



Keene  
Housing

MOVING TO WORK



ANNUAL PLAN 2022

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**Submitted to HUD**

**HUD Approval Received:**

# Section I. Introduction

As we enter our 22nd year in the Department of Housing and Urban Development's (HUD) Moving to Work (MTW) program, it appears that, after far too long, policy makers from Washington, DC to Concord, New Hampshire are finally turning their attention to the devastating effect our lack of affordable housing is having on our country. As policy makers contemplate exponential expansions of existing affordable housing programs and perhaps consider creating new ones, we are excited by the prospect that once again ideas first tested in Keene, New Hampshire may find their way into state and national policy.

We are quite certain, for example, that the success of any significant expansion of the Housing Choice Voucher Program will require a similarly significant expansion of administrative flexibilities for local providers. The current regulatory structure is too complex, unwieldy and inefficient to be expanded on the scale being contemplated by some in Congress. Luckily, those interested in streamlining voucher administration can draw on two decades of learning from the MTW program. There is no doubt that by pursuing the objectives Congress created for us when the program was created in 1996, the nation's MTW agencies have clearly demonstrated that, through a careful balance of local flexibility and federal accountability, Public Housing Authorities can:

- 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.

We hope that in the coming years, lessons learned from the nation's MTW agencies will inform local, state and national decisions about how best to expand affordable housing for the tens of millions of low-income families, elders and disabled Americans who need it. In the meantime, we will continue doing our work here in Keene, cautiously optimistic that it is noticed, and in some small way helping.

## **KH'S LONG TERM VISION**

Every five years we develop a strategic plan that provides our Board of Commissioners, staff, residents, voucher holders and the broader community with our goals and objectives for the next five years. We began implementing our latest five-year strategic plan in 2020.

Each year the Board of Commissioners and staff reviews our progress towards our strategic goals and, if necessary, revises or expands them as circumstances require. A copy of the updated Strategic Plan is attached to this Annual Plan for review.

## **KH'S SHORT-TERM GOALS**

As we begin the careful transition back to "regular business" in what we hope are the waning days of the COVID-19 pandemic, we are able to shift from pandemic triage to a new threat to our community. Over the past two years competition for rental units in the Monadnock region, and especially the City of Keene, have skyrocketed. The effect of this rapid and unexpected spike in the market has been twofold; first, voucher holders who in the past had little trouble finding units are struggling to lease-up. It is currently taking as long as 4 months for a voucher holder to find an apartment.

Second, smaller property owners are taking advantage of rising values and selling their small multi-family properties to

investors, some from larger communities outside of the Monadnock region, who are making modest improvements to the properties and then increasing the rents well beyond those affordable to low-income renters, even those lucky enough to have vouchers. To date we've been able to lease fewer than half of the fifty Mainstream vouchers we were awarded over the past two years, and the utilization rate of our MTW Housing Choice Voucher program is at the lowest level in a decade. There is currently no way for voucher holders – especially Mainstream voucher holders - to compete in the market; rents for the units that are available are too high, and even when they are not, owners are choosing to rent to applicants with good credit and steady jobs over voucher holders almost every time.

While these circumstances may feel very familiar to our colleagues in larger metropolitan areas of the country, it's been more than thirty years since the Monadnock region has experienced an affordability crisis this severe. In response, Keene Housing is developing a two-pronged strategy to help voucher holders find units in the community. First, we propose using our MTW flexibility to create a landlord incentive program aimed at helping voucher holders compete in this very difficult market. As described in Activity 2022.02.hc, owners leasing to voucher holders, with some restrictions, will receive a one-time \$1000 signing bonus. Additionally, owners staying in the voucher program after a voucher holder vacates an owner's apartment will receive, with some restrictions, a \$500 re-signing bonus. It is our hope that these incentives will make it easier for voucher holders to compete better in this extremely tight market.

Second, we are exploring the feasibility of starting a scattered site acquisition program. As of this writing we are in the early stages of this process but if it does prove feasible, we will begin acquiring small multi-family properties in and around Keene. Once acquired, we will rehabilitate and modernize the properties and make them available to low-income renters, likely project basing a significant portion of the units. The sources for the acquisition, rehabilitation and operations of these scattered site properties may include but not be limited to public and private equity, MTW funds as authorized in Attachment D of the Amended and Restated Moving to Work Agreement, the Affordable Housing Preservation and Modernization Program (2014.05.HC) and the Project-Based Voucher Program (2008.01.HC). Additionally, we will continue searching for land for developing additional housing for elderly and disabled households, likely developed as a Low Income Housing Tax Credit property.

Although we are focusing on addressing the need to find and build new units for those who need it today, we remain just as committed to preserving the stock we have for generations to come. In 2022 we will be moving forward with a series of capital improvements that we were unable to make during the pandemic. Most notably, we will be making significant progress towards our goal of achieving carbon neutrality by 2035 by replacing antiquated electric thermal storage units at North and Gilsum Apartments with high efficiency air source heat pumps. We will also complete a significant energy efficiency improvement project across our scattered site portfolio. Improvements, originally planned for 2022, will include new windows, siding, insulation and in some cases, HVAC systems. All of these projects rely on a host of funding sources, most notably generous rebates from EverSource Energy and MTW funds from our Affordable Housing Preservation and Modernization Program (2014.05.HC).

2022 will also mark the start of a new transitional housing program in collaboration with the Cheshire County Drug Court. This new initiative, as described on page 12, will provide individuals participating in the County's prison aversion program for low level drug offenders housing subsidy and access to Keene Housing's Resident Self Reliance program. If successful, this initiative will demonstrate that removing stressors related to insecure housing and homelessness will increase the probability that Drug Court participants successfully complete the program, avoiding serious relapses and additional prison time.

There are countless other initiatives both small and large, planned in the coming year which, we hope, will find us putting the pandemic behind us and getting back to doing what we love most, finding new ways to contribute to the well-being of the people we serve and communities in which they live.

