



**CONCORD HOUSING AND REDEVELOPMENT
MOVING TO WORK PLAN AND APPLICATION
ASSET BUILDING COHORT**

DRAFT FOR PUBLIC COMMENT

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PART I – MTW PLAN AND ASSET BUILDING INITIATIVES INFORMATION

A. MTW PLAN

I. Vision for PHA's Local MTW Program

Concord Housing and Redevelopment (CH+R) is pleased to submit its application to participate in the Moving to Work (MTW) Demonstration Program's Asset Building Cohort. Through the funding flexibility and regulatory relief provided by the MTW program, CH+R will design and test innovative strategies to increase housing choice and self-sufficiency, streamline programming, and administer more efficient and transparent programs that are responsive to community needs and priorities. CH+R envisions utilizing the flexibilities offered under the MTW program to improve the programs and services available to clients, increase and expand available housing opportunities, and facilitate new partnerships to leverage additional resources needed to address the affordable housing crisis in the region.

CH+R's overall mission, which is to "advocate, develop, operate, and manage affordable housing programs to provide decent, safe, and affordable housing for families in a manner that promotes and improves the economic independence and social well-being of its residents," aligns well with the three MTW statutory objectives. To fulfill this mission, CH+R provides a variety of programs and services designed to: (1) act as a catalyst and community partner in developing new affordable housing opportunities, (2) engage in community wide revitalization initiatives in a manner that improves the City's neighborhoods, promotes economic development, and increases employment opportunities for all citizens; (3) provide personal and economic enrichment opportunities for all constituents; and (4) help residents achieve independence through supportive services and training.

CH+R welcomes the opportunity to participate in Cohort #4 of the MTW Expansion, which is focused on asset building initiatives, defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. The asset building component of this initiative assists and incentivizes program participants to improve their credit scores, budget and save, establish, and achieve financial goals, and build generational wealth and opportunity. The lessons learned from this MTW cohort will be critical in shaping future policy around asset building, financial literacy, and other economic self-sufficiency initiatives. Further, CH+R appreciates the opportunity to connect with other innovative MTW agencies by participating in the “Community of Practice” sessions for MTW Asset Building Cohort to share ideas and best practices. Upon designation as an MTW agency, CH+R intends to utilize MTW programmatic and funding flexibilities to achieve other objectives, including streamlining program administration and increasing housing choice, as authorized in the MTW Operations Notice and through the MTW Plan/Supplement process.

As part of the Asset Building Cohort, CH+R’s MTW programs and services will be administered and managed by an experienced and qualified group of industry professionals. The team consists of six office staff, five maintenance staff, and is overseen by a five-member Board of Commissioners. The MTW program will be led by CH+R’s Executive Director, Julie Palmeri. Julie has over 15 years of experience in the affordable housing industry and has managed a variety of Federal Housing programs including the HOME Investment Partnerships Program, the Low-Income Housing Tax Credit (LIHTC) program, and USDA Rural Development programs. She is skilled in directing multiple projects from ideation to implementation, preparing and executing strategic plans, managing budgets and fiscal responsibilities, ensuring successful completion of projects, and monitoring compliance with all applicable regulations and procedures. Julie will have

oversight and responsibility for the overall management of the MTW program including strategic planning and coordination of initiatives and engagement with key external stakeholders including the Board of Commissioners and residents and program participants.

Julie will collaborate closely with Heather Sargent, CH+R's Director of Administration, and Dawn LaClair, the Director of Housing. Heather has achieved certifications in LIHTC Compliance, HUD Certified Occupancy Specialist, and Public Housing Management Specialist and currently manages the supportive services offered by CH+R. Dawn has managed numerous client programs throughout her twenty-two year tenure at the agency and is certified as a manager in the Public Housing and HCV programs, the Section Eight Management Assessment Program (SEMAP), and as a Housing Quality Standards (HQS) inspector. Dawn also participates on the Welcoming Concord Initiative Steering Committee which is a coalition of organizations and community leaders from across the state striving to make New Hampshire more welcoming, and specifically focused on welcoming immigrants and refugees to the community.

CH+R certifies that it meets the eligibility requirements for participation in the MTW Program, as listed in PIH Notice 2022-11. Specifically, CH+R has been designated as a High Performer under SEMAP, as verified by HUD, and meets all other stated requirements related to reporting, compliance, and fiscal obligations. Further, CH+R certifies it will implement its approved MTW activities in compliance with statutory requirements outlined in 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 ADA Act of 1990. Additionally, CH+R will comply with all regulations implementing these authorities other applicable Federal, State, and local civil rights laws; and it will affirmatively further fair housing including: (1) take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with 24 CFR 5.150-5.180

and 903.15; (2) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (3) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d).

