

PHA Name : Bristol Housing Authority

PHA Code : CT023

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of the City of Bristol (BHA) applied for Moving-to-Work (MTW) Cohort# 5: Asset Building Status and was awarded MTW status in September 2022.

The BHA has invested heavily in its relationship with its residents over the years, including Family Self-Sufficiency (FSS), the Resident Opportunities and Self Sufficiency (ROSS) Program, and many other initiatives in support of residents. MTW Cohort# 5: Asset Building provides the Housing Authority of the City of Bristol the opportunity to further build on its relationship with residents and support them in achieving financial independence. This Asset Building Cohort allows the BHA to benefit residents very directly: Selected residents from the Federal Conventional Public Housing Program (Section 9) will have the opportunity to have their monthly rent payments reported to between one and three of the National Credit Bureaus, unless they opt out, in order to build their credit profile for such things as home and car purchases (This is designated as Option# B in MTW Cohort# 5). Under this option, the BHA would report the public housing rent payments of public housing households that enroll in the program through an informed consent process to one or more credit bureaus with the goal of building credit for those households.

MTW agencies are freed up from many regulatory restrictions within the Section 8 and Section 9 Programs, and they are provided flexibility in merging their financial accounts, such that they can do new and creative things locally, such as resident services and housing development. The Housing Authority of the City of Bristol is very excited to participate in the MTW demonstration and for the opportunity of further benefiting its residents. The Housing Authority of the City of Bristol will use all resources and where appropriate, fungibility to enhance housing and program opportunities for its residents and will use the MTW Cohort# 5: Asset Building status as a way to provide top level housing resources.

The BHA seeks to establish and constantly explores new opportunities to partner with other communities and agencies to expand additional affordable housing opportunities. The BHA will use the additional resources and regulatory and budget flexibility that comes with MTW status to further improve the BHA's Housing Programs, including both HCV's and Conventional Federal Public Housing.

Along with further developing resident services, the BHA will continue its efforts to develop much-needed housing for low income, elderly, non-elderly disabled, homeless, veteran and family populations. The Housing Authority of the City of Bristol seeks to manage and operate an effective Housing Choice Voucher Program that provides the benefit of better housing options to its qualified HCV residents. In order to accomplish this, The Housing Authority of the City of Bristol is always making substantial efforts to improve technology, customer service and communication with its residents to enhance opportunities.

As a MTW Cohort# 5: Asset Building Housing Authority, The Housing Authority of the City of Bristol will continue to enact policies and procedures that will build strong relationships with residents and resident organizations, provide housing choice for qualifying HCV tenants, and support tenants and their families in achieving self-sufficiency.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Plan to Implement in the Submission Year
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Plan to Implement in the Submission Year

C. MTW Activities Plan that Bristol Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Description: BHA will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. BHA will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.</p> <p>Agency goals for MTW Activity: Increase rent reasonable turn window to support on-time reporting. This waiver supports BHA's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

The agency will determine rent reasonableness with the support of third-party software. BHA will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

No document is attached.

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used, and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical/disability expenses, if certified and claimed by the household. Annual household income will be determined as current and as anticipated once every three years. If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's gross rent is above their payment standard. At their annual lease anniversary, BHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households. However, as described in Activity: 1.u. – Standard Deductions (HCV), fixed-income households will also be given an opportunity to certify their medical and/or disability expenses and to qualify for the MTW standard expense deduction. If a fixed-income household claims a hardship, they may go through the process outlined in the hardship and grievance policy if applicable, by providing proof of medical/disability expenses above the MTW standard expense deduction.

