



DRAFT FOR PUBLIC COMMENT ATTACHMENTS TO MTW SUPPLEMENT November 2025

Documents included:

1. Hardship Policy (applies to all waivers where required)
2. Alternative Utility Allowance: Methodology outline
3. Alternative Family Selection Procedures for FSS and Foster Youth to Independence Program: Impact Analysis
4. Cohort Specific Waiver: Mid-point informal review



Hardship Policy (applies to all waivers where indicated in Supplement)

Families are able to apply for suspension of the minimum rent under the WPBHA's Hardship Policy when:

- The family has lost eligibility or is awaiting eligibility determination for a Federal, State or Local assistance program
- The family would be evicted if the minimum rent requirement was applied
- The loss of employment
- A death in the household
- Other circumstances to be determined by the WPBHA

Assisted families must submit a request for hardship exemption in writing. The WPBHA will respond in writing to the family's request within 10 working days including a timeframe for which the exemption will be applied. The exemption will be reviewed regularly as determined by the WPBHA. Once the hardship is lifted the tenant will be required to retroactively pay rent owed.



Waiver 1.i. Alternative Utility Allowance: Methodology outline



Mechanical • Electrical • Plumbing • Fire Protection
Technology • Commissioning • Energy

Mechanical • Electrical • Plumbing • Fire Protection
Technology • Energy • Commissioning Engineers

February 3, 2024

Michael Henzy
Smith & Henzy Affordable Group
98 SE 6th Avenue
Delray Beach, FL 33483

RE: UA Energy Consumption Model Estimate – Roseland Gardens – West Palm Beach, FL- 2024

MPE#: 2024-016

This letter regards Item #7 of the Certification of Completeness and Accuracy for Utility Allowance Energy Consumption Model Estimate form. All energy consumption models were performed using Trane TRACE 700 v6.3.0 computer program.

1. The following Building Identification Numbers (BIN) are associated with this property:

FL23-11501 thru FL23-11502.
2. Unit size:
 - a. 1 bedroom: 585 SF.
 - b. 2 bedroom: 825 SF.
3. Building orientation –The top floor worst-case orientation for each unit type was used for this estimate.
4. Design and materials – The exterior walls are stucco over 8" CMU construction, R7 foil insulation, and interior drywall. The roofing system has an elastomeric membrane, R19 board insulation, a 4" LW concrete slab, and interior drywall. Glazing systems are single pane, ¼" clear.
5. Mechanical Systems – All units are served by a DX, split system with the air handler located in the Mechanical Closet and the condensing unit exterior of each unit. Each air handler is equipped with a 5 KW electric heating section to handle the heating loads. The system sizes/SEER ratings are as listed below:
 - a. 1 -Bedroom: 1.0 ton/15.50 SEER.
 - b. 2 -Bedroom: 1.5 ton/17.00 SEER.
6. Appliances included: dishwasher, refrigerator/freezer, oven/range, and water heater.
7. Lighting - all units contain LED lighting.
8. The following energy data was used for the model: lighting – 0.22 – 0.34 W/SF (varies by space); refrigerator – 0.13 W/SF; misc loads – 0.3 W/SF; laundry – 0.15 W/SF.

9. Electric rate: Florida Power and Light - residential rate (JAN24).
10. Characteristics of the Building Location – The development is in West Palm Beach, FL. Weather data from ASHRAE was used for this location. Summer design conditions are 95F DB / 78 F WB. Winter design condition is 24 F DB.

Please see the attached TRACE simulation reports for all units.

Sincerely,

MATERN PROFESSIONAL ENGINEERING, INC.

A handwritten signature in black ink, appearing to read 'TS', with a horizontal line extending to the right.

Todd Stoltz, CEM, EMP, CxA, BCxP, CBCP
Project Manager

Enclosed:

Monthly Utility Costs – All units.

Monthly Energy Consumption - All units.

