA staff, clients and landlords/housing providers that we serve. WHHA seeks to increase housing choice options and to increase service providers' participation with our agency. Through the MTW demonstration program, WHHA wants to be able to be more effective with clients that we serve, by reducing their financial burdens, further coordinating services and / or helping them to coordinate services so that WHHA can be more aligned with their needs for housing purposes.

Through a combination of MTW waivers and activities under HUD's MTW Operations Notice we have selected a number of safe harbor waivers. As a result, WHHA will be able to implement a more comprehensive approach to administering our voucher program. WHHA will also seek opportunities to apply for additional vouchers in the future, so that we can assist additional eligible households.

Self-Sufficiency: Our vision is that self-sufficiency would increase amongst our program participants. We want to establish policies and provide resources and services that enable stability and motivate personal growth. We believe that through a combination of policy changes and partnering with other Health and Human Service and Department of Labor agencies and benefit programs, WHHA will be able to make changes that will encourage an increase in self-sufficiency.

The West Hartford Housing Authority would like the ability to develop housing that meets community needs, and to help low-income household secure decent, safe, sanitary and affordable housing with the option of coordinating or collaborating with different services to become self-sufficient.

Cost Effectiveness: We look forward to implementing changes in the voucher program that will reduce the cost to administer the program by eliminating or simplifying regulations and processes that present existing barriers to participants, landlords/housing providers, and program administrative staff.

WHHA would have triennial reexaminations for elderly/disabled households on fixed-incomes and without any

dependents. This activity will provide greater cost efficiency to administering WHHA's voucher program. This activity will help households and provide greater cost efficiency in administering WHHA's voucher program.

WHHA would eliminate the selection process in the award of PBVs to properties owned and/or substantially controlled by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity will provide greater cost efficiency to administering WHHA's voucher program. WHHA would establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing. This activity will provide greater cost efficiency to administering WHHA's voucher program.

WHHA would implement exception payment standards up to 150 % of applicable SAFMRs for households that qualify and request a reasonable accommodation. This activity will help households secure increased housing choice and help achieve greater cost-effectiveness.

WHHA believes that coordination with education, employment preparation and employment service grant programs provide meaningful opportunities for non-elderly / non-disabled households to meet the minimum income requirement being set by the agency. This activity would increase self-sufficiency and achieve greater program cost opportunities.

There are a number of challenges serving low-income households in our communities, including a range of impacts on inflated costs on the rental housing markets and utilities. Through the MTW waivers and WHHA's activities, these new changes will encourage increased landlord participation and create more opportunities for housing and affordability and accessibility within our community.

The MTW demonstration program will help WHHA maximize our ability to lease as efficiently and effectively as possible and to achieve other voucher program goals. MTW flexibility will serve to enhance our existing practices. These flexibilities will allow WHHA to assist more households to become self-sufficient and, in so doing, we will be able to serve more unassisted households each year.

Housing Choice: In the area of housing choice, WHHA will explore changes that will increase landlord participation as well as policies that will allow the voucher participants more housing options, as well as remaining committed to serving as many households as the program funding will allow. We also view the range of interventions and activities in our proposal as an effective approach for eviction prevention, financial stability and housing stability.

WHHA has shown that in tight housing markets, low-income families have barriers to leasing because they lack the necessary funds for application fees. WHHA proposes using Housing Assistance Payments (HAP) funds to pay for some of the landlord incentives in PIH Notice 2022-18, including application fee expenses for newly admitted qualified participants. These activities will help unassisted households secure their choice of qualified housing and encourage goals of self-sufficiency. Administrative relief will be derived from lowering the number of voucher holders who cannot find a place to use their voucher and helping clients find suitable housing faster with fewer applications.

For voucher-assisted households where the utility allowance for tenant-paid utilities exceeds 30 percent of their monthly adjusted income resulting in a utility allowance payment, WHHA would send the payment to the utility provider(s) to ensure that the allowance went towards paying their utilities and to help prevent some households from receiving utility shutoff notices due to non-payment. This activity helps preserve households' housing choice and helps achieve greater cost-effectiveness.

WHHA personnel with primary responsibility for the administration of the local MTW program are Jill Corrado, Executive Director and Yadira Mora, Housing Programs Director.