Households may continue to request interim reexaminations due to a decrease in income, and/or increases in eligible expenses through the hardship policy. Applicable households will be able to file one interim reexamination for decreases in income and/or increases in eligible expenses. BHA must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10 percent or more. BHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except BHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and BHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, BHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, BHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Triennial reexaminations for these households are expected to begin with reexaminations starting in January 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 45 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase

administrative burden o

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

The MTW activity applies to families where:

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

The MTW activity applies to all Federal Housing developments including Cambridge Park and Scattered Sites, Bonnie Acres, John F. Kennedy Apartments, and Gaylord Towers.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

Family circumstances may change throughout the period between triennial reexaminations and between applicable households' annual lease anniversaries. HUD and BHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the BHA must process interim reexaminations to reflect those changes. HUD regulations also permit the BHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition change. The BHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

At their annual lease anniversary between triennial reexaminations, BHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used, and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical/disability expenses, if certified and claimed by the household. Annual household income will be determined as current and as anticipated once every three years. If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's gross rent is above their payment standard. At their annual lease anniversary, BHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households. However, as described in Activity: 1.u. – Standard Deductions (HCV), fixed-income households will also be given an opportunity to certify their medical and/or disability expenses and to qualify for the MTW standard expense deduction. If a fixed-income household claims a hardship, they may go through the process outlined in the hardship and grievance policy if applicable, by providing proof of medical/disability expenses above the MTW standard expense deduction.

Households may continue to request interim reexaminations due to a decrease in income, and/or increases in eligible expenses through the hardship policy. Applicable households will be able to file one interim reexamination for decreases in income and/or increases in eligible expenses. BHA must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10 percent or more. BHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except BHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and BHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, BHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the

family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, BHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Triennial reexaminations for these households are expected to begin with reexaminations starting in January 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 45 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase

administrative burden o

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

The MTW activity applies to families where:

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

Family circumstances may change throughout the period between triennial reexaminations and between applicable households' annual lease anniversaries. HUD and BHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the BHA must process interim reexaminations to reflect those changes. HUD regulations also permit the BHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition change. The BHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, BHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

At their annual lease anniversary between triennial reexaminations, BHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also

be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

3.c. - Self-Certification of Assets (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.

Agency goals for MTW Activity:

Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also lower barriers to participants in obtaining asset verification.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, BHA will free up staff time to accomplish other tasks and require less

burdensome documentation of participants.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.

Agency goals for MTW Activity:

Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also lower barriers to participants in obtaining asset verification.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, BHA will free up staff time to accomplish other tasks and require less burdensome documentation of participants.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

5.a. - Pre-Qualifying Unit Inspections (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will allow prequalifying unit inspections (also known as a pre-inspection). Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after move-in as needed.

Agency goals for MTW Activity:

The apartment industry relies on a seamless turnover to meet its overhead costs and the financial implications of such delays are sufficient to deter them from participating in the program. Property owners lose rental revenue trying to get an HQS inspection scheduled for the individual apartment units...when in fact the family is ready to move in immediately. So not only do they lose but the voucher holder loses too because they are anxious to move in and find housing.

This activity will accelerate the lease-up process and minimize property owners' lost revenue during a period of vacancy and make the process closer to the unassisted rental market, which will incentivize their participation and/or retention in the voucher program all in service of increasing housing choice for voucher holders/households.

The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords in BHA's service area, by offering additional customer service. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster because they will not be waiting for an inspection, which may fail the first time and take more time to pass a re-inspection. Landlords will decrease their vacancy time and income lost. The pre-qualifying unit inspections are part of a larger landlord incentives initiative to

increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the Request for Tenancy Approval and normal inspection process (a deterrent for some landlords) and ensure more quality units are available to voucher holders.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will perform HQS inspections on project-based units that it owns, manages, and/or controls.

Agency goals for MTW Activity:

Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports BHA's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method
A BHA supervisor will re-inspect a sample of units (10% quarterly) for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2.

No document is attached.

9.a. - Increase PBV Program Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will increase the number of authorized units it project-bases.

