Keene Housing

Moving to Work

2019 Annual Plan

September 26, 2018

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Section I. Contents

Section I. Introduction

Moving to Work (MTW) is a deregulation demonstration by the Department of Housing and Urban Development (HUD). Created by the Congress in 1996, MTW provides a small group of high-performing public housing authorities (PHAs), like Keene Housing (KH), the fiscal and regulatory flexibility to develop and pilot innovative housing and self-sufficiency programs that meet the three goals Congress established for MTW when it created the demonstration:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

The local decision making that MTW allows in central to the program's success. By permitting MTW agencies the ability to de-silo their funds and shed many of the burdensome, and often outdated, regulations that ordinarily apply to PHAs, MTW agencies are better able to respond to the immediate needs of the communities they serve.

Since joining the program in 1999, KH has become one of the nation's leaders in affordable housing policy development. Many of Keene Housing's early MTW initiatives including the Transitional Housing Assistance Subsidy Program and the Stepped Subsidy Rent Reform have informed similar initiatives at other MTW agencies and have served as a model for national reform efforts. Our administrative streamlining efforts resulted in savings that we are able to reinvest into resident services, the community's homeless shelters, and property improvements. In 2017 alone our investments in these efforts resulted in:

- 17% of "work-able" households attaining economic self-sufficiency;
- $42,396 dollars in Rent Credits and Development Grants provided to households to attain their self-sufficiency goals;
- $1.6 million in property preservation and modernization efforts; and
- 799 shelter nights provided to homeless households.

KH's Long Term Vision

KH's long term vision and goals are outlined in the Agency's 2015-2020 Strategic Plan. The Strategic Plan includes eleven goals touching on everything from agency finances to youth programming. During the first half of the Plan period, we primarily focused on a few key areas: enhancing our programs, improving our existing housing stock, energy conservation, and reinvigorating our resident services. This focus has allowed us to ensure the long-term viability of our hard units, reduce operating costs and our carbon footprint, increase the number of households moving towards economic self-sufficiency, and provide quality services to our youth, elderly, and disabled populations.

As we take a step back and review all the work accomplished in the last few years, it is clear that the time has come to turn our attention to another crucial piece in our Strategic Plan - expanding the Region's affordable housing stock. In 2017, New Hampshire was again listed as the second oldest state in America and one of the nation's ten tightest housing markets for low-income households. The effect of these dual challenges can be seen on our wait lists — 4 out of 5 applicants are elderly or a person with a disability and wait times for our accessible and elderly housing is up to 8 years, compared to 1.5 years or less for our family properties. This is a situation that is expected to worsen in the years to come, as the state's median age is forecast to reach 50 within the next 2-5 years. In response, KH will be focusing much of our energy and effort into pursuing new Mainstream vouchers for non-elderly disabled households and to developing new housing to address the growing demand for one-bedroom units for elderly and disabled households.

We will also continue seeking out new rent, administrative and program reforms to help our working families achieve economic independence, thereby freeing-up scarce housing resources for the working families currently without high quality, affordable housing.

KH's Short-term Goals

For the immediate future, we remain focused on improving and expanding our housing stock, paying particular attention to the benefits of reducing our energy consumption and related operating costs. As such, we are proposing no new activities or changes to any existing activities for the 2019 MTW Plan year.

Instead we are dedicating our agency's resources to take on a major renovation of Central Square Terrace, one of the few non-MTW properties in our portfolio, and creating development plans for our first new construction in several years - 24 accessible studio and one bedroom units on the site of our former offices at Harper Acres.

We are also closing out Project MARCH (page 27), our initiative to end veterans homelessness in the Monadnock Region, due to low utilization. While veterans' homelessness continues to be a serious issue nationwide, the outpouring of resources and funding from sources outside of Keene Housing has been phenomenal, making our program functionally unnecessary. Details on our plans for winding down this activity can be found on page 27.

Section II. General Operating Information

Housing Stock Information

From our hard units to the programs that support them, KH's affordable housing portfolio has evolved into something unimaginable 18 years ago. Our portfolio has grown 300% since 2000, from a small number of public housing and Multifamily units to an impressive mix of units utilizing a variety of funding and subsidy streams. Today KH owns or manages 551 units of affordable housing including two homeless shelters, 155 units under a HUD Multifamily Project Based Section 8 contract, six Low Income Housing Tax Credit (LIHTC) properties, two homes for individuals diagnosed with chronic mental illness, and ten former public housing developments. Not only has the type and variety of units we owned changed, but so to has how we use our funding to manage our housing portfolio.

KH was one of the first PHAs to recognize the potential pitfalls of how the public housing program is funded and over-regulated, and in 2007, stepped away from the public housing model. By converting our entire public housing portfolio to conventional financing with MTW Project-Based Vouchers (PBVs) we were able to protect this important community resource from the slow decay caused by years of federal disinvestment.

Beyond public housing, we recognized that LIHTC rents are still out of reach for many low-income households. For this reason, all of our LIHTC units are supported by MTW PBV subsidies. The deep subsidy the PBVs provides expands the housing available to extremely low-income households who could not otherwise afford LIHTC rents. For those who we are unable to help through our traditional assisted housing programs, our homeless shelters utilize shallow subsidies provided through our Transitional Housing Assistance Subsidy Program (THASP, page 16).

To continue ensuring that affordable housing stays livable and affordable, our the Affordable Housing Preservation Program (AHPP, page 21) allows us to convert Multifamily properties that would otherwise become market rate, while our Affordable Housing Preservation and Modernization activity (page 23) provides us the funds needed to address our portfolio's capital needs. For a clearer picture of which units benefit from our participation in MTW, please see the table provided on page 9.

Planned New Public Housing Units

KH does not intend to add any public housing units to our portfolio in 2019.

Planned Public Housing Units to be Removed

KH does not own any public housing units.

