



# **Moving to Work (MTW)**

## **Draft Plan**

**Posted October 20<sup>th</sup>, 2023**

## **Part I**

### **a) MTW Plan**

#### **(1) Vision for PHA's Local MTW Program**

The Boca Raton Housing Authority (BRHA) continuously strives to employ innovative ideas and strategies that improve all of our programs. We have initiated creative solutions to challenges faced by all housing authorities, such as streamlining the application process, controlling fraud, maintaining high utilization, engaging landlords, performing on-time reexaminations, timely inspections, and collaborating with supportive service programs.

Providing families with pathways out of poverty is paramount to BRHA and the driving force for seeking for the Moving to Work (MTW) designation. BRHA's ultimate vision is to be a premier provider of affordable housing and MTW initiatives will further this vision. MTW initiatives, whether they relate to increased housing choice, household self-sufficiency or efficiency and cost effectiveness, will focus directly or indirectly on the ability of households to achieve self sufficiency especially through greater long-term economic independence.

- **Self-Sufficiency:** The goal of program participant's self sufficiency is at the center of BRHA strategic goals. Through MTW, BRHA will aim to increase self sufficiency of program participants by:
  - Implementing policies that allow residents to build savings and assets more effectively.
  - Increase partnerships with local organizations for job and skills training that would assist program participants in secure higher-level income and employment
- **Housing Choice:** Housing choice is the foundation of the Housing Choice Voucher (HCV) program. The program's main purpose is to afford participants the opportunity to secure decent, safe, and sanitary housing of their choice. The reality is housing choice for program

participants is often limited. Through MTW, BRHA will strive to increase housing choices by:

- Implementing landlords incentives to encourage wider participation in HCV program.
- Ensuring adequate payment standards are in place to increase housing choices in areas of opportunity.
- Cost Effectiveness: BRHA hopes to reduce the costs of administering the program in a myriad of ways using MTW efficiencies. By utilizing the potential MTW efficiencies listed below, BRHA is certain it will reduce the burden of administering the program, leading to a reduction in cost and staff time spent on these items. We believe that the reduction in time will allow our staff to serve our clients and community better.

Cost effective MTW Initiatives:

- Streamlined annual reexamination processes
- Efficient and reduced inspection requirements
- Possibly implementing rent policies like the simplification of the calculation of TTP
- Simplified deductions

BRHA's personnel with the primary responsibility for administering the MTW program encompass a multitude of HUD experience and housing background. The current Interim Executive Director has been with the agency for just under a decade and has been in the housing industry for over fifteen years. BRHA works closely with state and local government, local nonprofits and community agencies and has a stellar record of accomplishment implementing and administering a wide range of grants. In the last 5 years, BRHA has been awarded grants and funding for over 20+ programs and activities, which include several CDBG (Community Development Block Grant) projects, FSS (Family Self Sufficiency), and a myriad of funding for

our children's program. All of which require strict adherence and compliance too specific guidelines including recording keeping, progress reporting, etc. BRHA has successfully managed these programs and activities. BRHA has also successfully implemented HUD programs such as ROSS (Resident Opportunity and Self Sufficiency), VASH (Veterans Affairs Supported Housing) Vouchers, and the FSS Program.

BRHA is committed to civil rights and affirmatively furthering fair housing. BRHA proactively furthers fair housing in its policies and procedures by examining its programs and proposed programs and policies, identifying impediments to fair housing choice within those programs, and addressing those impediments in a reasonable fashion in view of the resources available. BRHA also works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing. We will commit to expand our efforts by educating program participants on the following:

- Their Fair Housing Rights
- How to recognize a violation
- How to file a complaint
- Ensure BRHA staff are adequately trained regarding fair housing.

BRHA is committed to racial equity and our policies ensure equal opportunity to participate in all programs. BRHA and verifies that it will carry out the programs of the agency 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 American with disabilities Act of 1990.

## **(2) Plan for Future Community/Resident Engagement**

BRHA understands that partnerships with our program participants are paramount. Each year, in developing the annual PHA plan, BRHA works closely with program participants to align the agency goals with our program participants' advancement. BHRA plans to continue this process for its future MTW Annual plan addendums. BRHA also plans to build on its existing relationship.

**Creation of Resident Services Department:** MTW will allow for the creation of a Resident Services Department. This department can work closely with our Resident Advisory Board and Resident Council to consult on BRHA's agency plan and any new initiatives to be implemented. BRHA will commit resources to compensate members of these groups for their contributions, as experience has shown that resident advisory and focus groups are larger and more diverse when participants are compensated for their time and expertise.