Agency goals for MTW Activity:

Sometimes, people do not necessarily associate affordable housing at 30% of low-income households' monthly adjusted income in both tenant-based voucher and project-based assistance programs as directly relating to self-sufficiency. However, the PBV program offers households housing costs at a 30% affordability threshold. With the right type of wrap around services pertinent to each population type and household, coupled with this activity and safe harbor waiver, BHA believes that significantly greater numbers of households will be able to become self-sufficient.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA may raise the Project Based Voucher cap within a project up to 100%.

Agency goals for MTW Activity:

Create family stability in an environment with support to encourage family self-sufficiency.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA will eliminate the selection process in the award of PBV 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.

Agency goals for MTW Activity:

Streamline the selection process for PBV. This waiver supports BHA's larger goal of using MTW flexibility to streamline administrative processes.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.d. - Alternative PBV Selection Process (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

The agency 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.

Agency goals for MTW Activity:

BHA's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA may lengthen the PBV HAP contract length up to 50 years.

Agency goals for MTW Activity:

This waiver supports BHA's larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households' income to housing cost burdens which directly impacts their long-term self-sufficiency.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA is proposing to change the current requirement to provide a tenant-based voucher when requested by a PBV household from 12 months after PBV tenancy to 24 months. Because of the limited availability of tenant-based vouchers in our community, the number of our unassisted or waiting list households is considerable, waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Portability under this activity must not be restricted for more than 24 months.
- ii. The agency 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.
- iii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

Agency goals for MTW Activity:

The goal of this activity is to reduce cost and achieve greater cost effectiveness in administrative cost expenditures as well as to increase housing choices for low-income families that are unassisted / on BHA's waiting list at greater rates than they otherwise would be served without this activity.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

15. - Acquisition without Prior HUD Approval (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

BHA proposes uses of this activity to acquire public housing sites without prior HUD approval. This activity allows MTW agencies flexibility around the timing of HUD's approval, but not the content of the approval. When acquiring the sites, BHA must have all submission materials in place as if HUD were approving the acquisition proposal prior to acquisition. BHA must provide the materials to the HUD Field Office for approval within 30-days of acquisition. If the Department is unable to approve the acquisition based on the materials submitted, then BHA must repay the cost of acquisition with non-federal funds.

Agency goals for MTW Activity:

The goal of this activity is for more expeditious acquisitions, resulting in the ability to competitively negotiate prices as owners as BHA would not have to wait unreasonable periods of time to complete the sale. Acquisition of sites through this activity would also increase the supply of high-quality affordable housing available to the residents in BHA's service area. BHA's proposed use of this activity to acquire sites without prior HUD approval and certify that HUD's site selection requirements have been met, would facilitate its development activities.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

17.c. - Housing Development Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description:

Under this activity, BHA may utilize MTW funding to acquire, renovate and/or build affordable housing units that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. BHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to: PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the BHA's Board of Commissioners. BHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium-sized properties. MTW funds likely would be provided in the form of a loan or recoverable grant. MMNA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. BHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.

In implementing this activity, BHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.

Agency goals for MTW Activity:

This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Due to upcoming HOTMA and NSPIRE changes, we did not implement the activities last fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Cambridge Park	Rehabilitation	Gap Financing, Tax Credit Partnership, Other	189.00	189.00	7.00	24.00	157.00	1.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>
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F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$865,782	\$697,373	\$168,409	
2023	\$2,499,227	\$2,499,227	\$0	

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family	

size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

H.	Public Comment
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Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
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No known evaluations.

RESOLUTION #1479

**TO APPROVE THE HOUSING AUTHORITY OF THE CITY OF BRISTOL MOVING
TO WORK SUPPLEMENT TO THE 2024-2025 ANNUAL AGENCY PLAN**


WHEREAS, the Housing Authority of the City of Bristol (BHA) Board of Commissioners adopted the 2024-2025 Annual Agency Plan by Resolution No. 1468 on February 20, 2024;

WHEREAS, BHA MTW Supplement to the Annual PHA Plan is attached hereto and made a part hereof;

WHEREAS, the office of Housing and Urban Development requires that the MTW Supplement be approved by BHA by Resolution;

NOW THEREFORE IT IS HEREBY RESOLVED that the attached MTW Supplement is approved and that the 2024-2025 Annual Agency Plan previously approved by the BHA Board of Commissioners is hereby supplemented with the MTW Supplement.

