



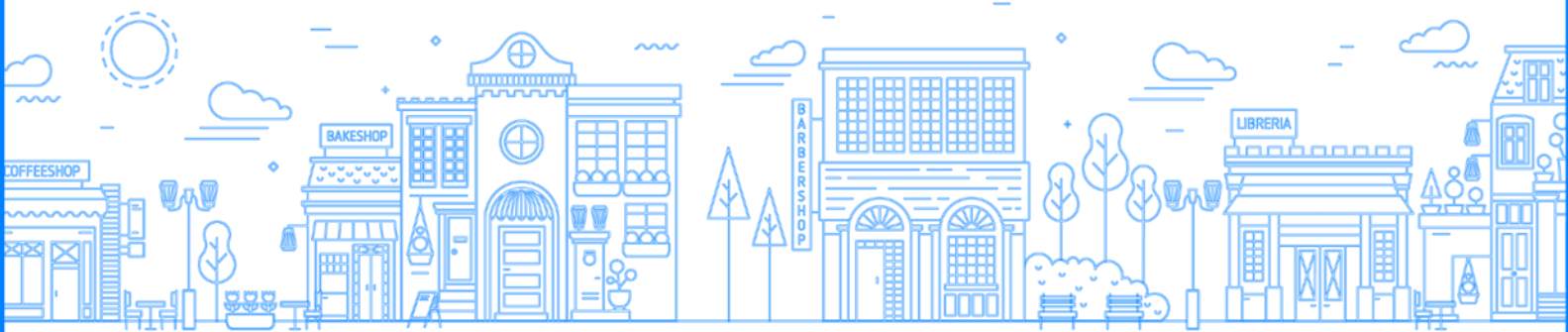
# COMMONWEALTH OF MASSACHUSETTS

Executive Office of Housing and Livable Communities

## Moving to Work Program Annual Plan for Fiscal Year 2024

Submitted to the  
U.S. Department of  
Housing and Urban Development

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## I. Introduction

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The Massachusetts Executive Office of Housing and Livable Communities (EOHLC, formerly DHCD) is a participant in the Moving to Work (MTW) Demonstration. MTW is a program authorized by Congress through which a limited number of Public Housing Authorities are provided with the flexibility to waive certain provisions of the US Housing Act of 1937 and related federal regulations, and to design and test approaches for providing housing assistance that address one or more of the following statutory objectives:

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

The terms and conditions of EOHLC's participation in the MTW program are defined in its MTW Agreement with the US Department of Housing and Urban Development (HUD), which extends through 2028.

EOHLC administers HUD-funded Housing Choice Voucher (HCV) programs, along with other state-assisted rental assistance programs, through a statewide network of Regional Administering Agencies (RAAs). See Appendix A for a listing of current RAAs. Subject to HUD approval in the MTW Annual Plan, MTW designation allows EOHLC to test new or modified programmatic approaches to administering HCV programs, to implement "local, non-traditional" housing and service activities for the benefit of low-income residents, and to utilize HCV Housing Assistance Payments (HAP) funds in a more flexible manner.

MTW flexibility applies to the HCV programs administered by EOHLC and which are part of the MTW Block Grant. EOHLC may apply MTW operating flexibilities to special purpose vouchers which are not part of the block grant in accordance with HUD's published guidance. In general, HUD allows special purpose vouchers to be administered in accordance with MTW agreements unless MTW provisions are inconsistent with the appropriations act or requirements of the Notice of Funding Availability (NOFA). Enhanced/Tenant Protection Vouchers will be rolled into the MTW Block Grant upon renewal of funds resulting in application of MTW flexibility to these vouchers.

EOHLC is required by HUD to prepare an MTW Annual Plan in a format defined in the MTW Agreement. This Annual Plan, which is subject to HUD approval, reflects the current Plan requirements including use of standard metrics and benchmarks. For purposes of the Annual Plan, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. Conversely, a "non-MTW activity" is an activity that does not require MTW funding or programmatic flexibility to implement.

EOHLC's FY 2024 MTW Annual Plan summarizes planned activities for the period from July 1, 2023, through June 30, 2024. HUD provides HAP funding on a calendar year basis; thus, the Annual Plan covers parts of two distinct funding periods. As of the date of this Annual Plan publication, EOHLC has not received confirmation of its 2024 HAP funding. If decreases in funding occur, EOHLC may need to modify,

delay, or cancel the proposals herein and/or take other necessary measures, including deferring issuance of turnover vouchers.

Prior to submission to HUD, EOHLC makes the Annual Plan available for public review and comment and conducts public hearings to solicit feedback. EOHLC reviews and considers written and verbal comments that are received during the public review period. Appendix C provides information on the public comment period for this Annual Plan.

## A. Overview of Short-Term Annual Goals and Objectives

Highlights of FY 2024 MTW activities are summarized below.

- EOHLC projects that rental assistance and related services will be provided to 21,165 MTW households.

In FY 2024, EOHLC will introduce new resources and services to assist voucher holders in finding suitable housing in Massachusetts' challenging rental market:

- **Security Deposit Assistance:** With the flexibility afforded by PIH Notice 2022-18, EOHLC plans to offer one-time security deposit assistance to MTW voucher holders moving to new units where a security deposit is required.
- **Housing Search Assistance:** With the flexibility afforded by PIH Notice 2022-18, EOHLC also plans to offer MTW voucher holders one-on-one assistance in identifying units that meet HCV requirements and voucher holders' preferences. Staff may also assist participants with landlord negotiation, completion of rental applications, coordination with the relevant RAA's leased housing team, and referrals to community resources. Landlord outreach and recruitment efforts may also be pursued.

Existing efforts to expand housing choice for low-income households will also extend into FY 2024. EOHLC's SNO Mass program will continue to serve eligible voucher holders with children who are interested in moving to high-opportunity neighborhoods. In addition, the Fair Housing Initiative will continue to investigate discriminatory practices and provide enforcement assistance for households with housing subsidies. MTW funds will also continue to support Housing Navigator, a comprehensive online database of income-restricted rental housing across the state.

EOHLC will continue to prioritize the preservation and production of affordable housing in FY 2024. EOHLC plans to expand its Affordable Housing Preservation and Development Fund (Activity 2018-9) by adding a new component:

- **Gap Financing:** EOHLC proposes to make additional funding available for redevelopment or modernization of public housing and production of new affordable housing through a new Gap Financing Initiative. MTW funds will support redevelopment projects for state public housing alongside tax credits, EOHLC capital subsidy, and other funding sources. EOHLC will fund public housing redevelopment projects that have a cost premium over other affordable housing production and preservation projects due to requirements to pay prevailing wage as well as relocation needs, demolition, and abatement costs. MTW funds may also support major modernization projects in state-aided public housing that do not include tax credits or other

mixed-finance sources. All projects must include 1:1 replacement of redeveloped housing serving low-income populations, and favorable projects will include new production of income-restricted units.

Another goal for EOHLC in FY 2024 is to continue to achieve administrative efficiencies in its HCV program, reducing burden for both participants and RAAs.

- **Alternative Verification Methods:** EOHLC proposes to utilize an alternative, streamlined method to verify household member income for program applicants and participants (see Activity 2024-1).
- **Income Eligibility:** EOHLC proposes to apply the PHA jurisdiction’s highest income limit (for the family size) not only at the issuance of a voucher but also at the time of admission to the program (see Activity 2024-2). This will reduce administrative burden on EOHLC and RAA staff as well as program participants. It will also result in additional housing choice for participants.

In FY 2024, EOHLC will also continue to provide economic relief and asset-building opportunities to voucher holders and other low-income households. For example, the working families income exclusion and the utility allowance modifications approved as part of EOHLC’s FY 2023 MTW Plan are currently being implemented and will extend through FY 2024. These policies help make rent and utilities more affordable to eligible households, freeing up limited income for other essential expenses and reducing the risk of falling behind on payments. EOHLC is also proposing a new formula for the calculation of preliminary escrow credit for households participating in the Family Self-Sufficiency (FSS) program. The proposed formula would be 30% of the growth in monthly earned income without consideration of the growth in monthly rent. This will allow households to escrow based on the increase in their earned income, regardless of whether or not there has been a change in their Total Tenant Payment (TTP).

In FY 2024, EOHLC will be focused on improving leasing success rates and aims to increase the number of households served as a result. In addition to the policies and initiatives described above, EOHLC looks forward to continuing to implement its many other previously approved MTW activities and explore potential modifications or expansions of these activities to better serve low-income households. EOHLC will also continue to explore new initiatives that further the MTW statutory objectives and EOHLC’s long-term MTW goals.

## B. Overview of Long-Term Goals

Through its participation in the MTW program, EOHLC is able to support a variety of programs and policies that promote housing stability and economic security for thousands of participating low-income households, including families with children, seniors, and people with disabilities. The programmatic flexibility afforded by MTW continues to be an important component of the Commonwealth’s overall housing strategy.

In 2022, EOHLC’s Division of Rental Assistance began an MTW strategic planning process, with the goal of developing:

1. A roadmap for effectively and efficiently spending down its MTW reserves in the coming years; and

2. A framework for alignment: (a) among MTW initiatives (current and future), (b) with HUD’s MTW statutory objectives, and (c) with the priorities of key stakeholders.

To date, the strategic planning working group has developed an “MTW Rubric” that establishes priorities and key considerations for all current and future MTW initiatives, including mission alignment, anticipated impact, spending, and operational feasibility. Using this rubric as a guide, the working group explored potential new activities and identified a handful of new initiatives and policies for which a significant financial investment from MTW is expected to have a significant impact, in terms of advancing our mission and benefitting a large number of households. Examples of these proposed new initiatives include security deposit assistance for all MTW voucher holders and increased investments in the redevelopment of public housing.

EOHLC will continue to engage in strategic discussions about its MTW program into FY 2024, and more specific long-term goals and strategies will be formulated after further analysis and stakeholder engagement. However, at this time, the areas of greatest focus are:

- Expanding housing choice for voucher holders;
- Increasing the preservation and production of affordable housing;
- Providing economic relief and asset-building opportunities to voucher holders; and
- Improving the voucher administration experience for tenants, landlords, and administering staff.



## II. General Operating Information

### Housing Stock Information

Through its Housing Choice Voucher (HCV) Program, EOHLC provides rental assistance to families, seniors, and persons with disabilities at properties owned by private or non-profit owners. EOHLC partners with a wide array of mission-driven, non-profit, and for-profit organizations to provide quality housing opportunities.

#### *i. Planned New Public Housing Units*

EOHLC does not administer a federal public housing program.

**Table 1: Planned New Public Housing Units in FY 2024**

AMP Name and Number	Bedroom Size						Total Units	Population Type*	# of UFAS Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
<b>Total Public Housing Units to be Added in the Plan Year</b>							<b>0</b>			

\*Population Type: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type is "Other" please describe:

N/A
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#### *ii. Planned Public Housing Units to Be Removed*

EOHLC does not administer a federal public housing program.

**Table 2: Planned Public Housing Units to Be Removed in FY 2024**

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
N/A	0	N/A
N/A	0	N/A
N/A	0	N/A

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
<b>Total: Public Housing Units to be Removed in the Plan Year</b>	<b>0</b>	

*iii. Planned New Project Based Vouchers*

**Table 3: Planned New Project Based Vouchers**

*\*The HUD-50900 form requires reporting of planned PBVs, which will be either under AHAP or HAP during the Annual Plan fiscal year. EOHLC’s PBVs are allocated through the state’s competitive rental round and in concert with the award of Low Income Housing Tax Credits (LIHTC). Proposal rounds are fluid and occur at varying times throughout the year with related funding announcements made upon award. Given that EOHLC’s MTW Plan is due to HUD prior to the award of FY 2024 PBV funding, EOHLC cannot identify which projects will be awarded PBVs at this time. Further, of the awards made, EOHLC cannot determine at this time which proposals will pass all screening thresholds and enter into AHAP or HAP contracts. EOHLC will report on all projects and PBVs committed, issued, and leased in the FY 2024 Annual Report.*

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
See explanation above			
<b>Total; Planned new Project-Based Units in Plan Year</b>			

*iv. Existing Project Based Vouchers*

**Table 4: Planned Existing Project Based Vouchers**

The projects listed in the table below represent the existing projects which are committed, issued, or leased in EOHLC’s PBV portfolio as of the date of this Plan.

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
1005 Broadway	8	Issued	No	New construction Family
1060 Belmont Street	7	Leased	No	Family and Elderly/Disabled units
108 Newbury Street	4	Leased	No	Family - New construction of four-story building
109 Gilman Street	1	Leased	No	Family unit
1129 Dorchester Avenue	8	Leased	No	Family and Elderly/Disabled units

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
1202 Commonwealth Avenue	6	Leased	No	Units for homeless individuals
12-14 Roach	8	Leased	No	New construction/ Elderly
126 Chandler Street	7	Leased	No	Family - new construction 2 & 3-BR
1285-1291 Mass Avenue	4	Leased	No	Family units
132 Chestnut Hill Ave.	8	Leased	No	New construction/ Elderly
140 East Street	2	Leased	No	Elderly/Disabled units
14-24 Roach Street	8	Leased	No	Family units
154-168 Eagle Street	8	Leased	No	Family units; supportive services
1599 Columbus	8	Committed	No	New Construction – Family housing
153 Green St Parcel A - 4%	3	Committed	No	Family
153 Green St Parcel A - 9%	3	Committed	No	Family
165 Winter Street	3	Leased	No	Family - Substantial rehab of historic former school
1-7 Piedmont Street	3	Leased	No	Elderly/Disabled units
1740 Washington Street	8	Leased	No	Units for homeless individuals
181 Chestnut	8	Leased	No	Rehab – Family
181 Washington Street	8	Leased	No	Family - New construction of four-story, mixed-use building
19 Hancock Street	3	Leased	No	Units for homeless individuals
191-195 Bowdoin	8	Leased	No	New construction/family
2 Hardy Street	6	Leased	No	Family-new construction 2 & 3-BR
2147 Washington Street	8	Committed	No	New Construction – Family housing
25 Amory Street - Jackson Square	8	Leased	No	Family - new construction 1, 2, 3-BR
25 Sixth Street	8	Committed	No	New Construction – Family housing
250 Centre Street	8	Committed	No	New Construction – Family housing
250 Gull Pond Road, Wellfleet	2	Leased	No	Family - New construction of three two-unit townhouses
28 Mount Pleasant Street	2	Leased	No	Units for homeless individuals
288 Harrison Residences	8	Committed	No	New Construction – Family housing
32 Kent Street	8	Leased	No	Family and Elderly/Disabled units
32 Old Ann Page Way	2	Leased	No	Family and Elderly/Disabled units
370 Essex Street	8	Committed	No	New construction/family
370 Harvard Street	8	Leased	No	New Construction/elderly
40A Nelson Avenue	3	Leased	No	Family units
430-436 Dudley Street	3	Leased	No	Units for homeless individuals
447 Concord Road	4	Leased	No	Family units
4-6 Ashland Street	3	Leased	No	Units for homeless individuals
46-48 School Street	2	Leased	No	Family units

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
470 Main Street	7	Leased	No	Family and Elderly/Disabled units
48 & 52 Franklin St & 348 Chestnut St	24	Leased	No	Family - Rehab with 1, 2, and 3 BR units
48 Water Street	6	Leased	No	Units for homeless individuals
48-64 Middlesex Street	6	Leased	No	Family units
5 Benefit Street	4	Leased	No	Family units
525 Beach Street	7	Leased	No	Family and Disabled - Three units reserved for disabled - new construction of four-story building
555 Merrimack	8	Committed	No	New Construction – Family and Disabled
57 Main Street	4	Leased	No	Family - PHA-owned rehab of three-story, mixed-use building
571 Revere Street	8	Leased	No	Family-new construction 2 & 3-BR
58 Harry Kemp Way	4	Leased	No	Family units
580 South Summer Street	12	Leased	No	Family - Rehab with 1, 2, and 3 BR units
6 Fort Street	8	Leased	No	Family and Elderly/Disabled units
66 Hudson at One Greenway	8	Leased	No	Disabled - PBV units reserved for disabled; new construction of 10-story high-rise
75 Amory Avenue	8	Leased	No	Family - New construction rental PBVs at 30% AMI
75 Cross Street	8	Leased	No	Supportive services
82 Green Street	10	Leased	No	Units for homeless individuals
86 Dummer Street	2	Leased	No	Family - New construction of rental in a three-story building
885C State Highway	1	Leased	No	Family - New construction - 40B project
9 Leyland Street	8	Committed	No	New Construction – Elderly housing
9 May Street	8	Leased	No	Family and Elderly/Disabled units
910 Main Street/Windrush	8	Committed	No	New Construction – Elderly housing
98 Essex	7	Leased	No	New construction/family
Acre High School Apartments	8	Leased	No	Family and Elderly/Disabled units
Acushnet Commons	3	Leased	No	Family units
Ames Privilege 2	4	Leased	No	Family - Substantial rehab of historic mill complex
Ames Shovel Works/Main and Oliver Streets	8	Leased	No	Family - Substantial rehab of historic factory complex
Amory Street/10 and 20 Amory Avenue	10	Leased	No	Family units

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Anchor Point I	8	Leased	No	New Construction – Family housing
Appleton Mill Apartments	8	Committed	No	New Construction – Elderly housing
Armory Street Apartments	1	Leased	No	Disabled - PBV unit reserved for disabled; new construction of four-unit building
Austin Corridor II	5	Leased	No	Family - Substantial rehab of six separate buildings
Baker Street	20	Leased	No	Family units
Barnstable Family/Kimber Woods	7	Leased	No	Family units
Barnstable Senior/Lombard Farm	8	Leased	No	Elderly/Disabled units
Bartlett Station (Building A)	8	Leased	No	New construction/family
Baystate Place Apartments	8	Committed	No	New Construction – Family housing
Bellingham Hill Family Homes	7	Leased	No	Supportive - Individual Service Plans (ISP) tailored to tenant needs. Services vary and can include: GED, parenting classes, employment training, financial management, referrals to other provider agencies
Benfield Farms/South Street	5	Leased	No	Elderly - New construction facility for the elderly
Bentley Apartments	8	Leased	No	Family-new construction 2 & 3-BR
Berkshire Peak (formerly Riverview Homes)	8	Leased	No	Disabled - Units reserved for disabled; new construction
Bethany Hill School	10	Leased	No	Family units
Blanchard School	6	Leased	No	Adaptive reuse family units
Bliss School	8	Leased	No	Family units
Borinquen Apartments (formerly Villa Borinquen)	8	Leased	No	Family and Elderly/Disabled units
Boston YWCA	13	Leased	No	Units for homeless individuals
Bostwick Gardens	8	Leased	No	New construction and Rehab, elderly, at 50% AMI
Bowers Brook	4	Leased	No	Elderly/Disabled units
Breezy Acres Expansion/Great Cove Community	8	Leased	No	Family - New construction of five duplex buildings
Brewster Woods	7	Committed	No	New Construction – Family housing
Bridgeview Center	8	Leased	No	Family and Disabled - New construction of mixed-use, multi-story building
Briscoe Village	8	Committed	No	New Construction – Senior Housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Broadway Building	4	leased	No	New Construction – Family housing
Broadway Building	4	Leased	No	new construction/Family
Brockton South TOD	8	Committed	No	New Construction – Family housing
Brook Ave.	4	Leased	No	Rehab/family units
Burbank Gardens	8	Leased	No	Rehab/family units
Burbank Terrace	7	Committed	No	New Construction – Family housing
Cabot Housing	8	Leased	No	New Construction SRO
Cabot Street Homes	8	Leased	No	Elderly/Disabled units
Campbell-Purcell	8	Leased	No	New construction, family units at 30% AMI
Canal Bluffs III (Highmeadows)	7	Leased	No	Family- new construction 2 + 3-bedroom units
Capen Court	8	Leased	No	Elderly/Disabled units
Capital Square Apartments	8	Leased	No	Family units
Carpenters Glen	8	Leased	No	Family - Rehab of existing townhouse-style development
Carter School	8	Leased	No	Substantial Rehab--Adaptive Reuse, Family units at 50% AMI
Casa Familias Unidas	8	Leased	No	Supportive services
Central Building	8	Leased	No	Substantial Rehabilitation of an historic building creating mixed-income rental units; 50 affordable, 5 market rate
Chapin School Veterans Housing	43	Leased	No	Adaptive reuse of former school for Veterans
Chestnut Crossing	8	Leased	No	Mod Rehab, 0-BR units at 50%
Chestnut Park Apartments	8	Leased	No	Family - Adaptive reuse of former church and school; 85, 95, 57-60 Chestnut Street, 218 Hampden Street
Clay Pond Cove	8	Leased	No	Family units
Cliftex Phase II	8	Committed	No	Adaptive reuse of a mill
Cole Ave.	8	Leased	No	Family - new construction 2 & 3-BR
Colonel Lovell's Gate Apartments	44	Leased	No	Family - Preservation
Commonwealth Apartments	88	Leased	No	Expiring Use Project - Family - 88 out of 106 EVs converted to PBVs
Conant Village	15	Leased	No	Family units
Congress Street Residences	8	Leased	No	Family - New construction; Dow, Palmer, Congress, Perkins, Ward Streets