**Continued Outreach to Existing Community Partners:** Outreach to existing community groups, including community groups comprised of and working with immigrants, people with limited English proficiency (LEP), and communities of color, to ensure a diversity of voices. Some of these groups include:

- Boca Helping Hands
- Americans for Prosperity
- Boca Chamber of Commerce
- Palm Beach County Veterans
- Legal Aid Society of Palm Beach County
- Local Community Centers
- Catholic Charities of Palm Beach
- Florida Rural Legal Services
- Dress for Success
- Housing Foundation of America

### **(3) PHA Operating and Inventory Information**

The Boca Raton Housing Authority was established in 1978. Its formation was a response to the needs of the "Pearl City" Community. Today, BRHA's operating inventory includes 95 public housing units and 634 housing choice vouchers. BRHA has been a high performing agency for

many years and continually maintains high occupancy and utilization rates in both the HCV and Public Housing programs.

BRHA has been awarded 4% Tax Credit to perform a Streamlined Voluntary Conversion (SVC) of its entire public housing program. The authority anticipates submitting an application to HUD for the disposition of its entire public housing stock in the next six months. The new development, The Residences at Martin Manor, will be a LIHTC (Low Income Housing Tax Credits) development.

#### **(4) Plan for Local MTW Program**

BRHA seeks to utilize MTW flexibility in its community to address local needs. We are thrilled to explore the possibilities of MTW in depth in the development and implementation of our MTW Plan. As it relates to the three statutory objectives of the MTW Demonstration Program BRHA's plan for its local MTW Program are as follows:

Self-Sufficiency

Cost Effectiveness

Housing Choice

- Streamline and simplify rent calculation, verification, recertification, utility allowance, inspection, rent reasonableness, portability and moves processes and requirements to improve operational efficiencies, reduce operational costs, and promote self-sufficiency.

#### **(Objective - Self-Sufficiency and Cost Effectiveness)**

- Establish Family Self-Sufficiency Program that encourages families set and attain goals towards economic independence and asset building. **(Objective - Self-Sufficiency)**
- Design and implement a Voucher Mobility Program to encourage voucher holders to

lease in areas of opportunity and increase housing choices. **(Objective – Housing Choice)**

- Design and implement a Landlord Incentive Program to expand housing choices. **(Objective – Housing Choice)**
- Development of new affordable housing units to expand housing choice. **(Objective – Housing Choice)**
- Structure evaluation metrics and benchmarks to determine degree of cost effectiveness

and efficiency **(Objective - Cost Effectiveness)**

- Implement Alternative Inspection schedules to reduce administrative burden and cost. **(Objective - Cost Effectiveness)**
- Implement Alternative reexamination schedules to reduce administrative burden, cost and promote program participant self sufficiency. **(Objective - Cost Effectiveness and Self-Sufficiency)**

#### **(5) Proposed Use of MTW Funds**

BRHA requests authority to use public housing and HCV funds flexibly in the MTW program. BRHA expects that eventually all of its MTW funding will be HCV funding, as it is in the process of disposing of its remaining public housing units. BRHA has been awarded 4% Tax Credit to perform a Streamlined Voluntary Conversion (SVC) of its public housing program.

Because BRHA consistently uses 100% of its HAP funding, spending funds flexibly will require identifying cost savings or exceedingly difficult tradeoffs. Through its planning process and consultations with stakeholders, BRHA has prioritized the following uses for MTW funding:

- Provide gap financing for development of affordable housing, prioritizing housing for families with children and development in communities of opportunity or as part of a plan to transform an existing community.

- Expand supportive services to BRHA participants for housing success, increasing income and self-sufficiency, and housing stability, building on BRHA’s existing successful programs and partnerships like FSS.
  - BRHA has identified a particular need to expand its service offerings to public housing participants, which BRHA will likely need to deliver differently from FSS in view of the number of households to be served.
  - BRHA will target savings from lower administrative costs due to streamlining and HAP savings from policy changes to expanding supportive services.
- Provide resources to help voucher participants successfully lease units in communities of opportunity, such as landlord incentives, security deposit assistance, flexible move funding for items such as application fees.

**(6) Evidence of Significant Partnerships**

BRHA has developed deep relationships with a number of key agencies in the community. These partnerships will help BRHA to achieve the vision of its MTW Program by providing financial support and resources for BRHA and its program participants. Some of the key relationships include:

- City of Boca Raton: CDBG funding to support community improvements, operation of our community center, and operations of our of children’s program. Rental Assistance
- Boca Helping Hands: Annual Thanksgiving Programs, Financial Assistance (Rental, Utility, Childcare) and Job Training
- Schimdt Family Foundation: Direct financial support for BRHA programs.
- YMCA of South Palm Beach County: Swim Classes for program participants of all ages
- Dress for Success: Programs that offer guidance on resume writing, interviewing and office attire for young adults entering the workforce.



- Spirit of Giving: Annual Gift Drive for program participants, monthly networking, and educational meetings for staff.
- Palm Beach County Youth Services: Summer Camp Scholarships for children 5-17.
- Prime Time of Palm Beach County: Direct financial support of program, education and training for program staff, partnerships with local entities to provide expanded learning opportunities for program participants
- Other organizations include – Junior League of Boca Raton, Breaking the Chains Outreach Ministries, Genesis Health, Boca Raton Regional Hospital, Consolidated Credit, American for Prosperity and many more.