Adopted April 16, 2024


Rickey Bouffard, Chair
Board of Commissioners
The Housing Authority of the City of Bristol

Seal:





**Housing Authority of the City of Bristol
164 Jerome Avenue – Bristol, CT 06010**

Chief Executive Officer
Mitzy Rowe

Board of Commissioners
Rickey Bouffard, Chair
Brian S. Suchinski, Vice-Chair
Greg Klimek
Ada O. Avilés
Bibi Hafford

Phone: (860) 582-6313
Fax: (860) 585-6033
TDD: (860) 584-1565
Website: www.bristolhousing.org

**Minutes of the Public Hearing
Agency Plan FY 2024-2025
Housing Authority of the City of Bristol**

**February 1, 2024
Gaylord Towers Community Room
55 Gaylord Street, Bristol**

1. Welcome & Introductions

The CEO called the meeting to order at 11:03 a.m.

Public attendees: James Barber (Gaylord Towers), Rachel Fuller (J.F. Kennedy Apartments), Dennis King (J.F. Kennedy Apartments), Kathleen Simpson (Gaylord Towers), and Joseph Swenton (Gaylord Towers), Romulo Suarez Ramirez (Gaylord Towers)

BHA staff present: Mitzy Rowe, Chief Executive Officer; Melissa Green, Deputy Director; Luis Velazquez, Director of Capital Fund; Sharon Oquendo, Director of Public Housing; Amy Dzurka, Senior Property Manager (AMP3); Laura LaMar, Property Manager (D.J. Komanetsky Estates); Ariana Caldas, Property Manager (AMP1, Scattered Sites, and MLM); Yaritza Soto, Property Manager (AMP2, Zbikowski LIHTC, and Zbikowski M8); Michael Kavanaugh, Executive Assistant to the CEO.

Also present: Ada O. Avilés, BHA Resident Commissioner; Dr. Dawn Leger, Grants Administrator, Economic & Community Development, City of Bristol

The CEO greeted all attendees and reviewed the purpose of this Public Hearing: The purpose of this Public Hearing is to review the changes and updates to the Housing Authority of the City of Bristol's (BHA) Agency Plan prior to submission to HUD on or before April 15, 2024.

2. Agency Plan Changes

The Director of Public Housing presented proposed changes to the Admissions and Continued Occupancy Plan (ACOP) as effected by The Housing Opportunity Through Modernization Act of 2016 (HOTMA) changes. She referred to two HUD handouts: "Highlights of Final Rule Implementing Sections 102, 103, 104 of HOTMA" and from the HUD Office of Multifamily Housing Programs "Background and Implementation of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) Final Rule."



HOTMA Income and Assets Final Rule

- Affects all BHA housing programs
- Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) delivers important benefits to tenants and reduces administrative burdens
- Mandatory Policy Changes with HOTMA: ACOP, Tenant Selection Plan – Multifamily and LIHTC, Tenant File Forms, Housing Application & Recertification Questionnaire Package, Resident Handbook, Hardship Policy, HUD Violence Against Women Act (VAWA) Policy and EIV Policies & Procedures
- Section 102
 - Addresses income reviews
 - Creates a “safe harbor” to allow PHAs to use income determinations made under other federal benefits programs for re-examinations
 - Increases standard deduction for elderly/disabled households
 - Creates financial hardship exemptions for adjusted income
 - Eliminates the use of the Earned Income Disallowance
 - Review of EIV not required at interim re-examinations
- Section 103
 - Modifies the continued occupancy standards of Public Housing residents
- Section 104
 - Establishes an asset limitation for families based on the value of net family assets and property ownership
 - provides exceptions for certain investments, including retirement savings and modest increases in income