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Conifer Hill Commons II	8	Leased	No	Family - Six units have disabled preference; new construction of three-story townhouse
Conifer Hill Commons Phase I	8	Leased	No	Family - Six units have disabled preference; new construction of three-story townhouse
Coolidge at Sudbury	8	Leased	No	Age-Restricted (55+ older) - New construction of four-story building
Coolidge at Sudbury Phase II	8	Leased	No	New construction/Family
Coolidge School Apts.	4	Leased	No	Elderly/Disabled units
Coppersmith Village Apartments, Boston	8	Leased	No	New Construction/Family
Cordovan at Haverhill Station	8	Leased	No	Family units
Cottage Square	8	Leased	No	Family - Adaptive reuse of former mill (four stories)
Counting House Lofts	6	Leased	No	Family - Adaptive reuse of historic mill (six stories)
Cumber Homes Apartments/Cumberland and Dwight	8	Leased	No	Family units
Cutler Heights	7	Leased	No	Family and Elderly/Disabled units
Dalton Apartments	8	Leased	No	Family - Substantial rehab of existing multifamily housing; 11 separate buildings
Depot Crossing	8	Leased	No	Family units
Depot Village I	5	Leased	No	Family - new construction 2 & 3-BR
Doe House	5	Leased	No	Units for homeless individuals
Downing Square Broadway Initiative	3	Leased	No	Family-new construction 3-BR
Downtown Brockton TOD	8	Leased	No	Family-new construction 2 & 3-BR
Duck Mill/Union Crossing Phase II	8	Leased	No	Family - Adaptive reuse of historic mill; PBVs serve 30% AMI families
Eagle Mill Phase I	8	Committed	No	New Construction – Family housing
Earle Street	15	Leased	No	Family units; supportive services
East Howard Street/Veterans Housing	8	Leased	No	Supportive Housing - Veterans preference; new construction, one building
Edmands House	59	Leased	No	Expiring Use Project - Family - 59 out of 68 EVs converted to PBVs
Elias Brookings Apartments	8	Leased	No	New Construction – Family housing
Fina House	7	Leased	No	Family units

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Firehouse Place	4	Leased	No	Family and Elderly/Disabled units
First Lowell	30	Leased	No	Expiring Use Project - Family - 30 out of 37 EVs converted to PBVs
Fitchburg Place	8	Leased	No	Elderly/Disabled units
Fitchburg Yarn Mill	8	Leased	No	Family units
Forest Springs, Great Barrington	5	Leased	No	Family - New construction
Founders Court/979 Falmouth Road	2	Leased	No	Family units
Four Addresses in Arlington/Summer Broadway Bow Webster	4	Leased	No	Family units; 29 Bow Street, 288B Summer Street, 77 Webster Street, 222 Broadway
Four Corners Plaza	8	Committed	no	New construction – Family housing
Four Corners Plaza	8	Leased	no	new construction/family
Freedom Village	6	Leased	No	Family and Elderly/Disabled units
Gateway Residences on Washington	8	Leased	No	Family - New construction mixed-use building
General Heath Square Apartments	8	Leased	No	New construction, family units
Gerson Building, Haverhill	8	Leased	No	New construction, family housing, 70% veteran's preference at 50% AMI
Glen Brook Way I	8	Leased	No	New construction/family
Glen Brook Way Phase 2	8	Committed	No	New Construction – Family housing
Golda Meir House Expansion	20	Committed	No	New Construction/elderly
Goshen Senior Housing, Goshen	6	Leased	No	Elderly - New construction
Grand Street Commons	8	Leased	No	New Construction – Family housing
Grandfamilies House	8	Leased	No	Supportive services
Granite Street Crossing	8	Committed	No	New Construction – Family housing
Granite Street Housing	5	Leased	No	Supportive services
Greater Four Corners Stabilization - Pilot, Boston	2	Leased	No	Family - Scattered site rehab of four buildings
Hadley Building	8	Leased	No	Family - Historic rehab of former furniture store
Harbor and Lafayette Homes	4	Leased	No	Moderate Rehabilitation with existing tenants
Harbor Cove/63 Washington Avenue	24	Leased	No	Supportive services
Harbor Village	8	Leased	No	Family-new construction 2 & 3-BR
Hayes	4	Leased	No	Elderly/Disabled Units
Haywood House	8	Committed	No	New Construction/elderly



Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Hearth at Four Corners	8	Leased	No	Elderly - new construction
Hearth at Olmstead Green	15	Leased	No	Elderly/Disabled units
Herring Brook Hill (River Street)	8	Leased	No	New construction
High Rock Homes	8	Leased	No	Family units
Highland Terrace	8	Leased	No	Family and Elderly/Disabled units
Highland Village	110	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Hillcrest Acres	8	Committed	No	New Construction – Family housing
Hillside Avenue	5	Leased	No	Family and Elderly/Disabled units
Hillside Village	16	Leased	No	Family units
Holbrook Center Senior Housing	8	Committed	No	New Construction – Elderly housing
Holcroft Park Apartments	8	Leased	No	Family and Elderly/Disabled units; 30 Mill Street; 10, 22, 30 Grant Street
Holcroft Park Homes Phase II	8	Leased	No	Family and Elderly/Disabled units
Holtzer Park	8	Leased	No	Family - new construction 1, 2, 3-BR
Holyoke Farms Apartments	8	Leased	No	Rehab/family units
Home Together	4	Leased	No	Family - New construction of two duplex buildings
Hope in Action	49	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - seven scattered sites/two towns
Indigo Block	8	Leased	No	Family-new construction 2 & 3-BR
Ingraham Place	8	Leased	No	Supportive services
Island Creek North	8	Leased	No	Age-Restricted (55+ older) - New construction; one four-story building
Island Creek North/Age Unrestricted	8	Leased	No	New construction - One four-story building; fitness center/community room
Island Parkside Phase 1	8	Committed	No	New Construction – Family housing
Island Parkside Phase 2	8	Committed	No	Family
Ivory Keys Apartments	8	Leased	No	Family - Substantial rehab of historic former piano factory
Jackson Commons	8	Leased	No	Family - New construction of four-story building
Janus Highlands	8	Leased	No	Family units
Jewel Crossing, North Attleboro	8	Leased	No	Family - New construction; mixed income
John J Meany Senior	8	Committed	NO	Elderly

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Julia Bancroft	8	Committed	No	New Construction – Elderly housing
Kaszanek House, Malden	8	Leased	No	Rehab of 11-unit SRO facility with a homeless preference
Kendrigan Place	8	Leased	No	Family - Rehab of existing six-story building
Kennedy Building Apartments, Hanover	4	Leased	No	Family - Adaptive reuse of old school building
Kensington Court @ Lakeville Station	8	Leased	No	Family units
KGH Phase 4	5	Leased	No	Family and Elderly/Disabled units
King Street	5	Leased	No	Supportive services
Kings Landing	78	Leased	No	Expiring Use Project - Family - 78 out of 108 EVs converted to PBVs
King's Lynne Apartments	176	Leased	No	Existing family housing
Knitting Mills	8	Leased	No	New construction
Knox Residence I	8	Committed	No	New Construction – Family housing
Knox Residence II	8	Committed	No	New Construction - Family housing
Lafayette Housing	8	Leased	No	Family units; 10 Congress Street, 3-13 Prince Street Place
Lawson Green Apartments	8	Leased	No	Elderly - new construction
Lenox Schoolhouse, Lenox	4	Leased	No	Age Restricted (55+ older) - Existing project changing from Assisted Living to 55 and older
Library Commons	5	Leased	No	Rehab/family units
Lighthouses	8	Committed	No	New Construction – Family housing
Lincoln Hotel	63	Leased	No	Family units
Little Pond Place	4	Leased	No	New Construction/family
Littleton Drive Senior	8	Committed	No	New Construction – Elderly housing
Loft @ 30 Pines (formerly Heywood Wakefield 4)	8	Leased	No	Family - Substantial rehab of historic former mill
Loring Towers	8	Leased	No	Family units
Loring Towers 2	138	Leased	No	Expiring Use – Family housing
Lower Winter Street	8	Committed	No	New Construction – Homeless
Ludlow Mill, Ludlow	8	Leased	No	Age Restricted (55+ older) - Adaptive reuse of historic mill building
Lunenburg Senior Living	8	Leased	No	New construction/family
Lydia Square Apartments Phase 1	8	Leased	No	Elderly - new construction
Malden Mills Phase II	7	Leased	No	Family - Adaptive reuse of historic mill building into 62 units

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Marion Village Estates/Front Street/Route 105	8	Leased	No	Family - New construction of two buildings/two stories
Maple Woods	8	Committed	No	Elderly/Disabled units
Marshall Place Apartments	8	Leased	No	Elderly/Disabled units
Mary Stone	8	Leased	No	Elderly - new construction
Mashpee Village Phase II	8	Leased	No	Family - Rehab of existing affordable housing; 51 garden-style buildings
Mashpee Wampanoag Housing	8	Leased	No	New construction, family housing, 30% AMI
Mason Square Apartments II	8	Leased	No	Family-new construction 2 & 3-BR
Mattapan Station 4%	6	Leased	No	Family - new construction 2 & 3-BR
Mattapan Station 9%	2	Leased	No	Family - new construction 2-BR
Mayhew Court	12	Leased	No	Family units
McCarthy Village/Whittlesey Village	12	Leased	No	Family - New construction of six duplexes on surplus housing authority land
McElwain School Apartments	8	Committed	No	New Construction – Family housing
Mechanic Mill	8	Leased	No	Rehab.
Mechanic Mill 2017	8	Leased	No	Substantial Rehab-Adaptive Reuse, Family units at 30%
Melpet/Route 134 Community Housing	7	Leased	No	Family - New construction of eight farmhouse-style buildings
Merrimack Place	8	Committed	No	New Construction – Elderly housing
Middlebury Arms	49	Leased	No	Expiring Use Project - Family - 49 out of 62 EVs converted to PBVs
Mildred Hailey Building 1A	4	Committed	NO	Family
Mildred Hailey Building 1B	4	Committed	No	New Construction - Family housing
Mill 8 Apartments	8	Committed	No	New Construction – Elderly housing
Montello Welcome Home	8	Leased	No	Supportive Housing - Homeless preference; new construction of 20-unit building (+1-2units)
Montello Welcome Home II	8	Leased	No	New construction. Supportive housing services- homeless preference.
Moran Square Redevelopment	8	Leased	No	New construction/family
Morgan Woods/Pennywise Path	6	Leased	No	Family units
Moseley Apartments	6	Leased	No	Substantial Rehab--Adaptive Reuse, Family units at 30% AMI
Noquochoke Village	8	Leased	No	Family- New construction

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
North Bellingham Veterans Home	8	Leased	No	Supportive Housing - Veterans preference; substantial rehab of legion post
North Square at the Mill District	8	Leased	No	New construction, family units at 30% AMI
North Village	134	Leased	Yes	RAD (Rent Supp) - Existing Family Housing; 12 townhouse-style buildings
Northampton Lumber Yard Apts.	8	Leased	No	New Construction/family
Ocean Shores	8	Leased	No	Elderly/Disabled units
Old High School Commons	6	Leased	No	Family and Elderly/Disabled units
Olmsted Green 100	8	Leased	No	New construction, family housing at 50% AMI
Olmsted Green Affordable Rental IV	8	Leased	No	Family-new construction 1, 2, 3-BR
Olympia Oaks	8	Leased	No	Family - New construction; 11 buildings
One Beach	8	Leased	No	Age-Restricted (55+ older) - New construction; four stories/elevator
Oscar Romero	8	Leased	No	Family and Elderly/Disabled units
Outing Park I	94	Leased	Yes	RAD (Mod Rehab) - Families - Existing multi buildings
Outing Park II	81	Leased	Yes	RAD (Mod Rehab) - Families - Existing multi buildings
Oxford Ping on 3-4 Ping Street	4	Leased	No	Disabled - New construction of 10-story (w/elevator) building: PBV units reserved for disabled
PAC 10 Lofts Phase II	8	Committed	No	New construction/family/disabled
Paige Apartments	8	Leased	No	Supportive - Individual Service Plans (ISP) tailored to tenant needs. Services vary and can include GED, parenting classes, employment training, financial management, referrals to other provider agencies
Palmer Cove	6	Leased	No	Family and Elderly/Disabled units, supportive services
Paradise Pond Apartments	8	Leased	No	Family units
Parcel 25 Phase 1A, Boston	8	Leased	No	Family - New construction; five-story, mixed-use building
Parcel 25 Phase II	8	Leased	No	New Construction/family
Parcel 8 & 9	8	Leased	No	New Construction – Family housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Parcel 8 & 9 Hamilton Canal District	8	Leased	No	Family - new construction 0 & 1-BR
Pelham House	3	Leased	No	Elderly/Disabled units
Pilot Grove Apartments II	7	Leased	No	Family - New construction of five townhouse buildings
Pine Woods	5	Leased	No	Family and Elderly/Disabled units
Plaza Apartments	8	Committed	No	New Construction – Family housing
Powderhouse Village	8	Leased	No	Elderly/Disabled units
Prichard Academy	2	Leased	No	Family - Rehab of two four-story buildings
Prospect Hill	4	Leased	No	Family units
Puerta de la Esperanza	27	Leased	No	Family - Rehab with 1, 2, and 3 BR units
Putnam Green	8	Leased	No	Family units
Reed House Annex	8	Leased	No	Supportive services
Renwood-PWA Ltd. Part./158 Walnut Avenue	8	Leased	No	Supportive services
Renwood-PWA Ltd. Part./36 Edgewood Street	3	Leased	No	Supportive services
Renwood-PWA Ltd. Part./526 Mass. Avenue	7	Leased	No	Supportive services
Residences at Brighton Marine	8	Leased	No	New construction, family units 100% preference for veterans
Residences at Canal Bluff	3	Leased	No	Family units
Residences at Fairmount Station	6	Leased	No	New Construction/family
Residences at Stonybrook	4	Leased	No	Family units
Residences at Stonybrook Phase II	8	Leased	No	Family - New construction of seven townhouse-style buildings
Residences at Yarmouth Gardens	8	Leased	No	New Construction – Family housing
Residences off Baker	8	Committed	No	New Construction – Family housing
Reviviendo	3	Leased	No	Units for homeless individuals; 105 Newbury Street, 105 Haverhill Street, 60 - 62 Newbury Street, 10 Jackson Terrace
Rice Silk Mill	5	Leased	No	Family units
River Street	4	Leased	No	New construction elderly (60+) 1-BR units at 30%
Robert Hill Way Senior Apartments	8	Leased	No	Elderly - new construction
Rosewood Way Townhouses	8	Committed	No	New Construction – Family housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
RTH Riverway	8	Leased	No	Disabled - Units reserved for disabled; new construction of 10-story building
Ruggles Assisted Living	35	Leased	No	Supportive services
Russell Terrace	2	Leased	No	Units for homeless individuals
Sacred Heart	8	Leased	No	Elderly/Disabled units; 23 Hawley Street, 30 Groton Street, 32 Groton Street
Salem Harbor	4	Leased	No	Family units
Salem Heights	72	Leased	No	Family units
Salem Point LP/Harbor, Ward, Peabody Streets	7	Leased	No	Family units; 43, 57-59, 64 Harbor; 43 Ward; and 38 Peabody Street
Sally's Way	4	Leased	No	Family - New construction of six buildings on town-owned land (99-year lease)
Sanford Apartments	5	Leased	No	Family units
Saunders School Apartments	16	Leased	No	Supportive services
Senior Residences at Machon	8	Leased	No	55+ new construction
Shoe Shop Place	5	Leased	No	Family - Adaptive reuse of an old mill creating rental housing
Simon C. Fireman Expansion	8	Committed	No	New Construction – Elderly housing
Chestnut Redevelopment	8	Leased	No	Existing housing rehab/family
Sirk Building	8	Leased	No	Family units
Sitkowski School	8	Leased	No	Elderly - Substantial rehab of former school
Southbridge Mills	5	Committed	No	New Construction – Family housing
Southgate Place	6	Leased	No	Family and Elderly/Disabled units
Spencer Green	8	Leased	No	Family and Elderly/Disabled units
Spencer Row	8	Leased	No	Family and Elderly/Disabled units
Spring Gate	181	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Spring Hill	37	Leased	Yes	RAD (Rent Supp) - Existing Family Housing - two-story, townhouse-style buildings
Spring Meadow	52	Leased	No	Expiring Use Project - Family - 52 out of 98 EVs converted to PBVs
Squantum Gardens/The Moorings	39	Leased	No	Elderly/Disabled units
Squirrelwood	2	Leased	No	Rehab & New Construction – Family housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
St. Joseph's Apartments	4	Leased	No	Family units
St. Joseph's Redevelopment	8	Leased	No	Family (3 units) and Disabled (5 units) - New construction of four-story, mixed-use building
St. Polycarp I	8	Leased	No	Family and Elderly/Disabled units
St. Polycarp-Phase II	8	Leased	No	Family units
St. Polycarp-Phase III	8	Leased	No	Family and Disabled - Three units reserved for disabled - new construction of three-story building
St. Theresa Condo I	8	Leased	No	New construction/elderly
St. Theresa Condo II	8	Leased	No	New construction elderly
Stable Path Residences	5	Leased	No	Family - New construction of 10 buildings (2- and 3-bedroom townhouses)
Stage Coach Residences	6	Leased	No	Family (4 units) and Disabled (2 units) - New construction/surplus PHA land
Steven's Corner	8	Leased	No	Family and Elderly/Disabled units
Stone Mill	8	Committed	No	New Construction – Family housing
Sudbury	11	Leased	No	Family units; 41 Great Road, 56 Great Road, 11 Ford, 19 Greenwood, 10 Landham
Summerhill Glen	89	Leased	No	Expiring Use Project - Family - 89 out of 120 EVs converted to PBVs
Sycamore on Main	8	Leased	No	New Construction – Family housing
Tapley Court	8	Leased	No	Family and Elderly/Disabled units
Tavernier Place	7	Committed	No	New Construction – Elderly housing
Tenney Place Phase I	8	Leased	No	Family - New construction of two buildings
Tenney Place Phase II	8	Leased	No	New Construction/family
Terrapin Ridge	8	Leased	No	New Construction/family
Thankful Chase	5	Leased	No	Family and Elderly/Disabled units
The Flats @ 22 (formerly Standard Box Apartments)	5	Leased	No	Family and Disabled - Four units reserved for disabled; new construction/townhouse style
The Kendall	8	Leased	No	Existing SRO; six units at 50% AMI and two units at 30% AMI
The Pryde	8	Committed	No	New Construction – Elderly housing
The Residences at Salisbury Square	8	Leased	No	Family - New construction of affordable rental housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Ticoma Green Workforce Housing	8	Committed	No	New Construction – Family housing
TILL Building	5	Leased	No	Family units
Tri-Town Landing	8	Leased	No	Family - New construction on site of former drive-in
Tri-Town Landing I	8	Leased	No	Family units
Tri-Town Landing II	8	Leased	No	Family - New construction of three-story building; former drive-in
Twelve Summer Street	4	Leased	No	Family units
Union Crossing	8	Leased	No	Family units
Union Street Lofts	5	Leased	No	Existing/family housing
Unity House	8	Leased	No	Family units; supportive services
Unquity House	139	Leased	Yes	RAD (Rent Supp) - Existing Elderly Housing - one high rise
Veteran's Supportive Housing/1323 Broadway Street	7	Leased	No	Supportive Housing - Homeless veterans; rehab of former nursing home
Veterans Park Apartments/Schoolhouse Green	8	Leased	No	Elderly/Disabled units
Village at 815 Main	5	Leased	No	Family units
Village at Hospital Hill	8	Leased	No	Elderly/Disabled units
Village at Hospital Hill II	8	Leased	No	Elderly/Disabled units
Village at Lincoln Park	3	Leased	No	Family - New construction on former amusement park site
Village at Lincoln Park Senior, Dartmouth	8	Leased	No	Elderly - New construction
Village at Nauset Green (formerly Campbell-Purcell)	8	Leased	No	New construction – Family housing
Village Center/Haydenville	6	Leased	No	Family - Rehabilitation of seven scattered site buildings: 11, 13 South Main Street; 1 North Main Street; 148 Main Street; 12 Williams Street; 397 Main Road; Chesterfield
Village Green Phase I	6	Leased	No	Family – New construction of two, three-story buildings
Village Green Phase II	8	Leased	No	Family - New construction - Phase II - PBVs are at 30% AMI
Wadleigh House	7	Leased	No	Supportive services
Washington Square	8	Leased	No	Family and Elderly/Disabled units
Washington Street SRO, Malden	4	Leased	No	Rehab of SRO facility (three-story building) preference for disabled



Property Name	Number of Project-Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Washington Westminster House	8	Leased	No	New Construction/family
Water Mill (formerly Whitney Carriage)	8	Leased	No	Family and Elderly/Disabled units
Wells School Apts	8	Leased	No	Adaptive re-use
Westfield Hotel	5	Leased	No	Supportive services
Westhampton Senior	3	Leased	No	Elderly/Disabled units
Westhampton Woods/Senior Housing-Phase II	2	Leased	No	Elderly - New construction of four duplex buildings
Westport Village Apartments	12	Leased	No	Elderly/Disabled units
Whipple School Annex	8	Leased	No	Elderly/Disabled units
Wilber School	8	Leased	No	Family units
Wilkins Glen	82	Leased	No	Expiring Use Project - Family - 82 out of 103 EVs converted to PBVs
Winter Gardens	6	Leased	No	Family and Elderly/Disabled units
Winter Street	13	Leased	No	Family - Workforce rental housing
Winthrop Apartments	8	Leased	No	Elderly - New construction of four-story building
Woodland Cove I	8	Committed	No	New Construction – Family housing
Woodland Cove II	8	Committed	No	New Construction – Family housing
Woods at Wareham	19	Leased	No	Expiring Use Project - Family - 19 out of 22 EVs converted to PBVs
Worcester Loomworks 2	8	Leased	No	Family - New construction (55 units); former mill site
Yarmouth Green	7	Leased	No	New construction, family housing at 30% AMI
YMCA	30	Leased	No	Elderly/Disabled units; two units for homeless individuals
YWCA Market Street	4	Leased	No	Family - Rehab of an existing five-unit building plus a new addition for five units
Zelma Lacey Mishawum	20	Leased	No	Supportive services
<b>Total: Planned Existing Project-Based Vouchers</b>	<b>4,658</b>			

*v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year*

Table 5: Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Description
EOHLC does not own or manage any federally funded public housing.