Amp Name And Number	Number Of Units To Be Removed	Explanation For Removal
N/A	0	N/A
	0	**Total Public Housing Units to be Removed in the Plan Year**

Planned New Project Based Vouchers

Property Name	Number Of Vouchers To Be Project-Based	RAD?	Description Of Project
N/A	0	No	N/A
	0	**Planned Total Vouchers to be Newly Project-Based**	

Planned Existing Project Based Vouchers

Property Name	Number Of Project-Based Vouchers	Planned Status At End Of Plan Year*	RAD?	Description Of Project
Bennett Block	14	Leased	No	14 former public housing studio and one bedroom units in mid-rise building
Brookbend East	11	Leased	No	40 LIHTC/MF two and three bedroom townhouse style units
Brookbend West	10	Leased	No	35 LIHTC/MF two and three bedroom townhouse style units
Cheshire Housing Trust	20	Leased	No	20 third-party owned and managed units of various size and style throughout Cheshire County
Cottage Street	3	Leased	No	3 two and three bedroom units
Evergreen Knoll	3	Leased	No	32 LIHTC/RD two and three bedroom townhouse style units
Forest View	38	Leased	No	38 former public housing two – and three-bedroom townhouse style units
Harper Acres	112	Leased	No	112 former public housing studio, one, and two bedroom units in mid-rise building
North & Gilsum Apartments	29	Leased	No	28 former public housing three and four bedroom townhouse style units
Riverbend Apartments	24	Leased	No	24 LIHTC two and three bedroom townhouse style units
Scattered Sites	19	Leased	No	18 former public housing units throughout the community. Range of units and building styles
Stone Arch Village Family	24	Leased	No	24 LIHTC two and three bedroom townhouse style units
Stone Arch Village Senior	33	Leased	No	33 senior/disabled one and two bedroom units in mid-rise building
	340	**Planned Total Existing Project-Based Vouchers**		

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

KH does not anticipate any other changes to our housing stock in FY2019.

General Description of All Planned Capital Fund Expenditures During the Plan Year

KH does not have any public housing units and is ineligible for Capital Funds at this time.

Leasing Information

Planned Number of Households Served

Planned Number Of Households Served Through:	Planned Number Of Unit Months Occupied/Leased*	Planned Number Of Households To Be Served**
MTW Public Housing Units Leased	0	0
MTW Housing Choice Vouchers (HCV) Utilized	7044	587
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	576	48
Local, Non-Traditional: Homeownership^	60	5
Planned Total Households Served	**7356**	**613**

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

*** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/ households to be served, the MTW PHA should estimate the number of households to be served.

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number Of Unit Months Occupied/Leased*	Planned Number Of Households To Be Served*
Tenant-Based	Project MARCH/2016.02.HC	0	0
Property-Based	THASP/1999.06.HC	576	48
Homeownership	Homeownership Flat Subsidy/ 2005.03.HC MTW	60	5

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	Closing out Project MARCH in 2019 due to low utilization

Wait List Information

Waiting List Information Anticipated

Waiting List Name	Description	Number Of Households On Waiting List	Waiting List Open, Partially Open Or Closed	Plans To Open The Waiting List During The Plan Year
MTW Project Based Voucher	Site-based	254	Open	Yes
MTW Housing Choice Voucher	Program-specific (NED)	286	Open	Yes
MTW Housing Choice Voucher	Community-wide	1505	Open	Yes
PBV Mobility	Site-based	127	Partially Open	No

Please describe any duplication of applicants across waiting lists:

Applicants may apply for more than one housing program wait list. While duplicate applicants have been removed within each program type, duplication will occur across housing program wait lists. For example, all 268 applicants on the MTW Housing Choice Voucher NED list are also on the MTW HCV tenant-based list.

Wait List Information

Waiting List Information Anticipated

Waiting List Name	Description of Planned Changes to Waiting List
MTW Housing Choice Voucher	Keene Housing is proposing a residency preference in its' 2019 Administrative Plan.

Keene Housing is adding a residency preference to the Housing Choice Voucher waiting list effective January 1, 2019.

Keene Housing's MTW Housing Choice Voucher waiting list is currently open and there are no plans to close the waiting list in 2019.

Section III. Proposed MTW Activities

Keene Housing is proposing no new activities for FY2019.

Section IV. Approved MTW Activities

Activity Numbering System

KH utilizes a numbering system to assist readers in finding specific activities or identifying an activity's purpose. The Plan approval year is the first section of the activity number. The second number refers to the activity number for that year. The final two letters indicate the statutory objective the activity relates to – Housing Choice (HC), Cost Effectiveness (CE), and Self-Sufficiency (SS). In cases where an activity falls under more than one objective, KH's primary goal in initiating the activity is used.

Implemented Activities

1999.01.HC Eligibility Administration Guidelines

Plan Year Approved: 2000 Year Implemented: 2000

KH uses a two-tiered system for determining eligibility for our MTW HCV program. First, we calculate a household's anticipated income by applying all applicable income sources as described at 24 C.F.R. 5.609. If the calculated income is 80% Area Median Income (AMI) or less, the household is eligible for assistance under the first threshold. KH then applies an asset threshold of $100,000 as a second layer for eligibility determination. Applicant households with assets of $100,000 or more are not eligible for assistance even if the applicant's anticipated income falls at or below the 80% AMI threshold.

The $100,000 asset threshold does not apply to inaccessible assets, such as irrevocable trusts. KH applies income from inaccessible assets to a household's income for determining income eligibility as if this threshold did not exist.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

1999.03.CE Rent Reasonableness Neighborhood Analysis Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

To comply with C.F.R. 24 902.507, Public Housing Authorities (PHAs) typically develop and maintain, or purchase, a database of rental units in the PHA's jurisdiction which they use to determine if an owner's proposed rent is reasonable compared to similar, unassisted units. Developing a reasonableness database often requires extensive administrative time or is accompanied by the high costs of hiring an outside contractor to provide the necessary data. KH found that the high annual administrative and financial costs of this task provided little value, as the region's rental market varies little from year to year and almost not at all across neighborhoods.

Dictating to participants what is a reasonable rent is also contrary to KH's philosophy of empowering participants to make decisions based on their needs, rather than to comply with arbitrary requirements set by KH or HUD. It is KH's belief that the household, not KH, is the best judge of what an appropriate rent is (see 40% Affordability Discontinuance activity on page 14). To ensure HCV holders are not being charged unreasonable rents, KH compares our participants' rents against the Market Analysis released regularly by the New Hampshire Housing Finance Authority.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

1999.07.HC Reasonable Rent Determination Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

KH believes that the determination of rent reasonableness for a unit is best left in participants' hands, as determined by each household's priorities, income, and needs. However, for many participants that are elderly, disabled, or newly leased up from the wait lists, finding appropriate housing can be more difficult.