HOTMA Overview of Changes

- Cannot implement HOTMA until HUD releases a new 50058 Family Report and HIP (Housing Informational Portal) system is operational
- Annual Re-examinations – the family’s income from the preceding 12-month period will be used to calculate the rent
- Dependent Deduction will remain at \$480 per dependent for 2024 but then will be adjusted annually for inflation likely around January 1 each year
- Exclude earned income of a dependent full-time student in excess of the dependent deduction-currently \$480 and will be adjusted annually for inflation
- Elderly/Disabled Deduction-Changing from \$400 per family to \$525 per family in 2024 – this will be adjusted annually for inflation likely around January 1 each year
- The sum of unreimbursed health and medical care or disability expenses that exceed 10% of annual income will be counted – HUD has created a hardship

Question: Are food stamps counted? Answer: The Deputy Director said that food stamps are listed under income but the total count is excluded; does not increase income.

The Deputy Director continued the presentation.

- Interim Increases
 - If a family had an interim decrease since their last annual
 - the PHA has discretion whether or not to consider increases in earned income
 - If the family did not have an interim decrease since their last annual: the PHA has no discretion and MUST NOT consider increases in earned income

- Assistance may not be provided initially or at reexam if the family has net assets exceeding \$100,000 or if the family has ownership interest in real property that is suitable for occupancy by the family as a residence
- Asset Income-When combined net family assets total \$50,000 or less:
 - We will accept a self-certification from the family; we must obtain 3rd party verification of all family assets every 3 years

NSPIRE

- NSPIRE inspections will replace the Housing Quality Standards (HQS) inspections for both Public Housing and the Housing Choice Voucher program
- Will begin implementing effective October 1, 2024 for the Housing Choice Voucher program
- The new NSPIRE model prioritizes health, safety, and functional defects over appearance. It implements inspections that better reflect the true physical conditions of the property

Question: Is this an inspection by BHA or HUD? Answer: The Director of Public Housing said that BHA conducts an annual inspection of every unit through a third party; HUD does inspections annually but not at all units, only randomly selected units.

The Director of Public Housing presented policy changes:

Security Deposits

- Per CT law, BHA will return any security deposits or final invoice within 21 days of resident vacating, currently 30 days

Move-out Prorated Rent

- BHA will prorate the rent for the month in which a resident vacates the premises. This means that residents will only be responsible for paying rent for the specific days they occupied the unit
- Congregate unique rule: if a 30-day notice of vacating is submitted, and the resident is in good standing, then the residents will only be responsible for paying rent for the specific days they occupied the unit

The Director of Public Housing said that residents of Zbikowski Park M8 will no longer be responsible for snow removal and lawn care as BHA maintenance will be responsible.

At Mountain Laurel Manor and Zbikowski Park M8, a denied applicant will have 14 calendar days in which to request a hearing instead of the current 10 business days.

The Director of Capital Fund presented changes to the Capital Fund and ongoing projects:

Cambridge Park

- Capital Fund Lead-Based Paint Grant – BHA has completed its testing of lead-based paint conditions at Cambridge Park. BHA is expecting to move to the abatement phase of the project in the Fall
- Underground Storage Tanks (UST) – BHA continues to work with Fuss & O’Neill and multiple vendors to safely remove the abandoned UST at Cambridge Park
- Community building/Main building completed required fire sprinkler upgrades.
- Security Cameras were installed around Cambridge Park, and the Bristol Police have access to the cameras. Cameras will be installed or upgraded on all properties eventually, but due to funding demands, the process will be done in phases in the next few years.

Cambridge Park Renovation

- The Director of Capital Fund presented a map of the property and pointed out where the new list of units to be demolished are located and said tenant protection vouchers will be issued for residents in those units. He pointed out where the ADA handicap accessible units will be located in various spread out spots. He pointed out where green spaces will be located.