II. Plan for Future Community/Resident Engagement

Resident and community engagement is critical to ensuring that CH+R initiatives reflect the goals and values of the low-income individuals and families that it serves. Over the course of its participation in MTW, CH+R will seek meaningful input from a diverse group of stakeholders, including but not limited to racial and ethnic minorities, persons with limited English proficiency, persons with disabilities, families with children, and groups representing such persons. Specifically, CH+R will solicit feedback from residents and program participants as well as local community groups who serve assisted residents and low-income households such as the Tri-County Community Action (TCCAP), a multi-purpose social service and advocacy organization that offers a variety of programs and resources to low-income individuals and families throughout the region, including advocacy support. Additionally, through its participation in the MTW program, CH+R hopes to encourage community-wide engagement and explore new partnerships with the potential to expand the breadth of services it offers to low-income families and individuals.

CH+R will meet with key partners and resident groups on a regular basis and at least annually to solicit feedback and input on agency plans, initiatives, and related program materials, and to develop future MTW strategies. To notify low-income families and individuals of proposed and new policies and initiatives, CH+R will work with local organizations serving and advocating for under-represented groups to provide notice and request input. Additionally, information related to proposed MTW initiatives and opportunities for input will be posted on the agency website and

relevant written materials will be made available to residents and program participants. Interpretation and translation services will be made available as well as other accommodations to ensure that all interested persons may have access to the information and opportunity to provide meaningful input. CH+R will hold public meetings to garner input on proposed initiatives from these groups throughout the process. Additionally, to disseminate CH+R policy initiatives and strategy more broadly, CH+R will engage community partners at various City agencies with ties to the local community such as the departments of Human Services, Community Development, Parks and Recreation, and Police & Fire.

III. PHA Operating and Inventory Information

Since its founding in 1961, CH+R has worked closely with the City of Concord and other community partners to utilize valuable, limited federal resources to support the development of low-income housing in the area. This has included the development and expansion of low-income public housing, participating in municipal redevelopment projects, and planning, and expanding overall voucher program resources. Additionally, Concord is New Hampshire's capital and third most populous city, and serves as a national resettlement city for refugees with individuals and families arriving from Afghanistan, Bhutan, the Democratic Republic of the Congo (DRC), Iraq, Somalia, Burundi, and many other countries. Affordable housing resources and related services and supports are critical to providing stability and promoting economic advancement among all constituents of Concord – both newcomers and long-term residents.

CH+R currently operates 262 public housing units across five (5) properties. Three (3) properties are restricted to elderly or disabled households and two (2) are family developments. In addition to its public housing units, CH+R owns and operates 25 units of income-restricted tax credit-financed family housing, 17 units of housing for persons with disabilities at two (2)

properties and manages 15 units across three (3) housing sites specifically dedicated to housing homeless and formerly homeless individuals on behalf of the Concord Coalition to End Homelessness (CCEH). In addition, CH+R owns 14 units of market rate housing and commercial units. The most significant challenge facing CH+R is its aging public housing portfolio, as most properties need substantial repairs, renovation, and rehabilitation at a level that far exceeds current available public housing capital resources. CH+R will continue to explore strategies to address this issue and hopes that participation in the MTW program, and the flexibilities allowed under MTW, will allow the agency to pursue and leverage additional resources that may not have been available or feasible in the past, such as the Rental Assistance Demonstration (RAD) program.

In addition to its owned and managed units, CH+R administers 249 Housing Choice Vouchers leased throughout the city, including 5 Foster Youth Initiative vouchers, 10 Mainstream vouchers, 14 Tenant Protection Vouchers (TPV), 3 Project Based Vouchers (PBV) and 217 Tenant-Based Housing Choice Vouchers (HCV). In recent years, voucher holders have faced increasing challenges to locating a unit to lease due to limited housing stock, a low vacancy rate, and increasing housing costs. A 2021 report released by the New Hampshire Housing Finance Agency (“2021 Residential Rental Cost Survey Report”) indicated that the vacancy rate in New Hampshire was 0.9% statewide and 0.4% for Merrimack County. Additionally, the study indicates that the 2-bedroom median gross rent in Merrimack County has increased by almost 20% from 2016-2021. During this time, the established Fair Market Rent (FMR) amounts have not kept pace with current asking rents by property owners, which puts voucher holders at a disadvantage compared with unassisted tenants and may contribute to property owner reluctance to lease an assisted tenant.