Jill Corrado was named the Executive Director of WHHA in March 2023 and is responsible for overseeing all WHHA activities, including the voucher administration, property management, development consulting and administrative departments and functions. Ms. Corrado previously served as Chief Financial Officer of the

Agency from May 2012 through February 2023. Prior to joining WHHA, Ms. Corrado was an Audit Manager at Grant Thornton, specializing in governmental and not-for-profit entities, and holds a CPA certification. Ms. Corrado holds a Bachelor of Science in Business Administration (BSBA) degree in Accounting from the University of Hartford (1996 – 2000). She serves as Secretary of WHHA and CEO of Trout Brook Realty Advisors.

Yadira Mora is the Housing Programs Director for WHHA (2017 – present). Ms. Mora is responsible for the day-to-day administration of 2500 HCV, Project Based Section 8 vouchers, and Rental Assistance Certificates comprised of both Federal/State Programs. Ms. Mora creates policies and procedures to effectively administer all scopes of our programs and is responsible for the supervision of an HCV Program Manager and nine full-time Housing Specialists. Ms. Mora performs quality control of staff work/client files as well as SEMAP audit of HCV/PBV programs. Prior to joining WHHA, Ms. Mora worked as a Housing Programs Supervisor at CVR Associates (2012 – 2017), as a Housing Choice Voucher Program Manager at the Winter Haven Housing Authority (2009 – 2012), as a Housing Choice Voucher Program Manager at the Sanford Housing Authority (2007 – 2009). Ms. Mora holds a BA in Social Services from Belhaven University, Orlando FL, and completed 25 credits towards MA in Human Behavior from National University, San Diego, CA.

WHHA takes seriously its obligations to fair housing and civil rights law and regulation. WHHA verifies that it will carry out the programs of the agency 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 American with disabilities Act of 1990, and will affirmatively further fair housing by examining its programs and proposed programs and policies, identifying impediments to fair housing choice within those programs, and addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require WHHA's involvement and by maintaining records reflecting these analyses and actions.

Fair Housing Goal:

Strategy/goal: Assist whenever possible in revitalizing neighborhoods in concentrated areas of poverty by creating and dedicating affordable housing opportunities.

Actions: Work with affordable housing developers to encourage use of Low-Income Housing Tax Credits (LIHTC) for new construction or preservation in deconcentrated areas. This helps to increase the mix of incomes in particularly impoverished neighborhoods where households may have incomes lower than the LIHTC residents.

Strategy/Goal: Provide households with access to equal housing opportunities.

Actions: The PHA has and will continue to seek opportunities to Project Base vouchers in new and/or revitalized construction, in an effort to afford low-income households an opportunity to equal/fair housing.

Fair Housing Goal:

Strategy/Goal: Increase low-income household access to resource rich neighborhoods.

Actions: In prior years, the PHA implemented Small Area Fair Market Rents (SAFMR) and established payment standards at 100% of the SAFMR's. In addition to this, as of August 2022, the PHA chose to adopt HUD's waiver to increase payment standards to 120%. This has provided households with the ability to afford housing in high opportunity areas, where they may not have had that option in the past.

Plan for Future Community/Resident Engagement

WHHA uses a local newspaper, our website and social media accounts, as well as sending mass e-mails out to clients. We acknowledge that some individuals have unique circumstances that we must accommodate. Directly and through our qualified partners, we will assist participants access to guides, tools and information translated under HUD's Limited English Proficiency regulation and implement accommodations for people with disabilities. WHHA plans to continue to engage assisted households in its program, as well as the broader community and stakeholders, in the implementation and development of its local MTW program. WHHA will be creating a working taskforce comprised of tenants and others who will help us create the MTW plan. During our public hearing with tenants WHHA will ask participants if they or other participants that they may know are interested in serving on this committee.