## Section II. General Operating Information

### HOUSING STOCK INFORMATION

#### Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

Asset Management Project (AMP) Fill In Name And Number	0/1 Bdm						Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A	0	0	0	0	0	N/A	0	0
Housing Units to be Added in the Plan Year:							0	

\* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

\*\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

KH does not anticipate adding any new public housing units in 2022.

#### Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP Name and Number	Number Of Units To Be Removed	Explanation For Removal
N/A	0	N/A. KH does not own any public housing units.
<b>Total:</b>		
Public Housing Units to be Removed in the Plan Year	0	

#### Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

Property Name	Number Of Vouchers To Be Project-based	RAD?	Description Of Project
N/A	0	N/A	N/A
<b>Total:</b>			
Planned new Project Based Units in Plan Year	0		

#### Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Select one of the of the following to

indicate the \*Planned Status by the end of the Plan Year: "Committed," "Leased," or "Issued." In column three, indicate whether the unit is included in RAD.

Property Name	Number Of Project-based Vouchers	Planned Status At End Of Plan Year*	RAD?	Description Of Project
Ash Brook Apartments	24	Committed	No	24 1-bedroom row/townhouse style units
Brookbend East	11	Leased	No	40 LIHTC/MF two and three bedroom townhouse style units with HAPC for 11 units
Brookbend West	10	Leased	No	35 LIHTC/MF two and three bedroom townhouse style units with HAPC for 10 units
Cheshire Housing Trust	30	Leased	No	20 units of various size and style throughout Cheshire County with a HAPC for 20 units
Cottage Street	3	Leased	No	3 two- and three-bedroom units with a HAPC for all 3 units
Evergreen Knoll	3	Leased	No	32 LIHTC/RD two- and three bedroom townhouse style units with a HAPC for 3 units
Keene Affordable Housing Properties	212	Leased	No	212 former public housing units with a HAPC for 212 units
Riverbend	24	Leased	No	24 LIHTC two and three bedroom townhouse style units with a HAPC for 24 units
Stone Arch Village Family	24	Leased	No	24 LIHTC two and three bedroom townhouse style units with a HAPC for 24 units
Stone Arch Village Senior	33	Leased	No	33 senior/disabled one and two bedroom units in mid-rise building with a HAPC for 33 units
Hampshire House	18	Leased	No	18 single room occupancy units
<b>Total:</b>	<b>392</b>			
<b>Planned Existing Project-Based Vouchers</b>				

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

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

#### Planned Other Changes To MTW Housing Stock Anticipated In The Plan Year

KH is partnering with Monadnock Family Services to provide a shallow subsidy for 6-bed transitional housing using the THASP Activity (1999.06.HC).

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

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.



## General Description Of All Planned Capital Expenditures During The Plan Year

The planned capital improvement consists of the rehabilitation of several scattered site units with energy saving initiatives. There are also plans for a large-scale replacement of the old heating system at a North and Gilsum Apartments by installing a new energy saving heat pump systems. There are several planned smaller improvements consisting of roof replacements, hot water boilers replacements and security equipment upgrades also being planned.

## LEASING INFORMATION

### Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

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^	876	73
Local, Non-Traditional: Homeownership^	48	4
<b>Planned Total Households Served:</b>	<b>7968</b>	<b>664</b>

\* "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 Household To Be Served**
Tenant-Based	N/A	0	0
Property-Based	THASP 1999.06.HC	876	73
Homeownership	MTW Homeownership Flat Subsidy 2005.03.HC	48	4

\* 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

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

Housing Program	Description Of Anticipated Leasing Issues And Possible Solutions
MTW Public Housing	KH has no units of public housing
MTW Housing Choice Voucher	Competition for rental units and increasing rents are causing extensive tolling times and rents for the units that are available are too high. KH is creating a landlord incentive program (Proposed Activity 2022.01.HC) and exploring the feasibility of starting a scattered site acquisition program (Approved Activities 2014.05.HC and 2008.01.HC).

Housing Program	Description Of Anticipated Leasing Issues And Possible Solutions
Local, Non-Traditional	One THASP supported shelter remains offline for modernization. Disruptions in supply chains and increased material costs have delayed the project. Additionally, it is unclear if KH's largest THASP partner, Southwestern Community Services (SCS) has sufficient funding to maintain the decompression sites it set-up at the beginning of the pandemic. The decompression sites allowed SCS to reduce the number of guests at their men's shelter without having to serve fewer guests in aggregate. If the decompression sites close due to lack of funding, and social distancing must still be maintained at the men's shelter, SCS will have no choice but to house fewer guests at the men's shelter until social distancing is no longer required.

## WAIT LIST INFORMATION

### Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

Waiting List Name	Description	Number Of Households On Waiting List	Waiting List Status (Open, Partially Open Or Closed)	Plans to open the waiting list during the Plan year
MTW Project-Based Voucher	Site-based	1,516	Open	N/A
MTW Housing Choice Voucher	Community-based	2,222	Open	N/A
PBV Mobility	Site-based	129	Partially Open	N/A

Duplication of applicants across waiting lists:

Eligible applicants may apply to both site-based and community-based waiting lists and be placed on both.

### Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

Waiting List Name	Description Of Planned Changes To Waiting List
Project-Based Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.
Tenant-Based Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.
Project-Based Mobility Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.

## Section III. Proposed MTW Activities

### 2022.01.SS BROADBAND UTILITY ALLOWANCE

The proposed Broadband Utility Allowance will increase working households' voucher holders' housing choices by providing an allowance to offset the cost of high-speed internet access. It is widely recognized that lack of access to high-speed internet prevents low-income households from employment and educational opportunities readily available to households that can afford high speed access. During the COVID-19 pandemic KH used CARES Act funds to subsidize internet access for families with children attending remote schooling and working households. This assistance was widely praised by participating households and proved a productive use of the funding. With CARES Act funding ending in 2021, KH will begin providing a \$40 per month utility allowance to all households participating in the Resident Self Reliance program (1999.05.SS) at the start of fiscal year 2022.