**b) Administrative Efficiencies Information**

**(1) Assessment of Past and Existing Efforts to Achieve Administrative Efficiencies**

Utilizing technology is at the forefront of all decision making; it drives our efficiency and therefore affords more time to serve the needs of our program participants. BRHA has strived to achieve administrative efficiency outside of the MTW Demonstration Program by:

- Implementing Electronic Recertifications
  - Program participants can complete the annual and interim recertification process 100% electronically without the need to visit the office.
- Tenant portals with electronic rent payments and work orders
- Planned utilization of social media platforms and webinars to communicate and educate the community about our services and available resources is a regular go-to.
- Updating its website to include readily available resources and information

**(2) Assessment of Needed Administrative Efficiencies**

BRHA would be interested in implementing the following waivers:

- Tenant Rent Policies - 1(i) and 1(j): Alternative Utility Allowance (PH); Alternative Utility Allowance (HCV)
- Tenant Rent Policies - 1(r) and 1(s): Elimination of Deduction(s) (PH); Elimination of Deduction(s) (HCV)
- Tenant Rent Policies - 1(t) and 1(u): Standard Deductions (PH); Standard Deductions (HCV)
- Reexaminations - 3(a) and 3(b): Alternative Reexamination Schedule for Households (PH); Alternative Reexamination Schedule for Households (HCV).
- Reexaminations - 3(c) and 3(d): Self-Certification of Assets (PH); Self-Certification of Assets (HCV)
- Housing Quality Standards (HQS) - 5(d): Alternative Inspection Schedules (HCV)

## **PART II - Appendices**

### [Appendices will be added to the final application submission](#)

- Appendix 1: Moving to Work Certifications of Compliance
  - The PHA must provide a certification that the MTW Plan and application package is consistent with the “Moving to Work Certifications of Compliance.” A certification sheet for this purpose is provided in Attachment I of this Notice.
- Appendix 2: Public Process Documentation
  - The PHA must provide documentation that the elements of the public process described in Section 5(C)(i)(c) of this Notice were met. There is no prescribed format or page limit for this appendix, but materials must include:
  - The public notice advertising the public hearing;
    - Evidence that the public hearing was held (items could include minutes, sign- in sheet, etc.); and
    - A resolution signed by the Board of Commissioners (or equivalent governing body) adopting the MTW Plan and application package and the

certifications contained therein. This resolution must contain: confirmation of the PHA's desire to obtain MTW designation under the fourth cohort of the MTW Expansion; a statement of the intention to comply with the MTW objectives, the MTW statutory requirements and the MTW Operations Notice; confirmation that the PHA met the public process requirements in Section 5(C)(i)(c) of this Notice;

- Appendix 3: Required Standard Forms
  - The PHA must provide completed versions of the:
    - Certification of Consistency with the Consolidated Plan (form HUD-2991);
    - Certification of Payments (form HUD-50071); and
    - Disclosure of Lobbying Activities (SF-LLL) if applicable.
- Appendix 4: Other Supporting Documentation
  - The PHA may elect to provide other materials such as letters of support, community meeting materials, resumes, memorandums of understanding, etc. to substantiate and reinforce narrative information provided in the MTW Plan and application package. Pages in this appendix must be numbered and length is suggested to be limited to 10 pages



October 20<sup>th</sup>, 2023

**AMENDED**

## NOTICE OF PUBLIC FORUM

### Boca Raton Housing Authority Moving To Work (MTW) Draft Plan

The Boca Raton Housing Authority (BRHA) publishes this notice of public forum for the Draft Moving to Work plan for BRHA.

BRHA has scheduled a Public Forum to be held at 6:30 PM, Wednesday, November 1<sup>st</sup>, 2023, at Lois Martin Community Center, 1350 N Dixie Highway, Boca Raton, FL 33432.

The Public Forum is open to all Boca Raton Housing Authority program participants and the public. This forum gives the opportunity to issue comments and/or recommendations on the Agency's Moving to Work Draft Plan. A copy of the Draft MTW Plan will be available for review at the Central Office located at 2333 Glades Road, Boca Raton, FL 33431, at Dixie Manor located at 1350 N Dixie Highway, Boca Raton, FL 33432 and on the agency's website at [www.BocaHousing.org/MTW](http://www.BocaHousing.org/MTW).

The plan will be posted for 30 days beginning on October 20<sup>th</sup>, 2023.

Comment Period October 21<sup>st</sup>, 2023, to November 20<sup>th</sup>, 2023.

Comments must be submitted in writing on or before November 20<sup>th</sup>, 2023.

Comments may be submitted by:

- Email [brha@bocahousing.org](mailto:brha@bocahousing.org), please use subject MTW Draft Plan comments.
- In writing at the Central Office located at 2333 Glades Road, Boca Raton, FL 33431
- In writing at Dixie Manor located at 1350 N Dixie Highway, Boca Raton, FL 33432
- On the agency's website at [www.BocaHousing.org/mtw](http://www.BocaHousing.org/mtw)