To balance these needs, KH determines rent reasonability for MTW voucher holders participating in our Income Based and Non Elderly Disabled programs and Step 1 Stepped Subsidy participants. For these households, we utilize the Rent Reasonableness Determination protocol used by New Hampshire Housing Finance Authority (NHHFA) to determine rent reasonableness. NHHFA administers a statewide Housing Choice Voucher program and their Rent Reasonableness tool, which is updated annually using data collected through their statewide rent survey, includes Cheshire County-specific data. NHHFA allows us to use their protocol at no cost to KH.

For households in Step 2 or Step 3 of the Stepped Subsidy Program, KH empowers participants to determine the reasonableness of the asking rent based on their own needs and priorities. KH staff educates Stepped Subsidy participants on how factors relating to rent reasonableness – such as location, unit size, unit type, accessibility, amenities, tenant paid utilities, and maintenance – contribute towards a reasonable rent, and provides support, if necessary, during the participant's negotiations with the owner.

KH does not execute Housing Assistance Payment (HAP) contracts or negotiate rents with owners on any participants' behalf, regardless of type of, or duration in, an HCV program. Instead, KH pays the HAP directly to the participant with the understanding that the participant is expected to pay full rent, not just their portion, to the owner. Participants who fail to pay their full rent are subject to eviction, removed from the HCV program, and any remedies available to KH for recovering misspent HAP.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

1999.08.HC 40% Affordability Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

KH does not require participants to maintain a rent burden of less than 40% when leasing a unit or negotiating rents with an owner. Instead, we allow the participant to be the judge of his or her priorities in relation to housing choice and rent burden. Participants are counseled during the issuance briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing a unit that creates a high rent burden. Once a unit is chosen, KH calculates the proposed rent burden and, if it exceeds 40%, KH allows the participant an opportunity to demonstrate how they will afford their rent without sacrificing other household necessities. Households whom KH permits to lease–up with a rent burden exceeding 40% are not eligible for Safety Net unless an unanticipated change in circumstances, such as income loss or change in household composition, causes a rent burden in excess of their rent burden at lease-up.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2005.03.HC MTW Homeownership Flat Subsidy

Plan Year Approved: 2005 Year Implemented: 2005

Keene Housing provides participants interested in homeownership the opportunity to purchase a home while keeping their MTW HCV through the MTW Homeownership Program. KH's program generally mirrors the traditional HUD homeownership program by requiring households to meet specific requirements in order to be eligible for the program, including homeownership counseling. Under the traditional HUD homeownership program, a non-elderly, non-disabled household may receive assistance for up to 15 years on a 20 year or longer mortgage (10 years for a shorter mortgage). This assistance continues regardless of income after the initial income eligibility determination.

In our experience, the lengthy approval process sometimes results in an eligible household finding themselves over the 80% AMI threshold by the time a home is located and a lender secured. Additionally, households sometimes increase their income above 80% AMI after obtaining a home.

While KH believes that supporting a household's homeownership goals and maintaining homeownership is important, we also believe that continuing to assist households after they no longer need assistance is contrary to our mission and an inefficient use of tax payer funds. To balance these two goals, in addition to HUD's standard term limits, KH initiated a flat subsidy for households in the program with incomes between 80% AMI and 140% AMI. By adopting both a flat subsidy and term limits, KH promotes participants' efforts to increase financial stability while holding them to a higher standard than HUD's traditional homeownership program.

With the economic and housing market instability in 2008, Keene Housing initiated a policy change that permitted homeownership families to request an interim recertification if their incomes changed. This policy change prevented at least two foreclosures and remains in place.

In 2017, the last year for which full data is available, no new Homeowner Vouchers were issued, although 5 households purchased a home without our assistance. Five households currently participate in the Homeownership program.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

1999.06.HC Transitional Housing Assistance Subsidy Program (THASP)

Plan Year Approved: 2000 Year Implemented: 2000

KH's Transitional Housing Assistance Subsidy Program (THASP) helps homeless and hard-to-house individuals and families access stable housing through partnerships with local service providers. THASP partners receive fixed subsidies to offset the costs of maintaining shelters for the region's homeless, re-entry, and domestic violence populations. In exchange, partners agree that THASP participants do not pay more than 30% of their income for shelter and receive case management and counseling to help gain long-term housing.

THASP has become a critical component of Keene's homeless and domestic violence shelter system. KH provides fixed subsidies for 4 transitional housing programs – a Men's Homeless Shelter, a Family Homeless Shelter, Second Chance for Success transitional housing program for individuals leaving incarceration, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault. Three of the shelters – the men's shelter, and family shelter, and Second Chance – are managed by Southwestern Community Services (SCS), the local Tri-Cap agency.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

1999.04.CE Stepped Subsidy Rent Reform

Plan Year Approved: 2000 Year Implemented: 2000

In KH's experience, non-elderly, non-disabled households coming off the wait list are often in need of more support and financial assistance than those who have been receiving assistance for a longer period of time. The Stepped Subsidy Rent Reform responds to this need by providing a deep Housing Assistance Payment (HAP), with households only paying 20% of gross income towards rent for the first two years of housing assistance (see table below for 2018 Stepped Subsidy amounts).

During this time participants are also enrolled in the Resident Self-Reliance (RSR) program (page 18) where they receive supportive services from KH's Resident Service Coordinators (RSCs). Households work with RSCs throughout their time with us to identify barriers to self-sufficiency and to develop a plan for moving towards financial security and, eventually, out of housing assistance.

# BR	VPS	Step 1 HAP	Step 2 HAP (65% of VPS)	Step 3+ HAP (45% of VPS)
SRO	$597	VPS-20% Gross Income = Subsidy	$390	$270
0	$797	VPS-20% Gross Income = Subsidy	$520	$360
1	$868	VPS-20% Gross Income = Subsidy	$560	$390
2	$1118	VPS-20% Gross Income = Subsidy	$730	$500

3	$1455	VPS-20% Gross Income = Subsidy	$950	$650
4	$1623	VPS-20% Gross Income = Subsidy	$1050	$730
5	$1866	VPS-20% Gross Income = Subsidy	$1210	$840

We have found that calculating HAP based upon a household's earnings punishes them for increasing their income by responding to the increased income with an in-kind increase in tenant rent payment. This is a serious disincentive for a household to increase its income and has been found to result in employment instability and under reporting of income. It has also been found to negatively impact a household's ability to save or plan for the future, both of which are contrary to KH's mission.