PHA Operating and Inventory Information

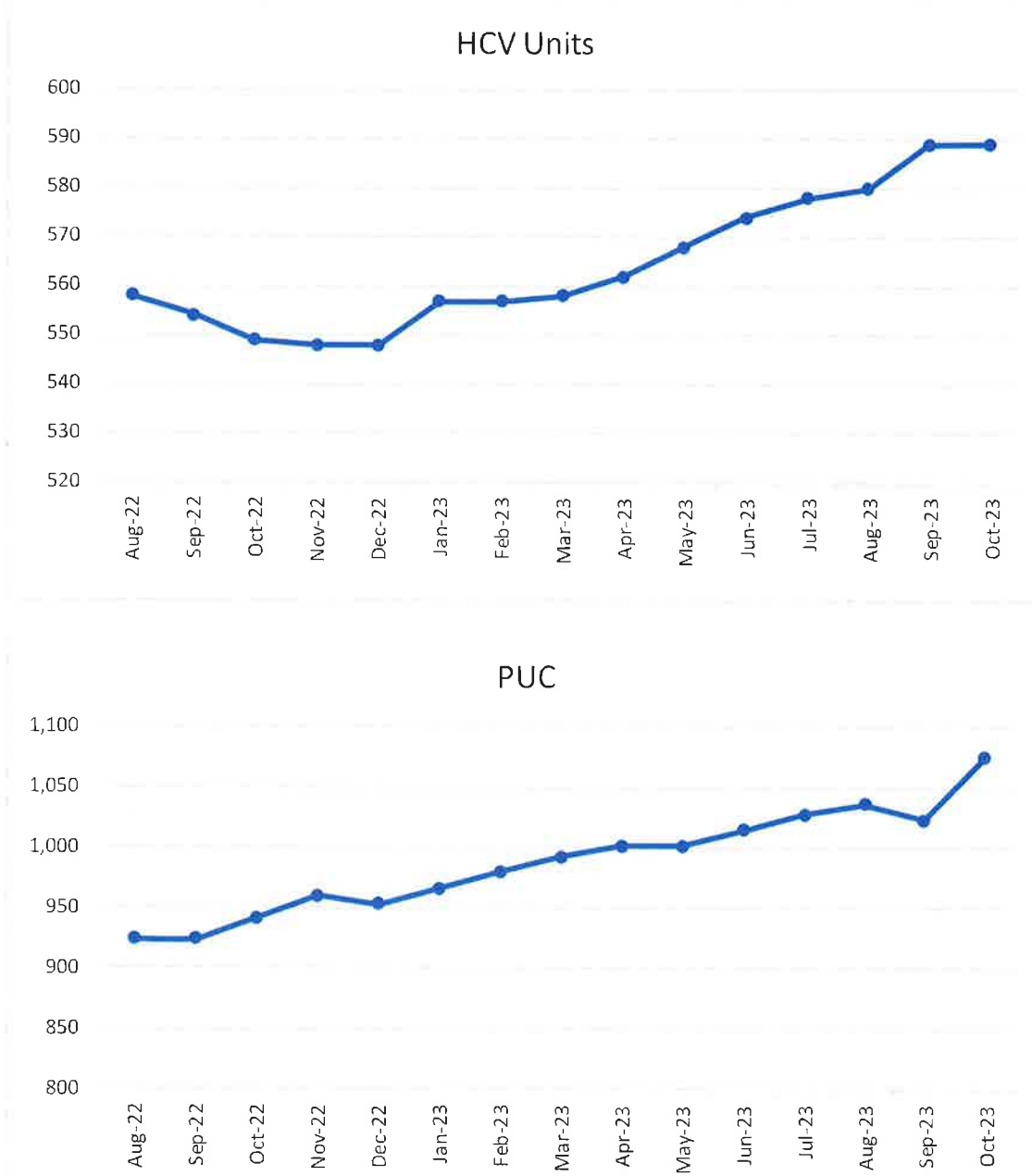
WHHA's Voucher Department administers the Federal Housing Choice Voucher Program for the Town of West Hartford. The WHHA HCV program has a budget authority of 684 vouchers, currently approximately 590 of which are utilized. Of the HCV program, approximately 25% are project based – spread out among 5 apartment complexes. The WHHA will soon be executing an AHAP for a 6th complex (15 PBVs) and intends to advertise in the near term for another award of up to 15 PBVs. WHHA has administered an FSS program for the last 15 years. WHHA is a high performer for SEMAP. Payment standards are based on Small Area FMRs and over recent years, WHHA payment standards have been set between 108%-110% of these figures. WHHA did adopt HUD's waiver through 12/31/23 for the adoption of payment standards at 120% of the Small Area FMRs, which resulted in a big improvement with applicants finding housing in West Hartford as a result of this higher payment standard (previous to that, lease up from the wait list was difficult because of high rent levels in West Hartford). The 120% payment standard was effective August 2022.

The West Hartford Housing Authority engages in the following three main activities:

- Voucher Administration;
- Property Management; and
- Development Consulting.

Voucher Administration

The growth of the HCV program can be seen in the following charts showing data over the time period since the payment standard waiver adoption:



Monthly HAP dollars paid from Aug 22- Oct 23 have increased by approximately \$117k (22%).