Certification of Completeness and Accuracy for Utility Allowance Estimate Per Energy Consumption Model

Development Information		Tenant Paid Utilities	Provider
Development Name	Roseland Gardens	Yes ☐	Electric
Development Address	West Palm Beach, Florida	No ☐	Gas
		No ☐	Water
Key Number		No ☐	Sewer
Date of Study	2/3/2024	No ☐	Trash
Effective Date		No ☐	Other

Unit Type	# of Units	Square Feet	Electric	Gas	Water	Sewer	Trash	Other	Total Per Month
1 bedroom	118	585	69						\$69
2 bedroom	30	825	76						\$76
									\$0
									\$0
									\$0
									\$0
Total Units		148							

The undersigned hereby certifies as follows:

1. Only utility costs paid directly by the resident(s) and not by or through the owner are included in the utility allowance calculation;
2. Cable television, telephone and internet costs are excluded from utility allowance calculation;
3. This estimate is based on the most recent 12-month period;
4. In the case of new buildings with less than 12 months of consumption data, 12 months of data for units of similar size and construction in the properties geographic area was used;
5. Utility rates are based on local rates and utility supplier(s) for the above-named property and data is no older than 60 days at the time of this submission;
6. The owner and Engineer/Qualified Professional are not related, as defined in IRC Section 267(b) or 707(b);
7. The Energy Consumption Model, at a minimum, takes into account specific factors including, but not limited to, unit size, building orientation, design and materials, mechanical systems, appliances, characteristics of the building location.

The following supporting documentation is included:

1. A letter from the Engineer/Qualified Professional explaining their analysis and findings for each Building Identification Number (BIN). The letter must explain how the specific factors in item #7 above were addressed.
2. Copy of the 90-day notice to residents.

Engineer/Qualified Professional:



2/3/2024

Signature

Date

Todd Stoltz, CEM, EMP, CxA, BCxP, CBCP

Printed Name

Matern Professional Engineering, Inc.

Entity Name

CEM #14429

License # if applicable

Owner:



2.8.24

Signature

Date

Darren Smith

Printed Name

Roseland Gardens, LLLP

Entity Name

Florida Housing Finance Corporation:

Signature - FHFC Asset Management & Compliance Dept.

Date

Email to FHFCAssetMgt@floridahousing.org

MONTHLY ENERGY CONSUMPTION

By MATERN PROFESSIONAL ENGINEERING INC.

Utility	----- Monthly Energy Consumption -----												Total
	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	

Alternative: 11-Bedroom

Electric	On-Pk Cons. (kWh)	424	384	474	465	477	484	513	526	529	538	484	471	5,769
	On-Pk Demand (kW)	1	1	1	1	1	1	1	1	1	1	1	1	1
Energy Consumption														
Building Source		33,656 Btu/(ft2-year)												
		100,978 Btu/(ft2-year)												
Environmental Impact Analysis														
Floor Area														
CO2 7,253 lbm/year														
SO2 21 gm/year														
NOX 12 gm/year														
585 ft2														

Alternative: 22-Bedroom

Electric	On-Pk Cons. (kWh)	470	426	537	524	540	552	587	606	600	604	543	525	6,514
	On-Pk Demand (kW)	1	1	1	1	1	1	1	1	1	1	1	1	1
Energy Consumption														
Building Source		26,946 Btu/(ft2-year)												
		80,847 Btu/(ft2-year)												
Environmental Impact Analysis														
Floor Area														
CO2 8,190 lbm/year														
SO2 23 gm/year														
NOX 13 gm/year														
825 ft2														

MONTHLY UTILITY COSTS

By MATERN PROFESSIONAL ENGINEERING INC.

Utility	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
Alternative 1													
Electric													
On-Pk Cons. (\$)	61	57	68	67	68	69	72	74	74	75	69	67	821
Monthly Total (\$):	61	57	68	67	68	69	72	74	74	75	69	67	821
Building Area =	585 ft²												
Utility Cost Per Area =	1.40 \$/ft²												
Alternative 2													
Electric													
On-Pk Cons. (\$)	67	62	75	74	76	77	81	84	83	84	76	74	912
Monthly Total (\$):	67	62	75	74	76	77	81	84	83	84	76	74	912
Building Area =	825 ft²												
Utility Cost Per Area =	1.11 \$/ft²												