To promote long-term employment and financial stability, after the first two years of assistance the amount of HAP a household receives is disconnected from their earnings and is instead calculated as a percentage of the voucher payment standard (VPS) the household for which the household is eligible. In Year 3 the household receives a monthly HAP equal to 65% of the VPS. The HAP is reduced again in Year 4 to 45% of VPS.

Stepped Subsidy is mandatory for all non-elderly, non-disabled households in the MTW HCV and PBV programs, although both elderly and disabled households may opt-in to the program. Currently 141 households have their subsidy calculated under the Stepped Subsidy Rent Reform.

Stepped Subsidy households are subject to the Reasonable Rent Determination Discontinuance activity (page 14). HAP is paid directly to the household and it is the household's responsibility to pay the full rent to the owner; KH does not execute a HAP contract with the owner. In addition, all Stepped Subsidy participants are required to participate in the RSR program as long as they receive housing assistance.

For Step 1 and Step 2 households pursuing educational goals in the Resident Self – Reliance program, KH "freezes" a household's progression in the Stepped Subsidy program at their current level if the head of household, spouse, or co-head is:

- Employed at least part-time, and
- Enrolled full-time in a post-secondary program and maintaining a passing GPA, as defined by the institution.

A household's subsidy remains frozen until such time that the eligible participant has completed their educational program, are no longer employed at least part-time, their enrollment drops below full-time, or their GPA drops below passing. In addition, the household must remain in compliance with all other voucher program obligations, including all requirements of the Resident Self-Reliance (RSR) program. Ongoing compliance is reviewed at the household's quarterly RSR meeting. Should KH determine a participant is no longer eligible for the freeze, the household's Step Subsidy progress resumes on the first day of the month after a 30 day notification of non-compliance. There is no limitation on how long a household may remain at the frozen level.

KH monitors rent burden quarterly to ensure participation in Stepped Subsidy does not cause excessive burdens to participating households. On average, 5% of Stepped Subsidy households maintained a burden of 40% or higher in 2016. These households are predominately choosing to rent a unit that exceeds the VPS or unit size for which the household is eligible.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

Hardship Case Criteria

The Stepped Subsidy program does not calculate household subsidy based on a participant's income, therefore participants are not eligible for an interim recertification should they experience a decrease in income. As an alternative to the interim recertification process, if a Stepped Subisidy household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program Safety Net provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. Typically, households are required to apply for Safety Net except for short term hardships due to a medical event and are required to meet additional criteria for applications beyond the first month.

1999.05.SS Resident Self-Reliance Program

Plan Year Approved: 2000 Year Implemented: 2000

Participants in the Stepped Subsidy Program are required to participate in KH's Resident Self-Reliance (RSR) program. RSR's central premise is that to become financially stable and self-sufficient, households must achieve the following five Foundational Proficiencies: Household Stability, Wellness and Healthy Relationships, Education and Training, Financial Management, and Employment and Household Management.

Each household is assigned a Resident Service Coordinator (RSC) who provides service coordination and case management to help participants understand and remove the obstacles keeping them from building wealth and achieving self-sufficiency. The RSCs are funded through HUD's Housing Choice Voucher (HCV) Family Self – Sufficiency (FSS) Grant Program.

Individualized Goal Setting

New participants meet with their RSC to complete an initial Proficiencies Assessment. The assessment helps the household and RSC develop an individualized 3-year Goal Action Plan. The plan includes actionable goals and milestones tailored to the assessment findings, with concrete dates for completion. Participants are encouraged to anticipate scheduled increases in rent, as described in the Stepped Subsidy activity (page 16), or other potential financial changes, such as changes in benefits due to increases in earnings, when developing their Goal Action Plan. By anticipating and planning for these changes, participants avoid the so-called "cliff effects" that can often derail self-sufficiency progress as a household's personal income increases and public assistance declines. Upon completion of a 3-year Goal Action Plan, the participant and RSC establish a new 3-year plan. This process continues until the household leaves the MTW program.

Development Grants and Rent Credits

KH created the Development Grants and Rent Credit (DGRC) fund in 2014 to help offset the costs associated with attaining household goals and to provide RSR participants financial rewards for attaining them. The amount of DGRC funds available to each household is determined annually, based upon MTW funding availability. RSR participants can receive DGRC funds both as Development Grants and Rent Credits.

Development Grants help households pay the costs associated with achieving goals in their 3-year Goal Action Plan.

Examples of Development Grants include help with tuition, textbooks, exams, childcare, and even car repairs.

Rent Credits are designed to provide a financial reward to households that meet an established milestone or goal from their 3-Year Goal Action Plan. Upon completing a goal, the household receives a credit towards the following month's rent. Rent credit amounts are agreed upon by RSC based upon the difficulty of the goal and the amount of funding available. Households may receive a Rent Credit for meeting any goal, even if they utilized a Development Grant to achieve it.

Development Grants and Rent Credits are available to all RSR participants who are in compliance with the RSR program and the Obligations of the Family agreement, which outlines all the responsibilities a voucher household is required to fulfill, as well as all prohibited actions.

Participant Compliance

Once a household establishes a 3-Year Goal Action Plan, the household and RSC meet quarterly to discuss the household's progress and any barriers that have arisen since the last meeting. Attending these meetings is mandatory. Participants who miss three (3) quarterly meetings are terminated from the RSR, Stepped Subsidy, and MTW HCV programs.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2005.01.CE Elderly and Disabled Household Alternative Recertification Schedule

Plan Year Approved: 2005 Year Implemented: 2005

KH uses a streamlined recertification process for elderly and disabled households receiving 100% of their income from any fixed income source that do not have net assets exceeding $50,000. Instead of the traditional recertification, KH relies on the published Cost of Living Adjustment (COLA) and Enterprise Income Verification (EIV) system to calculate each household's income.

Households receive a notification via mail of their new tenant share and subsidy without attending a recertification appointment. Included with this notice is the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). All elderly and disabled households may request an interim at any time.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2005.02.CE Stepped Subsidy Recertification Schedule

Plan Year Approved: 2005 Year Implemented: 2005

Instead of the traditional annual recertification process, participants whose subsidies are calculated under the Stepped Subsidy Rent Reform are recertified at each Step change, typically Years 3 and 4.