- The Voucher Department also administers approximately 2,100 State of CT vouchers. WHHA acts as a subcontractor to the State of CT Department of Housing's selected contractor for voucher administration (HCV and RAP). WHHA administers all of the necessary services related to lease up, recertification and interim activities, and follows the HCV Admin Plan and CTRAP Admin Plan of the State of CT DOH. These voucher holders served, live in various towns in Central Connecticut.

In WHHA's tenant-based voucher program, 37% of households are elderly, 17% of households are disabled, 46% of households are non-elderly/non-disabled, and 37% of households are female-headed with children, 71% are White Only, 27% are Black/African American Only, 1% are American Indian Or Alaska Native Only, 1% are Asian Only, 0% are Native Hawaiian/Other Pacific Islander Only, 0 percent are White, American Indian/Alaska Native Only, 0% are White, Black/African American Only, 0% are White, Asian Only, 0% are Any Other Combination, 42% are Hispanic or Latino and 58% are Non - Hispanic or Latino.

In WHHA's project-based voucher program, 74% of households are elderly, 22% of households are disabled, 1% of households are non-elderly/non-disabled, and 2 % of households are female-headed with children, 71% are White Only, 27% are Black/African American Only, 1 % are American Indian Or Alaska Native Only, 2% are Asian Only, 0% are Native Hawaiian/Other Pacific Islander Only, 1% are White, American Indian/Alaska Native Only, 0% are White, Black/African American Only, 0 % are White, Asian Only, 0% are Any Other Combination, 22% are Hispanic or Latino and 78% are Non - Hispanic or Latino.

Property Management

The Property Management Department currently manages 397 units at the following 6 apartment buildings in West Hartford (all of which were developed by WHHA's related non-profit entity, Trout Brook Realty Advisors, Inc.):

- The Goodwin: A mixed income property of 47 apartments with a unit mix of one, two and three bedrooms. This was ground up construction undertaken by Trout Brook Realty Advisors (TBRA), financed with funds from the State of CT and private bank financing.
- The Lofts at 616 New Park: A mixed income property of 54 apartments with a unit mix of one and two bedrooms. This was ground up construction undertaken by TBRA, financed mainly with 9% LIHTC and State of CT funds. This project has 14 PBVs administered by the WHHA Voucher Department.
- The Faxon: A mixed income property of 67 apartments with a mix of one and two bedrooms. This was a renovation project developed by TBRA and a development partner and financed mainly with 9% LIHTC and State of CT funds. This project has 17 PBVs administered by the WHHA Voucher Department.
- The Residences at 540 New Park: A mixed income property of 52 apartments with a mix of one and two bedrooms. This was a ground up construction project developed by TBRA and a development partner, financed mainly with 9% LIHTC and State of CT funds. This project has 13 PBVs administered by the WHHA Voucher Department.
- AE Plant Apartments: A 137-unit affordable complex restricted to those 55 years old and over. This was formerly 95 units of Federal Public Housing that were fully renovated and increased to add 42 new construction units. This was financed with ARRA funds and State of CT funds. This project has 66 PBVs administered by the WHHA Voucher Department.
- Elm Grove Apartments: A 40-unit affordable property with garden style one-bedroom units restricted to those 55 years and older. This was a former State Public Housing site that was fully renovated, financed with private bank and State of CT funds. This project has 40 PBVs administered by the WHHA Voucher Department.

Development Consulting

Trout Brook Realty Advisors, Inc. is a 501(c)(3) non-profit who was established by West Hartford Housing Authority. TBRA is controlled by WHHA through the appointment of its board members, two of whom are common board members and engage in real estate development activity. The two entities have closely aligned missions.

Over the last 12 years, Trout Brook has developed or redeveloped 397 units of housing in West Hartford, 83% of which are deed-restricted affordable units. Trout Brook utilizes WHHA staff (through contract) in the navigation of the development process from project inception through final certificate of occupancy and final project closing. TBRA, through WHHA staff, is currently proposing another 49-unit complex, hoping to be financed with 9% LIHTC and State of CT funds.

The Town of West Hartford

The Town of West Hartford is dynamic and diverse. West Hartford is an inclusive and engaged community whose residents are enriched by excellent public schools, outstanding public safety, vibrant public spaces and a variety of programs and services. West Hartford has many areas of high and very high opportunity and has become attractive to renters. In recent years, many apartment complexes have been developed with high rental rates, but the Town has required developers to earmark a certain percentage of their new units as affordable. The Town still remains under the 10% benchmark of affordable units to total.

