BRATTLEBORO HOUSING AUTHORITY d.b.a

BRATTLEBORO HOUSING PARTNERSHIPS MOVING TO WORK SUPPLEMENTAL PLAN 2026 Fiscal Year (April 1, 20206 – March 31, 2027)

INTRODUCTION

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

Each year BHP may submit an MTW Supplemental Plan that describes what changes it seeks to make for the upcoming year and reports on past changes. A requirement is to make the plan available for review/comment for a 45-day period and to hold a public hearing.

For a number of reasons, BHP will not be asking for any waivers for the year starting April 1, 2026. This year's Supplemental Plan will report on the progress of past changes. It will be available for review and comment starting November 17, 2025 and will close on January 3, 2026. A public hearing will be held on December 15, 2025, the BHP Board of Commissioners will approve the plan on January 5, 2026, and it will be submitted on January 13, 2025 Comments can be sent to bhp@brattleborohousing.org or be given at the public hearing which will be held remotely:

https://us02web.zoom.us/j/84876082452?pwd=WHhmeTJ6MVpJcjRYWXd4TnY0ZTIzUT09 1- 888 788 0099 US Toll-free

Meeting ID: 848 7608 2452 Passcode: 702932

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). 2025 (April 1,2025-March 31, 2026).

Following is a list of the waivers applied for and approved along with a report on the progress of those waivers, the report is in *italics* and in parentheses:

- 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, Samuel Elliot Apartments in 2025, Moore Court, Ledgewood Heights and all Housing Choice Vouchers (HCV) (Section 8) in 2026, Hayes Court in 2027, and continue the cycle.
 - o (this cycle has been put in place and the 2024 reexaminations for Hayes Court and 2025 reexaminations for Samuel Elliot Apartments were completed. We are now preparing for Moore Court, Ledgewood Heights and Section 8 in 2026.)
- Interim recertifications for increases in income no longer impact tenants share of rental amount.

- (This has been implemented and as a result, households have been able to increase their incomes to improve the quality of their lives. It has meant that the average income of our residents/participants has increased from \$26,000 to \$30,000 and the average tenant contribution has remained the same. This is additional money that households can use for other necessities.)
- Allowing families with assets of less than \$50,000 to self-certify the assets.
 - (while this does not affect many of the residents, for those that it does this reduced the amount of effort during reexaminations. It is no longer just a waiver for BHP but has been adopted by HUD as a standard policy)
- 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.
 - o (Implemented and no problems as of this date)
- Each year BHP receives a Family Self-Sufficiency (FSS) grant. BHP has renamed the program Learning Employment Academic Program (LEAP). BHP asked to eliminate the need for a special Program Coordinating Committee (PCC) for LEAP and instead make use of already existing committees in our community.
 - (The elimination of a special PCC has freed up both BHP staff and community partners. Making use of already existing committees has increased participation, cooperation, and outcomes)
- Require all residents/participants between the ages of 18-54 unless disabled or the primary caregiver for a disabled person, to participate in LEAP.
 - (This change has resulted in a number of people meeting their individual goals with the help of the LEAP Coordinator. Although the number changes from time to time, as of October there were 109 individuals required to participate. Of those 92 are active and the remainder are new to the program and are just getting enrolled. This change has been valuable to most of our residents/participants.)
- Create our own Contract of Participation (COP) for the LEAP participants.
 - (The standard COP was burdensome and complicated. Our new one is easy to understand and use. We are just at the point of the end of the three-year COP so most individuals will see theirs renew for another three years.)
- 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.
 - (the exclusion of rent increases is related to the general three-year reexaminations. The incentives for participation of the rent credits and development grants have proved successful. We have awarded 30 rent credits and 16 development grants, examples - gas cards to take care of ailing parent, required shoes for employment, windshield replacement for safety.)
- Exclude all student financial aid from rent calculations.
 - o (this has been put in place but so far has not been used. We anticipate more use of this as we begin the new three-year cycle of reexaminations)
- Increase the number of Project Based Vouchers (PBVs) allowed to be used in a single project to 100%.
 - (we have not used this yet but anticipate being able to use it in upcoming projects, including Melrose Terrace Redevelopment.)

- Increase the total number of PBVs able to be used in all programs to 50% of our allowable units.
 - (This has allowed us to use more Project Based Vouchers in places like the Alice Holway Development in Putney among others.)
- The ability to provide PBVs to shared housing and manufactured homes.
 - We have not yet had occasion to use this but anticipate it will be useful as more housing is developed in the area)
- Increase the PBV contract with a landlord to 50 years.
 - (We have seen an interest in this by housing developers as more and more smaller landlords are retiring and more corporate housing is developed)
- 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.
 - o Limited damage claims.
 - o Limited "loyalty" payment
 - (Because of staff changes and uncertain federal funding going forward, none of these have been implemented. Once funding is secure we will review these waivers)
- Changing the medical deduction policy
 - Eliminating Over the counter drugs
 - o Supplements
 - Memberships and clothing
 - o Require no threshold percentage of income to qualify
 - Offer a hardship policy
 - (this policy became effective April 1, 2025. Because of our reexamination cycle, it has not yet been used. We expect during this year that there may be some who apply for the hardship policy, and some who are newly qualified to use the deduction.)
- Exclude paid child support payments from income for rent calculation purposes.
 - o (this policy became effective April 1, 2025. Because of our reexamination cycle, it has not yet been used. We expect during this year that there may be some who are qualified to use the deduction.)

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- Allow BHP to do its own Housing Quality Standards(HQS) inspections on properties it owns and/or manages
 - o (this change has allowed us to save time and money when apartments turn over and when there is a time deadline for the inspection.)