

INTRO

Brattleboro Housing Partnerships was designated a Moving To Work (MTW) agency by HUD in 2020. Each year BHP can ask for specific waivers to HUD regulations in an MTW Supplemental Plan in order to create policies and programs that better meet the needs of our residents/participants and the larger community. Last year BHP asked for three waivers.

First was to change the reexamination schedule from every year to every three years. Second was to allow self-certification for, and not impute income from, assets under \$50,000. Third was to change the apartment inspection schedule from every year to every three years. All three were approved. Final approval from HUD did not arrive until June so there were delays in the implementation schedule. Implementation planning is currently under way. The 2022 report contains details of the implementation schedule.

WAIVERS REQUESTED FOR 2023

For the 2023 Supplemental Plan beginning in April 2023 we will be asking for three new waivers and a modification to one that was approved last year.

First Request – Modification to 2022 Supplemental Plan

The modification to last year's plan is for the three-year reexamination schedule. The late approval combined with other external events delayed implementation planning. As that got under way it became clear that for a number of reasons, including the need for new software, we could not fully implement it this year. Therefore we are asking to modify the waiver so that the three-year reexamination only applies to those on fixed incomes, all others will continue to have recertification done every year.

This will still result in staff efficiencies without creating additional complexities in the software.

Second Request – Changes to the Family Self Sufficiency (FSS) Program

We also will be requesting a waiver to adapt our current FSS program to better meet the needs of our population and community. The FSS program is designed by HUD to help people move toward self-sufficiency. We have found that the HUD design does not meet the needs of our resident/participants as well as we would hope. It is too inflexible and not designed to meet different individual's situations.

The changes we are requesting will require that all residents/participants (excluding persons with disabilities) between the ages of 18-54 must work with the Resident Service Coordinator to develop a five-year Goal Plan to help move toward more self-sufficiency. This Goal Plan will be developed by the resident/participant and will reflect their own personal, financial and educational situation. At quarterly meetings with the RSC, resources will be pursued to help achieve the goals. Support will be given by the RSC toward achievement of the goals.

The requirements for participation mean that every participant develop a Goal Plan and meet/check in once every quarter (four meetings a year) with the RSC to review progress, change goals if needed and pursue resources to help achieve the goals. Incentives for meeting goals will

be provided, including rent credits and grants to help meet goals. Not meeting the quarterly check-in could result in losing housing assistance. A hardship policy (see below) exists to allow the person and the RSC to come to an agreement to alleviate this loss on a case-by-case basis.

Hardship Policy

On a case-by-case basis participants may adjust their Goal Plan to reflect life changes. If there is good cause preventing movement toward stated goals, the plan may be changed and there will be no negative repercussions. Good cause is an event or circumstance that is beyond the participant's ability to control. It can include loss of a job, change in family situation or make-up, illness, natural disasters, outside forces among others. The RSC will work with the participant to develop a new goal plan that reflects the new circumstances. If a participant is so affected by an event or circumstance beyond their control that it becomes overly burdensome for them to work on their Goal Plan, the RSC can put the Plan on an indefinite pause until circumstances improve. The participant will check in quarterly for an update on their circumstances. In this case, the RSC will assume responsibility to initiate the check-in.

Third Request – Elimination of the escrow portion of FSS

Escrow was meant to encourage people to become more self-sufficient. Over the years it worked for some resident/participants but has not been helpful to most. So this year we are asking to eliminate the escrow provision and instead be allowed to offer more immediate incentives toward self-sufficiency. At this point these incentives will include rent credits and development grants. As resident/participants achieve goals they may be eligible for credit to their next month's rent. They may also be eligible for a development grant related to their goals that will help reduce barriers to achievement.

Fourth Request relates to Housing Development

BHP will also pursue a waiver that would allow it to acquire, renovate and/or build affordable units for low-income families that are not necessarily public housing units. In the potential development of these units BHP must still adhere to many HUD requirements including Fair Housing, Non-Discrimination, etc. This flexibility will be valuable as we study the possible reuse of Melrose Terrace and how any reuse can serve our residents/participants and the larger community in meeting our housing needs.

TIMELINE FOR THE 2023 SUPPLEMENTAL PLAN

November 4, 2022 – draft proposal will be posted and available for public review and comment

December 20, 2022 – end of comment period

December 20, 2022 – public hearing

January 9, 2023 – Board of Commissioners vote on proposal

January 14, 2023 – submit proposal to HUD

April 1, 2023 – begin to implement changes if proposal approved by HUD

**Please send comments to bhp@brattleborohousing.org or PO Box 2275
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