As a result of its participation in the MTW Demonstration Program, if allowable, WHHA would create a development fund to address issues with the existing housing stock and market availability. WHHA would create this plan using a portion of Housing Assistance Payment Reserves over several years to develop affordable housing in conjunction with the Project-Based Voucher program.

Challenges that WHHA faces in leasing HCV units are that rental housing markets in WHHA's service area is a high-cost area and landlord participation in the voucher program is difficult when they can receive greater rents in the unassisted rental market.

West Hartford, Connecticut had 6.3% persons in poverty according to the U.S. Census Bureau's 2021 American Community Survey – 1 yr. (<https://www.census.gov/quickfacts/fact/table/westhartfordcdpconnecticut/PST045222>)

West Hartford is a high-cost area, as illustrated by Apartment List National Rent Report (October 2023) by Apartment List Research Team.

Midwestern and Northeastern markets have maintained positive rent growth - "At the other end of the spectrum, the fastest rent growth has been occurring in metros across the Midwest and New England. Most of the metros ranking high for rent growth over the past 6 and 12 months are located here, including the Chicago, Boston, and New York metros which can be found in both columns. Of course, given the recent rental market cooldown, even these metros are experiencing relatively modest growth compared to what was measured at this time last year. Like Portland in the previous table, here the Providence metro is visible in all three columns, highlighting how Rhode Island has become a popular destination for new renters moving in from some of the more-expensive nearby markets.

Fastest Metro-Level Rent Growth Among 51 CBSAs with Population >1 Million

Rank	Over Past 6 Months	Over Past 12 Months	Over Past 3 Years
#1	Providence (+7%)	Hartford (+4%)	Miami (+40%)
#2	Grand Rapids (+5%)	Milwaukee (+4%)	Tucson (+37%)
#3	New York (+5%)	Chicago (+3%)	Tampa (+36%)
#4	Boston (+5%)	Tucson (+3%)	Orlando (+32%)
#5	Hartford (+5%)	Louisville (+3%)	San Diego (+32%)
#6	Kansas City (+4%)	Kansas City (+3%)	Grand Rapids (+31%)
#7	Washington (+4%)	Providence (+2%)	Providence (+30%)
#8	Chicago (+4%)	Boston (+2%)	New York (+29%)
#9	Detroit (+4%)	New York (+1%)	Charlotte (+29%)
#10	Seattle (+3%)	Indianapolis (+1%)	Raleigh (+28%)

Source: Apartment List Rent Estimates; data through September 2023
Data Available: www.apartmentlist.com/research/category/data-rent-estimates

Apartment  List

Over the longer three-year period, the fastest rent growth is still concentrated in the Sun Belt even as many metros there cool in 2023. The Miami metro is the only one registering three-year rent growth over 40 percent, but the Tucson, Tampa, Orlando, and San Diego markets all exceed 32 percent and round out the top five. North Carolina is also a state that has experienced a rapid influx of rental demand over the course of the pandemic, and as a result, the Raleigh and Charlotte metros also find themselves in the top ten."

Provide any specific examples of how the PHA has demonstrated innovation and creativity within its current program (including grants received, participation in other HUD programs, etc.)

The housing authority participates in creating education services and briefings for landlords.

Plan for Local MTW Program

As described below in detail, the WHHA's overall vision for its Moving to Work (MTW) demonstration program, focuses on the three statutory objectives of the MTW Demonstration Program – cost effectiveness, self-sufficiency and housing choice.

1.b. Tiered Rent (HCV)

WHHA may implement changes to the TTP calculation to create a system based upon income bands. Rents and/or participants' Total Tenant Payment (TTP) established under this system must be set using the lowest income in each band. For example, if an income band is \$2,500–\$5,000 then the rent for that band must be set using \$2,500. WHHA must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

1.f. Minimum Rent

WHHA may set a minimum rent that is higher than allowed under current statute and regulation. Minimum rent must not exceed \$130 per month. WHHA must exclude elderly and disabled families from rent policy. WHHA must conduct an impact analysis and implement a hardship policy. This activity will provide greater cost efficiency to administering WHHA's voucher program.

1o. Initial Rent Burden (HCV)

WHHA may waive the maximum family share at initial occupancy of 40% of the family's monthly income. WHHA must implement an impact analysis and must not allow the family share at initial occupancy to exceed 60% of the family's monthly income. This activity will provide households with housing choice and self-sufficiency opportunities.