Once a household reaches Step 3, KH replaces the recertification process with an Enterprise Income Verification (EIV) systems check to test if the family has met the $0 HAP threshold (page 21), and for processing recertifications.

All Stepped Subsidy households also participate in the Resident Self-Reliance Program (RSR) and are required to attend quarterly meetings with their Resident Service Coordinator (RSC). Participants and RSCs review income and employment data at these meetings. This data is used to ensure program eligibility and to measure each household's progress towards their 3-Year Goal Action Plan. If necessary, RSCs also collect new Authorization for Release of Information/Privacy Act Notices (HUD form 9886) at this time.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2008.01.HC Project-based Voucher Program

Plan Year Approved: 2008 Year Implemented: 2008

KH project-bases at least 75% plus any funding received for units project based through the AHPP activity (page 21). In addition, KH waives the required public process for project-basing units within KH owned and managed properties and those project-based through the AHPP activity. KH also uses its MTW flexibility to project base up to 100% of the units within a property.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2008.02.CE Restrictions on Section 8 Portability

Plan Year Approved: 2008 Year Implemented: 2008

KH restricts the ability of participants in the RSR program to port out of the Monadnock Region unless they have a verifiable need for a reasonable accommodation, are the victim of domestic violence, or can show that, consistent with the RSR program's intent, such a move would demonstrably increase their financial stability, such as new employment or enrollment in an educational program.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2013.01.SS $0 HAP Rent Burden Test

Plan Year Approved: 2013 Year Implemented: 2013

KH encourages participants to increase their income and move towards self-sufficiency. However, we understand that the fear of a sudden loss of important safety nets, such as housing subsidy, may hold participants back from pursuing opportunities to change jobs and/or increase income. Even if a household increases their income so that they no longer need housing assistance, there are many obstacles that they may face in the first few months after the household loses housing assistance. However, as an agency dedicated to helping our low – income neighbors reach permanent financial independence, we recognize that we should not continue helping households that no longer need our assistance.

The $0 HAP Rent Burden Test provides us a way to meet that delicate balance. When a Stepped Subsidy household reaches economic independence, measured as having a gross rent or eligible VPS at or below 30% of gross income, KH reduces the HAP to $0 for 6 months. If the household does not experience an unanticipated change in income within the $0 HAP period, housing assistance is terminated. This provides households a period to adjust to life without housing assistance, while also ensuring we are being responsible stewards of the tax payers' investment.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2014.01.HC Affordable Housing Preservation Program (AHPP)

Plan Year Approved: 2014 Year Implemented: 2015

AHPP provides property owners the ability to opt-out of an expiring Project Based Rental Assistance (PBRA) contract and execute to a AHPP PBV HAP contract with KH. As vouchers sometimes provide higher payments than older PBRA contracts, entering into a AHPP PBV HAP contract can provide owners access to additional rental revenue and new potential funding opportunities for capital improvements. In addition, the AHPP program is much easier and less expensive for owners to comply with than HUD's multifamily program. This results in reduced overhead for owners, which when combined with competitive PBV rents, makes the AHPP program very attractive to owners of expiring use properties as well as investors interested in purchasing and preserving them. At opt-out, KH provides residents the option of remaining in place and converting their Enhanced Vouchers to PBVs, staying in-place with their Enhanced Vouchers, or taking their vouchers to the private market.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2014.02.CE Medical Deduction Threshold

Plan Year Approved: 2014 Year Implemented: 2014

Using HUD's traditional medical deduction formula, elderly and disabled households may claim unreimbursed medical expenses over 3% of their annual income as a deduction when their income is being calculated for the purpose of rent determination. Prior to implementing this initiative KH found that most households did not need the deduction or were using it to offset costs not covered by Medicaid or Medicare. With the implementation of the Affordable Care Act (ACA), KH found that fewer households needed the lower medical deduction threshold for out-of-pocket medical expenses and were primarily using the deduction for optional private insurance coverage. KH decided to align its medical deduction threshold to that used by the Internal Revenue Service and increased the threshold to 7.5% for elderly and disabled households' unreimbursed medical expenses. This change created a buffer for households that suffer unusually high out-of-pocket medical expenses while ensuring that limited housing dollars were not being used to subsidize private insurance.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2014.03.SS Asset Exclusion Threshold

Plan Year Approved: 2014 Year Implemented: 2014

When a household's assets total $50,000 or less, KH does not include the imputed value of the household's assets as income when determining the household's total tenant payment. This allows voucher participants the opportunity to establish and increase assets without being penalized by a corresponding rent increase. KH continues calculating the imputed value for all assets in the income calculation when a household's total assets exceed $50,000.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2014.04.SS Keene Housing Kids Collaborative

Plan Year Approved: 2014 Year Implemented: 2015

Keene Housing Kids Collaborative (KHKC) is a 501(c) (3) non-profit organization KH created in 2015 to provide educational and other services to children living in KH owned or managed properties, as well as children living in privately owned housing with assistance from an MTW Housing Choice, Non-Elderly Disabled, or Mainstream voucher. No child for whom KH provides any sort of support is excluded from participating in KHKC programming or community partnerships.

After many years of operating a small after school program with just a handful of children participating, KH, through its support for KHKC, is now fully engaged in the very difficult work of providing KH youth the educational, social and emotional tools and experiences they need to flourish in school and in the community so that, once they complete high school and move on to secondary or vocational school, they will be prepared to succeed. KHKC's task is to make sure that children growing-up in KH or KH assisted housing will not need housing assistance when they become adults.