#### Metrics

**Table 1. Increase in Household Income**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Earned Income of Households Affected by this Policy in Dollars	\$28,615	\$29,187		

#### CE #2

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average Amount of Savings of Households Affected by this Policy in Dollars	\$880	\$900		

**Table 3. Increase in Positive Outcomes in Employment Status**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	61	62		
2. Employed Part-Time	20	21		
3. Enrolled in an Educational Program	8	9		
4. Enrolled in Job Training Program	0	1		
5. Unemployed	21	22		
6. Other	6	7		

**Table 4. Households Removed from Temporary Assistance for Needed Families (TANF)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	6	7		

Data will be collected from the Resident Services software KH uses to track Resident Self Reliance program outcomes.

#### Cost Implications

The utility allowance is expected to cost KH \$70,000 per year. KH has sufficient MTW funds available to cover these costs for the foreseeable future.

## Need/Justification for MTW Flexibility

This activity is authorized under the First Amendment to the Amended and Restated Moving to Work Agreement Between the U.S. Department of Housing and Urban Development and Keene Housing.

### 2022.02.HC OWNER RECRUITMENT & RETENTION PROGRAM

The proposed Owner Recruitment and Retention Program will increase voucher holders' housing choices by providing financial incentives for property owners to participate in KH's voucher programs. Owners agreeing to rent their units to a voucher holder after a voucher holder vacates the same unit will be eligible for a \$500 "Re-signing Bonus". Owners not currently renting to a voucher holder will receive a \$1000 "Signing Bonus" for joining or rejoining the voucher program. This program began in late 2021 with non-federal funds. MTW funds will be used for this activity at the start of Fiscal Year 2022.

## Metrics

**Table 1. Housing Choice**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Housing Units made Available as a Result of the Activity	0	25		

KH's Finance Department will track the number of re-signing bonuses paid out each year.

## Cost Implications

It is unlikely that the activity's cost will exceed \$50,000 in any year and will likely decrease once voucher utilization rates stabilize. KH has sufficient MTW funds available to cover these costs for the foreseeable future.

## Need/Justification for MTW Flexibility

Per Attachment C D. 1. d. of the Amended and Restated Moving to Work Agreement KH is authorized to determine a vacancy loss policy and payment policy for occupied units that differs from the policy requirements mandated in the 1937 Act and implementing regulations. This authorization waives certain provisions of Section 8(o)(9) of the 1937 Act and C.F.R. 982.311 as necessary to implement KH's Annual MTW Plan. Further, per Attachment C D. 1. a. of the Amended and Restated Moving to Work Agreement KH is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. This authorization waives certain provisions of Section 8(o)(7) of the 1937 Act and 24 C.F.R. 982.162 as necessary to implement the Agency's Annual MTW Annual Plan.

### 2022.03.SS KEENE HOUSING - CHESHIRE COUNTY DRUG COURT PATHWAY HOME

The proposed program is a partnership between KH and the Cheshire County Drug Court (CCDC). The Drug Court is an alternative sentencing program for low level drug offenders. The CCDC program provides participants with a set of goals and supportive services that, in aggregate, significantly reduces the likelihood of recidivism. However, CCDC staff believes that a lack of stable, affordable housing contributes to some participants' failure to complete the program. By providing CCDC participants stable housing during their time in the program, and a clear path to a MTW Housing Choice Voucher upon program completion, this activity is intended to improve CCDC participants' success rates. Successful CCDC participants are those who move from substance abuse and potential incarceration

to steady employment, stable housing and a trajectory towards relative economic self-sufficiency.  
Noteworthy program features include:

**Eligibility and Rent Determination**

- Similar to the THASP program (1999.06.HC) referrals and initial eligibility screening made by CCDC staff
- Applicants must meet Housing Choice Voucher program statutory requirements related to income, sex offender and immigration status, and meth amphetamine production in federally assisted housing
- Applicants must apply for KH's MTW Housing Choice Voucher program
- Participants are automatically enrolled in KH's Resident Self Reliance Program (1999.05.SS)
- Similar to households in Step 1 of the Stepped Subsidy Rent Reform (1999.04.CE) program, participants pay 20% of gross income towards rent throughout their time in the program
- \$125 minimum rent
- Unlimited interim recertifications
- Income recertified annually

**Continued Participation:**

- Participants must adhere to CCDC program requirements
- Participants must remain in compliance with their lease and KH's Obligations of the Family

**Length of Participation:**

- CCDC participation can last between 375 days and 3 years
- Housing assistance will continue from initial enrollment through CCDC program completion
- CCDC participants who successfully complete the program will receive a preference on KH's MTW Housing Choice Voucher program waiting list

KH will begin accepting program referrals at the beginning of fiscal year 2022.

**Metrics**

**Table 1. Increase in Household Income**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$18,566	\$18,900		

**Table 2: Increase in Household Savings**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase)	\$250	\$260		

**Table 3: Increase in Positive Outcomes in Employment Status**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
1. Employed Full-Time	3	4		
2. Employed Part-Time	1	2		
3. Enrolled in an Educational Program	0	1		
4. Enrolled in Job Training Program	0	1		
5. Unemployed	0	1		
6. Other	0	1		
1. Employed Full-Time	43%	57%		
2. Employed Part-Time	14%	29%		
3. Enrolled in an Educational Program	0%	14%		
4. Enrolled in Job Training Program	0%	14%		
5. Unemployed	0%	14%		
6. Other	0%	14%		

**Table 4: Households Removed from Temporary Assistance for Needy Families (TANF)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	1	0		

**Table 5: Households Assisted by Services that Increase Self Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self sufficiency (increase)	0	8		

Data will be collected from CCDC staff, the Resident Services software KH uses to track Resident Self Reliance program outcomes and KH's enterprise software.

## Cost Implications

The annual expense for this program is estimated to be \$97,920.