2.a. Payment Standards Small Area Fair Market Rents (HCV)

WHHA is authorized to adopt and implement any reasonable policy to establish payment standards based upon Small Area Fair Market Rents (SAFMR). In lieu of establishing a unique payment standard for each ZIP code area within its jurisdiction, a PHA may use this flexibility to establish payment standards for "grouped" ZIP code areas. Payment standards must be between 80% and 150% of the SAFMR. The payment standard in effect for each grouped ZIP code area must be within the basic range of the SAFMR for each ZIP code area in the group. WHHA must implement an impact analysis and implement a hardship policy. This activity will provide households with housing choice and self-sufficiency opportunities.

3.b. Alternative Reexamination Schedule for Households (HCV)

WHHA agency may establish an alternative reexamination schedule for households. Reexaminations must occur at least every three years. WHHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. WHHA must implement an impact analysis and include a hardship policy. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

3.d. Self-Certification of Assets (HCV)

At reexamination, WHHA may allow the self-certification of assets only up to \$50,000. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

Project-Based Voucher Program Flexibilities

WHHA would be authorized to adopt and implement the activities listed below in the project-based voucher program. For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

9.a. Increase PBV Program Cap (HCV)

WHHA may increase the number of authorized units that it project-bases of no more than 50% of the lower of either the total authorized units or annual budget authority. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

9.b. Increase PBV Project Cap (HCV)

WHHA may raise the PBV cap within a project up to 100%. WHHA is subject to Notice PIH 2013–27 where applicable, or successor. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

9.c. Elimination of PBV Selection Process (HCV)

WHHA may eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review must be conducted. WHHA must complete site selection requirements. HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). WHHA is subject to Notice PIH 2013–27 where applicable, or successor. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017–21. This activity will provide households with self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

9.d. Alternative PBV Selection Process (HCV)

WHHA may establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing. If the selected project is PHA-owned, HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). WHHA is subject to Notice PIH 2013–27 where applicable, or successor. This activity will provide households with self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

WHHA believes in removing the additional public notice competition from other funding sources identified as having a standing competitive round. Removing those competitive rounds, public notices, and unit use limitations removes barriers that create an enormous burden and cost on administration.

9.e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

WHHA may attach and pay PBV assistance for shared housing units and/or manufactured housing. PBV units must comply with HQS. PBV units must comply with deconcentration and desegregation requirements under 24 CFR part 903. A subsidy layering review must be conducted. Shared housing units may not be owner occupied. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

9.f. Increase PBV HAP Contract Length (HCV)

WHHA may increase the term length of a PBV HAP Contract. PBV HAP Contract length must not be shortened. PBV HAP Contract length must not be greater than 50 years, including any extensions. PBV HAP Contract is subject to appropriations and the end of an agency's MTW authorization. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

9.g. Increase PBV Rent to Owner

WHHA is authorized to develop a local process to determine the initial and re-determined rent to owner. Any policy must comply with rent reasonableness, unless modified by waiver(s) 2.c. and/or 2.d. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

9.h. Limit Portability for PBV Units (HCV)

WHHA is authorized to waive the requirement to provide a tenant-based voucher at 12 months when requested by a PBV household. Portability under this activity must not be restricted for more than 24 months. WHHA must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.

Family Self-Sufficiency Program With MTW Flexibility

WHHA would be authorized to operate its Family Self-Sufficiency (FSS) Program, and any successor programs, exempt from certain HUD program requirements. If the agency receives dedicated funding for an FSS coordinator, such funds must be used to employ a self-sufficiency coordinator and in accordance with any requirements of any NOFA under which funds were received. Recruitment, eligibility, and selection policies and procedures must be consistent with the Department's nondiscrimination and equal opportunity requirements. To the extent that Family Self-Sufficiency activities include supportive services, such services must be offered to elderly and disabled persons who are participants in the covered program and eligible for such services. Notwithstanding the above, any funds granted pursuant to a competition must be used in accordance with the NOFA.

The following activities will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

10.a. Waive Operating a Required FSS Program (HCV)

WHHA operates an FSS program voluntarily but would be authorized to waive this requirement. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

10.b. Alternative Structure for Establishing Program Coordinating Committee (HCV)

The agency is authorized to create an alternative structure for securing local resources to support an MTW Self-Sufficiency Program. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

10.c. Alternative Family Selection Procedures (HCV)

WHA would be authorized to develop its own recruitment and selection procedures for its MTW FSS Program. Alternatively, the agency may make participation in the MTW FSS Program mandatory for any household member that is non-elderly or non-disabled. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHA's voucher program.