CH+R has innovatively addressed these challenges by entering Memoranda of Understanding with three (3) area organizations to provide housing navigation and stabilization supports to program participants: the Concord Coalition to End Homelessness (CCEH), Family Promise of Greater Concord (FPGC), and the Friends Program. These partnerships are described in greater detail in Section VI of this application. Additionally, CH+R partners with the City of Concord and local community groups to provide low and no-cost services and programs to its residents and program participants. This includes providing free daycare services for residents, afterschool, and homework support programming, and partnering with the local Boys and Girls Club and Parks and Recreation Department to sponsor activities for children and youth throughout the year. CH+R has also launched online rent payment and landlord portals to improve self-service access and technological tools available to residents and is moving to become paperless in its program operations.

IV. Plan for Local MTW Program

The MTW Program Operations Notice describes the regulatory waivers and associated activities that are available for participating agencies to adopt and implement as part of the Annual Plan/MTW Supplement process. CH+R will consult with residents and program participants, the Tri-County Community Action Program (TCAP), the Board of Commissioners, and other community stakeholders to determine which waivers are of interest to clients, will support the agency's overall strategic goals, and are financially and programmatically feasible and sustainable. Waivers and activities currently of particular interest to CH+R, organized by the three MTW statutory objectives, include: (1) *Cost Effectiveness*: streamlining the recertification process for households in public housing and HCV by conducting regular recertifications on a biennial or triennial basis, and allowing for self-certification of assets where appropriate, resulting in

additional savings for participants, decreased administrative burden for staff, and overall cost savings for the agency. Additionally, CH+R plans to explore utilizing alternative and streamlined utility allowance models, as well as simplified rent calculation methodologies. (2) *Self-Sufficiency*: development of a Family Self Sufficiency (FSS) program to incentivize participants to increase earned income, participate in financial counseling and coaching, establish savings accounts, build credit, and work towards economic self-sufficiency goals. Utilizing MTW, CH+R will explore additional flexibilities and incentives to further enhance and promote FSS program goals and established benchmarks. (3) *Housing Choice*: pursue flexibilities related to payment standard and rent reasonableness determinations, streamlining HQS inspections through alternative inspections criteria and ability to pre-qualify units for assistance, and landlord leasing incentives such as vacancy loss, damage claims, and other financial incentives.

As noted, one of the major challenges facing CH+R is the need to leverage additional resources to invest in the agency's aging public housing stock. The flexibilities afforded under the MTW Program would enable CH+R to propose, design, and implement innovative solutions to addressing these needs, including leveraging additional capital resources and partnerships. For example, CH+R intends to explore the feasibility of participation in the Rental Assistance Demonstration (RAD) Program utilizing appropriate MTW waivers, which would allow CH+R to transition its housing stock to a Section 8 project-based assistance platform to leverage public and private debt and equity necessary to complete much-needed repairs and reinvestment throughout its portfolio of low-income housing units.

V. Proposed Uses of Funds

CH+R requests authority to use Public Housing and Housing Assistance Payments (HAP) funds flexibly to implement authorized MTW activities. CH+R will implement funding flexibility

in accordance with the Operations Notice and allow for flexible use of funding across Section 8 and 9 programs and for MTW local, non-traditional programs. Through the MTW Supplement process and with input from key internal and external stakeholders, CH+R anticipates seeking approval to utilize HAP funding for authorized purposes to implement approved MTW activities including, but not limited to: local non-traditional voucher programs, supportive services and service-enriched housing programs, landlord and participant financial incentives, and affordable housing development and preservation.

VI. Evidence of Significant Partnerships

CH+R has a long-term partnership and close working relationship with the City of Concord including the departments of Human Services, Community Development, and Parks and Recreation. In addition to partnering on community revitalization and neighborhood planning initiatives, CH+R coordinates with the city and the local Boys and Girls Club to provide free and/or affordable recreational activities for its residents and program participants, in addition to childcare and afterschool assistance. CH+R also partners with local non-profit organizations collaborating with homeless individuals and families throughout the area. In recent years, CH+R has entered into Memoranda of Understanding (MOU) with three local agencies to provide services and supports to its non-elderly disabled Mainstream voucher applicants and participants: the Concord Coalition to End Homelessness (CCEH), Family Promise of Greater Concord (FPGC), and the Friends Program. Each of these three organizations has committed to supporting CH+R's Mainstream voucher tenants by providing applicant referrals to CH+R as well as case management support, including: (1) basic life skills information and counseling on money management, use of credit, housekeeping, proper nutrition and meal preparation, and access to healthcare services; (2) counseling on compliance with rental lease requirements and with HCV program participant

requirements, including assistance/referrals for assistance on security deposits, utility hook-up fees, and utility deposits; and (3) other services as noted in each individual MOU and outlined below.

In addition to the services noted above, each of the of the partners have committed additional resources to support clients in their housing navigation and personal goals. Specifically, CCEH has committed to providing CH+R clients assistance in accessing disability income, job preparation and attainment counseling, educational attainment, and other personal goals. FPGC also provides educational and career advancement counseling to participants as well as funding to help with car repairs to enable individuals and families to sustain employment and/or access other resources throughout the community. Further, FPGC case managers focus on building relationships with owners of rental properties and function as a mediator between landlords and prospective tenants to increase landlord participation in the program. In addition to these efforts, a network of volunteers from the Friends Program assists clients with job preparation and attainment as well as identifying childcare resources and securing placements and eligibility for cost reductions or other childcare assistance.

Each of these partnerships has enhanced the level of housing navigation and supports available to residents and program participants. Participation in the MTW program would enable CH+R to further expand on these productive partnerships and make these services and supports available to a wider range of program participants and applicants across all its programs. In turn, this would support CH+R's overall vision for its MTW Program which is to improve the programs and services available to clients, increase and expand available housing opportunities, and facilitate new partnerships to leverage additional resources needed to address the affordable housing crisis in the region.

B. ASSET BUILDING INITIATIVES INFORMATION

I. Assessment of Existing Asset Building Programs

CH+R has experience facilitating connections between assisted households and local asset building programs and institutions in the area including partnering with local financial institutions to make low or no-interest loans available to residents and program participants. Additionally, CH+R currently works with credit bureaus to report rent payments of its assisted residents; however, participation in the program is currently low among residents due to lack of information about the program and the potential benefits of participating. CH+R welcomes the opportunity to expand this program through its participation in the MTW program, and to utilize additional resources and tools to track the efficacy of such activities to enhance the program and establish best practices. While CH+R does not currently operate a HUD-sponsored Family Self-Sufficiency (FSS) program, we intend to explore the feasibility of implementing such a program through the flexibilities offered through MTW.

CH+R also collaborates closely with various partners who operate asset building and home-buyer programs, including CATCH Neighborhood Housing and Family Promise of Greater Concord (FPGC). CATCH's mission is to "create communities where every person is confident of a safe and affordable home." In addition to operating and managing its own rental housing portfolio CATCH also administers a collaborative homebuyer education and counseling program called HOMEteam, which provides participants with the information and tools needed to make good financial decisions related to purchasing, renting, and maintaining a home. CH+R supports CATCH's work by referring and connecting clients to its programs and resources. Additionally, CH+R partners with FPGC, as noted previously, to operate a program that encourages clients to budget and save as well as to establish a checking account while in the program.

II. Choice of Asset Building Option

CH+R has chosen to pursue the “Credit Building Option” model, as described in Section 3(B) of PIH Notice 2022-11. Under this option, CH+R will report the rent payments of public housing households that enroll in the program to one or more credit bureaus. CH+R has selected this option because it believes that assisting residents and program participants to build positive credit history is a key component to increasing financial well-being and pursuing other economic activities. Having poor or no credit history can affect an individual’s ability to lease a rental unit, secure a job, purchase essential goods and services, and invest in longer-term assets such as homes and businesses. Over 95% of CH+R residents pay their rent on time and CH+R believes that this should be reflected in individual’s credit score and history to open additional opportunities for economic advancement.

III. Information Specific to Asset Building Initiatives Option Chosen by PHA

CH+R’s goal in implementing this initiative is to assist public housing households with building their credit, which will unlock other opportunities related to financial goals and economic self-sufficiency activities such as career advancements, investing in homes and/or business activities, expanded housing opportunities and choice, and increased economic security and personal satisfaction. CH+R intends to offer the credit building program to up to 100 households at the onset of the program, representing approximately 40% of public housing residents. If there is significant resident interest then CH+R will assess the feasibility of expanding the overall number of households, as approved by HUD. CH+R currently reports 8% of overall resident rent payments to credit bureaus and will build on this existing model and relationship to expand the program to additional households. Households will have the opportunity to learn more about the program before deciding whether to opt in and enroll in the program through an informed consent

process. During the informed consent process, CH+R will explain all potential risks and benefits of participating in the credit building program, and households will be able to withdraw their participation at any time.

CH+R anticipates the total cost of administering the credit reporting program to be less than \$10,000 annually and does not anticipate a need to seek additional funding or resources from public or private sources to support this initiative at this time. Further, CH+R hopes to utilize the staff time and cost savings realized through streamlining other aspects of program administration through the MTW process to make up for the additional staff labor and/or costs associated with reporting information to credit bureaus and providing education and information about the program to residents.