Other Properties

Gaylord Towers and J.F. Kennedy Apartments: hot water tank replaced and new fire alarm panel upgraded
Bonnie Acres: New selective ADA ramps, landings and sidewalks were installed. D.J. Komanetsky Estates (congregate): renovation phase one is complete with five newly renovated units and phase two has begun; new second elevator among upgrades to come in the project. Mountain Laurel Manor: renovation continuing with first four units begun, sidewalks repaired, storm sewers upgraded among the progress.

Question: Is there funding for broken appliances such as stoves and refrigerators. The Director of Public Housing said that it is a maintenance issue, not a Capital Fund issue, and that such appliances that cannot be fixed are replaced.

Capital Fund Plan

- BHA is anticipating a formula amount of approximately \$1.575M for the 2024 Capital Fund Program. The 2024 formula is based on the previous year award.
- BHA's goals for 2024-2028 include projects that enhance availability, improving the safety and security of residents, and modernizing the public housing stock.

Five-Year Plan Improvements

- The Modernization Department uses reports from architects, engineers, inspections; recommendations, environmental testing, staff feedback, and resident input and concerns to prioritize planning and budgeting for projects.
- Cambridge Park:
 - Continue select replacement of roofs, boilers, heating baseboards, windows, siding and doors
 - Renovations to targeted kitchens and baths; includes Union Street and West Street units
 - Community building standby emergency generator
 - Section 18 Application to HUD to begin major renovations
- Bonnie Acres:
 - Site improvements including parking lot, fencing, security and lighting
 - Upgrades at community building including new flooring and kitchen partition shutter
 - Interior renovations to the extension buildings
- Gaylord Towers:
 - Electrical code upgrades
 - New waste collection system (trash compactor)
 - Unit ventilation upgrades and fan replacements
 - Shower valves and bathroom sinks
 - Balcony doors and hallway heating
 - Parking lot lighting
 - Security cameras
 - Upgrades fire/security systems
- J.F. Kennedy Apartments:
 - Hallway heating/cooling upgrades
 - Site Improvements including sidewalks, plantings, fencing, and resident pavilion
 - Upgrades to fire/safety security systems

- Corridor flooring replacements
- Roof and boiler replacements
- Ventilation improvements at units

The Deputy Director reported on the Moving to Work program:

- BHA received HUD designation as a Moving to Work (MTW Expansion) agency effective February 1, 2023.
- Cohort #4: Asset Building Cohort; Option 2: Credit Building
- Moving to Work Supplement to the BHA Annual Plan approved and finalized by HUD July 13, 2023
- Credit reporting company contract negotiations are in progress
- Participating residents sign-up to begin following credit reporting in place
 - 50 residents total made up of 25 participants and 25 in a control group
- Target to start reporting is October 2024

3. Public Participation

The CEO asked if there were any questions regarding the proposed changes. Question: will there be a resident camera policy; the CEO stated that a draft of the policy is being reviewed and a final draft will be presented to the RAB board for comment.

There were no other comments from meeting attendees.

The CEO stated that all changes to plans and policy are done in consultation with the Resident Advisory Boards; Tenant Commissioner Ada O. Avilés; and Dr. Dawn Leger, Grants Administrator, City of Bristol Economic and Community Development.

The CEO projected on the screen the address of the executive office of BHA—164 Jerome Avenue, Bristol, CT 06010—and she encouraged any and all to write to her at that address or email her with any comments on the proposed plans and changes, and that the deadline for comments is Tuesday, February 20, 2024 at 4:30 p.m.

4. Adjournment

The meeting was adjourned at 11:53 a.m.

MTW 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 MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", 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 MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement 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 MTW Supplement 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 MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the City of Bristol

CT023

MTW PHA NAME

MTW PHA NUMBER/HA CODE

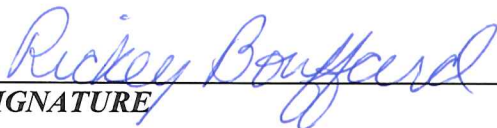
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729,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

Rickey Bouffard

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

February 20, 2024

DATE

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