10.d. Modify or Eliminate the Contract of Participation (HCV)

The agency is authorized to modify the terms of or eliminate the FSS Contract of Participation (HUD-52650), in lieu of a local form. The agency may modify the terms of the Contract of Participation to align with adjustments made to its MTW FSS Program using MTW flexibility. Further, the agency may discontinue use of the Contract of Participation and instead employ a locally developed agreement that codifies the terms of participation. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHA's voucher program.

10.e. Policies for Addressing Increases in Family Income (PH & HCV)

WHA would be authorized to set its own policies for addressing increases in family income during participation in the MTW FSS Program. Consistent with the goals and structure of its MTW FSS Program, the agency may set policies for whether income increases are recognized for purposes of increasing rent (consistent with the agency's existing rent policy) or changing the amount of funds moved to escrow/savings through the program. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHA's voucher program. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHA's voucher program.

WHA must review FSS Guidance. WHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program. WHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract. WHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. If WHA requires MTW FSS Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity. If WHA requires MTW FSS Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity. WHA must not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act. If WHA terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's Grievance Procedure (24 CFR part 966, subpart B) or the HCV informal hearing process (24 CFR part 982.555). WHA must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV assistance.

Local, Non-Traditional Activities

MTW Funding can be utilized per statute and regulation on the eligible activities listed at sections 9(d)(1), 9(e)(1), and 8(o) of the 1937 Act. Any authorized use of these funds outside of the allowable uses listed in the 1937 Act constitutes a local, non-traditional activity. The agency is authorized to implement the local, non-traditional activities listed below to provide a rental subsidy to a third-party entity to provide housing and supportive services to eligible low-income participants, and to contribute MTW Funding to the development of affordable housing. Families served through the activities described below must be at or below 80% of Area Median Income. Implemented activities must meet one of the three MTW statutory objectives of increasing the efficiency of federal expenditures, incentivizing self-sufficiency of participating families, and increasing

housing choice for low-income families. The use of MTW Funding must be consistent with the requirements of 24 CFR 200 and other basic requirements for the use of federal assistance. The agency must determine the eligibility of families in accordance with 24 CFR 5.609 and with section 3(b)(2) of the Act. Local, non-traditional activities must fall within one of the three categories below and comply with PIH Notice 2011-45 or any successor notice/and or guidance.

This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.

Proposed Use of MTW Funds

WHHA requests the authority to use Housing Assistance Payment funds and administrative fee funds flexibility using fungibility.

Evidence of Significant Partnerships

Discuss any significant partnerships between the PHA and other public agencies, city/state/local governments, private nonprofits and/or for-profit entities (particularly local welfare offices and local providers of job training, financial empowerment, and related services). The PHA should clearly explain how such partnerships will help to achieve the vision of the PHA's local MTW program. Discuss how the PHA intends to leverage funding and/or other in-kind resources in the implementation of its local MTW program.

WHHA has a strong partnership with the Town of West Hartford, including but not limited to, departments such as the Town Manager, Social Services, Planning and Zoning and Economic Development. The Town is committed to expanding affordable housing opportunities for its residents, including the development of new housing stock, the rehabilitation of older stock and the expansion of availability of housing options for current and future residents, especially for those who have the least choice in achieving their locational preference. Working together with the Town, WHHA would be able to design local strategies to help with our mission and the Town's goals of furthering housing choice for residents simultaneously.

Town of West Hartford Social Services has been a partner that has helped in connecting residents with referrals or services to help residents to obtain more self-sufficiency. WHHA intends to continue this partnership and further enhance self-sufficiency for residents if MTW status is obtained.

WHHA has a strong partnership with M&T Bank, our financial and lending institution. M&T Bank has been involved as a lender and investor on a few development projects undertaken in the last several years. They also provide community outreach services and classes on financial literacy and credit counseling. WHHA intends to foster these services by working with M&T Bank to bring classes like these to our residents in an effort to increase self-sufficiency, one of our MTW goals.

WHHA has a strong relationship with the State of Connecticut Department of Labor Community Services Division. Through this relationship, WHHA can refer residents for help in finding area job fairs, job readiness training, career counseling and basic resume writing services. In addition, there is help in finding additional financial literacy workshops hosted by area Banks which can be offered to our residents. WHHA feels this relationship will help to increase self-sufficiency, one of our MTW goals.