Certification of Completeness and Accuracy for Utility Allowance Estimate Per Energy Consumption Model

Development Information		Tenant Paid Utilities		Provider
Development Name	Roseland Gardens	Yes ☐	Electric	Florida Power & Light
Development Address	West Palm Beach, Florida	No ☐	Gas	
		No ☐	Water	
Key Number	3534	No ☐	Sewer	
Date of Study	2/3/2024	No ☐	Trash	
Effective Date	Credit underwriting	No ☐	Other	

Unit Type	# of Units	Square Feet	Electric	Gas	Water	Sewer	Trash	Other	Total Per Month
1 bedroom	118	585	69						\$69
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Engineer/Qualified Professional:

2/3/2024

Signature _____

Todd Stoltz, CEM, EMP, CxA, BCxP, CBCP

Printed Name

Matern Professional Engineering, Inc.

Entity Name

CEM #14429

License # if applicable

Owner:

2.8.24

Signature _____

Darren Smith

Printed Name

Roseland Gardens, LLLP

Entity Name

Florida Housing Finance Corporation:

2/29/2024

Signature - FHFC Asset Management & Compliance Dept. _____

Date

Email to FHFCAssetMgt@floridahousing.org



Waiver 10.c. Alternative Family Selection Procedures
for FSS and Foster Youth to Independence Program:
Impact Analysis



MTW Waiver: 10.c. Alternative Family Selection Procedures (PH & HCV) Impact Analysis

Family Self Sufficiency and Foster Youth to Independence (FYI) Voucher

The West Palm Beach Housing Authority has twenty-five (25) FYI vouchers. As of 10/10/2025, eighteen (18) vouchers have been issued and one (1) is pending intake.

It is the WPBHA's position that there are no negative impacts in this proposal. Participants will follow one of two pathways (1) if they opt out of the FSS program, they will be subject to established FYI voucher terms, or (2) if they do not opt out the FSS program, they will retain their voucher for an additional two years and build savings and progress towards their educational or home ownership goals.

Notifying the existing FYI Voucher holders

The WPBHA's Housing Financial Services Department will notify each of the current FYI voucher holders via letter. The letter will notify each household of their FSS enrollment, and include information about the additional two years this will add to the voucher. The Housing Financial team will also request an in-person meeting to discuss the program.

If the voucher holder remains in the FSS program they will be managed through the Housing Financial Services team.

Notifying new FYI Voucher holders

All new voucher holders will be automatically enrolled in the FSS Program by the Housing Financial Services team. They will be provided an opportunity to opt out when they have their initial meeting with the Housing Financial Services team.

Opting Out and Supporting Policy and Procedures

FYI voucher holders may choose to opt out of the FSS Program at any point. If an FYI participant chooses to opt out in year four (4) or five (5) of their FSS Contract they will also forfeit their voucher. This outcome will be discussed with the Participant household at the issuance of their voucher and they will be reminded at every interim and annual recertification.

To support this process, Chapter 19: Special Purpose Vouchers of the Housing Choice Voucher Program Administrative Plan will be updated to include the automatic enrollment of FYI voucher recipients and the process for opting out of program.



MTW Waiver: 10.c. Alternative Family Selection Procedures (PH & HCV) Impact Analysis

Table: Existing FYI Voucher Household Current end date vs. New end date with FSS Participation

Voucher	Lease up date	Current end date	New end date with FSS participation
Household 1	3/13/2024	3/1/2027	3/1/2029
Household 2	11/1/2023	11/1/2026	11/1/2028
Household 3	10/16/2023	10/1/2026	10/1/2028
Household 4	6/29/2023	6/1/2026	6/1/2028
Household 5	3/15/2024	3/1/2027	3/1/2029
Household 6	6/29/2023	3/1/2026	3/1/2028
Household 7	3/13/2024	3/1/2027	3/1/2029
Household 8	9/18/2024	9/1/2027	9/1/2029
Household 9	11/28/2023	11/1/2026	11/1/2028
Household 10	1/1/2024	11/1/2027	11/1/2029
Household 11	4/18/2024	4/1/2027	4/1/2029
Household 12	5/1/2024	5/1/2027	5/1/2029
Household 13	6/1/2024	6/1/2027	6/1/2029
Household 14	12/10/2024	12/1/2027	12/1/2029
Household 15	7/3/2024	7/1/2027	7/1/2029
Household 16	11/1/2024	11/1/2027	11/1/2029
Household 17	7/29/2025	7/1/2028	7/1/2030
Household 18	7/22/2025	7/1/2028	7/1/2030



Asset Building Cohort 4 Specific Waiver: Mid-point informal review



Cohort Specific Waiver: Opt-out Savings Account

Midpoint review 2025

a) Narrative

At establishment, the Asset Building program planned to work with 25 randomly selected households to provide the tools and knowledge to assist them in building their asset base. This could include increasing income, achieving higher education, establishing banking products, establishing and building credit, improving money management, or increasing savings. The impact of this work was expected to be twofold; firstly, to reduce cost by promoting economic mobility and transitioning families to financial self-sufficiency, and secondly, facilitate operational improvements which will support the program as it evolves.

The WPBHA will contribute a minimum of \$2400 of unrestricted dollars over 24- months to participants from the HAP-Held Reserves. In addition to WPBHA-committed dollars, the WPBHA had partnered with Third Federal and community-based organization Consolidated Credit to create an enhanced matched savings program that included education programs, training and targeted information to support participants in this program. While originally anticipated to last the full 24 months, only the first year of funding was made available. This funding has now been fully depleted. The WPBHA has decided to increase its own MTW commitment to bridge this gap for the next 12-months.

Families were randomly selected for participation and provided the option to opt-out of the program at any point. Maintaining a total of 25 households has proven challenging. As of November 2025, there are 20 HCV households actively participating in the program after 44 HCV and 5 LIPH households opted out. A significant driver for households opting out is the impact the unrestricted dollars have on other federal income based supports (e.g. SNAP or SSI/SSN).

To enable participants immediate access to their unrestricted dollars the WPBHA deposited \$120 as the first month payment (Notice PIH 2022-11). Throughout the 24-month period, participants will have access to tailored coaching as well as educational and financial incentives to proactively build their assets and financial acumen.

An informal midway check-in with participants of the program was undertaken by the WPBHA and detailed in section g) of this report.

b) MTW Statutory Objective

Cost effectiveness, Self-sufficiency and Housing Choice

c) Cost implications

Increased expenditures. Dollars will be taken from HAP-Held reserves.



Cohort Specific Waiver: Opt-out Savings Account

Midpoint review 2025

d) Different policy by household status/family types/sites

The MTW activity may be applied to all Section 8 and Section 9 assisted families. The 25 participating families were randomly selected.

e) Safe Harbor Waiver

No safe harbor waiver is required.

f) Hardship Policy

No hardship policy is required for this waiver.

g) Impact Analysis

The Asset Building program will be formally evaluated over a twenty-four (24) month period in partnership with third party evaluators.

Separate to the formal evaluation, an informal midway check-in with participants of the program was undertaken by the WPBHA. Participants were asked to provide us with feedback about what was working for them in the program, what wasn't working and how the unrestricted dollars were impacting them.

The Director of Housing Financial Services coordinated two pathways to collect participant feedback:

1. A mail out (both email and hard copy) of the survey developed by the WPBHA (attached)
2. A zoom discussion with participants scheduled for 6/26/2025 at 6pm.

Zero participants returned a completed survey.

Nine (9) participants attended the zoom discussion.

Participants were overwhelmingly supportive of the program. Some shared stories of how they had used the unrestricted dollars over the course of the first year:

- One participant was able to use the unrestricted dollars to purchase a new laptop. This enabled them to access online educational programs.
- Participants indicated that they were able to pay off bills and it made it easier to balance their budget
- One participant also indicated that she was using the unrestricted dollars to pay down debt.

Participants did express challenges with the unpredictability of payments from Consolidated Credit. They received payments from Consolidated Credit at some point each quarter and not having it on a clearly articulated schedule made it difficult to plan and budget for these additional dollars.