To that end, KHKC has already forged important partnerships with various providers of educational, social, athletic, and other programming for children, with an initial focus on preschool to elementary-aged children. KHKC is engaging local academics with interest in issues of child development and generational poverty to study how KHKC's interventions with support from KH, can effect the economic outcomes of children living in KH-assisted housing. The hope is that much can be learned by exploring how, thanks to MTW, KH is combining its focus on adult self-sufficiency in the RSR program with the work KHKC is doing with the children of RSR families in particular, to effect multi-generational economic development.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2014.05.HC Affordable Housing Preservation & Modernization Program

Program Year Approved: 2014Year Implemented: 2014

The Affordable Housing Preservation and Modernization Program allows KH to use savings realized from MTW rent, programmatic, and administrative reforms to address KH, and KH-affiliate owned properties', growing capital needs. These funds allow KH to respond to the portfolio's needs in a rational way, with a predictable schedule, based on greatest need and economies of scale, rather than in reaction to unpredictable and uncertain grant opportunities. With planned capital expenditures for 2018 of more than $1 million, MTW is playing a critical role in preserving the lion's share of Keene's affordable units.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2015.01.CE Affordable Housing Preservation Program Rent Reform

Plan Year Approved: 2015 Year Implemented: 2015

The AHPP Rent Reform provides a streamlined methodology for calculating rent while providing households an opportunity to increase income and assets without immediate increases in rent. As in the traditional PBV program, subsidy is calculated based upon 30% of a household's adjusted annual income. However, the activity alters the current methodology for calculating rent and the recertification schedule with the following streamlined strategies:

- Triennial recertifications for all households.
- Interim recertifications are limited to household composition changes and cases where the total household income permanently drops by $50 per month or more, with access to Safety Net for short term financial hardship.
- The Utility Allowance in effect at the effective date of the last regular recertification is used to calculate rents at interim recertifications.
- Household assets with a total net value of $50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated.
- Utilizes the published Cost of Living Adjustment (COLA) and the Enterprise Income Verification (EIV) system to calculate household income for elderly and disabled households.

By simplifying the recertification and rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. In addition, this policy allows participant households the opportunity to increase earnings and assets without being discouraged by corresponding increases in rent. As evidenced by KH's successful Stepped Subsidy Activity, disconnecting a household's rent from increases in earnings or assets often leads to positive household outcomes.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

Hardship Case Criteria

Households affected by this policy are provided two options when they experience a hardship that increases their rent burden. First, should a household experience a decrease in household income of $50 or more per month, it may request that KH, or the administering agency, perform an interim recertification to recalculate the household's share of the rent.

Second, if a household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program which provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. KH has operated Safety Net since first joining MTW in 2000 as part of the Stepped Subsidy activity.

2015.02.CE Affordable Housing Preservation Program Alternative Inspection Schedule

Plan Year Approved: 2015 Year Implemented: 2015

Properties participating in AHPP (page 21) use the following alternative schedule for Housing Quality Standards (HQS) inspections:

- All units converting to AHPP are inspected by the administering agency for HQS compliance no more than 90 days before initial conversion.
- If all units pass initial inspection, KH inspects 20% of the units biennially.
- Should any unit fail initial or biennial HQS inspection, the property is subject to an annual inspection of 100% of units until all pass HQS inspection, at which time the property returns to a 20% biennial inspection schedule.
- Properties subject to a higher inspection protocol than HQS may use that protocol in lieu of a biennial (not initial) HQS inspection.

Properties that fail an inspection based upon a higher standard protocol are subject to an annual HQS inspection of all (100%) units until all units pass HQS or a higher inspection protocol.

A household may, at any time, request a HQS inspection from the administering agency should the tenant believe that their unit does not meet HQS.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2015.03.CE Earned Income Disregard Discontinuance

Plan Year Approved: 2015 Year Implemented: 2015

KH discontinued allowing new households to claim the Earned Income Disregard (EID) from the calculation of tenant rent. All households claiming EID as of January 1, 2015 were permitted to do so until the natural end of their EID allowance, as required by regulation.

Hardship Case Criteria

All households are eligible for assistance under KH's Safety Net program. Safety Net permits households who experience unanticipated increases in rent burden due to a loss of income or increase in medical expenses to apply for a temporary reduction of their tenant share. In addition, the population eligible for the EID are generally not in the Stepped Subsidy program and can request an interim recertification for long-term income changes at any time.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

2016.01.CE Project-Based Unit Agency Conducted Inspections

Plan Year Approved: 2016 Year Implemented: 2016

Keene Housing's Moving to Work Agreement C D. 1.f. and D.7.A, gives KH the authority to inspect all KH and KH affiliate owned PBV units.

PBV units owned and managed by Keene Housing are inspected by KH's Director of Facilities and Assets who certifies that these units meet Uniform Physical Condition Standards (UPCS) at turnover. Additionally, a KH inspector certifies that these units meet Housing Quality Standards (HQS) as specified in KH's MTW HQS activities: 2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule and 2013.02.CE Housing Quality Standards (HQS) Alternative Inspection Protocol. Special HQS inspections are conducted by request.

Changes Proposed for FY2019

KH proposes no changes for this activity.

2017.02.HC PBV Mobility Wait List

Plan Year Approved: 2017 Plan Year Implemented: 2013

Keene Housing increased the tenancy requirement for PBV households from one to two years. In addition, we established a ratio whereby every sixth tenant-based voucher issued will go to an eligible PBV household that has requested a tenant-based voucher by opting in to our Mobility wait list.

The policies ensure equitable access to housing by households waiting for assistance as well as by assisted households looking to move to the private market. This initiative meets the Housing Choice statutory objective and increases the number of units available to all low-income households by ensuring that availability of PBV units are not a barrier to those needing assistance. And it reduces wait times by ensuring that those on the wait list are assisted before those already being assisted.

For administrative purposes, all PBV households who applied for our tenant-based wait list prior to the implementation of this policy were automatically moved to the Mobility Wait List in the order of their original application. At lease-up, all PBV households are informed of their right to a tenant-based voucher after two – years of tenancy and given the choice to opt-in to our Mobility Wait List. PBV households may request to be placed on the Mobility wait list at any time.

PBV households are still eligible for transfers within the KH PBV portfolio during the two-year tenancy requirements if such a transfer is approved by the PBV owner. In addition, KH waives the PBV Mobility Wait List requirements for PBV households that meet the eligibility criteria for a tenant-based voucher under KH's Violence Against Women Act (VAWA), Reasonable Accommodation, or Government Displacement/Natural Disaster Preference policies.

Changes Proposed for FY2019

KH proposes no changes to this activity.

2017.02.HC Local Payment Standard

KH sets its own Local Payment Standards based on actual market data, rather than HUD's FMRs, using the same Rent Comparability Study methodology used for our HUD Multifamily properties. The Local Payment Standard activity increases the mandated Payment Standard cap to 175% of FMR, waives the requirement to utilize HUD's FMRs when determining the agency's Payment Standards, and allows KH to self-approve rents exceeding its Board-approved VPS, when necessary.

KH's current VPS does not exceed 120% of the HUD established FMR nor has the agency approved any rents exceeding the board approved VPS.

Changes Proposed for FY2019

KH proposes no changes to this activity.

Metrics Changes for FY2019

Any changes to metrics or baselines for this activity will be outlined in the FY2018 Report.

Not Yet Implemented Activities

KH has implemented all MTW activities.

Activities on Hold

Keene Housing has no MTW activities on hold.

Closed Out Activities

2006.01.CE Standard Deductions

Plan Year Approved: 2006 Year Closed: 2013

In 2006, KH adopted a flat deduction for all elderly and/or disabled households. Households who believed their unreimbursed medical expenses were above the 3% medical deduction threshold could request that KH calculate their medical deduction instead of applying the standard deduction.

Since the process of verifying and calculating medical deductions can often be administratively burdensome, it was believed that using a flat deduction would provide administrative savings to offset any potential HAP loss. Delays in implementation and data collection resulted in KH being unable to determine the impact of this activity until 2012. A 2012 analysis showed that the loss in HAP funds due to households receiving medical deductions that they would not otherwise be eligible for far outweighed any administrative savings.

In 2013, KH discontinued application of the standard deduction for households with no unreimbursed medical expenses or expenses below the medical deduction threshold.

2011.01.CE HOUSING QUALITY STANDARDS BIENNIAL INSPECTION SCHEDULE

Plan Year Approved: 2011 Year Closed: 2017

KH uses a biennial schedule for units that have passed an initial or annual inspection for HQS compliance. Any property that fails an initial or biennial inspection is held to an annual inspection schedule until such time that all units pass an annual inspection.

Due to changes in 24 CFR 982.405, which now permit all public housing authorities to utilize a biennial inspection schedule, KH closed out this activity in FY2017.

2013.02.CE HOUSING QUALITY STANDARDS ALTERNATIVE INSPECTION PROTOCOL

Plan Year Approved: 2013 Year Closed: 2017

KH permits units that pass an inspection held to a stricter protocol than HQS – REAC, UPCS, State Finance Authority, etc. – to use the stricter protocol to demonstrate compliance with the property's biennial HQS inspection requirement. Due to changes in 24 CFR 982.405, which now permits all public housing authorities to use a higher protocol to verify HQS compliance, KH closed out this activity in FY2017.

1999.02.CE Housing Quality Standards Landlord Self-Certification Inspection Protocol

Plan Year Approved: 2000 Year Closed: 2018

Property owners are permitted to self-certify HQS compliance of units that pass an initial KH HQS inspection in lieu of a KH administered biennial inspection. This self-certification is completed by the owner certifying a unit has been maintained to HQS standards or by providing evidence that a unit has passed a third party inspection with criteria that are equal to or at a higher standard than HQS, such as REAC or UPCS.

KH performs quality control inspections on a randomly selected number of owner certified units biennially. HCV participants receive information on HQS standards at lease-up and may request special inspections anytime they believe a unit violates HQS. Units that fail a biennial, quality control, or participant requested inspection return to a KH administered annual inspection schedule until the unit receives a 'Pass' status. Landlord self-certified units are held to the same schedule or standards as other units.

KH closed out this activity in FY2018 due to continued low landlord participation.

2016.02.HC Project March (Monadnock Area Resources Curing Homelessness

Plan Year Approved: 2016 (Amended) Plan Year Implemented: 2016

Project MARCH uses a Housing First model that provides partner agencies fixed subsidies to secure and maintain private market housing for their homeless clients. The first Project MARCH Partner is Southwestern Community Services (SCS). SCS is our region's Community Action Agency, and out largest THASP partner (page 16). KH pledged up to twenty (20) Project MARCH subsidies to SCS in 2016. This commitment expands affordable housing options in the community and provides options beyond the shelters for those who may otherwise find it difficult to secure permanent, affordable housing.

Project MARCH utilizes preferences to prioritize homeless veterans, followed by chronic homeless households, then homeless households. Every household who receives housing through Project MARCH is also offered two months of supportive services from SCS. SCS continues working with households who request additional services after the mandatory two month services period ends.

The Project MARCH partner is responsible for creating and enforcing eligibility and continued occupancy policies. Such policies must, at minimum, meet the following requirements:

- Ensure that no policies or procedures violate any federal, state, or local regulation or statute.
- Certify that no Project MARCH participant has been convicted of drug related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- Require that at least one member of the participating household has established citizenship or eligible immigration status.
- Confirm that all units leased through Project MARCH meet Housing Quality Standards (HQS) protocols and are subject to KH's HQS quality control protocols.
- Ensure that a Project MARCH participant's rent burden will not exceed 45% of monthly income.
- Certify that no Project MARCH participant's annual income will exceed 80% of the Area Median Income (AMI) at eligibility.
- Verify that the partner will not impose a time limit for participation, but will require Project MARCH participants to apply for housing assistance with KH as part of the Project MARCH eligibility process.

Changes Proposed for FY 2019

KH and its partner have found the current program design of Project MARCH difficult to administer and maintain a high utilization. After careful consideration, we have decided to close out this activity and explore other options for assisting this population. Upon closing this activity, all current Project MARCH participants will be moved to the KH or SCS housing assistance program depending on program eligibility and appropriateness.

Section V. Sources and Uses of Funding

This section describes the agency's projected revenue and expenditures for MTW funds for 2018 and reflects use of MTW Block Grant Single-fund Flexibility.