Other partnership agencies WHHA currently works with are Community Renewal Team, The Connection, The Bridge Family Center and Urban League of Greater Hartford. These are all area non-profit organizations that offer a variety of services to residents including but not limited to credit repair, financial literacy, security deposit assistance, assistance with child care services, resume writing services, vocational education and transportation services. We feel these partnerships can be expanded upon in order to help increase both self-sufficiency and furthering housing choice opportunities – two of our MTW goals.

Assessment of Past and Existing Efforts to Achieve Administrative Efficiencies

Pursuant to PIH Notice 2021-34 and PIH Notice 2022-30, WHHA applied to HUD for a waiver to allow for the setting of payment standards up to 120% of the Small Area Fair Market Rent (SAFMR). This was approved and

therefore, the payment standards have been increased to 120% of the SAFMR up until 12/31/23. WHHA has seen that the increase in the payment standards has helped with leasing efforts – both with new admission and moves, as tenants are able to find housing under this waiver where they may not have under the previous 110% maximum.

WHHA conducts biennial HQS inspections, while maintaining interim inspections for tenant-complaints, owner-complaints or emergency exigent health and safety events.

Following WHHA's first HQS inspection of a voucher-assisted dwelling unit where there are no life-threatening deficiencies, WHHA allows for property owner certifications that any identified items have been adequately repaired to ensure compliance with HQS.

Before the COVID pandemic, WHHA held landlord orientation briefings. These are now done virtually. WHHA has an on-line landlord portal as well as direct deposits of its Housing Assistance Payments (HAPs).

WHHA conducts mail-in annual reexaminations which is accommodating to families and more administratively efficient for staff.

WHHA created and revised its program forms, new policies, streamlined processes.

WHHA staff uses a hybrid schedule between remote work and work in the office. WHHA uses MS Booking calendar to facilitate staff's efficient use of setting up appointments, meetings and communicating about them. WHHA staff have QR codes on their digital business cards for easy access to contact information, including the calendar links.

WHHA converted to YARDI software to gain administrative efficiencies and to facilitate voucher-assisted households being able to complete their recertification materials on-line in the future.

Asset Management covers systems and organizational capacity to oversee real estate assets. This includes regulatory compliance, customer service, property management and related systems that support these functions such as Information Technology, staff expertise and the creation of new or revised administrative policies.

WHHA switched software providers in 2022 to a system with much more robust features than the previous software with respect to facilities management data.

WHHA performs semi-annual property walkthroughs attended by management, facilities staff, property management staff and resident services coordinator staff in order to assess physical condition of the properties, to ensure consistent policies and procedures, to assess risks at each location and aid in the preparation of an internal capital needs assessment for each building. External capital needs have not yet been prepared, as the housing stock is still relatively new in age.

Maintain security and public safety systems at the highest levels permitted by available funding. WHHA completed baseline current security systems and identify hard improvements that would enhance security.

WHHA has continued to grow our HCV and PBV programs in order to serve more people. At the beginning of 2023, we placed 13 new PBVs in a newly opened development and by the end of 2023, we will have executed an AHAP for another 15 PBV units.

WHHA has hosted workshops for landlords specifically related to HQS inspections. We intend to continue that process as needed and especially as inspection standards change.

Resident coordinator staff are located at each managed property in order to connect residents with service providers in the area, to work in connection with these agencies for the betterment of our residents and to generally assist residents with whatever they may need.

WHHA conducts collaborative workshops with Resident Service Coordinators (RSC) and Property

Management team to exchange knowledge of policy and practices in order for the RSC's to better serve residents.

WHHA developed a monitoring and evaluation plan. Using a variety of tools such as surveys, resident assessments, and community-level data, this information will be used to improve and refine services and programs.

Assessment of Needed Administrative Efficiencies

WHHA is interested in implementing the following MTW waivers and associated activities, if we are designated as an MTW PHA under this cohort:

- Reexaminations - 3(b): WHHA would have triennial reexaminations for elderly or disabled households on fixed-incomes and without any dependents, biennial reexaminations for elderly or disabled households with fixed-incomes and non-fixed incomes and with dependents, and biennial reexaminations for non-elderly/non-disabled households.
- Reexaminations - 3(d): Self-Certification of Assets (HCV). At reexamination, WHHA may allow the self-certification of assets only up to \$50,000. This activity will provide households with housing choice, self-sufficiency opportunities and provide greater cost efficiency to administering WHHA's voucher program.
- Project-Based Voucher Program Flexibilities - 9(c): WHHA would eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.
- Project-Based Voucher Program Flexibilities - 9(d): WHHA would establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing.