

BRATTLEBORO HOUSING PARTNERSHIPS MOVING TO WORK SUPPLEMENTAL PLAN

INTRODUCTION

In January 2021, Brattleboro Housing Partnerships was designated by HUD as a Moving to Work (MTW) agency. This designation allows BHP to apply for waivers from the one-size-fits-all rules and regulations of HUD in order to implement policies and procedures that better meet the needs of our participants and our community.

Each year BHP may submit an MTW Supplemental Plan (it is supplemental to its regular Annual Plan) that describes what changes it seeks to make for the upcoming year. It is required to make the proposed changes available for review/comment for a 45 day period and to hold a public hearing.

The proposed changes in the Supplemental Plan for FY 2025 (April 2025-March 31, 2026) will be available for review/comment from August 23, 2025 – October 7, 2025. **A public hearing will be held on October 7, 2025.** The Board will review comments and adopt the final plan at its October 14, 2025 meeting, and the Plan will be submitted before the deadline of January 12, 2025. If the waivers are approved by HUD, they will become effective April 1, 2025.

HISTORY

BHP submitted Supplemental Plans with waiver requests for the fiscal years 2022 (April 1, 2022-March 31, 2023), 2023 (April 1, 2023 – March 31, 2024), and 2024 (April 1, 2024 – March 31, 2025). The waivers applied for and approved in those years are:

- Performing reexaminations of income for rent calculations from every year to every three years. Reexaminations will be done on this schedule – Hayes Court in 2024, Samule Elliot Apartments in 2025, Moore Court, Ledgewood Heights and all HCV (Section 8) in 2026, Hayes Court in 2027, and continue the cycle.
- Allowing families with assets of less than \$50,000 to self certify the assets.
- Perform on going inspections of Section 8 units every three years rather than every year. Initial and special requested inspections will be done upon request.
- Eliminate the need for a special Program Coordinating Committee for our LEAP (previously called FSS) program and instead make use of already existing committees in our community.
- Require all residents/participants between the ages of 18-54 unless disabled or the primary caregiver for a disabled person, to participate in the LEAP (Learning Employment Academic Program).
- Create our own Contract of Participation for the LEAP participants.
- Not using increases in income for LEAP participants in determining rent calculations during their Action Plan period. Allow rent credits and development grants for progress toward goal achievement.
- Exclude all student financial aid from rent calculations.

- Increase the number of Project Based Vouchers (PBVs) allowed to be used in a single project to 100%.
- Increase the total number of PBVs able to be used in all programs to 50% of our allowable units.
- The ability to provide PBVs to shared housing and manufactured homes.
- Increase the PBV contract with a landlord to 50 years.
- Offer landlord incentives (these have been approved but are yet to be implemented):
 - Limited vacancy loss payments for: delays in repairs beyond the control of the landlord; persons transitioning from treatment or incarceration; court ordered eviction.
 - Limited damage claims.
 - Limited “loyalty” payment

CURRENT

The waivers being request for FY 2025 (April 1, 2025 – March 31, 2026), if approved will be able to be implemented April 1, 2025) There following waivers are being requested:

MEDICAL DEDUCTION

Under our current policy, any household whose head of household is 62 or over or disabled, may claim a of medical deductions from their income if they are over 3% of adjusted monthly income, for purposes of rent calculations. HUDs new rules under Housing Opportunities Through Modernization Act (HOTMA) which will take effect in 2025, will increase the threshold for deduction from costs over 3% to costs over 10%.

We are asking for a waiver to the current HUD policy of the 3% threshold and the future 10% threshold to establish a policy that better meets the needs of our residents.

We are asking for this waiver because we find that many people who have medical expenses will not qualify because they do not meet the 10% (or even the current 3%) threshold. Yet these recurring legitimate medical expenses are straining their budgets.

Our new policy would:

- Not change the eligibility requirement that the head of household is 62 or over or disabled. If that eligibility requirement is met, the allowable expenses for all family members would be excluded as is currently the case.
- Allow certain expenses for all qualified households without having to meet a threshold;
- Not allow Over the Counter medications, even if recommended by a licensed medical practitioner
- Not allow food or nutrition supplements, even if recommended by a licensed medical practitioner
- Not allow quality of life expenses such as gym memberships, massages, exercise gear even if recommended by a licensed medical practitioner
- Provide for a one-time hardship policy

Hardship policy: Current policy allows residents to include OTC, food supplements and other quality of life expenses for deductions if ordered by a licensed medical care professional. Starting in April 2025 with the policy change that excludes these expenses, some families may need time to financially adjust. Any participant claiming health care expenses as a deduction as of April 1, 2025 may request a hardship relief one time. They will be granted a one-time allowance to use the previous 12 months expenses, including those expenses that are allowed at that date. At their next triennial recertification they will be subject to the new policy. If expenses that are allowed as of April 2025 increase, they will be eligible to apply for an interim recertification under the triennial recertification hardship policy.

THIRD PARTY HQS INSPECTIONS

Currently all units that are owned, managed or controlled by BHP must have their Housing Quality Standards (HQS) inspections done by an outside entity. This can cause delays and additional costs. When an apartment is ready for a resident to move in, time is often of the essence. Any delays could result in loss of rental income to BHP and delayed housing for the new resident. In addition, biennial inspections of 20% of the units must also be done by an outside entity. This results in additional costs. BHP has been contracting with another PHA for these inspections. That entity is an hour away so there is considerable time and expense for each inspection.

We are requesting a waiver to do two things: allow ongoing, regular HQS inspections to be done every three years instead of the current two years; and allow BHP to conduct its own HQS initial and regular inspections. A special inspection may be requested at any time by the tenant, landlord/owner, local officials, HUD, caregiver, family or other concerned entity.

CHILD SUPPORT DEDUCTION

We are asking for a waiver to allow us to exclude child support which is paid to be excluded from income for rent calculation purposes. Third party verification will be required establishing the actual amount paid. The verification could come from Office of Child Support, bank statement, or other. A resident/participant receiving such a deduction must sign an agreement that if this payment stops, they will report it and agree to an interim recertification for rent calculation purposes.