*vi. General Description of All Planned Capital Expenditures During the Plan Year*

Table 6: General Description of All Planned Capital Expenditures During the Plan Year

<b>Description</b>
EOHLC does not own or manage any federally funded public housing nor does it receive public housing capital funds from HUD.

**Leasing Information**

*i. Planned Number of Households Served*

Table 7 below provides information only on MTW households that EOHLC plans to serve during FY 2024. In total, EOHLC expects to serve 21,165 MTW households.

**Table 7: Planned Number of Households Served**

<b>Planned Number of Households Served Through:</b>	<b>Planned Number of Unit Months Occupied/Leased</b>	<b>Planned Number of Households to Be Served</b>
MTW Public Housing Units Leased	N/A	N/A
MTW Housing Choice Vouchers (HCV) Utilized	251,232	20,936
Local, Non-Traditional: Tenant-Based	1,032	86
Local, Non-Traditional: Property-Based	1,716	143
Local, Non-Traditional: Homeownership	N/A	N/A
<b>Planned Total Households Served</b>	<b>253,980</b>	<b>21,165</b>

**Table 7A: Local, Non-Traditional Housing Programs**

<b>Local, Non-Traditional Category</b>	<b>MTW Activity Name/Number</b>	<b>Planned Number of Unit Months Occupied/Leased</b>	<b>Planned Number of Households to Be Served</b>
Tenant-Based	Family Economic Stability Program (FESP)	468	39
Tenant-Based	Youth Transition to Success Program (YTTSP)	252	21
Tenant-Based	Expanding Housing Opportunities: Relocation Assistance	300	25
Tenant-Based	Residential Assistance for Families in Transition/ERMA (RAFT/ERMA)	0	0
Tenant-Based	Massachusetts Student Housing Security Pilot	12	1
Property-Based	Affordable Housing Preservation and Development Fund	1,716	143
Homeownership	N/A	N/A	N/A
<b>Planned Households Served – Local Non-Traditional Programs</b>		<b>2,748</b>	<b>229</b>

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

**Table 8: Anticipated Issues and Possible Solutions Related to Leasing**

<b>Housing Program</b>	<b>Description of Anticipated Leasing Issues and Possible Solutions</b>
MTW Public Housing	N/A
MTW Housing Choice Voucher	EOHLC does not anticipate any leasing issues in the MTW HCV program.
Local, Non-Traditional	Vouchers issued under the FES Program generally serve clients in the Boston area. There is a lack of available affordable housing options in the

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
	<p data-bbox="620 233 1390 296">Boston housing market, which has impacted the leasing success rate of FES participants searching for housing in this area.</p> <p data-bbox="620 338 1414 571">Two local non-traditional programs will be placed on hold or will be otherwise decreasing enrollment during FY 2024: The RAFT/ERMA activity will be on hold in FY 2024 (see Section IV, Part C) as the MTW resources are no longer needed for this program. The Massachusetts Student Security Pilot will be ending partway through FY 2024, and it is only anticipated that one student will be served during the first half of FY 2024.</p>

## Waiting List Information

### *i. Waiting List Information Anticipated*

**Table 9: Waiting List Information Anticipated**

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Housing Choice Voucher Program, Federal Non-MTW Housing Choice Voucher Units	Other*	54,830	Open	Yes
Tenant-Based Local Non-Traditional MTW Housing Assistance Program	Other**	223	Open	Yes

\*EOHLC combines site-based and centrally managed waitlist features. All of EOHLC's Section 8 programs (including MTW and Non-MTW vouchers) use a regional, centrally managed waitlist with the exception of Project Based developments.

\*\*The Tenant-Based Local Non-Traditional MTW Housing Assistance Program listed in the chart above represents the Family Economic Stability (FES) Program waitlist. The waitlist for this program is managed by Metro Housing|Boston. Applicants must meet certain requirements such as working at least part-time or participating in a full-time job training program.

#### **Describe any duplication of applicants across waiting lists:**

The individuals on the Local Non-Traditional Waiting List for the FES program may also be on the Federal HCV Waiting List.

### *ii. Planned Changes to Waiting List in the Plan Year*

EOHLC does not have any planned changes to the waiting list:

Waiting List Name	Description of Planned Changes to Waiting List
No Changes	No Changes

### III. Proposed MTW Activities

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EOHLC is proposing two (2) new MTW activities for FY 2024:

1. Alternative Verification Methods
2. Income Eligibility

## Activity 2024-1: Alternative Verification Methods

### Activity Description

This activity will allow EOHLC to utilize an alternative, streamlined method to verify household member income for program applicants and participants. EOHLC intends to implement these alternative verification methods to streamline program administration and reduce administrative burdens to benefit both clients and the agency. Outlined below are the proposed verification changes.

- Extend the time that verification documents are valid. Under existing program requirements, verification documents are acceptable only if they are dated within 60 days from the date of request. The following changes are proposed:
  - Applicants: Verifications may not be dated more than 120 days from the date of voucher issuance.
  - Participants: Verifications for reexaminations may not be dated more than 120 days from the effective date of the transaction.
  - Fixed Sources of Income: Verification documents for fixed income sources such as Social Security, Social Security Disability Insurance (SSDI), and pension income will be valid for the full calendar year in which the income is effective. For example, if a Social Security or SSDI benefit letter is dated February 1, 2023, that benefit letter will be valid for any certification with an effective date in 2023.
- Increase the threshold for when it is mandatory to obtain additional verification documentation when there is a substantial difference in reported income. EOHLC will increase the discrepancy threshold to \$5,000. EOHLC and its designees will continue to identify income discrepancies and take action to process discrepancies which may result in interim or annual correction actions; however, the threshold for the discrepancy will be set at \$5,000.
- Revise the HUD Verification Hierarchy: Under the existing HUD Income Verification Hierarchy, EOHLC is required to request and document attempts to obtain written third-party verification forms and oral verification prior to relying on a participant self-certification. EOHLC's modified Income Verification Hierarchy will allow EOHLC and its designees to rely on any of the third-party verification methods before accepting self-certification. This process will streamline the verification process and allow EOHLC and its designees to repurpose staff time on tasks outside of verification.

Level	Verification Technique	Ranking
4	Upfront Income Verification using HUD's EIV and IVT	Highest (Mandatory)
3	Upfront Income Verification using non-HUD system	Highest (Optional)
2	Written Third-Party Verification; Written Third-Party Verification Form; or Oral Third-Party Verification	High (Mandatory) <ul style="list-style-type: none"> <li>▪ Supplements EIV and UIV</li> <li>▪ Also used for: <ul style="list-style-type: none"> <li>○ Non-EIV/UIV reported income sources</li> <li>○ Disputes of EIV reported information</li> </ul> </li> </ul>
1	Self-Certification	High (Optional) <ul style="list-style-type: none"> <li>▪ To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or</li> <li>▪ When participant cannot produce written third-party verification documents.</li> </ul>

**Statutory Objective**

This activity supports the MTW objective of cost effectiveness by simplifying and streamlining the verification of income while also ensuring accurate calculation of rent and subsidy amount.

**Anticipated Impact**

The alternative verification methods activity will apply to all program applicants and participants. As the new verification methods will simplify and streamline the income verification process, it is not projected to create any hardships for applicants or participants. Program applicants and participants may request an informal review/hearing to dispute the calculations used to determine income and rent. EOHLC will follow its applicable policies on informal reviews/hearings.

**Anticipated Timeline**

EOHLC projects that the alternative verification methods will begin to be used starting with admissions and recertifications processed on or after July 2023.



### Activity Metrics Information

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<b>Total Time Spent on Activity Prior to Implementation:</b> 18,659 hours  <b>Number of Recertifications*:</b> 8,293  <b>Time per Recertification:</b> 2.25 hours	<b>Anticipated Total Time Spent on Activity in FY:</b> 17,272 hours  <b>Anticipated Number of Recertifications:</b> 8,636  <b>Time per Recertification:</b> 2.00 hours		
<i>*Baseline represents the number of recertifications completed as of FY 2022 MTW Report</i>				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	28%	24%		
<i>*Baseline represents the tenant rent error rate as of the FY 2022 MTW Report</i>				

### Cost Implications

This is a cost/revenue neutral activity. While the screening and recertification processes will result in time savings for staff, metric CE #1 Agency Cost Savings does not apply as the staff time savings resulting from these efficiencies will be re-purposed for other job duties and no positions are proposed to be eliminated as a result of this activity.

### Need/Justification for MTW Flexibility

This activity requires waiver of certain provisions of Section 8 of the Housing Act of 1937 and 24 CFR 982.516 as found in the MTW Agreement Attachment C, Section D, Paragraph 3. These waivers are necessary to implement the various provisions of this activity and EOHLIC's Annual MTW Plan.

### Rent Reform/Term Limit Information

Not applicable.

## Activity 2024-2: Income Eligibility

### Activity Description

Income limits as established by HUD for program eligibility vary by location. As per 24 CFR 982.201(b)(4), the applicable income limit for issuance of a voucher **when the family is selected** for the program is the **highest** income limit (for the family size) for areas in the PHA jurisdiction. The applicable income limit for **admission** to the program is the income limit for the area where the family is **initially assisted** in the program.

Because EOHLC administers vouchers through a statewide network of RAAs and because EOHLC's jurisdiction includes the entire state of Massachusetts, assisted households may utilize their voucher anywhere in the state without needing to exercise portability. Income limits may vary in different regions of Massachusetts, and thus a household that is deemed eligible at issuance (using the highest income limit for the entire Massachusetts jurisdiction) may be ineligible for admission in the community in which they already reside or in a nearby community (even one that may be covered by the same RAA).

Thus, under this activity, EOHLC proposes to waive the second component of 24 CFR 982.201(b)(4) requiring that the household be income eligible in the area in which the household will be initially assisted. Instead, EOHLC proposes to apply the PHA jurisdiction's highest income limit (for the family size) not only at the issuance of a voucher but also at the time of admission to the program. This will reduce administrative burden on EOHLC and RAA staff as well as program participants. Even more importantly, it will also result in additional housing choice for participants, as the two-tiered policy of 24 CFR 982.201(b)(4) may be more relevant in the case of portability or a wider geographical jurisdiction, but internally in Massachusetts, it has the unintended, and contrary, consequence of limiting housing choice across the state but even in participant's own immediate communities.<sup>1</sup>

*Note: The standard provisions of 24 CFR 982.201(b)(4) will still apply to households who exercise portability outside of EOHLC's jurisdiction and/or to another PHA. Additionally, EOHLC will continue to ensure that at least 75 percent of assisted households are "very low-income," that substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations, and that a comparable mix of families are assisted under the Agreement as would have been otherwise.*

### Statutory Objective

This activity supports the MTW objective of cost effectiveness by simplifying and streamlining the verification of income while also providing for accurate calculations. Additionally, it increases housing choice as households will have the option to move anywhere within EOHLC's jurisdiction (all of Massachusetts) without risk of losing voucher assistance due to the requirement to re-verify income eligibility, especially in an area that may have a lower income limit.

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<sup>1</sup> One example EOHLC has observed is a family residing in Brockton whose income is within the jurisdiction's highest income limit (Boston) but is higher than the Brockton income limit, and thus they are able to receive a voucher but are then unable to lease in their own community.

**Anticipated Impact**

This activity will apply to all program applicants and new participants and is not projected to create any hardships. Program applicants may request an informal review to dispute the calculations used to determine income at the time of eligibility. EOHLC will follow its applicable policies on informal reviews.

**Anticipated Timeline**

EOHLC projects that this activity will be implemented beginning with vouchers issued after HUD approval of the activity.

**Activity Metrics Information**

<i>CE #2: Staff Time Savings</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<p><b>Total Time Spent on Activity Prior to Implementation:</b> 527 hours</p> <p><b>Number of MTW Tenant-Based New Admissions during FY:</b> 351 (used CY2022 as baseline)</p> <p><b>Time Spent Determining Eligibility:</b> 1.5 hours</p>	<p><b>Anticipated Total Time Spent on Activity in FY:</b> 351 hours</p> <p><b>Anticipated Number of MTW Tenant-Based New Admissions during FY:</b> 351</p> <p><b>Time Spent Determining Eligibility:</b> 1 hour</p>		

**Cost Implications**

This is a cost/revenue neutral activity. While the activity will result in time savings for staff, metric CE #1 Agency Cost Savings does not apply as the staff time savings resulting from these efficiencies will be re-purposed for other job duties and no positions are proposed to be eliminated as a result of this activity.

**Need/Justification for MTW Flexibility**

This activity requires waiver of certain provisions of Sections 16(b) and 8(0)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as authorized in the MTW Agreement Attachment C, Section D, Paragraph 3. Specifically, this activity waives provisions of 24 CFR 982.201 as noted above and is necessary to implement the various provisions of this activity and EOHLC’s Annual MTW Plan.

**Rent Reform/Term Limit Information**

Not applicable.

## IV. Approved MTW Activities

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This section of the Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by EOHLC. As required, this section also includes summary information on MTW activities that have not yet been implemented, activities placed on hold by EOHLC, and closed out activities.

EOHLC has updated the metrics in the approved activities to reflect HUD's guidance that *MTW PHAs are required to track all applicable "Standard HUD Metrics" under each implicated statutory objective for each MTW activity*. Accordingly, standard metrics which EOHLC determined were not applicable to the identified statutory objective were removed.

### A. Implemented Activities

#### Activity 2000-1: Family Economic Stability (FES) Program

##### **Plan Year Approved, Implemented, Amended**

Approved FY 2000 and implemented FY 2001.

##### **Description/Update**

The Family Economic Stability (FES) Program is an assistance model, which provides a fixed annual stipend for five years to eligible families, regardless of future income or family composition changes. Within certain guidelines, participants exercise considerable decision-making in the utilization of the funds, including unit selection and use of support funds. Case management and program coordination is provided by Metro Housing|Boston staff. Participants may select any housing unit, which they deem affordable and appropriate for their needs and which passes a Housing Quality Standards inspection. The FES program also assists participants in reaching their goals related to increasing earned income, career progress, improving credit and financial literacy skills, increasing asset base, and developing a three-year housing stability plan.

Eligibility for the FES Program is targeted to low-income working families who meet the following criteria:

- Are committed to maintaining employment and agree to provide information to assess the effectiveness of the program;
- Families who are working at least part-time, who are imminently employed, or who are enrolled in a full-time job-training program; and
- At voucher issuance, household income must be sufficient to ensure that the tenant share of rent, with the subsidy, is no more than 40% of the monthly income.

FES provides participants with a "flat subsidy" that is not tied to household income. When a participant increases their earned income, as required by the program, their rent subsidy will not decrease. Conversely, if participants lose their jobs, their subsidy will not increase. FES staff and participants work closely to manage employment stability to avoid sudden loss of income. Participants are supported in their housing search and selection to determine the most affordable unit based on family size and counseled to consider the challenges of a flat subsidy when selecting potential housing. Participants are

also required to participate in financial coaching. EOHLC will continue to review and adjust subsidy levels for consistency with housing costs.

Metro Housing| Boston is the only RAA that operates a FES program and anticipates serving 50 households in their FES Program in FY 2024. The FES Program currently has a waitlist of 223 households.

### **Program Extensions**

EOHLC, on a case-by-case basis, may extend the rental subsidy for an additional six months following a loss of earned income as a result of an economic/health/natural disaster emergency as declared by the Governor or his/her designee.

### **Hardship Policy**

All of the hardship criteria below relate to hardships caused by economic/health/natural disaster emergencies as declared by the Governor or his/her designee and are only applicable during such emergencies.

- **Subsidy:** In the event of job loss, and a resulting rent burden greater than 40% of household income, participants may request to have their subsidy temporarily returned to their enrollment subsidy level. EOHLC will review and approve these requests in consultation with Metro Housing| Boston.
- **Support Funds:** EOHLC will waive the policy prohibiting the use of support funds for rent share in the event of job loss. Note: in order to maintain the availability of flexible support funds to meet other needs, all other available financial supports will be reviewed before releasing support funds.
- **Escrow Funds:** EOHLC will allow the use of accrued escrow funds to make payments for essential expenses such as rent and utilities, including internet access if enrolled in online classes. Note: in order to maintain the availability of escrow funds to maintain an asset base, all other available financial supports will be reviewed before releasing escrow funds.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024. EOHLC will be examining the FES program's current impact and assessing whether any changes (e.g., expansion to other regions) are warranted.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the anticipated outcomes in FY 2024. The metric for SS #2 will only be reported for graduates of the program during the plan year to more accurately reflect program outcomes. Additionally, the baseline for SS #3 was updated to reflect the baseline participation numbers for the one agency that is administering the FES program. At initial implementation there were two agencies administering the FES program.

**Metrics**

<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$18,937	\$30,000		
<b>SS #2: Increase in Household Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of <b>escrow</b> of households affected by this policy in dollars (increase).	\$0.00	\$1,150		
Average amount of <b>savings</b> of households affected by this policy in dollars (increase).	\$0.00	\$2,500		
<i>*These metrics are reported only for graduates of the program during the plan year.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	1 participant	8 participants		
	1% of participants	16% of participants		
Employed Part-Time or Full-Time	50 participants	42 participants		
	99% of participants	84% of participants		
Enrolled in an Educational Program or Job Training**	0 participants	4 participants		
	0% of participants	8% of participants		
<p><i>*Baseline numbers represent data from when the program switched from two administering agencies to one. Currently only 1 agency administers the FES program, and the target participation is 50 households.</i></p> <p><i>**Participation in education is required only at some point in the program. Totals will vary based on when current participants participate in their required education component.</i></p>				

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	4 households in FY 2015	7 households		
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0 households	50 households		
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 households	6 households*		
<i>*Self-sufficiency is defined as graduation from the FES Program.</i>				

**Planned Significant Changes**

No significant changes are planned.



## Activity 2010-2: Payment Standard Exceptions

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010. Amended in FY 2024.

### Description/Update

Under this MTW initiative, EOHLC is authorized to approve any documented and reasonable exception to payment standards as a reasonable accommodation for HCV households with disabled household members without HUD approval.

This policy is utilized without regard to the percentage increase requested over the payment standard. Generally, EOHLC will not impose a limit on the number of exception payment standards; however, EOHLC reserves the right to limit the number of payment standard exceptions when and if budgetary issues arise.

EOHLC will continue to utilize its MTW authority to approve payment standard exceptions without prior HUD approval. EOHLC does not anticipate any significant changes to the volume of requests and outcomes for reasonable accommodation payment standard exceptions in FY 2024.

### Planned Non-Significant Changes

EOHLC proposes to use MTW flexibility, as authorized in Attachment C, Section D.2.a of the Amended and Restated MTW Agreement, to adopt reasonable payment standards that may differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This may include setting EOHLC's HCV payment standards based on certain percentages of HUD's Small Area Fair Market Rents to align with current local rental markets, to increase voucher utilization, and to expand housing choice.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the latest modification to this activity. In addition to including the number of households approved for a payment standard exception as a reasonable accommodation, the benchmark and outcome will also include all households that lease up in a new unit (including new admissions and relocations) after any changes are made to EOHLC's payment standard formula.

### Metrics

<b>HC #5: Increase in Resident Mobility*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	200 households		
<i>*These metrics include the total annual number of households that lease up in a new unit (including new admissions and relocations), as well as the number of households that submit payment standard exception requests that are granted as a reasonable accommodation.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2010-4: Development of Local Forms

### Plan Year Approved, Implemented, Amended

Approved FY 2010, implemented FY 2013, amended FY 2024.

### Description/Update

Under this initiative, EOHLIC develops local versions of forms, as needed, to streamline processing, utilize “plain language,” address MTW policies, and address local housing market features. New forms are rolled out to RAA contractors as they are completed.

To date, EOHLIC has developed an addendum to the PBV HAP contract to reflect EOHLIC’s MTW policies, a local version of the FSS Contract of Participation and Individual Training and Service Plan, and a local version of the Privacy Act and Release Form.

In FY 2024, EOHLIC anticipates finalizing and implementing local versions of the Request for Tenancy Approval, the HCV Tenancy Addendum, the Project Based Tenancy Addendum, and PBV Statement of Family Responsibility to reflect differences between the provisions in the documents and EOHLIC’s MTW policies. While the new forms do not result in agency savings, the new forms more accurately reflect EOHLIC’s MTW program and policies.

EOHLIC will continue to look for new ways to streamline processing and enable greater staff efficiency while maintaining required data elements and transparency.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2024.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2024.

### Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<b>Total Cost Prior to Implementation:</b> \$243,302	<b>Total Cost:</b> \$119,178		
	<b>Number of Assisted Households:</b> 22,351	<b>Number of Assisted Households:</b> 20,936		
	<b>Total Time per Form:</b> 0.5 hours	<b>Total Time per Form:</b> 0.25 hours		
	<b>Avg. Hourly Rate:</b>	<b>Avg. Hourly Rate:</b>		

	\$21.77	\$22.77		
<i>*Baseline reflects the revised metric methodology implemented in FY 2022.</i> <i>**Benchmark reflects the number of planned HCV assisted households.</i>				
<b>CE #2: Staff Time Savings</b>				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<b>Total staff time required prior to implementation:</b> 11,176 hours  <b>Number of Assisted Households:</b> 22,351  <b>Total Time per Form:</b> 0.5 hours	<b>Total staff time required after implementation:</b> 5,234 hours  <b>Number of Assisted Households:</b> 20,936  <b>Total Time per Form:</b> 0.25 hours		
<i>* Baseline reflects the revised metric methodology implemented in FY 2022.</i> <i>** Benchmark reflects the number of planned HCV assisted households.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2011-2: Supporting Neighborhood Opportunity in Massachusetts (SNO Mass)

**(Formerly Your Choice Program & Opportunity Neighborhoods)**

### **Plan Year Approved, Implemented, Amended**

Approved FY 2011 and implemented FY 2020.

### **Description/Update**

Under this initiative, EOHLC established the Supporting Neighborhood Opportunity in Massachusetts (SNO Mass) Program. The purpose of EOHLC's SNO Mass MTW initiative is to provide significant supports and encouragement to existing voucher participants and/or new voucher holders who wish to move to areas with empirically documented high-quality schools, healthy environments, and other opportunities. These communities have historically been "off-limits" to voucher holders due to market and administrative restrictions. Through SNO Mass, EOHLC is increasing housing choice for its voucher holders.

Existing participants and/or voucher holders interested in moving into opportunity neighborhoods are provided with counseling both before and after the move through the participating RAAs. Participating households are eligible to receive up to one month's approved contract rent to assist with security deposits plus up to \$2,500 for other allowable pre- and post-move expenses to assist families with accessing services and educational and extracurricular activities for their children in their new neighborhood.

SNO Mass is offered at all RAAs statewide with SNO Mass Mobility Specialists available at each RAA. Mobility Specialists complete family assessments to determine priorities and establish a housing plan that meets each family's needs. Once families are situated in their new neighborhoods, Mobility Specialists remain engaged for two years to provide post-move counseling. In FY 2024, EOHLC will continue to focus on support for existing voucher holders; however, the program may be expanded in future fiscal years to offer services to new voucher holders. EOHLC anticipates providing program orientation to 145 interested households in FY 2024 and providing counseling to 120 households. EOHLC's goal is to enroll and engage 90 households in housing search and ultimately move or lease up 55 households in identified opportunity neighborhoods.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2024.

**Metrics**

<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	55 households		
<i>*While RAAs will provide orientation to 145 interested households, EOHLC expects only 55 households will move/lease up a unit in a neighborhood of opportunity in FY 2024.</i>				
<b>HC #7: Households Assisted by Services that Increase Housing Choice</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0 households	145 households		

**Planned Significant Changes**

No significant changes are planned.

## Activity 2011-4: Multi-Year Recertifications

### (Formerly Biennial Recertification Process)

#### Plan Year Approved, Implemented, Amended

- Biennial Recert and Limit on Interim Recerts: Approved FY 2011; implemented and modified FY 2012.
- Triennial Recert: Approved FY 2020 and implemented FY 2021.

#### Description/Update

Under this initiative, the following recertification policies apply:

- Biennial recertifications for all MTW households;
- Annual recertification for zero-income households;
- Triennial recertifications for elderly/disabled households with fixed income only (SS/SSI/pension);
- Limit the number of voluntary interim recertifications that an MTW family may complete between regular biennial recertifications to two (2). Required interim recertifications do not count against the limit. The following households are exempt from this provision and are able to complete an interim recertification at any time: elderly and disabled households, households that live in an Expiring Use project on the conversion date and select a PBV, households participating in the SNO Mass program, and FSS households;
- Any household that believes they would benefit by an annual recertification may request an annual income recertification. If a household has requested and is approved for an annual recertification frequency, EOHLC will allow one voluntary interim recertification between annual recertifications.

In FY 2024, EOHLC will continue the biennial recertification process and the triennial recertification process for elderly/disabled households on fixed income. EOHLC continues to benefit from overall cost and time savings for processing biennial and triennial recertifications. As families generally do not have to report increases in income between biennial and triennial recertifications, this activity also has a positive financial impact for families.

#### Hardship

During a state of economic/health/natural disaster emergency declared by the Governor or his/her designee, EOHLC may temporarily lift the limit on voluntary interim rent reductions for non-exempt families.

#### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2024.

#### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2024.

**Metrics**

<i>CE #2: Staff Time Savings*</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<p><b>Total Time Spent on Activity Prior to Implementation:</b> 50,745 hours</p> <p><b>Number of vouchers:</b> 20,298</p> <p><b>Time per Recertification:</b> 2.5 hours</p>	<p><b>Anticipated Total Time Spent on Activity in FY:</b> 19,431 hours</p> <p><b>Anticipated Number of Recertifications:</b> 8,636</p> <p><b>Time per Recertification:</b> 2.25 hours</p>		
<i>*Accounts for time savings from Biennial/Triennial Recertifications &amp; Rent Simplification</i>				

**Planned Significant Changes**

No significant changes are planned.



## Activity 2011-5: Youth Transition to Success Program (YTTSP)

### **Plan Year Approved, Implemented, Amended**

Approved FY 2011 and implemented FY 2013. Amended in FY 2021.

### **Description/Update**

EOHLC initially designed and implemented a time-limited program to provide continued support to and build upon the successes of youth currently participating in its Family Unification - Aging Out of Foster Care Program that are facing the expiration of their subsidy. As the demand for FUP vouchers continued to grow, EOHLC has expanded the YTTSP throughout the years. YTTSP now provides subsidies and support to a broader group of youth, which includes FUP AOP referrals, “College” referrals from DCF, and referrals for individuals enrolled in a full-time designated employment program, referred from other providers outside of DCF. Participants receive a shallow, short-term, and time-limited subsidy; supportive services; funds for education, training, and employment-related expenses; an escrow account; and case management. Where DCF services are required for participation in this program, participation in the program ends when DCF services end.

EOHLC continues to review program eligibility requirements, subsidies, and incentives and may modify such program features in order to better serve program participants and enhance efforts for self-sufficiency. Any such modifications will be included in future MTW plans.

The following outlines eligibility requirements:

#### ***FUP AOP Referrals:***

- Referred by DCF
- Participated in FUP AOP for no less than 18 months
- Employed for at least 12 hours per week
- Enrolled in an education or training program at the time of referral. This includes individuals who are currently enrolled in a GED program as well as those who have completed nine (9) college level credits, but who may not have completed a full year of college
- Participant in good standing under FUP AOP, including no tenancy violations and current on rent
- Income eligible for the HCV Program; and
- Meet other EOHLC eligibility screening requirements.

#### ***College Referrals:***

- Referred by DCF
- Enrolled in a full-time or part-time moving to full-time post-secondary degree or Associate’s Degree program at the time of referral. This includes individuals who have completed 9 college level credits, but who may not have completed a full year of college
- Income eligible for the HCV Program; and

- Meet other EOHLC eligibility screening requirements.

***Other Agency Referrals:***

- Enrolled in a full-time designated employment program;
- Income eligible for the HCV Program; and
- Meet other EOHLC eligibility screening requirements.
- Note: These types of referrals were accepted in 2018-2019. Participants received a 5-year flat rent subsidy. All of those subsidies will end during FY 2024. It is not expected that referrals of this type will be accepted going forward.

YTTSP will provide participants with:

- A flat rental subsidy that holds steady for the first two years and then steps down annually by 15% for the final three years.
- A matched savings account up to \$800/year; and
- An annual support budget of \$500 for expenses related to sustaining employment and meeting educational goals.

During periods of economic/health/natural disaster emergencies, as declared by the Governor or his/her designee, the following activity changes will be in effect:

**Program Extensions**

Any participant who is scheduled to graduate from the program during the six-month period starting from the Governor’s declaration of emergency will be eligible to receive rental subsidy for an additional six months from their planned graduation date. EOHLC may consider longer extensions if necessary, to allow participants to complete their educational program.

**Employment Requirements:**

- Employment requirements are suspended (but not requirements to pay tenant share of rent) if a participant experiences a job loss or reduction in hours as a result of the emergency. In the event that third party verification is not available, EOHLC will process the change using a self-certification and will follow up with third party verification and confirmation from DCF staff.

**College Enrollment/Job Training Enrollment**

- If a current participant can document that they are unable to meet online enrollment requirements of their educational institution and/or the enrollment requirements of their job training program, EOHLC will waive enrollment in an education or job training program as a requirement for ongoing participation until the next semester after the declared emergency has been lifted. If in-person classes resume earlier, this waiver will end.
- In the event that third party verification of education/training enrollment status is not available, EOHLC will process the enrollment using a self-certification and will follow up with third party verification and confirmation from DCF staff.

## Hardship Policy

- **Subsidy:** In the event of job loss, participants may request in writing to have their subsidy returned to their enrollment subsidy level. In the event that third-party verification is not available, EOHLC will process the change using a self-certification and will follow up with third party verification and confirmation from DCF staff.
- **Subsidy:** Until the state of emergency is lifted, rent subsidies will not be reduced in Years Three and Four.
- **Support Funds:** EOHLC will waive the policy prohibiting the use of support funds for rent share, in the event of job loss. Note: in order to maintain the availability of flexible support funds to meet other needs, all other available financial supports will be reviewed before releasing support funds.
- **Escrow Funds:** EOHLC will allow the use of accrued escrow funds to make payments for essential expenses such as rent, utility payments including internet access if enrolled in online classes. Note: in order to maintain the availability of escrow funds to maintain an asset base, all other available financial supports will be reviewed before releasing escrow funds.

In FY 2024, EOHLC anticipates a total of 30 households will be served by this activity.

## Planned Non-Significant Changes

There are no non-significant changes planned for FY 2024.

## Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the anticipated outcomes in FY 2024.

## Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0.00	\$380,000*		
<i>*This number is tied to the number of participants.</i>				
<i>SS #1: Increase in Household Income*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$9,492 for current YTTSP participants at time of enrollment	\$35,000		
<i>*Benchmark reflects only those participants from other agency referrals.</i>				

<b>SS #2: Increase in Household Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$1,500 savings		
<i>*The benchmark reflects only FUP AOP and college track referrals.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	0 participants	3 participants (out of 10 total)		
	0% of participants	30% of participants		
Employed Part-Time or Full-Time	7 participants	7 participants (out of 10 total)		
	100% of participants	70% of participants		
Enrolled in an Educational Program or Job Training	7 participants	17 participants (out of 20 total)		
	100% of participants	85% of participants		
<i>*For employment and unemployment, benchmark and outcome reflect only those participants from other agency referrals. For education and job training, the benchmark and outcome reflect only FUP AOP and college track referrals.</i>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	0 households	4 households		
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0 households	30 households		

<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 households	8 households		
<i>*Self-sufficiency is defined as graduation from the YTTS Program.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2012-1: MTW Utility Allowances

### Plan Year Approved, Implemented, Amended

- UAP \$25 or less
  - Approved FY 2012
  - Implemented FY 2012
- Simplified UA Schedule – Heat only
  - Approved FY 2014
  - Implemented FY 2014
- Other Electricity
  - Approved FY 2016
  - Implemented FY 2017
- Discretionary Periodic UA Review
  - Approved FY 2019
  - Implemented FY 2019
- Introduction of UAs for Cooking and Hot Water
  - Approved FY 2023
  - Implemented FY 2023

### Description/Update

Under this initiative, EOHLC established a simplified Utility Allowance (UA) schedule and eliminated Utility Allowance Payments under \$25. In FY 2014, EOHLC designed a UA model that eliminated all utility allowances except for heat. However, in FY 2017, in response to concerns about rising electricity costs, EOHLC implemented a revision to the UA model to include a utility allowance for other electricity. Finally, under this activity, EOHLC modified its UA policy to reflect discretionary periodic review of HCV utility allowance schedules to determine if adjustments are required. Annual updates are no longer required. EOHLC maintains UA schedules for tenant-paid heat and other electricity that are based upon normal consumption by energy-conscious households as well as by unit size. EOHLC's UA schedules do not vary by geographical area and/or building type. Utility allowances for any other tenant paid utilities are not provided. EOHLC determines reasonable accommodations for utilities on a case-by-case basis.

EOHLC implemented the following changes to its MTW Utility Allowance activity in FY 2023 for all new entrants or recertifications after February 1, 2023:

- EOHLC implemented an updated utility allowance schedule for other electricity which reflects changes in electricity rates.
- EOHLC added utility allowances for cooking and hot water heating to address some of the additional financial pressures placed on low-income families. The UA schedule for cooking and hot water heating is based on normal consumption by energy-conscious households. The UA schedule does not vary by geographical area or building type. EOHLC is adding the cooking and hot water heating UA to any household who pays for heat or other electricity for a period of two years. At the end of the two-year period, EOHLC will evaluate utility costs and inflationary trends

and will determine whether to maintain the UA for cooking and hot water heating, to adjust it, or to discontinue it.

**Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

**Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the changes in MTW utility allowances.

**Metrics**

<i><b>CE #1: Agency Cost Savings*</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	\$31,476,912	\$37,611,396		
<i>*Represents total utility allowances with additional UAs added back.</i>				
<i><b>CE #2: Staff Time Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<p><b>Total staff time prior to implementation:</b> 2,256 hours</p> <p><b>Time required to calculate UA:</b> 8 minutes</p> <p><b>Number of UAs calculated in FY 2013:</b> 16,919</p>	<p><b>Anticipated total staff time after implementation:</b> 1,433 hours</p> <p><b>Time required to calculate UA:</b> 5 minutes</p> <p><b>Anticipated number of UAs:</b> 17,195</p>		
<i><b>CE #3: Decrease in Error Rate of Task Execution</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	10%	7%		

<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average Tenant Rent Share (increase).	\$382 per household in FY 2014	\$323 per household		
<i>*EOHLC does not have any rental revenue and has been instructed by HUD to report on Average Tenant Rent to Owner.</i>				

**Planned Significant Changes**

No significant changes are planned.



## Activity 2012-4: Expiring Use Preservation Initiative

### Plan Year Approved, Implemented, Amended

Approved FY 2012 and implemented FY 2013.

### Description/Update

This initiative was designed to preserve the long-term affordability of expiring use properties. EOHLC will make use of the resources provided by HUD in the form of Enhanced and Tenant Protection Vouchers to continue the affordability of the units in these projects by converting eligible units immediately to Project-Based Units with a 15-year affordability period.

Since its approval, this initiative has been modified so that MTW flexibilities may extend to units converted to PBV under RAD. Additionally, EOHLC modified the income eligibility requirements for tenants who occupy units at the time of a RAD conversion to the PBV program.

In FY 2024, EOHLC does not anticipate any additional developments will be added to its expiring use or RAD inventory. To date, EOHLC has 9 expiring use contracts with a total of 546 units under HAP contract. Additionally, EOHLC has completed 8 Rental Assistance Demonstration (RAD) conversion projects and currently provides a subsidy for 825 units under this program.

### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2024.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

### Metrics

<b>HC #2: Units of Housing Preserved</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 housing units	1,371 housing units*		
<i>*Previously EOHLC had included only Expiring Use units when setting benchmarks and determining outcomes for this metric. This figure includes all RAD and Expiring Use units, and EOHLC will continue to use this methodology going forward and does not include any additional units for FY 2024.</i>				

### Planned Significant Changes

No significant changes are planned.

## Activity 2012-5: Family Self Sufficiency Program Enhancements

### Plan Year Approved, Implemented, Amended

Approved FY 2012 and implemented FY 2013.

### Description/Update

EOHLC uses MTW funds to enhance the existing Family Self-Sufficiency (FSS) Program. These features will encourage participation and successful completion of the program. Features include, but are not limited to:

- Providing matched savings for clients who would otherwise be ineligible for the escrow component of FSS due to their level of earned income at the time they join the program (Savings Match Homeownership Program);
- Providing flexible funds for expenses that would otherwise present barriers and thus prevent participants from maintaining or starting employment and/or enrolling in education or job training; and
- Establishing a \$5,000 incentive payment for FSS graduates that choose to withdraw from the HCV Program within 2 years of completion of the FSS Program and who purchase homes.

In November of 2013, EOHLC also began providing “gap” funding to address financial barriers to employment and increase long-term economic capacity by providing participants with incentives to complete education and training programs before entering the workforce.

In January 2014, EOHLC implemented the revisions to the enhanced FSS program including:

- Placement of an absolute cap on the amount of escrow regardless of prior FSS participation at any of EOHLC’s RAAs statewide. The cap, which may be periodically reviewed and updated at EOHLC’s discretion, will be set at \$25,000 per household. Education and job training incentive payments provided under the FSS program will be counted toward the escrow cap. Homeownership incentive payments, Jump Start awards, and earned interest are not applied to the escrow cap.

To encourage the goal of homeownership for applicable households in the FSS Program, EOHLC obtained approval to modify its current FSS Program to allow certain households to define a path to homeownership by utilizing individualized homeownership education, financial coaching, required workshops, and a modified savings/escrow component. EOHLC continues to offer the previously approved goal-specific incentive payments as well as the matched savings homeownership incentive. This component of EOHLC’s FSS program provides higher income households with the opportunity to supplement the traditional escrow model with a EOHLC match of individual savings. In this way EOHLC is able to assist more families to realize the goal of homeownership.

EOHLC has implemented local versions of the FSS Contract of Participation (COP) and Individual Training and Services Plan (ITSP). The local versions of the COP and ITSP allow EOHLC to reflect MTW program requirements and incentives for FSS participants.

EOHLC anticipates that approximately 50 new participants will join the FSS Program with a total participation of 825 FSS participants in FY 2024. Additionally, EOHLC anticipates that 126 households will graduate from the FSS program in FY 2024 with an average escrow balance of \$4,700.

### **Planned Non-Significant Changes**

As mentioned, EOHLC utilizes a local MTW version of the Contract of Participation (CoP) form to reflect its MTW policies. The MTW CoP and FSS Action Plan materials have been updated to incorporate FSS Final Rule provisions, as required by HUD. Additionally, in FY2024 EOHLC proposes the following modifications to its MTW FSS program and related policies:

- Term of the CoP: EOHLC proposes to continue to utilize a 5-year term on all FSS CoPs, with the effective date of the CoP to be the first day of the month following the date the contract is executed (rather than the first reexamination of income after the CoP execution date) and the initial expiration date to be five years from the first day of the month following CoP execution. This will enable participants to enroll and begin escrowing more quickly and will provide greater clarity on the start and end dates for the 5-year term of the contract.
- Mandatory Goals: EOHLC proposes to establish the following additional mandatory goals for all FSS participants, as applicable:
  - For participants enrolled in the Savings Match Homeownership Program, graduation will also be incumbent on the participant completing five homeownership focused workshops.
  - All other FSS participants will be required to complete a financial budgeting workshop as a condition of graduation from FSS.
  - All FSS participants are required to maintain quarterly communication with the FSS Case Manager throughout the term of the CoP.
- Preliminary Escrow Credit: EOHLC will modify the calculation of preliminary escrow credit to reflect 30% of the growth in monthly earned income without consideration of the growth in monthly rent. This will allow households to escrow based on the increase in their earned income, regardless of whether or not there has been a change in TTP. EOHLC has conducted an impact analysis (see Appendix F) to determine the projected impact of this change on household escrow. This change is projected to result in an overall increase in participant escrow amounts, and EOHLC has budgeted funding to accommodate these changes.
- Maximum Escrow Amount: EOHLC proposes to modify the FSS escrow credit calculation to remove the maximum escrow amount, which caps the escrow at the lower of the Payment Standard or Gross Rent minus the Baseline Rent. This will streamline the calculation of escrow and provides participants with greater opportunity to increase their escrow.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2024. Note: HUD required all FSS programs to stop enrollment on June 15, 2022, until revised FSS Program Action Plans were approved by HUD. EOHLC's FSS Action Plan was approved in September 2022, but enrollment remained on hold until software vendors updated their programming to reflect final rule changes. EOHLC began enrollment on

November 1, 2022, and as such has reduced the metric benchmark for SS#5 to reflect the five-month pause in enrollment.

**Metrics**

<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$20,554	\$26,500		
<b>SS #2: Increase in Household Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of escrow of households affected by this policy in dollars (increase).	\$0.00	\$4,700		
<b>SS #3: Increase in Positive Outcomes in Employment Status*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	501 participants	219 participants		
	57% of participants	32% of participants		
Employed Part-Time or Full-Time	372 participants	465 participants		
	43% of participants	68% of participants		
<i>*Represents work-able households only.</i>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	162 households	70 households		

<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0	825		
<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	\$931 in FY 2014	\$1,252		
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Household contributions towards housing assistance (increase).	\$388 in FY 2014	\$550		
<i>*Represents Average Tenant Rent to Owner.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 households	126 households		
<i>*Self-sufficiency is defined as graduation from the FSS program.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2015-1: Rent Simplification

### Plan Year Approved, Implemented, Amended

Approved FY 2012; Implemented FY 2012 and modified FY 2016.

### Description/Update

In FY 2012, HUD approved EOHLC's Rent Simplification activity. In FY 2016, EOHLC received HUD approval on changes to the Rent Simplification activity; however, EOHLC has not implemented any of the changes except for the provisions outlined below. The components of rent simplification, which are currently in effect are as follows:

- Minimum Rent of \$50;
- Exclusion of all Full-Time Student Income;
- Streamlined Earned Income Disregard;
- Streamlined Asset Verification and Calculation;
- Application of the Payment Standard in effect on the effective date of the regular recertification, regardless of any change in the Payment Standard from year to year;
- Application of the Payment Standard used at the last regular recertification during an interim recertification with the following exception:
  - Where households on biennial and triennial recertification cycles have interim recertifications related to increases in contract rents, EOHLC will apply the payment standard in effect at the time of the interim recertification. Where the payment standard in effect at the time of the applicable interim recertification reflects a decrease when compared to the payment standard applied at the last regular recertification, EOHLC will not update the payment standard at the interim recertification and will wait until the next regular recertification to update the payment standard.
- Streamlined approach for calculation of unreimbursed medical expenses by using the prior year's paid, unreimbursed medical expenses plus prospective medical insurance premiums. Over-the-counter medications must be accompanied by a physician's prescription and paid receipt.
- Exclusion of 100% of income received from EOHLC-reviewed and -approved guaranteed income programs which is paid to support financial stability and economic equality.
- \$5,000 exclusion of earned income for working families (implemented FY 2023).

In addition to the provisions above, there are a number of rent simplification policies which HUD has approved and EOHLC has not yet implemented. EOHLC may implement these previously approved provisions in FY 2024.

- Revised Mixed Families rent formula where mixed families will pay an additional 10% of TTP regardless of the number of family members without citizenship or eligible immigration status;
- The income disregard for households with children who returned to the unit after completing two- or four-year post-secondary degree or accredited technical school programs.

Finally, in FY 2024 EOHLC may also review the current approved rent simplification activity and consider alternative models such as tiered rents or rents based on household size. Any such changes will be included in a subsequent MTW Plan Supplement or Annual Plan.

**Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

**Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2024.

**Metrics**

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	<p><b>Total Cost of Activity Prior to Implementation:</b> \$922,037</p> <p><b>Number of vouchers:</b> 20,298</p> <p><b>Time per Recertification:</b> 2.5 hours</p> <p><b>Average Hourly Staff Rate:</b> \$18.17</p>	<p><b>Anticipated Total Cost of Activity in FY:</b> \$442,444**</p> <p><b>Anticipated Number of Recertifications:</b> 8,636</p> <p><b>Time per Recertification:</b> 2.25 hours</p> <p><b>Average Hourly Staff Rate:</b> \$22.77</p>		
<i>*Baseline represents the metrics used when this activity was initially proposed.</i>				
<i>**Accounts for cost savings from Biennial/Triennial Recertifications &amp; Rent Simplification</i>				

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	<b>Total Time Spent on Activity Prior to Implementation:</b> 50,745 hours  <b>Number of vouchers:</b> 20,298  <b>Time per Recertification:</b> 2.5 hours	<b>Anticipated Total Time Spent on Activity in FY</b> 19,431 hours  <b>Anticipated Number of Recertifications:</b> 8,636  <b>Time per Recertification:</b> 2.25 hours		
<i>*Baseline represents the metrics used when this activity was initially proposed.</i>				
<i>**Accounts for time savings from Biennial/Triennial Recertifications and Rent Simplification.</i>				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease)	21% Average error rate for income and rent errors	19%		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Increase in agency rental revenue in dollars (increase)	\$382	\$308		
<i>*EOHLC does not have any rental revenue and has been instructed by HUD to report on average tenant rent to owner.</i>				

**Planned Significant Changes**

No significant changes are planned.



## Activity 2018-1: Expanding Housing Opportunities: Relocation Assistance

### **Plan Year Approved, Implemented, Amended**

Approved FY 2018 and implemented FY 2020.

### **Description/Update**

In FY 2018, HUD approved EOHLIC's Expanding Housing Opportunities activity. Under this Activity, EOHLIC uses MTW funding flexibility to support a comprehensive redevelopment program that will preserve existing state-aided low-income housing. Construction and long-term operating funding will be from state and private equity sources. MTW funds are primarily supporting rental subsidies, moving expenses, and start-up costs (e.g., security deposits, vacancy payments) associated with short-term housing for low-income residents during construction. No MTW funds will be used to support construction. Relocation assistance under this activity will be provided to eligible families at or below 80% of AMI.

EOHLIC issued an RFP and awarded planning grants to two Local Housing Authorities (LHAs), Somerville Housing Authority (SHA) and Chelsea Housing Authority (CHA), for the preservation and redevelopment of public housing.

The Chelsea project (Innes Apartments) closed in May of 2022, with relocation beginning in the spring. The project broke ground in the early part of FY 2023 with construction estimated to be completed toward the end of FY 2024 or early FY 2025. Fourteen households were temporarily relocated to private, market-rate units and are receiving an MTW-funded rent subsidy. An additional 46 households have temporarily relocated to other types of housing and will not require a rent subsidy but may be assisted with moving costs and other relocation-related expenses using MTW funding.

The Somerville project (Clarendon Hill) closed during the first quarter of CY 2023. Phase 1A of the project involves the demolition of 72 public housing units and the construction of 168 units, of which 130 represent public housing replacement units and 38 represent net-new affordable housing units. Most tenants in Phase 1A have been temporarily relocated to other parts of the Clarendon Hill development or to other Somerville Housing Authority public housing developments; MTW funds have been used to assist some of these tenants with relocation-related expenses. A total of 11 residents have temporarily relocated to privately-owned units and are currently receiving an MTW-funded rent subsidy. Construction is not anticipated to be completed for this project in FY 2024.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the outcomes in FY 2024.

**Metrics**

<i>HC #2: Units of Housing Preserved</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	0		
<i>HC #4: Displacement Prevention</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	0	100		

**Planned Significant Changes**

No significant changes are planned.

## Activity 2018-3: Vouchers for Special Populations

### (Formerly Support for the Secure Jobs Initiative: Vouchers and Services)

#### Plan Year Approved, Implemented, Amended

Approved FY 2018 and implemented FY 2019.

#### Description/Update

In FY 2018, HUD approved EOHLC's Support for the Secure Jobs Initiative: Vouchers and Services activity. Under this activity, EOHLC utilized MTW vouchers and MTW Block Grant funding flexibility to support and expand on the Secure Jobs Initiative (SJI), which provides integrated case management, employment supports, and housing assistance for homeless and low-income families.

EOHLC provided Housing Choice Vouchers to up to 50 eligible families referred from the SJI Program. Supportive services were provided to participants using MTW Block Grant funds and referrals from SJI were made upon completion of training or job placement. EOHLC screened SJI referrals per its Administrative Plan screening policies, and income, rent, and subsidy were calculated per EOHLC's MTW income and rent policies. As participants leave the program, EOHLC will reissue these vouchers as regular MTW program vouchers and they will no longer be allocated to a participant in the Secure Jobs Program.

The administering agency, Department of Transitional Assistance, via a lottery, referred eligible families to EOHLC for these vouchers. As of the end of FY 2023, 48 of the Secure Jobs vouchers were actively leased up. In FY 2024, it is not anticipated that any new vouchers will be issued to Secure Jobs participants.

#### Planned Non-Significant Changes

In FY 2024, EOHLC plans to expand this activity to allow vouchers to be set aside for other vulnerable populations in our communities. At this time, the state of Massachusetts is experiencing a homelessness crisis, with the number of households residing in EOHLC's Emergency Assistance (EA) family shelters at a record high and increasing rapidly. As a "right-to-shelter" state for families experiencing homelessness, the state has an obligation to provide shelter to all families who qualify. By providing vouchers to households referred from EA family shelters (and other types of shelters, as needed), EOHLC will be able to help relieve the pressure on our state's shelter capacity and provide permanent housing to some of the state's most vulnerable residents. In FY 2024, we anticipate setting aside up to approximately 250 vouchers for households referred by our shelter partners. Not all of these vouchers are expected to be fully leased up during FY 2024.

#### Planned Changes to Metrics/Data Collection

Given that the Secure Jobs component of this activity is no longer active and referrals will instead be coming from shelters and other service providers with the goal of connecting vulnerable households to housing opportunities, the cost effectiveness and self-sufficiency metrics no longer reflect the objectives or effectiveness of this activity. Housing choice metrics more accurately reflect the activity's objectives. As a result, EOHLC plans to remove the following metrics:

- CE #4: Increase in Resources Leveraged
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

- SS #5: Households Assisted by Services that Increase Self Sufficiency
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Agency Rental Revenue

EOHLC plans to add the following metrics:

- HC #5: Increase in Resident Mobility
- HC #7: Households Assisted by Services that Increase Housing Choice

**Metrics**

<i>HC #5: Increase in Resident Mobility*</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	180 households		
<i>*Defined as the number of households served by this activity that lease up in a unit using their voucher.</i>				
<i>HC #7: Households Assisted by Services that Increase Housing Choice*</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0 households	250 households		
<i>*Defined as the number of households served by this activity that are issued a voucher.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2018-5: A Better Life Program Model

### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2018.

### **Description/Update**

In FY 2018, HUD approved and EOHLIC implemented the “A Better Life” (ABL) Program Model activity. The ABL program serves eligible families in state-aided public housing developments and is intended to provide participants with skills necessary for meaningful employment and to effectively remove barriers to obtaining self-sufficiency. There are four main program components: work/participation requirements, comprehensive case management, community partnerships with local service providers, and an escrow incentive.

Under this activity, four Local Housing Authorities (LHAs) – Chelsea, Gloucester, New Bedford, and Taunton – received funding from EOHLIC to plan for the operation of the ABL program at their state-aided public housing developments. In FY 2019, EOHLIC awarded three of the four LHAs (Gloucester, New Bedford, and Taunton) implementation grants.

MTW Block Grant service dollars have gone to support Family Life Coaches at the three LHAs who conduct outreach to residents, inform them about the program requirements and benefits, and help them set personal goals in the areas of employment, education, family health and stability, and asset building. MTW funding is also used to cover expenses that will help participants pursue their employment goals (e.g., drivers’ education, training and certification fees). LHAs are leveraging existing relationships with local service providers and using the ABL grant to partner with new ones.

The work requirement component of ABL was not enforced during the pandemic. In the spring of 2022, EOHLIC worked in collaboration with the LHAs to revise the ABL requirements to make program compliance more attainable for residents; the revised policies took effect in FY 2023. EOHLIC also extended its contracts with the LHAs until spring 2024 to allow for more time to pilot the revised policies.

In FY 2024, LHA coaches will continue to provide one-on-one support to participants and connect them to resources to assist with removing barriers to employment. Additionally, coaches will continue to refer participants to education, training, and job opportunities. EOHLIC anticipates that approximately 425 participants (350 households) will receive services under this activity.

### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

### **Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect the anticipated outcomes in FY 2024. The definition of self-sufficiency was revised in the FY 2023 Plan to reflect a standard which could be tracked.

**Metrics**

<b>SS #1: Increase in Household Income*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$24,659	\$26,500		
<i>*Metrics reflect avg. earned income of participants who are receiving services under this program.</i>				
<b>SS #2: Increase in Household Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of savings/escrow of households affected by this policy (in dollars)	\$0	\$1,200		
<i>*Metric reflects avg. participant escrow which is one of the identified indicators of program success.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Unemployed	189	234		
	66%	55%		
Employed Part-Time or Full-Time	97	191		
	34%	45%		
Enrolled in an Educational Program or Job Training	0	43		
	0%	10%		
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	73	70 households 20%		

<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	286	350 households (425 participants)		
<b>SS #7: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Household contributions towards housing assistance (increase).	\$439	\$600		
<i>*Represents the avg. tenant rent for the 286 initial participating households.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0 participants	100 participants		
<i>*Self-sufficiency is defined as at least 35 hours of employment per week for an individual participant.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2018-7: Enhanced Local Project-Based Voucher Program

### Plan Year Approved, Implemented, Amended

Enhanced Local PBV: Approved and implemented FY 2018. PBV Site-Based Waiting Lists: Approved in FY 2010 and implemented in FY 2013.

### Description/Update

Through its Enhanced Local Project-Based Voucher (PBV) Program, EOHLC partners with for-profit and non-profit housing providers to expand the supply of affordable housing to low-income families. To meet the evolving needs of the Agency and the residents served, EOHLC enhanced and expanded its existing PBV program as follows:

- EOHLC authorized owners/managers of PBV developments to be responsible for all PBV waiting list intake and management functions for their developments. Applicants contact the owner/manager of a specific development in order to file an application. Applicant files and the waiting list itself are maintained at the development site. Owner/managers are responsible for contacting and screening applicants who come to the top of the waiting list, collecting all needed information from the applicant, and then forwarding the applicant to the RAA for eligibility determination and processing.
- Increase the 20% cap on PB units in EOHLC's portfolio. EOHLC will use 40% as the cap for budget authority allocated to Project-Based vouchers.
- Project base up to 100% of the dwelling units in any PBV project or building.
- Both initial and re-determined PBV rent to owner will not exceed the lowest of the following:
  - The reasonable rent;
  - The rent requested by the owner; or,
  - Such other amount determined by EOHLC to be appropriate for the unit, based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, EOHLC believes a shallower or higher subsidy may be more appropriate.
- Waive the option that allows PBV participant families to move with a tenant-based voucher after one year of assistance in a project-based unit, which has not yet been implemented.

EOHLC will retain its existing MTW policy and continue to allow project-based participant requests for tenant-based vouchers with threshold caps for each RAA. In a prior plan year, EOHLC received approval to discontinue providing tenant-based vouchers to project-based participants; however, EOHLC may choose not to implement this portion of the approved activity.

EOHLC's PBVs are allocated through the state's competitive rental round and in concert with the award of Low Income Housing Tax Credits. Proposal rounds are fluid and occur at different times throughout the year with related funding announcement made upon award. Given that EOHLC's MTW Plan is due to HUD prior to the award of FY 2024 PBV funding, EOHLC cannot identify which projects will be awarded PBVs at this time. Further, of the awards made, EOHLC cannot determine at this time which proposals will pass all screening thresholds and enter into AHAP or HAP contracts. EOHLC will report on all projects and PBVs



committed, issued, or leased in FY 2024 in the FY 2024 Annual Report. For purposes of the metrics in this activity, EOHLC estimates that approximately 250 new PBV units will be added throughout its jurisdiction in FY 2024.

**Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

**Planned Changes to Metrics/Data Collection**

HC #4 has been updated to reflect the total of existing PBVs and anticipated new PBVs in FY 2024. The number of anticipated new PBVs is projected based on prior fiscal years.

**Metrics**

<i>HC #4: Displacement Prevention</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease).	0	4,908		

**Planned Significant Changes**

No significant changes are planned.

## Activity 2018-9: Affordable Housing Preservation and Development Fund

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2018.

### Description/Update

In FY 2018, HUD approved and EOHLIC began the implementation of the Affordable Housing Preservation and Development Fund activity. Under this activity, EOHLIC utilizes MTW Block Grant funds to support the development and preservation of affordable rental housing units through implementation of a new Affordable Housing Preservation and Development Fund (AHPD). AHPD funds will provide loans or grants to eligible projects to leverage state-aided public housing capital resources, private equity, privately raised debt, tax credits, proceeds from land and property disposition, and other applicable local and federal resources to preserve and modernize units serving Extremely Low Income (ELI) populations while opening up opportunities for net-new housing production.

AHPD funds support the development and preservation of rental units targeted for households earning less than 80% of Area Median Income. EOHLIC requires deed restrictions or other legally binding covenants to ensure long-term affordability in conformance with HUD Notice PIH 2011-45 and/or other applicable HUD guidance. Where AHPD provides loans to a project, the minimum affordability term is thirty years unless otherwise approved by HUD. Units must meet HQS standards throughout the term.

Rental units funded through AHPD may be owned by a public housing authority, non-profit affiliates of a housing authority, or other public or private entities. Examples of the types of rental projects eligible for AHPD funds include:

- Existing state-aided public housing developments slated for preservation/redevelopment
- Newly proposed affordable developments involving LIHTC
- At-risk affordable developments nearing the end of their compliance period

EOHLIC will report on all funded activities through the MTW Annual Report.

In some cases, projects may be funded that involve the use of Housing Choice Vouchers, Project Based Housing Choice Vouchers, or Project Based Rental Assistance contracts. Any such projects will be subject to all applicable requirements established by HUD.

Projects funded through a competitive process will be eligible for these funds with a priority for projects that serve public housing residents, produce new housing units in addition to preservation through redevelopment with replacement, and/or include supportive services. EOHLIC will require any project involving redevelopment of public housing to include 1:1 replacement of public housing units with units serving a similar income level and having similar tenant protections.

Applicants for funding will be required to demonstrate experience in affordable housing development, commit to comply with all requirements of the MTW funds, and meet other EOHLIC eligibility requirements. Only projects that demonstrate readiness to proceed will be eligible for funding. EOHLIC will evaluate the status of necessary zoning and permitting approvals, the status of architectural documents, and the status of other funding commitments to determine project readiness.

The following projects have been funded under this activity and are now complete.

- **Cambridge Housing Authority:** MTW funding was used to substantially rehab three state-aided public housing sites for disabled individuals totaling 25 units. MTW funding of \$1.1 million was used to leverage another \$422,000. A construction contract was awarded and Notice to Proceed was issued in FY 2021. Construction was completed in FY 2022, and there is no further work anticipated on this project for FY 2024.
- **Boston Housing Authority, Camden Apartments:** MTW funding of approximately \$4 million leveraged approximately \$25 million in other funding sources (including permanent debt, federal 4% LIHTC, state and federal historic tax credits, a seller note, and FHLB soft debt) to preserve an apartment building built in 1949, consisting of 72 units. Relocation of existing tenants and phased, substantial rehabilitation of the property began in FY 2019. The scope of work included updating the fire alarm system and all kitchens and bathrooms, completing accessibility and common area upgrades, installing new energy-efficient mechanical systems, and updating landscaping throughout. A certificate of occupancy was issued in June 2019 and the permanent loan was closed in FY 2021. All 72 units are now occupied. No further work on this project is anticipated in FY 2024.

Current projects that are being funded under this activity include the following:

- EOHLC will utilize MTW funds for the preservation and development of affordable housing for low-income elderly and disabled households. Working in partnership with the Executive Office of Elder Affairs, EOHLC will provide financial support to preserve Chapter 667 state public housing developments with high capital needs and facilitate partnerships between LHAs and local service agencies to provide service-rich environments that allow residents to age in their community. EOHLC is utilizing MTW funding up to \$5 million to support housing preservation at two projects:
  - **Lakeview Avenue in Lowell:** To complete kitchen and bath modernizations, fire safety, electrical, and accessibility improvements, MTW funding of up to \$3 million has so far been used to leverage approximately \$2 million from other funding sources in order to rehabilitate 20 units at Lakeview Avenue. Construction began in May 2022 and is anticipated to be completed by August 2023.
  - **Balch Apartments in Beverly:** MTW funding of approximately \$2 million has so far been used to leverage an additional \$1 million from other sources in order to complete building envelope improvements, door replacements, kitchen and bathroom upgrades, one ADA unit conversion, electrical distribution, and site and walkway improvements in 26 units at Balch Apartments. Construction began in June 2022. Substantial completion of construction is anticipated by June 2023.

In FY 2023, EOHLC proposed and received HUD approval to provide MTW funding under this activity to support the development and preservation of rental units targeted for low-income households through the following funding programs, pursuant to Notices of Funding Availability (NOFA) published in October 2022.

- **Scattered Site Consolidation:** The 705 Scattered Site program is a state-funded family public housing program that aims to provide housing for low-income families in neighborhoods

throughout the state. Housing authorities across the state have difficulty maintaining state-funded scattered site family units in older one- to three-family homes. Concentrating these scattered sites into small (10-20 unit) developments with modern construction will preserve the benefits of having small developments integrated into the community while giving residents access to better-maintained, modern homes with accessible and sustainable features. Replacement housing developments will be funded by MTW funds, proceeds from disposition, and local funds. EOHLC will provide up to \$25 million in MTW funding to support the scattered site consolidation project including disposition and replacement, through new construction, of approximately 100 family housing units. The deadline for applications was June 2023. EOHLC received 7 applications and expects to make awards in August 2023.

- **Repositioning State Funded Public Housing:** MTW funding will be utilized to rehab or redevelop approximately 400 state-funded public housing units owned by LHAs to HQS or higher standards. Following the rehab, these units will be accepted into the HUD public housing portfolio using available Faircloth authority. This may involve a Faircloth-to-RAD transaction at the PHA's discretion. EOHLC will provide up to \$30 million in MTW funding to support these repositioning efforts. There is a rolling application process for this activity. As of July 2023, EOHLC has made one award for \$2.175 million to Worcester Housing Authority through this program.
- **Recapitalizing Multifamily Developments:** EOHLC will utilize approximately \$1 million in MTW funds to support the long-term preservation of one Section 8 New Construction/Substantial Rehab property with a total of up to 10 units. Funds will be utilized to conduct capital needs assessments and undertake moderate to substantial rehabilitation for properties with poor capital condition, low reserves, and little ability to increase Housing Choice Voucher rents. These efforts will result in improved living conditions and preservation of the least well-resourced project-based Section 8 properties once they no longer have access to EOHLC public housing technical assistance and emergency funding. Contract administration for these properties is being transferred from EOHLC to MassHousing by HUD. The deadline for applications was February 10, 2023; one application was received with EOHLC making a \$1 million award to Barre Housing Authority.

Total commitments across these three sub-initiatives will not exceed \$55M. In the FY 2023 plan, EOHLC also clarified that either loans or grants can be provided to projects funded under this activity.

### **Planned Non-Significant Changes**

In FY 2024, EOHLC proposes to make additional funding available for redevelopment or modernization of public housing and production of new affordable housing through a new Gap Financing Initiative. MTW funds will support redevelopment projects for state public housing alongside tax credits, EOHLC capital subsidy, and other funding sources. EOHLC will fund public housing redevelopment projects that have a cost premium over other affordable housing production and preservation projects due to requirements to pay prevailing wage. These will generally be public housing redevelopment projects, which are quite expensive due to prevailing wage requirements, relocation needs, and demolition and abatement costs. Eligible projects must already be subject to prevailing wage, and thus not adversely impacted by Davis-Bacon wage rates, and sponsors must commit to compliance with all federal requirements, including HQS compliance, environmental review, and MTW reporting requirements. These funds may also support

major modernization projects in state-aided public housing that do not include tax credits or other mixed-finance sources.

All projects must include 1:1 replacement of redeveloped housing serving low-income populations, and favorable projects will include new production of income-restricted units. The NOFA will also encourage sponsors to consider inclusion of non-restricted units to help contribute to project budgets and boost housing supply, but MTW funds will not be used on non-income-restricted units.

Subject to HUD approval, EOHLC will make up to \$30 million available for award in FY 2024 and anticipates making approximately \$10-15 million available thereafter through annual funding rounds, subject to funding availability. We anticipate that funds will be expended pursuant to these awards starting in FY 2024.

EOHLC anticipates that MTW funds will support one to two major redevelopment projects per year. Each project will differ, but EOHLC estimates, based on past projects, that \$15 million would leverage approximately \$85 million to replace 200 units of public housing and build 100 units of new affordable housing.

**Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2024.

**Metrics**

<b>CE #4: Increase in Resources Leveraged*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0	\$28,422,000		
<i>*Includes all projects funded from the onset of this activity. Funds leveraged are counted upon completion of construction.</i>				
<b>HC #1: Additional Units of Housing Made Available*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	0		
<i>*Defined as new units constructed. Does not include existing units that have been rehabilitated and/or demolished and re-constructed. Existing units undergoing redevelopment are reflected in HC #2.</i>				

<b>HC #2: Units of Housing Preserved*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	143		
<i>*Includes all projects funded from the onset of this activity. Units are counted upon completion of construction and occupancy at the end of the fiscal year.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2020-1: Moving to College

### (Formerly Massachusetts Student Housing Security Pilot)

#### **Plan Year Approved, Implemented, Amended**

Approved FY 2020 and implemented FY 2022.

#### **Description/Update**

EOHLC utilizes MTW Block Grant funding flexibility to support a housing stability program for college students who are experiencing homelessness. Specifically, EOHLC worked with the Department of Higher Education (DHE), the Executive Office of Health and Human Services (EOHHS), the Department of Elementary and Second Education (DESE), and local colleges to launch the Moving to College (MTC) program, which provides scholarships for housing to income-eligible, homeless college students.

EOHLC will provide up to \$200,000 in MTW funds to DHE, annually for an initial two years. EOHLC will establish an MOU with DHE and/or the Interagency Council on Housing and Homelessness (ICHH) to issue funding directly to designated local colleges. Requirements for compliance, as well as reporting requirements, will be part of the MOU. DHE, the ICHH, and the local colleges have a standing committee that is responsible for reporting to EOHLC both on compliance and MTW reporting requirements. EOHLC will approve all program guidance created by the committee, and continued funding will be contingent on compliance with HUD requirements and the MOU.

Designated local colleges and regional teams are responsible for identifying eligible participants, defined as currently admitted, full-time students, who are HCV income eligible, meet HUD's definition of Unaccompanied Homeless Youth or who have recently aged out of foster care and meet HUD's criteria of an independent student. Colleges utilize FASFA applications in order to determine income eligibility as well as the amount of funds needed for housing and college-related expenses such as classes, supplies, etc. DHE is responsible for ensuring that participants meet HUD's criteria of an independent student. Based on individual participant housing needs, DHE will issue up to \$14,000 per participant per year for two years for housing-related costs. Housing-related costs are limited to housing assistance, in the form of rent for dormitory costs. Identified housing is subject to HUD's HQS requirements, and participants are permitted to reside in shared housing. DHE contracts with either EOHLC's regional administering agencies or a third party to conduct HQS inspections. Inspectors are required to document proper training/certification. HQS inspection records are forwarded to and maintained by EOHLC. Participants are also eligible to receive financial aid from other sources for other college-related identified expenses. Housing scholarship funds are not transferrable outside the partner school network.

Participants must continue to remain enrolled full-time and maintain passing grades in order to be eligible for a renewed scholarship each academic year with the goal of earning degrees and/or certificates of value. Every student is required to utilize academic support services and counseling services available at their respective campuses and through community-based service providers who will work with students, providing case management. In the event that a student needs to take a leave from his or her academic program, such a leave would be considered temporary and all efforts will be made to get the student to re-enroll, perhaps in a different academic program, or at another institution.

The clients served under this activity are not participants in the Housing Choice Voucher Program or residents of federal public housing.

Though implementation was initially planned for FY 2021, the COVID-19 pandemic presented challenges to planning and delayed implementation until FY 2022. At the start of the 2021-2022 academic year, fourteen (14) students were enrolled in Moving to College. In FY 2023, the total number of students dropped to twelve (12) as scholars left the program to pursue other academic and/or housing options. The scholarships for eleven (11) of these twelve (12) students will end prior to FY2024. Only one scholarship will extend into FY 2024.

**Planned Non-Significant Changes**

The Moving to College pilot has encountered several challenges, including lower-than-expected demand for the initial 20 scholarships and the frequency of students switching dorm rooms or leaving school. In this highly fluid context, conducting HQS inspections and tracking data for MTW reporting became more cumbersome. It was ultimately determined that MTW was not the most compatible funding source for the program. As a result, no additional scholarships are expected to be funded through MTW at this time. All but one of the existing scholarships are scheduled to end during the Spring 2023 semester; one remaining scholarship will extend into FY 2024, ending in January 2024.

**Planned Changes to Metrics/Data Collection**

EOHLC has updated the metrics to reflect anticipated outcomes in FY 2024. Additionally, EOHLC has updated the definition of self-sufficiency to reflect completion of two years of post-secondary education.

**Metrics**

<i><b>CE #4: Increase in Resources Leveraged</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0.00	\$125,093		
<i><b>SS #3: Increase in Positive Outcomes in Employment Status*</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Enrolled in an Educational Program or Job Training	0 households	1 household		
	0%	100%		
<i>*This initiative is not anticipated to increase the number of households employed, as the goal of the Activity is to keep students enrolled in college.</i>				
<i><b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0	1 household		



<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	0	1 household		
<i>*Self-sufficiency is defined as completion of 2 years of post-secondary education.</i>				

**Planned Significant Changes**

No significant changes are planned for FY 2024.

## Activity 2021-1: Fair Housing Initiative

### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2021.

### **Description/Update**

The Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Massachusetts further prohibits discrimination on the basis of marital status, military or veteran status, sexual orientation, gender identity and expression, age, ancestry, receipt of public assistance, and age of children (under 6 years) in housing containing lead paint. Despite progress, many challenges remain, and EOHLIC regularly hears from its voucher holders and others about instances of discrimination, with the Massachusetts Commission Against Discrimination alone having received over 400 housing discrimination complaints in FY 2019.

EOHLIC will utilize MTW Block Grant funding of up to \$500,000 per year for a three-year period. Funding will be awarded to a selected non-profit agency or agencies to identify fair housing compliance and enforcement issues across EOHLIC's jurisdiction, investigate discriminatory practices, and provide enforcement assistance (including through voluntary resolution efforts and litigation) for households with a housing subsidy or voucher. Additionally, the funding will be used to develop best practices and education for low-income households and owners regarding fair housing including but not limited to advertising and outreach, as well as seminars on protected classes, fair housing rights and responsibilities, reasonable accommodations, and language assistance. The clients served under this activity may include families with housing assistance vouchers outside of the participants in EOHLIC's Housing Choice Voucher Program.

In FY 2022, using a competitive bid process, EOHLIC selected a partnership made up of four fair housing agencies throughout the state, all of whom, prior to EOHLIC's selection, provided fair housing training, education, and outreach services. Since then, the partner agencies have hired staff, developed and launched a survey of RAAs and PHAs to assess training needs, and prepared training materials. Trainings for RAA and PHA staff began in fall of 2022. In FY 2024, trainings for housing staff will continue and outreach efforts will also be directed at housing seekers, renters, and property owners. In addition to trainings, the partner agencies have been conducting fair housing testing and pursuing applicable enforcement actions. Funding and services are focused on discrimination against voucher holders and/or discrimination against families with children under the age of 6 in housing containing lead paint. Investigation and enforcement activities will continue in FY 2024.

### **Planned Non-Significant Changes**

EOHLIC will utilize up to \$100,000 of additional MTW funding to cover the cost of a media campaign. The campaign is intended to educate voucher recipients, housing providers, and the general public about discriminatory housing practices.

### **Planned Changes to Metrics/Data Collection**

Metrics reflect anticipated outcomes in FY 2024.

**Metrics**

<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice through investigation and enforcement	0 households	60 households over a three-year period		
Number of households receiving services aimed to increase housing choice through education and outreach	0 households	2,667 per year*		
<i>*Education and outreach will be provided to housing providers and landlords, in addition to tenant families.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2021-2: Emergency Waivers

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2021.

#### Description/Update

The novel coronavirus spread in the United States at a pace that required significant policy and personal interventions to contain and treat it. The economic impacts on households, businesses, and financial markets have been profound. Research speaks directly to ways in which families may be impacted by the effects of COVID-19, as well as how decisionmakers can shape policies to mitigate negative impacts. Additionally, the outbreak of COVID-19 has placed additional burdens on housing authorities which are working tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements. While the Coronavirus Aid, Relief, and Economic Security (CARES) Act provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher (HCV) programs, the duration of this pandemic, and potentially others in the future, remains unknown and the backlog of transactions, inspections, and delayed reporting requirements grows.

Accordingly, EOHLC has established an emergency waivers activity which addresses the burdens placed on all stakeholders and includes the following emergency waivers in response to economic and/or health-related emergencies and/or natural disasters, as declared by the Governor or his/her designee, including the authority to determine when to place and lift the waivers. EOHLC may revise, add, and/or remove waivers as needed to address emergency-related conditions.

1. **Delayed Reexaminations:** EOHLC may waive the requirement to conduct a reexamination of family income and composition at least annually. Currently EOHLC completes reexaminations on a biennial basis for HCV program households and on a triennial basis for HCV elderly/disabled households on fixed incomes. Where reexaminations have been delayed due to a declared emergency, EOHLC will complete the reexamination no later than the anniversary month of the year following the close of the emergency declaration. The subsequent reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on July 2020, EOHLC would complete the reexam within one year following the close of the emergency declaration. The next scheduled biennial reexam would be effective 2 years following the effective date of the first recertification after the close of the emergency declaration.
2. **Verification of Income:** During periods of declared emergencies, EOHLC will waive the requirements of the verification hierarchy but continue to use EIV.
3. **Increase in Payment Standard:** EOHLC will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, EOHLC will apply the increased payment standard at the next interim reexamination after the effective date of the increased payment standard. If EOHLC delays a reexam, EOHLC will apply the payment standard in effect on the effective date of the delayed regular reexamination.

4. **Delayed Regular HQS Inspections:** EOHLC may waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, EOHLC will complete the HQS inspection no later than the anniversary month of the year following the close of the emergency declaration. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due by July 2020, EOHLC would complete the inspection within one year following the close of the emergency declaration. EOHLC will continue to request a self-certification from the owner that no life-threatening conditions exist in the unit as of the originally-intended inspection date. Additionally, EOHLC will continue to conduct complaint inspections.
5. **Interim HQS Inspections:** EOHLC may waive the requirement to conduct re-inspections to confirm repair; however, EOHLC will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification and that a non-life-threatening deficiency has been corrected within 30 days of EOHLC notification.
6. **HQS QC Inspections:** EOHLC will waive the requirement to conduct HQS quality control inspections and instead may suspend HQS quality control inspections until the emergency waiver has been lifted.
7. **FSS Contract of Participation:** EOHLC will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, EOHLC may extend a family's COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, EOHLC may extend their COP beyond the two-year extension threshold.

The Governor of Massachusetts lifted the COVID-19 related state of emergency on June 15, 2021. Accordingly, EOHLC discontinued application of these emergency waivers and is addressing completion of any outstanding recertifications and inspections. The Emergency Waivers activity will be reactivated when and if economic and/or health related emergencies are declared in FY 2024 and beyond.

#### **Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

#### **Planned Changes to Metrics/Data Collection**

As EOHLC does not anticipate another state of emergency will be declared in FY 2024, the metrics have been updated accordingly.

**Metrics**

<i>HC #4: Displacement Prevention</i>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% of AMI that would lose assistance or need to move	0	0		
<i>*The benchmark represents the number of assisted households during the period of declared emergencies who are effectively protected from displacement.</i>				

**Planned Significant Changes**

No significant changes are planned.

## Activity 2023-1: Housing Navigator Initiative

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2023.

### Description/Update

EOHLC is utilizing MTW Block Grant funding to support the Housing Navigator Massachusetts, whose goal is to make it easier to find and apply for affordable housing by collecting and providing online information on 100% of the affordable rental housing available to the public in Massachusetts. The Housing Navigator Massachusetts (HNM) is a non-profit agency that addresses the glaring digital divide around the important choice of where families live. Specifically, HNM develops technology that promotes housing equity and develops data that brings transparency to the affordable housing market.

Massachusetts, as a whole, ranks 3<sup>rd</sup> highest in the nation for rent-burdened households (for whom rent exceeds 30% of income), making it all the more important that low-income individuals get a fair chance at affordable housing opportunities. Access to high-quality information helps not just renters, but owners, housing advocates, homelessness providers, and housing funders. The MA Department of Housing and Community Development has mandated Housing Navigator participation for the roughly 2,000 newly developed affordable units it funds annually. This ensures that the housing data will continue to be an up-to-date resource for all. The Housing Navigator listings provide critical information on eligibility, waitlists, lotteries, and more – in terms that every user can understand.

The clients served under this activity are low-income households including Housing Choice Voucher participants. This local non-traditional activity falls under the category of Service Provision as defined in HUD PIH Notice 2011-45 and will conform to the General Parameters detailed in part 5.A. of the Notice.

Leveraging other state and private dollars, EOHLC has signed a three-year contract of up to \$1 million per year in MTW Block Grant funds to support the costs of maintaining and updating HNM's software; however, EOHLC reserves the right to review and adjust the funding for the Housing Navigator as needs dictate and/or to expand the functions of the Housing Navigator.

The Housing Navigator maintains a regular cycle of user engagement, including surveys and focus groups of renters, service providers, and owners to solicit user feedback and research to inform adaptations to existing features and the organization's road map for future updates. EOHLC and HNM have identified the following priorities for improvement of the search tool:

- Creating a way to identify waitlists with shorter wait times for the convenience of users;
- Increasing the overall level of detail for units accessible to persons with disabilities through property owner outreach and the creation of a data system containing information that EOHLC currently collects from architects;
- Simplifying the input tool to reduce the amount of time it takes property owners (particularly first-time users) to enter information into the tool;
- Easing difficulty for users who are searching for housing with a mobile voucher; and
- Prototyping a system for the submission of online rental applications.

**Planned Non-Significant Changes**

There are no non-significant changes planned for FY 2024.

**Planned Changes to Metrics/Data Collection**

Metrics have been updated to reflect anticipated outcomes in FY 2024.

**Metrics**

<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice	3,800	10,000 average per month*		
<i>*The Housing Navigator database is available to the public, so – while most users are low-income households seeking housing – users may also include housing providers, landlords, policymakers, and researchers.</i>				

**Planned Significant Changes**

No significant changes are planned.



## B. Not Yet Implemented Activities

### Activity 2011-1: Value Vouchers

#### **Description/Update**

EOHLC plans to implement a new “MTW value voucher” targeted to the homeless and those with disabilities. This initiative will provide a lower cost subsidy than a conventional voucher. Participants will be offered units in privately assisted housing developments where the rental costs are lower (generally by 25% or more) than current HUD published FMRs, but still not affordable to very low and extremely low-income households. These would generally be units in LIHTC, Section 236, and certain state-funded developments, for example, where rents are generally set at or below 60% of AMI.

#### **Timetable for Implementation**

This activity was approved by HUD in 2011; however, EOHLC has not utilized this flexibility to date, in part due to questions about owner interest and the impact of layering subsidies. EOHLC plans to officially close out this activity in the FY 2024 MTW Report but will continue to explore ways of addressing affordability gaps.

#### **Explanation of Non-Significant Changes Since Approval**

No changes have been made since approval.

## C. Activities on Hold

### Activity 2010-3: Owner Incentive Fund

#### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2010.

#### **Description/Update**

An Owner Incentive Fund pilot initiative was established in January 2010 to promote upgrades to the housing stock in areas of the state with a large percentage of older, deteriorated housing stock. EOHLC's goals for this activity were:

- Leasing higher quality units including incentivizing owners to upgrade existing housing;
- Increasing the number of units that are accessible to persons with disabilities;
- Expanding the number of units leased in currently underserved neighborhoods; and,
- Encouraging new owner participation.

The Owner Incentive Fund was implemented by one of EOHLC's nine Regional Administering Agencies (Berkshire Housing Development Corporation). Participating owners were eligible for a flat fee financial incentive payable over the first year of the HAP contract, provided that their unit was compliant with HQS at all times during this initial term. At the end of the first year under HAP contract, owners were eligible for an additional one-time payment under certain conditions.

From FY 2016 to FY 2022, the Owner Incentive Fund activity only yielded an average of 5-6 upgraded units per year, including just one in FY 2022. As a result, EOHLC has decided to put this activity on hold in FY 2024 and close it out as part of the FY 2024 MTW Report. EOHLC will explore other statewide strategies for incentivizing landlord participation and improving housing stock quality.

### Activity 2018-2: Residential Assistance for Families in Transition (RAFT) / Emergency Rental and Mortgage Assistance (ERMA)

#### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2018, amended in FY 2020.

#### **Description/Update**

In view of changing circumstances and need as a result of COVID-19, EOHLC reversed the planned close-out of this activity as reported in the FY 2019 MTW Annual Report. EOHLC launched the Emergency Rental & Mortgage Assistance (ERMA) portion of this activity on July 1, 2020, to serve renters and homeowners between 50 and 80% AMI who were financially impacted by the COVID-19 pandemic. EOHLC established a joint application for the RAFT and ERMA programs (which had similar policies but served different income groups). RAA staff reviewed applications and worked with applicants and property owners to collect required documentation. A total of approximately \$2.7 million in MTW funds were disbursed to eligible households to cover rent and mortgage arrearages.

When additional, more flexible federal and state resources became available for emergency rental and mortgage assistance, the ERMA program became underutilized. EOHLC decided to terminate the ERMA program effective December 31, 2021. The RAFT/ERMA activity will be closed out as part of EOHLC's FY 2024 MTW Report.

## Activity 2018-4: Support for the Secure Jobs Initiative: Services Only

### **Plan Year Approved, Implemented, Amended**

Approved FY 2018 and implemented FY 2019.

### **Description/Update**

In FY 2018, HUD approved EOHLC's Support for the Secure Jobs Initiative: Services Only activity, and EOHLC began implementation planning. Using MTW Block Grant funding flexibility, this activity built upon the services portion of the Secure Jobs Initiative (SJI). The clients served under this activity were not participants in the Housing Choice Voucher Program or residents of federal public housing. Low-income participants in this activity received supportive services, but not vouchers. Leveraging other state and private dollars, MTW Block Grant funds partially supported recruitment and referral, intake and assessment, completion of IEPs, job readiness training, career counseling, job development and connecting participants to employers and post-employment placement services. MTW Block Grant service dollars were used flexibly to pay for small expenses such as licensure tests, RMV fees, transportation passes, uniforms, and other expenses that may act as barriers to successful employment.

EOHLC's funding commitment to the services component of Secure Jobs ends on June 30, 2023. In light of increased funding for this program in the Massachusetts state budget, it is not expected that MTW funds will be used to support the program in FY 2024 and beyond. EOHLC plans to close the activity out in the FY 2024 MTW Report.

## Activity 2019-1: Launch

### **(Formerly Pathways to Prosperity)**

### **Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2019.

### **Description/Update**

Under the Launch program, EOHLC committed up to \$2 million per year for three years, in MTW Block Grant funding flexibility to connect low-income youth ages 18-24, living in subsidized housing in the Boston area, to programs and services that help them obtain employment and a sustaining wage. EOHLC contracted with the United Way of Massachusetts Bay to recruit, engage, and connect targeted youth to employment readiness, job placement, vocational training, certificate programs, and/or other post-secondary education programs.

For Launch participants who are also participants in EOHLC's federal HCV Program, EOHLC may exclude 100% of the increase in earned income for up to a 3-year period. The exclusion period begins after

enrollment in Launch, at the point where earned income increases and continues regardless of employment status, until the end of the period determined by EOHLIC.

EOHLIC has connected with other employment training and referral agencies who are responsible for referring low-income adults outside of the 18-24 age range to area job training providers such as Secure Jobs, Jewish Vocational Services, and/or One-Stop Career Centers.

Phase II of the Launch partnership began in FY 2021 and ends in FY 2023. Given EOHLIC's interest in programs that can be scaled up or replicated statewide and given the other Launch partners' interest in serving a broader pool of young people (not just those living in subsidized housing), there was agreement that the MTW contract would not be extended past its current end date of February 28, 2023. EOHLIC plans to close out this activity in its FY 2024 MTW Report.

## D. Closed Out Activities

The following table summarizes previously approved MTW activities that EOHLC has completed, discontinued, or determined do not require MTW authority to implement.

**Table 10: Closed-Out MTW Activities**

Activity	Plan Year Approved	Plan Year Implemented	Close Out Year	Reason for Close Out
Biennial Inspections (Activity 2011-3)	FY 2011	FY 2013	FY 2015	EOHLC closed out this activity as an MTW initiative due to the 2014 Appropriations Act, which allows EOHLC to transition to a biennial inspection schedule without MTW authority.
Project Based Voucher Discretionary Moves (Activity 2012-3)	FY 2012	FY 2012	FY 2018	EOHLC proposed and received HUD approval for a new Local Project-Based Voucher Program, which includes revisions to the PBV opt out policy.
Rent Reasonableness (Activity 2013-1)	FY 2013	FY 2013	FY 2018  Note: The FY 2019 Plan included this activity; however, prior to the end of FY 2018 (after the FY 2019 Plan was submitted) EOHLC closed this activity.	Under HOTMA, the trigger for reasonable rent redeterminations increased from a 5% decrease to a 10% decrease in FMR from one year to the next. EOHLC determined that a 10% decrease in FMR was such that a reasonable rent redetermination would be warranted to ensure that subsidies paid are in line with market rents.
PBV Rent Reasonableness (Activity 2013-2)	FY 2013	FY 2013	FY 2019	EOHLC closed out this activity and consolidated it with the approved Enhanced PBV Program activity (Activity 2018-7). This action will allow EOHLC to report on all Enhanced PB activity features under one activity.
Equity Builder Program (Activity 2018-8)	FY 2018	Never Implemented	FY 2020	After discussions with for-profit and non-profit owners, EOHLC determined the activity was not financially feasible. Owners relayed lack of interest in pursuing the program and a lack of financial benefits. As the success of the program is dependent on owners providing LTO units, EOHLC decided to close the activity out.

Activity	Plan Year Approved	Plan Year Implemented	Close Out Year	Reason for Close Out
Health Starts at Home (2018-6)	FY 2018	FY 2018	FY 2020	The Health Starts at Home (HSH) activity was a planned three-year initiative implemented in FY 2018; the study has ended. HSH households are permitted to retain their voucher; however, EOHLC no longer issues new HSH vouchers.

## V. Planned Application of MTW Funds

### A. Planned Application of MTW Funds

EOHLC operates an MTW Program that involves only Housing Choice Vouchers. The tables below provide a projection of sources and uses for the MTW Program for FY 2024. Note that no state or local funds are utilized. Note also that HCV funding is allocated on a calendar year (CY) basis. As of the posting of this Plan, EOHLC has not been notified of total renewal funding for the CY; thus, the amounts listed below may change based on actual funding levels.

#### i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2024

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$0
70600	HUD PHA Operating Grants	\$346,000,000
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$50,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$4,200,000
<b>70000</b>	<b>Total Revenue</b>	<b>\$350,250,000</b>

#### ii. Estimated Application of MTW Funds

Table 12: Estimated Application of MTW Funding for FY 2024

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$4,560,000
91300+91310+92000	Management Fee Expense	\$21,250,000
91810	Allocated Overhead	\$150,000
92500 (92100+92200+92300+92400)	Total Tenant Services	\$6,200,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$0
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$0
95000 (95100+95200+95300+95500)	Total Protective Services	\$0

FDS Line Item Number	FDS Line Item Name	Dollar Amount
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$0
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$0
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$318,090,000
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expense	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$350,250,000</b>

**Please describe any variances between Estimated Total Revenue and Estimated Total Expenses:**

N/A
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*iii. Description of Planned Application of MTW Funding Flexibility*

Under the MTW Program, EOHLIC is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are described below:

- EOHLIC may use Single Fund Flexibility to fund Housing Innovation Specialist positions to expedite issuance, inspection, and leasing processes for special populations or voucher holders participating in specific EOHLIC programs (e.g., Emergency Housing Vouchers, SNO Mass). EOHLIC anticipates that, if adopted, approximately \$950,000 will be spent to fund the staffing positions and provide housing-related services.
- EOHLIC will use up to \$150,000 in Single Fund Flexibility in FY 2024 to fund MTW program evaluations. Specifically, EOHLIC will use a third-party evaluator to continue the evaluation of the MTW program “A Better Life” (ABL). The evaluator of ABL will collect data and information on program implementation and participant outcomes and compile key findings and recommendations into a final report.
- EOHLIC will use up to \$4.5 million over five years in Single Fund Flexibility to support a career navigation initiative for HCV participants. Specifically, the funds will support the cost of hiring new Career Navigators (Navigators) at Career Centers in four regions. Navigators will meet one-on-one with individuals to help them identify a career path that fits with the available jobs in their region with good wages, benefits, and opportunity for advancement. Navigators will also work with participants to identify training or education opportunities, facilitate employer relationships, and support participants through the process of finding a job and post-employment transition. Individuals will be referred to Navigators by FSS Coordinators and other RAA staff members, including SNO Mass staff and program representatives working with MTW voucher holders. Given



the Career Centers’ specialized expertise in career navigation/job development and strong employer relationships, they are best suited to support HCV participants in this aspect of self-sufficiency development. Additionally, funds will support the development of resources, such as regional employment maps. The employment resources will assist staff at Career Centers and RAAs in directing participants toward areas of employment opportunity. Navigators and RAA staff will be brought together quarterly for training and networking.

- Other Supportive Services: EOHLC will use approximately \$3 million in MTW funds on activities to support a wide range of supportive services for EOHLC program participants including: expansion of FSS programming; job training and placement; educational partnership initiatives; affordable homeownership programs; and other economic development and self-sufficiency program activities.

*iv. Planned Application of PHA Unspent Operating Fund and HCV Funding*

**Table 13: Planned Application of PHA Unspent Operating Fund and HCV Funding**

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP	\$187,000,000	\$39,000,000
HCV Admin Fee	\$3,800,000	\$3,800,000
PH Operating Subsidy	N/A	N/A
<b>Total:</b>	<b>\$190,800,000</b>	<b>\$42,800,000</b>

*v. Description of Planned Expenditures of Unspent Operating Fund and HCV Funding*

**Table 14: Description of Planned Application of PHA Unspent Operating Fund and HCV Funding**

Item No	Planned Use	Estimated Amount	Funding Source the Planned Use is Attributable to	Projected Time Line or Time Line Update
1.	MTW Initiatives	\$17,500,000	HAP Reserves	6/30/2024
2.	MTW/Public Housing Initiatives	\$21,500,000	HAP Reserves	6/30/2024

**B. Local Asset Management Plan**

*i. Is the MTW PHA allocating costs within statute?*

Yes
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*ii. Is the MTW PHA implementing a local asset management plan (LAMP)?*

No
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*iii. Has the MTW PHA provided a LAMP in the appendix?*

No
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*iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan year.*

Not applicable
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### C. Rental Assistance Demonstration (RAD) Participation

#### *i. Description of the RAD Participation*

As EOHLC does not own or operate any federal public housing units, only Second Component RAD conversions are undertaken. EOHLC understands the relevance and inherent housing preservation and expansion benefits related to the conversion of Rent Supplement, Rental Assistance Payments and Mod/Rehab Program units to project-based assistance under the RAD Program. Table 13 below indicates that EOHLC does not anticipate any RAD Component 2 conversions in FY 2024.

Table 14 includes those developments that EOHLC has converted through the RAD Program. EOHLC entered into HAP contracts for RAD conversions beginning in FY 2013. The last conversion entered into was in FY 2015. To date, there were 825 units converted under RAD Component 2 to Project Based Assistance.

**Table 13: RAD Conversions Planned in FY 2024**

<b>Rental Assistance Demonstration (RAD) Participation</b>
EOHLC does not anticipate any RAD conversions will take place in FY 2024

**Table 14: RAD Conversions Completed or Projected to be Completed by the End of FY 2024**

<b>Rental Assistance Demonstration (RAD) Participation</b>
To date, the following RAD conversions have taken place:

Property Name	No. of Units Converted to PBV	RAD Conversion Type	FY Reported	Description
North Village	134	2 <sup>nd</sup> Component Rent Supplement	FY 2013	Existing family housing
Hope in Action	49	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing family housing
Spring Hill	37	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing family housing
Unquity House	139	2 <sup>nd</sup> Component Rent Supplement	FY 2014	Existing elderly housing
Highland Village	110	2 <sup>nd</sup> Component Rent Supplement	FY 2015	Existing family housing
Outing Park I	94	2 <sup>nd</sup> Component Mod/Rehab	FY 2015	Existing family housing
Outing Park II	81	2 <sup>nd</sup> Component Mod/Rehab	FY 2015	Existing family housing

Property Name	No. of Units Converted to PBV	RAD Conversion Type	FY Reported	Description
Spring Gate	181	2 <sup>nd</sup> Component Rent Supplement	FY 2015	Existing family housing
<b>TOTAL</b>	825			

*ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.*

No

*iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment.*

Not applicable

## VI. Administrative

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### A. Board Resolution and Certifications of Compliance

EOHLC does not have a Board of Commissioners and, therefore, does not have a Board resolution process in place. EOHLC's Undersecretary is the official authorized to sign the attached Certifications of Compliance. The required signed MTW Annual Plan Certifications of Compliance with Regulations is attached in Appendix B.

### B. Documentation of Public Process

EOHLC provided public notice of the draft Annual Plan. The public comment period extended from March 1, 2023, through March 31, 2023. The plan was made available on EOHLC's website and was mailed upon request. Two public hearings were conducted virtually via Zoom on March 15 and March 16, 2023, with 22 individuals participating. Copies of the public notice, a summary of comments and responses, and listing of hearing attendants are attached in Appendix C.

### C. Planned and Ongoing Evaluations

EOHLC, in collaboration with its network of Regional Administering Agencies, utilizes internal resources to track and monitor performance of proposed and ongoing MTW activities.

In FY 2019, EOHLC selected a third-party evaluator (MDRC) to conduct an evaluation of the "A Better Life" (ABL) activity. To date, MDRC has completed an 18-month interim evaluation memo and a 36-month interim evaluation memo. The MDRC evaluation team will continue to collect program data and compile their findings, culminating in a final report expected to be completed toward the end of FY 2024.

### D. Lobbying Disclosures

EOHLC does not have any lobbying activities to disclose. EOHLC has included the Lobbying Activities (SF-LLL) form in Appendix D and Certification of Payments (HUD-50071) form in Appendix E.

## Appendix A: Listing of Regional Administering Agencies

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**Berkshire Housing Development Corp.**

One Fenn Street Pittsfield, MA 01201  
413.499.4887

**Community Teamwork, Inc.**

155 Merrimack Street Lowell, MA 01852  
978.459.0551

**Housing Assistance Corp**

460 West Main Street Hyannis, MA 02601  
508.771.5400

**NeighborWorks Housing Solutions**

169 Summer Street Kingston, MA 02364  
781.422.4200

**Lynn Housing Authority & Neighborhood Development**

10 Church Street Lynn, MA 01902  
781.592.1966

**Metro Housing| Boston**

1411 Tremont Street Boston, MA 02120  
617.859.0400

**RCAP Solutions**

191 May Street Worcester, MA 01602  
800.488.1969

**South Middlesex Opportunity Council**

7 Bishop Street Framingham, MA 01702  
508.620.2336

**Way Finders**

1780 Main Street Springfield, MA 01103  
413.233.1500

## Appendix B: Certification of Compliance with Regulations

CERTIFICATIONS OF COMPLIANCE	
<p style="text-align: center;"><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b> <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b></p> <p style="text-align: center;"><b>Certifications of Compliance with Regulations:</b> <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p>	
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning ( 07/01/2023 ), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p>	
<ol style="list-style-type: none"><li>(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.</li><li>(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.</li><li>(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).</li><li>(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.</li><li>(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.</li><li>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.</li><li>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</li><li>(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.</li><li>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.</li><li>(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.</li><li>(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.</li></ol>	

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Commonwealth of Massachusetts Department of Housing and Community Development		MA 901
<b>MTW PHA NAME</b>	<b>MTW PHA NUMBER/HA CODE</b>	
<p><i>I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.  <b>WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).</b></i></p>		
Jennifer D. Maddox	Undersecretary	
<b>NAME OF AUTHORIZED OFFICIAL</b>	<b>TITLE</b>	
Jennifer D. Maddox	April 13, 2023	
<b>SIGNATURE</b>	<b>DATE</b>	



# Appendix C: Documentation of Public Process

Includes Public Notice, Participation List and Summary of Comments, and Related Responses

## Public Notice

### Massachusetts Department of Housing and Community Development (DHCD)

Funding Agency for the Housing Choice Voucher Program administered regionally by:  
 Berkshire Housing Development Corporation in Pittsfield, MA; Community Teamwork, Inc. in Lowell, MA;  
 Housing Assistance Corporation in Hyannis, MA; Lynn Housing Authority and Neighborhood Development in  
 Lynn, MA; Metro Housing Boston in Boston, MA; NeighborWorks Housing Solutions in Kingston, MA;  
 RCAP Solutions, Inc. in Worcester, MA; South Middlesex Opportunity Council in Framingham, MA;  
 Way Finders in Springfield, MA

#### NOTICE OF PUBLIC HEARINGS REGARDING DHCD'S HOUSING CHOICE VOUCHER PROGRAM (HCVP) DRAFT MOVING TO WORK (MTW) PROGRAM ANNUAL PLAN FOR FY 2024

**Wednesday, March 15, 2023**  
**10:00 a.m. – 11:30 a.m.**  
**AND**  
**Thursday, March 16, 2023**  
**2:30 p.m. – 4 p.m.**

In accordance with its MTW Agreement, DHCD will hold two public hearings prior to finalizing its FY 2024 Moving to Work Annual Plan. This plan provides details about DHCD's proposed MTW activities that will commence beginning July 1, 2023.

DHCD's draft MTW Annual Plan is available on DHCD's Website at <https://www.mass.gov/service-details/moving-to-work-program-mtw> under *Moving to Work Plans*. Additionally, this document will be mailed upon request, by calling Kristin Haas at DHCD at 617-573-1199 between the hours of 8:00 a.m. and 4:00 p.m. Monday-Friday.

The hearings will be held virtually using Zoom and are accessible using the respective links below, as well as by phone (audio only). Those interested in providing oral comments only need to attend one of the two hearing sessions and may arrive and leave the Zoom meeting at any time between the start and end times listed below.

<b>Wednesday, March 15, 2023, 10:00 a.m. – 11:30 a.m.</b> <b>Meeting ID: 815 0782 0133    Passcode: 796034</b>	
To join from a computer or phone using the Zoom app	<a href="https://us06web.zoom.us/j/81507820133?tk=DF7OGVwvQXguT-lqSdE1n3_xfETLh_L4NZVmWGZDe8c.DQMAAAAS-j6iZRZM1BMemR2aINWU1h4Xy03aTdFU0Z3AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA&amp;pwd=RjBrQXpHV1RRN2JQaFltc3pISWJJUT09">https://us06web.zoom.us/j/81507820133?tk=DF7OGVwvQXguT-lqSdE1n3_xfETLh_L4NZVmWGZDe8c.DQMAAAAS-j6iZRZM1BMemR2aINWU1h4Xy03aTdFU0Z3AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA&amp;pwd=RjBrQXpHV1RRN2JQaFltc3pISWJJUT09</a>
To join from a phone, audio only	For higher quality, dial a number based on your current location. US: +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 646 931 3860 or +1 929 205 6099 or +1 301 715 8592 or +1 669 900 6833 or +1 689 278 1000 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 669 444 9171  Or one tap mobile: US: +13052241968,,81507820133#,,, *796034# or +13092053325,,81507820133#,,, *796034#



<b>Thursday, March 16, 2023, 2:30 p.m. – 4 p.m.</b> <b>Meeting ID: 895 3154 4954    Passcode: 007132</b>	
To join from a computer or phone using the Zoom app	<a href="https://us06web.zoom.us/j/89531544954?tk=WRxNR8e7XUxUTkXin8wxENZ6vPDIJG5wT3Cc4IArRw.DQMAAAAU2H71ehZ0VW51azZfzIFnbUxGbUZJcXFaRTN3AA&amp;pwd=TTFRQTVabmNwZGNxeCtqVDJTTjhrQT09">https://us06web.zoom.us/j/89531544954?tk=WRxNR8e7XUxUTkXin8wxENZ6vPDIJG5wT3Cc4IArRw.DQMAAAAU2H71ehZ0VW51azZfzIFnbUxGbUZJcXFaRTN3AA&amp;pwd=TTFRQTVabmNwZGNxeCtqVDJTTjhrQT09</a>
To join from a phone, audio only	For higher quality, dial a number based on your current location. US: +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 646 931 3860 or +1 929 205 6099 or +1 564 217 2000 or +1 669 444 9171 or +1 669 900 6833 or +1 689 278 1000 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847  Or one tap mobile: US: +13017158592,,89531544954#,,,,*007132# or +13052241968,,89531544954#,,,,*007132#

**DHCD will accept written comments through March 31, 2023. Written comments should either be emailed to [kristin.haas@mass.gov](mailto:kristin.haas@mass.gov) and [jaimerebhan-buckminster@mass.gov](mailto:jaimerebhan-buckminster@mass.gov) or sent by mail to:**

**DHCD Division of Rental Assistance  
100 Cambridge Street - Suite 300  
Boston, MA 02114  
Attention: MTW Annual Plan Comments  
FAX: 617-573-1345**

If you require an accommodation to review the Annual Plan (materials in Braille/large print, sign language interpreters, etc.), please contact DHCD at 617-573-1198 no later than March 10, 2023.



### Public Hearing Participation List

Public hearings were held virtually via Zoom on March 15, 2023, and March 16, 2023. The following individuals participated in the March 15 hearing:

No.	Name	Affiliation
1.	Kristin Haas	MA Department of Housing and Community Development (DHCD)
2.	Jaime Rebhan-Buckminster	MA Department of Housing and Community Development (DHCD)
3.	Maryssa Schneider McLean	MA Department of Housing and Community Development (DHCD)
4.	Cecilia Woodworth	MA Department of Housing and Community Development (DHCD)
5.	Karlene Maiolino	MA Department of Housing and Community Development (DHCD)
6.	Sofia Stavvaki	MA Department of Housing and Community Development (DHCD)
7.	Joel Deery	MA Department of Housing and Community Development (DHCD)
8.	Anne Marie Belrose	Regional Housing Network of Massachusetts
9.	Judith Liben	Massachusetts Law Reform Institute (MLRI)
10.	Josh Bedarian	RCAP Solutions
11.	Nancy Rivera	RCAP Solutions
12.	Sally Nieves	RCAP Solutions
13.	Philip Pereira	RCAP Solutions

The following individuals participated in the March 16 hearing:

No.	Name	Affiliation
1.	Kristin Haas	MA Department of Housing and Community Development (DHCD)
2.	Jaime Rebhan-Buckminster	MA Department of Housing and Community Development (DHCD)
3.	Maryssa Schneider McLean	MA Department of Housing and Community Development (DHCD)
4.	Cecilia Woodworth	MA Department of Housing and Community Development (DHCD)
5.	Joanne McKenna	MA Department of Housing and Community Development (DHCD)
6.	Sofia Stavvaki	MA Department of Housing and Community Development (DHCD)
7.	Joel Deery	MA Department of Housing and Community Development (DHCD)
8.	Tom Timms	MA Department of Housing and Community Development (DHCD)
9.	Vanessa Galarza	Community Teamwork, Inc. (CTI)

### Summary of Public Comments & EOHLC Responses

The table below is a summary of the oral and written comments received during the public hearing and comment period. The table also reflects EOHLC responses to the comments.

No.	Topic	Comment	EOHLC Response
<b>Judith Liben, Massachusetts Law Reform Institute (MLRI)</b>			
1.	<b>Thank You</b>	<ul style="list-style-type: none"> <li>▪ Thank you for the plan’s many activities and for taking full advantage of the flexibilities allowed by HUD.</li> <li>▪ Regarding Housing Navigator (Activity 2023-1): For decades, advocates have been asking for a system that would allow not only voucher holders, but everyone, to find all affordable housing in the state. Now we have this invaluable tool, which is a perfect use of MTW funds.</li> <li>▪ Thank you for the security deposit assistance activities, the housing search assistance activities, the Fair Housing Initiative, gap financing for the redevelopment of state public housing, for streamlining income-eligibility and verification methods, and for SNO Mass.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the support and feedback on these initiatives.</li> </ul>
2.	<b>Benchmarks and Outcomes</b>	<ul style="list-style-type: none"> <li>▪ The columns for “Outcome” and “Benchmark Achieved?” are blank, so it’s difficult to provide useful comments if we don’t know the outcomes of activities. I would appreciate an explanation of how that system works and how we can learn how successful or how challenging programs were as we figure out how to spend money in the next year.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The “Outcome” and “Benchmark Achieved?” columns are populated in the MTW Annual Report and not in the Annual Plan, which is the document currently out for public comment. The MTW Annual Report is the document produced at the end of the fiscal year in which EOHLC evaluates and reports on the outcomes and progress of each activity. The Annual Report is typically completed and</li> </ul>

			<p>sent to HUD in September of each year.</p> <ul style="list-style-type: none"> <li>▪ Copies of EOHLC’s Annual Plans and Reports are available on EOHLC’s MTW webpage.</li> </ul>
3.	<b>Unspent HAP Funds</b>	<ul style="list-style-type: none"> <li>▪ Why is there \$187 million in unspent HAP? Is that just normal MTW accounting or does it reflect more structural issues, especially the challenges of finding housing with vouchers?</li> </ul>	<ul style="list-style-type: none"> <li>▪ When EOHLC’s calendar year funding exceeds regular MTW program activity spending for that year, the difference gets added to EOHLC’s MTW reserves. The way that HUD structures EOHLC’s HAP funding contributes to the possibility of an annual surplus.</li> <li>▪ This surplus, combined with leasing challenges and lower-than-anticipated spending on some past initiatives, has contributed to the current reserve level.</li> <li>▪ EOHLC engaged in strategic planning in 2022, and the FY24 MTW Plan reflects planned investments that will draw on EOHLC’s MTW reserves.</li> </ul>
4.	<b>Rent Simplification: Mixed Families (Activity 2015-1)</b>	<ul style="list-style-type: none"> <li>▪ It’s time to implement the revised mixed family rent formula. In the Section 8 program and in EOHLC’s MTW program, there is one group of families that is singled out to pay higher rents, which are called prorated rents, that are usually not affordable. Those are mixed-immigrant families – families that include at least one citizen or eligible non-citizen and an ineligible non-citizen.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC continues to monitor the impact of the current mixed family rent policy and will consider implementing the policy as needed. This activity would impact less than 1% of families in EOHLC’s portfolio but has broader impacts and implications beyond EOHLC’s portfolio that require further study.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ These households effectively lack equal access to the program because under federal rules they must pay a prohibitively higher rent than other families.</li> <li>▪ EOHLC proposed and HUD approved a formula under which mixed families would pay an additional 10% of total payment rather than the unaffordable “prorated” rent. EOHLC has not implemented the mixed-family rent cap, and these families continue to lose an equal chance to participate in the program.</li> </ul>	
5.	<b>Value Vouchers (Activity 2011-1)</b>	<ul style="list-style-type: none"> <li>▪ Ms. Liben asks EOHLC to rethink the program or put it on hold rather than closing it out officially if it cannot be implemented this year.</li> <li>▪ This could be a useful additional tool because Value Vouchers would be best put to use in these times when market rents are out of sight and it’s harder than ever to lease up with vouchers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Thank you for the feedback on this activity. EOHLC plans to put this activity on hold and close it out in the FY 2024 Report. However, EOHLC will continue to explore ways of addressing affordability gaps.</li> </ul>
6.	<b>A Better Life (Activity 2018-5)</b>	<ul style="list-style-type: none"> <li>▪ Is ABL still a compulsory work and training program, or is it voluntary?</li> <li>▪ Revised policies are not included in the plan. If it’s mandatory, we continue to oppose this as we have in previous testimony. If not, we’d love to know what the revised policies are.</li> <li>▪ When can we expect the evaluation that the plan describes?</li> </ul>	<ul style="list-style-type: none"> <li>▪ In 2022, EOHLC resumed enforcement of the ABL program requirements. However, the requirements were modified to expand the pathways to program compliance (e.g., meeting with a coach monthly) and to reduce the penalty for noncompliance (instead of eviction, households who remain noncompliant would face a rent increase). Overall, these policy changes have been viewed positively by residents.</li> <li>▪ The final evaluation report from MDRC is expected in summer of 2024.</li> </ul>

7.	<b>Existing Project Based Vouchers</b>	<ul style="list-style-type: none"> <li>▪ There is a list of the dozens of Project Based Voucher developments, and that list names developments but does not tell us in what cities and towns they are located. Please add addresses and a map.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback. EOHLC must comply with the table format that HUD outlines in Form 50900 (“Elements for the Annual Moving to Work Plan and Annual Moving to Work Report”). City/town name is not one of HUD’s prescribed columns for Table 4 (“Existing Project Based Vouchers”).</li> <li>▪ In addition, EOHLC’s MTW Annual Plan and Annual Report are not intended as resources for housing search. EOHLC would direct the public to resources like Mass.gov’s Affordable Units for Rent page and Housing Navigator for more detailed information about PBV and other affordable units.</li> </ul>
8.	<b>Site Based Waiting Lists</b>	<ul style="list-style-type: none"> <li>▪ There are so many project-based developments growing every year, and it’s still the case that one has to go to each development in order to apply for housing. Ms. Liben would like EOHLC to work to improve this process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback and continues to explore ways to improve the application process for those seeking affordable housing.</li> </ul>
9.	<b>Project Based Voucher Revised Opt-Out Policy</b>	<ul style="list-style-type: none"> <li>▪ It would be helpful if EOHLC said what that policy is so people know at what point tenants in project-based developments can exercise the option to obtain a tenant-based voucher.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Section 20.32 of EOHLC’s Section 8 Administrative Plan addresses the opt-out policy, allowing PBV participants to request to move with tenant-based assistance after two years of PBV tenancy. This policy is enabled by MTW Activity 2018-7, which extended the original approved policy in (the now closed) Activity 2012-3.</li> </ul>

10.	<p><b>Rent Simplification: Earned Income Exclusion (Activity 2015-1)</b></p>	<ul style="list-style-type: none"> <li>▪ Consider expanding the earned income exclusion to other types of households, given skyrocketing rents and utilities and shrinking supply of units available to voucher holders.</li> <li>▪ At the very least, the exclusion should be available to people with disabilities who might not have earned income. Fair Housing laws require that.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC intends to provide this exclusion for an initial two-year period, at which time EOHLC will review economic indicators and determine whether to continue, discontinue, or expand the income exclusion.</li> <li>▪ When applying the increased earned income exclusion to working families only, it is projected to increase EOHLC’s HAP commitment by almost \$8 million. EOHLC will need to ensure that this initiative is sustainable after the initial 2-year period, before it can determine whether it is feasible to further expand it to additional households.</li> </ul>
11.	<p><b>Proposed New Activity: Technical Assistance for Tenants of State Public Housing</b></p>	<ul style="list-style-type: none"> <li>▪ Ms. Liben proposes that EOHLC fund technical assistance for tenants whose state public housing is being redeveloped.</li> <li>▪ As more state public housing faces redevelopment and new ownership structures, it’s critical that residents have legal representation in order to have meaningful input throughout the development process.</li> <li>▪ Set aside MTW funds for at least a pilot program with several attorneys who are trained and available to residents statewide to review policies, plans, and legal documents related to redevelopment of public housing communities. This would allow state public housing transformation to go forward with an educated tenant voice.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this suggestion; however, EOHLC does not have plans at this time to use MTW funds for this purpose.</li> </ul>
12.	<p><b>Proposed New Activity: Fair</b></p>	<ul style="list-style-type: none"> <li>▪ The time has come for an in-depth Affirmatively Furthering Fair Housing</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this suggestion.</li> </ul>

	<b>Housing Evaluation</b>	<p>evaluation of EOHLC’s MTW program.</p> <ul style="list-style-type: none"> <li>Ms. Liben proposes that some of the money that’s spent on “non-core” Section 8 activities be used to do a complete Fair Housing review of EOHLC’s MTW program so we can figure out how to make a good program work even better.</li> </ul>	
<b>Sally Nieves, RCAP Solutions</b>			
1.	<b>Alternative Verification Methods (Activity 2024-1)</b>	<ul style="list-style-type: none"> <li>Will the extension on the length of time that fixed income verification documents are valid also apply to TANF or EAEDC?</li> </ul>	<ul style="list-style-type: none"> <li>No, the policy on fixed income verification outlined in this activity does not apply to TAFDC or EAEDC; those are not considered fixed sources of income.</li> </ul>
<b>Jennifer Gilbert, Housing Navigator Massachusetts, Inc.</b>			
1.	<b>Housing Navigator (Activity 2023-1)</b>	<ul style="list-style-type: none"> <li>Thanks to EOHLC for making Housing Navigator Massachusetts part of the Draft MTW Plan.</li> <li>Housing Navigator Massachusetts, Inc. was founded in 2019 with the intention of improving fair housing and housing opportunity by providing a “One Stop Shop” for renters seeking affordable housing in our state.</li> <li>Individual renters, both those with mobile vouchers and those seeking affordable rents without a voucher, are our primary user group.</li> <li>Housing Navigator activities include: robust outreach to renters and owners, garnering new listings, maintaining high-quality data, and adding new features.</li> <li>Housing Navigator accomplishments include: 6,500+ users per week (new search every minute), onboarding</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates the support and feedback on this initiative.</li> </ul>



		<p>sessions for property owners, First Come First Serve listings, and a short waitlist pilot.</p> <ul style="list-style-type: none"> <li>▪ Housing Navigator makes housing opportunities more transparent and more actionable, and has already achieved powerful results for low- and moderate-income households across the Commonwealth.</li> </ul>	
<b>Erik Sundsted, South Middlesex Opportunity Council (SMOC)</b>			
1.	<b>RAA Transfer Process</b>	<ul style="list-style-type: none"> <li>▪ SMOC is involved with a particularly high number of transfers due to the central location of its coverage area.</li> <li>▪ It appears that each RAA is using their own “transfer checklist,” which is causing challenges and delays in processing transfers as well as QC issues. There is lack of consensus on which agency is responsible for certain aspects of the transfer process.</li> <li>▪ SMOC proposes that EOHLC clarify and make clear to all RAAs the policy in place.</li> <li>▪ SMOC proposes that a universal checklist and universal transfer packet be created for all RAAs to use in addition to more written clarity and guidance from EOHLC regarding the transfer process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Since the conversion to Tenmast, EOHLC has worked with the RAAs to clarify, improve, and streamline the transfer process, including agreeing on and implementing a standardized transfer checklist. While it’s not part of this MTW Planning process, EOHLC can consider further discussion on transfers.</li> </ul>
<b>The Fair Housing Alliance of Massachusetts</b>			
1.	<b>Fair Housing Initiative (Activity 2021-1)</b>	<ul style="list-style-type: none"> <li>▪ The Fair Housing Alliance of Massachusetts (“FHAM”), which is comprised of four independent entities (the Housing Discrimination Testing Program of Suffolk University, the Massachusetts Fair Housing Center, the Southcoast Fair Housing Center, and Community Legal Aid) submitted comments in support of Activity 2021-1: Fair Housing Initiative.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for this initiative.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ We appreciate that one of the primary objectives of the Moving to Work (“MTW”) Demonstration is to “[i]ncrease housing choices for low-income families.” In Massachusetts, discriminatory housing practices continue to limit housing choice for many residents. Despite the existence of state anti-discrimination laws that prohibit discrimination against renters due to their participation in a voucher program, or because of the requirements of such programs, landlords and real estate professionals still engage in such behaviors.</li> <li>▪ In light of that reality, FHAM writes to express how critical EOHLIC’s funding for fair housing initiatives has been and remains, so that the Commonwealth’s residents receive accurate, timely education about the laws and so that the laws are vigorously enforced.</li> <li>▪ FHAM activities include: outreach to and education of local public housing authorities; collaboration with the Commonwealth’s SNO Mass program; statewide, coordinated investigations into discriminatory housing practices; enforcement actions based on the results of those investigations; advocacy and legal representation of individual households harmed by discriminatory practices; and a comprehensive education media campaign.</li> </ul>	
<b>NeighborWorks Housing Solutions (NHS)</b>			
1.	<b>Housing Search Assistance</b>	<ul style="list-style-type: none"> <li>▪ NHS strongly supports this initiative afforded by PIH Notice 2022-18 and anticipates assisting more families more quickly and fewer expired vouchers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLIC appreciates the feedback and support for this initiative.</li> </ul>

2.	<b>Alternative Verification Methods (Activity 2024-1)</b>	<ul style="list-style-type: none"> <li>▪ NHS commends EOHLC for attempting to streamline program administration and administrative burdens via extending the time that verification documents are valid.</li> <li>▪ Regarding the proposed change to increase the discrepancy threshold to \$5,000: The change makes sense given the newly implemented \$5,000 working family exclusion.</li> <li>▪ NHS favors the proposal to modify the verification hierarchy such that designees may rely on any third-party verification method before accepting self-certification.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for this initiative.</li> </ul>
3.	<b>Income Eligibility (Activity 2024-2)</b>	<ul style="list-style-type: none"> <li>▪ NHS applauds EOHLC’s proposal to streamline initial screening and eligibility which means that households will be screened for income eligibility according to the income limits of the area where the voucher is initially issued. This will reduce voucher holder confusion, especially if a voucher holder transfers to another jurisdiction, and will reduce administrative burden.</li> <li>▪ NHS strongly supports the proposal that eliminates re-verifying income eligibility when a household transfers across programs (from non-MTW to MTW or vice versa).</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for this initiative.</li> </ul>
4.	<b>Existing Project Based Vouchers</b>	<ul style="list-style-type: none"> <li>▪ It would be helpful to see the cities in which the project-based vouchers are committed, issued or leased.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback. EOHLC must comply with the table format that HUD outlines in Form 50900 (“Elements for the Annual Moving to Work Plan and Annual Moving to Work Report”). City/town name is not one of HUD’s prescribed columns for Table 4</li> </ul>

			<p>(“Existing Project Based Vouchers”).</p> <ul style="list-style-type: none"> <li>In addition, EOHLC’s MTW Annual Plan and Annual Report are not intended as resources for housing search. EOHLC would direct the public to resources like Mass.gov’s Affordable Units for Rent page and Housing Navigator for more detailed information about PBV and other affordable units.</li> </ul>
5.	<b>Development of Local Forms (Activity 2010-4)</b>	<ul style="list-style-type: none"> <li>NHS appreciates EOHLC’s commitment to updating and preparing universal forms.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates the feedback and support for this activity.</li> </ul>
6.	<b>Rent Simplification: Mixed Families (Activity 2015-1)</b>	<ul style="list-style-type: none"> <li>NHS wholeheartedly supports the proposal to revise the mixed family rent formula so that mixed families pay an additional 10% of TTP as this will dramatically minimize the rent burden for mixed families.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC continues to monitor the impact of the current mixed family rent policy and will consider implementing the policy as needed. This activity would impact less than 1% of families in EOHLC’s portfolio but has broader impacts and implications beyond EOHLC’s portfolio that require further study.</li> </ul>
7.	<b>Medical Expenses</b>	<ul style="list-style-type: none"> <li>Although this is not a 2024 proposed activity, NHS requests that EOHLC review the medical expense deduction policy and adopt a streamlined methodology with respect to the deduction to avoid administrative burden on the agency and the participants and minimize errors.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates this feedback and will continue to explore opportunities for simplifying rent and improving administrative efficiency.</li> </ul>
8.	<b>Inspection Requirements</b>	<ul style="list-style-type: none"> <li>Although this is not a 2024 proposed activity, NHS supports revising the annual inspection requirement for households with children under 6.</li> </ul>	<ul style="list-style-type: none"> <li>EOHLC appreciates and will consider this feedback.</li> </ul>

<b>Anne Marie Belrose, Regional Housing Network of Massachusetts (RHN)</b>			
1.	<b>Security Deposit and Housing Search Assistance</b>	<ul style="list-style-type: none"> <li>▪ We believe that many components of the plan provide new opportunities – and increased flexibility – for MTW voucher holders to optimize participation in the program. In particular, we expect that security deposit assistance provided in accordance with PIH Notice 22-18 will reduce or eliminate the barrier that costly security deposits can represent. Similarly, we expect that the proposed housing search assistance will provide voucher holders with critical assistance in the most daunting components of housing search, most notably, locating a unit that meets program requirements, as well as negotiation, completing applications, and accessing community resources.</li> <li>▪ The FSS changes that are proposed also expand opportunities for low-income households.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates the feedback and support for these initiatives.</li> </ul>
2.	<b>Expansion of Housing Choice / Existing Project Based Vouchers</b>	<ul style="list-style-type: none"> <li>▪ Expansion of housing choice – especially in high opportunity areas – while reducing barriers to fair housing is critical. One suggestion to assist readers in understanding where such opportunities may exist would be to include the municipality in which housing is located in Table 4 (page 10.)</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback. EOHLC must comply with the table format that HUD outlines in Form 50900 (“Elements for the Annual Moving to Work Plan and Annual Moving to Work Report”). City/town name is not one of HUD’s prescribed columns for Table 4 (“Existing Project Based Vouchers”).</li> <li>▪ In addition, EOHLC’s MTW Annual Plan and Annual Report are not intended as resources for housing search. EOHLC would direct the public to resources like Mass.gov’s Affordable</li> </ul>

			Units for Rent page and Housing Navigator for more detailed information about PBV and other affordable units.
3.	<b>Alternative Verification Methods (Activity 2024-1)</b>	<ul style="list-style-type: none"> <li>▪ The alternative verification methods that are proposed may reduce the administrative burden and time required to process applications. However, there is consensus among RHN member organizations that the time required to process applications as indicated in the plan (2.5 hours, on page 31) is grossly understated, even with the proposed changes.</li> <li>▪ Ongoing challenges with language access and the lack of translated vital documents from EOHLC to the RAAs leads to duplicative costs and intensive work as each RAA translates common documents.</li> <li>▪ Critically, the challenges and time required to process applications in Tenmast cannot be overstated. While communication and response time is greatly improved, system outages, buffering, and other problems that cause major delays persist. RAAs continually cite the challenges with Tenmast as a reason for staff attrition.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EOHLC appreciates this feedback.</li> </ul>
4.	<b>RAA Transfer Process</b>	<ul style="list-style-type: none"> <li>▪ Each RAA utilizes its own “transfer checklist,” which makes communication and challenges of transfers more difficult, with ensuing delays.</li> <li>▪ Concerns have been raised about core documents not being included by the transferring agency and possible implications of this for EOHLC audits of the receiving agency.</li> <li>▪</li> </ul>	<ul style="list-style-type: none"> <li>▪ Since the conversion to Tenmast, EOHLC has worked with the RAAs to clarify, improve, and streamline the transfer process, including agreeing on and implementing a standardized transfer checklist. While it’s not part of this MTW Planning process, EOHLC can consider further discussion on transfers.</li> </ul>

		<ul style="list-style-type: none"><li>▪ To that end, RHN requests that EOHLC provide clarification to all RAAs regarding the policy related to such transfers. Ideally, RHN proposes that a universal checklist and transfer packet be created for all RAAs to use in addition to increased clarity and policy guidance. In particular, clarity as to which agency is responsible for obtaining and reviewing specific documentation related to the file being transferred is sought.</li></ul>	
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# Appendix E: Certification of Payments (HUD-50071)

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

## Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Commonwealth of Massachusetts Department of Housing and Community Development

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official

Jennifer D. Maddox

Title

Undersecretary

Signature

Jennifer D. Maddox

Digitally signed by Jennifer D. Maddox  
Date: 2023.04.13 16:43:44 -04'00'

Date (mm/dd/yyyy)

04/13/2023

Previous edition is obsolete

form HUD 50071 (01/14)

## Appendix F: Impact Analysis

### Change to FSS Preliminary Escrow Credit Calculation

As described in Activity 2012-5, EOHLC is proposing to modify the calculation of preliminary escrow credit to reflect 30% of the growth in monthly earned income without consideration of the growth in monthly rent. This will allow households to escrow based on the increase in their earned income, regardless of whether or not there has been a change in TTP.

	MTW
<b>Number of Active FSS Households</b>	764
<b># of Households with Escrow</b>	
Current/Standard Calculation	335
New Proposed Policy: Escrow calculation based on 30% of increase in monthly earned income (with no comparison to change in TTP)	354
<b>Total Monthly Escrow</b>	
Current/Standard Calculation	\$150,861
New Proposed Policy: Escrow calculation based on 30% of increase in monthly earned income (with no comparison to change in TTP)	\$186,636
<b><i>Escrow calculation based on 30% of increase in monthly earned income only (with no comparison to change in TTP)</i></b>	
<b>Households with an Increase in Monthly Escrow</b>	186
\$1 to \$10	22
\$11 to \$25	22
\$26 to \$50	13
\$51 to \$100	30
\$101 to \$250	47
\$251 to \$500	35
\$501 to \$750	13
\$751 to \$1,000	3
Over \$1,001	1
<b>Households with a Decrease in Monthly Escrow</b>	0
<b>Households with No Change in Monthly Escrow</b>	168