## Need/Justification for MTW Flexibility

Per Attachment C B. 4. of the Amended and Restated Moving to Work Agreement KH may develop and adopt new short-term transitional housing programs, consistent with an eligible use of section 8 funds, with supportive services in one or more buildings in collaboration with government agencies. This authorization waives certain provisions of Sections 3, 4, 5, 8, and 9 of the 1937 Act and 24 C.F.R. 941, and 960 Subpart B as necessary to implement KH's Annual MTW Plan. Further, per Attachment C D. 2. a. of the Amended and Restated Moving to Work Agreement KH is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement KH's Annual MTW Plan. Finally, per Attachment C D. 3. b. of the Amended and Restated Moving to Work Agreement KH is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement KH's Annual MTW Plan.

## **Rent Reform Information**

### **Impact Analysis**

The activity does not affect any current participants therefore there is no impact on existing households. However, as described above, CCDC participants receiving housing assistance through this activity will pay 20% of their gross income in rent. It is reasonable to assume, then, that these households will not be rent burdened. It is conceivable that some participants paying the \$125 minimum rent may, pursuant to KH's MTW Administrative Plan, be eligible for a rent reduction through the Safety Net process.

As with all rent reform activities, KH will monitor participant rent burdens quarterly to ensure that there is no pattern of rent burdened participants or other unintended consequences of the rent reform aspects of the activity.

### **Hardship Case Criteria**

As described above, CCDC participants receiving assistance through this activity will have access to Safety Net. The Safety Net portion of the MTW Administrative Plan is provided in Appendix II of this Plan.

### **Description of Annual Reevaluation**

With its generous subsidy, KH does not anticipate this activity will have any negative effect on participants, particularly considering that absent this activity they would likely receive no housing assistance from KH whatsoever. None-the-less, as described above, KH will monitor rent burdens quarterly and if, at the end of any fiscal year, it appears that there are unintended negative consequences of this fairly innocuous activity KH will either make adjustments to it or jettison it completely.

### **Transition Period**

As described earlier, this activity is new. There is no transition period. Households will begin being admitted at the start of fiscal year 2022.

## 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 FY2022

KH proposes no changes to this activity.

#### 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 13). 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 FY2022

KH proposes no changes to this activity.

### 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 FY2022

KH proposes no changes to this activity.

### 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 FY2022

KH proposes no changes to this activity.

### 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. Four households currently participate in the Homeownership program.

## Changes Proposed for FY2022

KH proposes no changes to this activity.

### 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 3 transitional housing programs – a Men's Homeless Shelter, a Family Homeless Shelter, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault. Two of the shelters – the men's shelter, and family shelter – are managed by Southwestern Community

Services (SCS), the local Tri-Cap agency.

## Changes Proposed for FY2022

THASP partners are expanding to include regional mental health and disability agencies providing clients with transitional and housing stabilization services.

### 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).

During this time participants are also enrolled in the Resident Self-Reliance (RSR) program (page 17) 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 135 households have their subsidy calculated under the Stepped Subsidy Rent Reform.

Stepped Subsidy households are subject to the Reasonable Rent Determination Discontinuance activity (page 13). 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, 4% of Stepped Subsidy households maintained a burden of 40% or higher in 2020. 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 FY2022**

KH proposes no changes to this activity.

## **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 Subsidy 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 Career 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 15), or other potential financial changes, such as changes in benefits due to increases in earnings, when developing their Career 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 Career Plan, the participant and RSC establish a new 3-year career 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 Career 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 Career Plan. Upon completing a goal, the household receives a credit towards the following month’s rent. Rent credit amounts are 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 Career 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 FY2022

KH proposes no changes to this activity.

## 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 FY2022**

KH proposes no changes to this activity.

### **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 20), 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 Career Plan. If necessary, RSCs also collect new Authorization for Release of Information/Privacy Act Notices (HUD form 9886) at this time.

### **Changes Proposed for FY2022**

KH proposes no changes to this activity.

### **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 20). 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 FY2022**

To provide for additional management flexibility, KH may provide that the specific units under the project-based voucher contract or contracts may change as vacancies occur (i.e., float). KH may substitute project-based Mainstream vouchers for regular PBVs at units that become vacant, subject to applicable Mainstream voucher requirements.

### **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 FY2022**

KH proposes no changes to this activity.



## **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 FY2022**

KH proposes no changes to this activity.

## **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 FY2022**

KH proposes no changes to this activity.

## **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 FY2022**

KH proposes no changes to this activity.

### **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 FY2022**

KH proposes no changes to this activity.

### **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 FY2022

KH proposes no changes to this activity.

### 2014.05.HC AFFORDABLE HOUSING PRESERVATION & MODERNIZATION PROGRAM

Program Year Approved: 2014 Year 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 2022 of \$1.1 million, MTW is playing a critical role in preserving the lion's share of Keene's affordable units.

## Changes Proposed for FY2022

KH proposes no changes to this activity.

### 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.

## 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 1999 as part of the Stepped Subsidy activity.

## Changes Proposed for FY2022

KH proposes no changes to this activity.

## 2015.02.CE AFFORDABLE HOUSING PRESERVATION PROGRAM ALTERNATIVE INSPECTION SCHEDULE

Plan Year Approved: 2015      Year Implemented: 2015

Properties participating in AHPP (page 20) 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 FY2022

KH proposes no changes to this activity.

## 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.

## Changes Proposed for FY2022

KH proposes no changes to this activity.

## 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.

## 2016.01.CE PROJECT-BASED UNIT AGENCY CONDUCTED INSPECTIONS

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.

## Changes Proposed for FY2022

KH proposes no changes to 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 FY2022

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 FY2022

KH may also use other generally accepted local market data including but not limited to the New Hampshire Housing and Finance Authority annual rental survey.

## 2020.02.CE 2017 MAINSTREAM RENT REFORM

The proposed 2017 Mainstream (2017 MS) Rent Reform activity provides a streamlined rent calculation methodology for households with 90% or more of their income coming from fixed sources. By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Initial year of assistance verification 90% of income is from fixed income sources.
- Years two (2) and three (3) households self-certify fixed income sources have not changed.
- Years two (2) and three (3), Cost of Living Adjustment (COLA) recertifications (see 2005.01.CE Elderly and Disabled Household Alternative Recertification activity).
- Interim recertification for fixed income changes in years two (2) or three (3) to determine continued eligibility for the streamlined recertification process.
- Annual recertifications required if the 90% from fixed sources threshold isn't met until such time as household income returns to 90% from fixed sources.
- Medical deduction threshold 7.5%.

This activity's rent determination and recertification rules will only be applied to new lease-ups upon HUD approval of the Amended FY 2020 MTW Plan.

## Metrics

The following is a list of the metrics KH will track using HUD's established criteria.

### CE #1

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars.	\$346	\$51		

### CE #2

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	14.25	3		

**CE #5**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Household Contribution towards housing assistance (increase).	\$0	\$91,228		

**Cost Implications**

KH expects an 85% cost decrease and staff time savings of an estimated 11 hours once the activity is implemented.

**Need/Justification for MTW Flexibility**

The use of MTW funds for the 2017 Mainstream Rent Reform activity is permitted under the Use of Funds section in the First Amendment to Attachment D. of the Amended and Restated Moving to Work Agreement.

This activity is permitted by the 2017 Mainstream Voucher Program Notice of Funding Availability (NOFA), III. Eligibility Information, E. Program Specific Requirements. Specifically, "Moving to Work (MTW) agencies may administer these vouchers under their MTW agreements, unless inconsistent with Appropriations Act requirements or the requirements of this NOFA. If a conflict occurs, the Appropriations Act and/or this funding notice govern."

**Authorization(s): Attachment C. Section D.2 Rent Policies and Term Limits.**

The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rent or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

**Rent Reform Information**

This activity's rent determination and recertification rules will only be applied to new lease-ups upon HUD approval of the Amended FY 2020 MTW Plan; therefore, no current households will be impacted by the activity's implementation.

KH will use HUD's metrics to track outcomes and the impact of the rent reform activity on participating households and administrative costs annually. These data will be entered into KH's Management Information Software system for reporting requirements.

**Hardship Case Criteria**

Elderly and disabled households may request an interim at any time.

**Changes Proposed for FY2022**

KH proposes no changes to this activity.

**2020.02.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS RENT REFORM**

The proposed Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) rent reform activity provides a

streamlined methodology for calculating rent while providing households an opportunity to increase earnings and assets without being discouraged by corresponding increases in rent.

By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Participants pay 20% of gross income towards rent for the duration of participation in the FYI-TPV program.
- 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.
- Households total net value of \$50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated (see activity 2015.03.CE Earned Income Disregard Discontinuance).
- Utilization of the Enterprise Income Verification system annually to determine continued eligibility of FYI-TPV participants.

Pursuant to Notice PIH 2019-20 (HA), issued July 26, 2019, and authorization from the Department of Housing and Urban Development's Foster Youth to Independence Team, MTW agencies may administer the FYI-TPV Program per their MTW Agreement as long as it is not inconsistent with Appropriations Act requirements (including the Authorizing Statute (section 8(x) of the United States Housing Act of 1937)), or the requirements of the Notice PIH 2019-20.

The activity will be implemented upon HUD's approval of the Amended FY2020 MTW Plan.

## METRICS

The following is a list of the metrics KH will track using HUD's established criteria.

### SS#1

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Unknown	Unknown		

### SS#3:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Employed full-time	0	2		
Employed part-time,	0	2		
Enrolled in an educational program,	0	1		
Enrolled in job training program,	0	1		
Unemployed	0	0		
Other	0	0		

### CE#1

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$608	\$200		

## CE#2

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	18.27	8.25		

## CE#5

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase)	\$0	\$1,879		

## Cost Implications

Many youths aging out of foster care face challenges like homelessness, difficulty finding employment due to lack of employment experience and job training, and lack of permanent and safe housing options. These households are not unlike participants entering Step 1 of the Stepped Subsidy program (see activity 1999.04.CE Stepped Subsidy Rent Reform).

Like Step 1 in the Stepped subsidy program, the FYI-TPV Rent Reform activity provides a deep Housing Assistance Payment (HAP), with households only paying 20% of gross income towards rent during their participation. While it is impossible to predict actual HAP costs, with its deep subsidy, the activity will likely result in greater HAP costs. However, most participants are expected to be single-member households, resulting in smaller HAP than for larger unit households. Additionally, HUD limits the number of available of FYI-TPVs to twenty-five (25) per year. Due to these factors, we expect no meaningful or substantial impact on HAP costs.

## Need/Justification for MTW Flexibility

To promote long-term employment, educational opportunities and housing stability, the activity will enable FYI-TPV Program participants the opportunity to focus on the supportive services that accompany the FYI-TPV Program. These services provide basic life skills training, housing counseling, landlord support services, employment and training, and education and career advancement services. Youth in the FYI-TPV Program must agree to participate in these services as part of the eligibility determination by the Department of Health and Human Services (DHHS) as part of their referral process.

## MTW Authorization Attachment D. Uses of Funds.

Attachment C.D.2.(a) Rent Policies and Term Limits which waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

Attachment C, Section D.3(a) Eligibility of Participants which authorizes the Agency to determine income qualifications for participation in the rental assistance program that differ from the currently amended program requirements in the 1937 Act and its implementing regulations, as long as the requirement that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(2) of the 1937 Act, ii) a comparable mix of families are assisted under the Agreement as would have been otherwise in Section I.C. of the

MTW Agreement are met. This authorization waives certain provisions of Section 16(b) and 8(o)(4) of the 1937 Act and 24 CFR 5.606, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW Plan.

#### Attachment C, Section D.3(a) Eligibility of Participants

### Rent Reform/Term Limit Information

KH proposes to use 20% of gross monthly income to calculate the tenant portion of rent for the 36-month duration of the household's participation in the FYI-TPV Program in an effort to promote and support the employment and educational goals of the participants. Households are subject to all ongoing program eligibility criteria.

The FYI-TPV Program has not been fully administered as of the submission of this amendment, therefore no impact analysis can be completed until KH determines eligibility for the HAP, submits an application for the HAP, and receives the requested HAP for each eligible applicant.

KH will use HUD's metrics to track outcomes and impact of the rent reform activity on participating households and administrative costs annually. These data will be entered into KH's MIS system for reporting requirements.

If a FYI-TPV household experiences a temporary, unforeseen rent burden increase to 45% or higher of 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.

KH will implement the activity upon HUD's approval of KH's Amended FY2020 MTW Plan.

### Changes Proposed for FY2022

KH proposes no changes to this activity.

### 2020.01.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS DEVELOPMENT GRANTS

Learning from the success of the Development Grant and Rent Credit program (see 1999.05.SS Resident Self Reliance Program), KH will make Development Grants (DG) available to Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) participants to help mitigate some of the financial barriers that may impede their self-sufficiency goals. These financial barriers may include transportation, tuition, textbooks, exams, childcare and employer required uniforms or special equipment.

KH will maintain a Development Grant application and schedule of allowable expenses to ensure that DGs are used to further participants' long-term self-sufficiency goals. DG payments are made directly to the vendor providing goods or services to the participant, rather than directly to the participant. FYI-TPV participants are not required to participate in the Resident Self-Reliance Program.

The activity will be implemented upon HUD's approval of the Amended FY2020 MTW Plan.

### METRICS

The following is a list of the metrics KH will track using HUD's established criteria.

#### SS#1

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Not available	Not available		



Keene Housing Metrics	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Households that received Development Grants.	0	2		
Total Development Grant Funds Distributed.	\$0	\$1,000		

## COST IMPLICATIONS

KH does not expect that, given its small number of authorized FYI-TPVs, DG costs will exceed \$1,000 per year.

## NEED/JUSTIFICATION FOR MTW FLEXIBILITY

The use of MTW funds for the Foster Youth to Independence Tenant Protection Vouchers Development Grants activity is permitted under the Use of Funds section in the First Amendment to Attachment D. of the Amended and Restated Moving to Work Agreement.

This flexibility is needed as there is otherwise no funding available to provide Development Grants to FYI-TPV participants.

## Changes Proposed for FY2022

KH proposes no changes to this activity.

## NOT YET IMPLEMENTED ACTIVITIES

KH has implemented all MTW activities.

## ACTIVITIES ON HOLD

KH has no activities on hold.

## CLOSED OUT ACTIVITIES

### 2016.02.HC PROJECT MARCH (MONADNOCK AREA RESOURCES CURING HOMELESSNESS)

Plan Year Approved: 2016 (Amended) Plan Year Implemented: 2016 Year Closed: 2019

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 our largest THASP partner. 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.

## **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.

# Section V. Sources and Uses of Funding

This section describes the agency's projected revenue and expenditures for MTW funds for 2022 and reflects use of MTW Block Grant Single-fund Flexibility.

## ESTIMATED SOURCES AND USES OF MTW FUNDS

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS)

## PLANNED APPLICATION OF MTW FUNDS

### Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS).

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$0
70600	HUD PHA Operating Grants	\$5,900,000
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$1,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$0
70000	Total Revenue	\$5,901,000

### Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year should not be included in this section.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
	Total Operating - Administrative	\$0
FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$460,000
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
92500 (92100+92200+92300+92400)	Total Tenant Services	\$230,000
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
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$3,000
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	\$4,300,000
<b>97400</b>	<b>Depreciation Expense</b>	<b>\$0</b>
<b>97500+97600+97700+97800</b>	<b>All Other Expense</b>	<b>\$0</b>
<b>90000</b>	<b>Total Expenses</b>	<b>\$4,993,000</b>

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

In addition to the expenses listed above, KH expects to transfer approximately \$908,000 out of the MTW fund to support our MTW activities such as 2014.05.HC Affordable Housing Preservation and Modernization Program and 2014.04.SS KH Kids Collaborative.

### Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

#### Planned Application Of MTW Funding 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.

### PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$782,464	\$782,464
HCV Admin Fee	\$	\$
PH Operating Subsidy	\$	\$
<b>TOTAL:</b>	<b>\$782,464</b>	<b>\$782,464</b>

## Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30th and end-of-year at December 31st. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at: [https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide\\_vJuly2020.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide_vJuly2020.pdf).

### FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
<b>Current Assets</b>		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
<b>Current Liabilities</b>		
310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

FDS Line Number	FDS Line Item	Definition
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
<b>Current Liabilities</b>		
310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

KH expects to transfer unspent HAP funding out of the MTW fund to support our MTW activities such as 2014.05HC Affordable Housing Preservation and Modernization Program and 2014.04SS KH Kids Collaborative.

\* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

\*\* HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

## 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**

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

#### **Rental Assistance Demonstration (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

**Extract of the Minutes of the  
Keene Housing Board of Commissioners Meeting  
September 23, 2021**

Members Present: J.B. Mack, Chairperson  
Vice Chairperson Coates  
Susan Shaw, Commissioner  
Bob Elliott, Commissioner

**Resolution No. 704 – Approval of Fiscal Year 2022 Moving to Work Annual Plan**

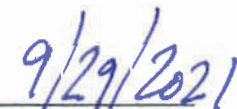
RESOLVED, that the Keene Housing Board of Commissioners approves and adopts Keene Housing's Fiscal Year 2022 Annual Moving to work Plan, and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated September 16, 2021 from Denise Pratt, Director of Housing and Services, to Joshua Meehan, Executive Director.

Motion to adopt: Mr. Elliott

Motion seconded by and approved: Ms. Shaw

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

  
\_\_\_\_\_  
Joshua Meehan, Executive Director

  
\_\_\_\_\_  
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 ( 01/01/2022 ), 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

NH010

MTW PHA NAME

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

Chairman, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

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 2022. The public comment period is open from 8:30 am on Sunday, August 1, 2021, until 4:30 pm on Tuesday, August 31, 2021.