Estimated Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

The following table summarizes estimated MTW sources of funds for 2019 by Financial Data Schedule (FDS) line item, as required by new HUD guidance on MTW Plans and Reports. Since HUD's FY2019 funding levels have yet to be established, the following estimates assumes no additional proration in HUD funding.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	$0
70600	HUD PHA Operating Grants	$5,722,075
70610	Capital Grants	$0
70700 (7010+70720+70730+70740+70750)	Total Fee Revenue	$0
71100+72000	Interest Income	$1,332
71600	Gain or Loss on Sale of Capital Assets	$0
71200+71300+71310+71400+71500	Other Income	$0
70000	**Total Revenue**	**$5,723,407**

Estimated Use of MTW Funding for the Fiscal Year

The next table summarizes estimated MTW expenditures of funds for 2019 by FDS line item. The FDS line item format captures only select capital costs. The table does not include funds utilizing Single Fund Flexibility and/ or allocated to programs and activities outside traditional operations, for example KH's Affordable Housing and Modernization Program. As a result, comparing totals of the two tables will not provide a clear picture of KH's financial outlook. Expenses which are not captured within the table are described within the narrative of the individual activities which utilize MTW funds in ways not captured by FDS.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	$500,101
91300+91310+92000	Management Fee Expense	$0
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	$259,712
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$0
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$0
95000 (95100+95200+95300+95500)	Total Protective Services	$0

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$2,051
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$0
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$0
97100+97200	Total Extraordinary Maintenance	$0
97300+97350	HAP + HAP Portability-In	$4,221,651
97400	Depreciation Expense	$1,000
97500+97600+97700+97800	All Other Expense	$0
90000	**Total Expenses**	**$4,984,515**

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

In addition to the expenses listed above, KH expects to transfer approximately $738,892 out of the MTW fund to support our MTW activities such as 2014.05.HC Affordable Housing Preservation & Modernization Program and 2014.04.SS Keene Housing Kids Collaborative.

Description of Planned Use of MTW Single Fund Flexibility

KH does not own any public housing and therefore does not combine Section 8 and Section 9 funds. KH relies solely on Section 8 funds and administrative fees to administer our programs.

Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute? Yes

ii. Is the MTW PHA implementing a local asset management plan (LAMP)? No

iii. Has the MTW PHA provide a LAMP in the appendix? No

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

Keene Housing does not own or manage any public housing units and is not required to implement or submit a Local Asset Management Plan.

Rental Assistance Demonstration (RAD) Participation

v. Description of RAD Participation

Keene Housing does not participate in RAD.

vi. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

vii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

Section VI. Administrative

Board Resolution And Certifications Of Compliance

Extract of the Minutes of the Meeting of the
Keene Housing Board of Commissioners
September 19, 2018

Members Present: J.B. Mack, Chairperson
Tom Moses, Vice Chairperson
Pam Slack, Commissioner

<u>Resolution No. 614 – Approval of the FY2019 Annual Moving to Work Plan</u>

RESOLVED, that the Keene Housing Board of Commissioners approves and adopts Keene Housing's Fiscal Year 2019 Annual Moving to Work Plan, and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated August 31, 2018 from Denise Pratt, Director of Programs and Services, to Joshua Meehan, Executive Director.

Motion to adopt: Ms. Slack

Motion seconded by: Mr. Moses

Motion, upon being put to vote, was passed unanimously.

Joshua Meehan, Executive Director

9/24/2018
Date

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01-01-19), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan 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 Americans with Disabilities Act of 1990.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.

(21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Keene Housing
MTW PHA NAME

NH010
MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

J. B. Mack
NAME OF AUTHORIZED OFFICIAL

Chairman
TITLE

SIGNATURE

9-19-2018
DATE

* ***Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

Documentation Of Public Process

Public Notice

Keene Housing (KH) invites the community-at-large to review and provide comments regarding Keene Housing's DRAFT Moving to Work (MTW) Annual Plan for Fiscal Year 2019. Keene Housing is proposing no new activities in 2019. The public comment period is open from 8:30am on Monday, August 1, 2018 until 4:30pm on Friday, August 31, 2018. KH welcomes written comments during the public comment period.

Keene Housing is holding three (3) public hearings prior to finalizing the 2019 MTW Annual Plan. All meetings will occur at the Community Room of KH-owned or managed property unless otherwise noted.

Date:	Monday, August 6th @ 1:00p
Location:	Harper Acres Community Room at 105 Castle Street, Keene
Date:	Monday, August 20th @ 5:50p
Location:	Brookbend Pavilion at 27 Ivy Drive, Keene
Date:	Wednesday, August 22nd @ 5:30p
Location:	Keene Housing Main Office at 831 Court Street, Keene

A copy of the DRAFT MTW Plan is available for review at our Administrative Office located at 831 Court Street, Keene, starting from August 1st until August 31st during normal business hours. Electronic versions can be downloaded from www.keenehousing.org or e-mailed to interested members of the public upon request by contacting Denise Pratt, Director of Programs and Services, at (603)352-6161 or dpratt@keenehousing.org.

Total Attendees: 0

No comments received during public comment period.

Planned And Ongoing Evaluations

Keene Housing has not engaged any outside evaluators to review our program as a whole. The agency does engage outside evaluators on an as-needed basis.

Lobbying Disclosures

Keene Housing does not own or manage any public housing units or receive any Capital Fund Grants. As such, KH is not subject to submittal of the Annual Statement/Performance Evaluation Report.

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

1. Type of Federal Action: a.
- a. contract
- b. grant
- c. cooperative agreement
- d. loan
- e. loan guarantee
- f. loan insurance

2. Status of Federal Action: a.
- a. bid/offer/application
- b. initial award
- c. post-award

3. Report Type: b.
- a. initial filing
- b. material change

For Material Change Only:
year 2019 quarter ______
date of last report FY2017

4. Name and Address of Reporting Entity:
☒ Prime ☐ Subawardee
Tier ______, *if known*:

Keene Housing
831 Court St.
Keene, NH 03431

Congressional District, *if known*: 4c

5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:

Congressional District, *if known*:

6. Federal Department/Agency:
Department of Housing and Urban Development

7. Federal Program Name/Description:
Moving to Work

CFDA Number, *if applicable*: ______

8. Federal Action Number, *if known*:

9. Award Amount, *if known*:
$

10. a. Name and Address of Lobbying Registrant
(*if individual, last name, first name, MI*):

b. Individuals Performing Services (*including address if different from No. 10a*)
(*last name, first name, MI*):

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Signature: ______
Print Name: Joshua R. Meehan
Title: Executive Director
Telephone No.: 603-352-6161 Date: 9/19/2018

Federal Use Only:

Authorized for Local Reproduction
Standard Form LLL (Rev. 7-97)

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Applicant Name

Keene Housing

Program/Activity Receiving Federal Grant Funding

Moving to Work

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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Name of Authorized Official	Title
Joshua R. Meehan	Executive Director
Signature	Date (mm/dd/yyyy)
	09/19/2018

Previous edition is obsolete

form HUD 50071 (/ 0.03)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3