**Two public hearings are scheduled on Wednesday August 18, 2021.**

**Time: 12:00 pm to 1:00 pm**

Keene Housing, 831 Court St., Keene, NH 03431

**Time: 5:30 pm to 6:30 pm**

Keene Housing, 831 Court St., Keene, NH 03431

An electronic version of the DRAFT 2022 MTW Plan is available for review on our website at [www.keenehousing.org](http://www.keenehousing.org) or e-mailed to interested members of the public upon request by contacting Denise Pratt, Director of Housing and Services at 603-352-6161 Ext. 314 or [dpratt@keenehousing.org](mailto:dpratt@keenehousing.org).

KH welcomes written comments received during the public comment period before Tuesday, August 31, 2021.

### 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

## Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Keene Housing

Program/Activity Receiving Federal Grant Funding

Keene Housing Moving to Work Housing Choice Voucher Program

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.

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)

Name of Authorized Official

Joshua Meehan

Title

Executive Director

Signature


Date (mm/dd/yyyy)

09/23/2021

Previous edition is obsolete

form HUD 50071 (01/14)

## APPENDIX I. 2020 - 2025 Strategic Plan



2020-2025



Keene  
Housing

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# STRATEGIC PLAN

**“Progress is not in enhancing what is, but in advancing toward what will be.”**

Khalil Gibran

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## INTRODUCTION

This Strategic Plan provides Keene Housing's Board of Commissioners, our staff, the people we serve, and our partners – local, regional and national – with a road map that identifies the strategic goals Keene Housing will strive to achieve by 2025. This plan was developed with active engagement and feedback from our Board of Commissioners, staff, residents, voucher holders, landlords, and community partners from as nearby as City Hall and as far away as Washington, DC.

This strategic plan finds us at a very different place organizationally than we were at when the last strategic plan was developed, in 2015. In 2015 much of Keene Housing's senior staff and several Board Commissioners were relatively new to the organization, having only worked together for a few years. We were in the early stages of developing a strategy for addressing the portfolio's long-term capital needs, and we were just beginning to understand the portfolio's energy costs and opportunities for savings. Similarly, in 2015 we started to think differently about how we could better help the young people we house become successful adults, and about what more we could do to help the elderly and disabled neighbors we serve live healthier, happier, more independent lives.

By early 2019, when work on this Strategic Plan began, we were encouraged that we'd achieved many of the goals we'd set for ourselves in 2015. We'd spent the last five years aggressively addressing the portfolio's most pressing capital needs, including a massive rehabilitation project at Central Square Terrace, our 90-unit historic building in the heart of downtown Keene. Our understanding of the portfolio's energy performance and strategies for improvements had also come into focus. By 2019 we'd made significant strides towards decreasing our energy needs and had already made great progress towards reaching our goal of relying 100% on renewable energy by 2035.









Since providing it with seed funding in December 2014, the Keene Housing Kids Collaborative (KHKC) has grown from a small start-up nonprofit serving a few children, to one of the city's most recognized service organizations, serving hundreds of Keene Housing kids each year. We are also pleased that goals related to our elderly and disabled residents' quality of life were largely achieved, in great part due to the addition of a dedicated Elderly/Disabled Resident Service Coordinator in 2016. Thanks to her hard work, our elderly and disabled residents had many more opportunities to participate in activities that helped maintain their mental and physical health, social connections and sense of belonging. Similarly, our Community Garden program took off with over 35 dedicated Community Gardeners maintaining over 60 raised beds across our real estate portfolio.

Even with all of these accomplishments, there is still much work to be done, and this Strategic Plan is the guide we will use to identify and track our progress over the coming five years.









# 2020 PROGRESS REPORT










## Goal 1: Preserve, Improve and Expand Affordable Housing Stock

- Preventive maintenance plan, with focus on reducing energy consumption 
- Landscape and grounds improvement and maintenance plan 
- Implement annual and five year Capital Plans 
- Update Capital Needs Assessments on a five-year cycle 
- Rehabilitation of Bennett Block 
- Recapitalization plans for Stone Arch Village and Evergreen Knoll 
- Rehabilitation of 105 Castle Street 
- Identify and undertake at least one additional development project 








## Goal 2: Promote Energy Conservation and Sustainability

- Implement Energy Strategic Plan in coordination with Capital Plan 
- Maintain and update Energy Strategic Plan 
- Replace Electric Thermal Storage units with high efficiency HVAC systems 
- Water conservation plan for community gardens 
- Monitor utility consumption 
- Educate residents about energy conservation benefits 

## Goal 3: Prudently Manage and Oversee Agency Finances

- Annual update of the agency-wide Financial Management Plan 
- Opportunities for residents to contribute to curb appeals 
- Annual review of rent and management fees 
- Monitor vacancy loss 
- Regularly renew and update cost allocation methodology 
- Conduct analysis of benefits and health insurance costs 
- Conduct analysis of property insurance costs 
- Identify and secure additional revenue 
- Revenue opportunities for community rooms 

## Goal 4: Achieve Excellence in Management

- Achieve annual voucher program utilization goals 
- Achieve annual property management and maintenance goals 
- Annual update of TSOP and MTW Administrative Plan 
- Software platform conversion for voucher, property management and finance operations 
- Identify areas of risk and implement quality controls where needed 
- Streamline housing and voucher administrative processes and systems 
- Receive accreditation from the Affordable Housing Accreditation Board 

Completed  Underway  Not Started 



#### Goal 5: Promote Wellness and Independence Among Seniors and Residents with Disabilities

- Opportunities for additional resident services through recurring federal and state resources ○
- Implement strategies to ensure successful housing search and tenancy ◎
- Expand partnerships providing on-site quality of life programs and services ○

#### Goal 6: Support Resident Economic Development

- Develop, implement and evaluate Rent Reform RCT Study ◎
- Look for additional THASP partners ◎
- Increase the use of FACs by local service providers and residents ○

#### Goal 7: Support Youth Development Through Collaboration with KHKC

- Improve communications between KHKC and KH BOC ◎
- Reduce MTW contribution toward KHKC operating costs ◎
- Introduce KHKC leadership to additional affordable housing partners ◎

#### Goal 8: Build Board and Staff Capacity and Skills

- Continue bonus program that recognizes extraordinary performance ◎
- Continue conducting employee satisfaction/feedback surveys ◎
- Annually update Board training materials and schedule ◎
- Increase training opportunities for Board members and to engage with KH staff ◎
- Continue developing strategies to attract and retain quality staff ◎
- Implement interdepartmental cross training initiatives ○
- Implement interdepartmental "Shadow Days" ○

#### Goal 9: Enhance Customer Service and Operational Efficiency

- Develop and implement a plan to improve the website ✓
- Develop and implement a security plan ◎
- Assess and implement enhancements to KH's hardware, software and IT network ◎
- Develop and implement a Communications Plan ○
- Solicit input from residents and stakeholders on KH programs and initiatives ○
- Develop a disaster response plan to recover quickly from a natural disaster ○
- Evaluate and deploy technological tools to assist residents and applicants ◎

#### Goal 10: Be a Strong and Effective Advocate for Innovation in Affordable Housing and Supportive Service Programs

- Actively participate in and support the MTW Collaborative ◎
- Actively participate in and support AHAB ◎
- Actively participate in and support the New Hampshire Housing Authority Corp. ◎
- Actively participate in and support PHADA ◎
- Actively support the advocacy efforts of Housing Action New Hampshire ◎
- Senior staff hold leadership positions with local, state and federal organizations ◎
- Continue advocating for low and moderate-income people to elected officials ◎

Completed ✓ Underway ◎ Not Started ○



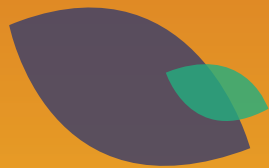
## A ROADMAP TO 2025

As was the case with our previous five-year strategic plan, this plan is organized by goal, with each goal broken down into a series of related objectives and projects that will help ensure that we stay grounded and focused on our way to 2025. We will also continue the practice of reviewing and when needed, revising, the Strategic Plan each year.

These annual reviews give the Board of Commissioners and staff opportunities to check on our progress towards the goals, objectives and projects articulated in this plan. These check-ins also give us opportunities to make revisions when circumstances “on the ground” change. If it is to be a useful tool, the strategic plan must be a living document; we must be able to adjust and revise it in response to emerging opportunities and threats.

As we look ahead to 2025, we are excited by what is to come. We look forward to completing the portfolio’s remaining rehabilitation projects and turning our attention to creating new affordable housing for our neighbors who need it. We look forward to continuing to be leaders in the areas of energy efficiency and solar energy production. We are excited to find new ways to support the health and well-being of our frailest residents and helping our working families achieve greater economic independence. And, as always, we are grateful that, thanks to our designation as a U.S. Department of Housing and Urban Development Moving to Work (MTW) Agency, we have the flexibility to respond to emerging opportunities and threats in ways that most other Public Housing Authorities cannot. Much of what we have accomplished, and what we hope to achieve in the years ahead is largely possible because of our MTW designation.

Finally, we look forward to working with all of our partners; as we try to meet our shared challenges over the next five years. This Strategic Plan is being printed at a time when business leaders, politicians and policy makers of all political and philosophical stripes are beginning to recognize the effect the affordable housing shortage is having on our communities’ social, physical and economic health. While we wish it didn’t take as long as it has for the housing crisis to be recognized for what it is, we are grateful that from Keene to Concord to Washington, decision makers are starting to work on solutions. We look forward to doing our part to help.



### MISSION STATEMENT

“Keene Housing provides and advocates for affordable housing and supportive services that strengthen and empower low and moderate-income households in the Monadnock region.”



## GOAL 1:

### Preserve, Improve and Expand Affordable Housing Stock

KH's existing real estate portfolio is a critical component of the region's affordable housing stock. Maintaining and improving the portfolio for future generations is amongst KH's primary responsibilities. This goal captures a broad range of initiatives that help ensure the portfolio's long-term viability including capital improvements, landscaping and other activities to improve "curb appeal", preventive maintenance and, when appropriate, recapitalization.

We also recognize that our current portfolio will never be large enough to meet the growing demand for high quality affordable housing in the Monadnock region. Therefore, this goal also encompasses efforts to address broader regional affordable housing needs through a combination of preservation and development activities.

#### OBJECTIVES:

- Address the portfolio's capital needs
- Restructure/recapitalize portfolio financing where needed to ensure viability and long-term affordability
- Identify and secure new funding to support capital needs including continuing use of MTW funds
- Maintain exceptional "curb appeal"
- Leverage Project Based Vouchers and the Transitional Housing Assistance Subsidy Program as regional affordable housing preservation and expansion tools
- Pursue development opportunities that respond to identified, quantifiable regional housing needs

#### PRIORITY PROJECTS:

- Update annually and implement portfolio-wide preventive maintenance plan, with a focus on activities that reduce energy consumption **Underway**
- Update annually and implement portfolio-wide landscape/grounds improvement and maintenance plan **Underway**
- Implement annual and five-year Capital Plans with a focus on priority needs such as life safety improvements, energy efficiency and accessibility projects (including those that support "aging in place"), in a manner that keeps residents informed, and minimizes disruption to their lives **Underway**
- Update Capital Needs Assessments on a five-year cycle **Underway**
- Develop and implement plan for the rehabilitation of Bennett Block **Underway**
- Develop and implement recapitalization strategy, and related capital improvements, for projects nearing the end of the Low-Income Housing Tax Credit initial compliance period including Stone Arch Village and Evergreen Knoll **Underway**
- Develop a plan for the rehabilitation of 105 Castle Street, preserving its role as a community space for Harper Acres residents **Underway**
- Identify and undertake at least one additional development project by 2025 **Not started**



## GOAL 2:

### Promote Energy Conservation and Sustainability

With the exception of personnel expenses, energy is Keene Housing's largest operating cost. Recognizing the overriding importance of reducing energy consumption and costs, KH is an active participant in the Better Buildings Challenge established by the US Departments of Energy and Housing and Urban Development. Focusing on reducing utility consumption and incorporating energy efficient, sustainable materials into capital projects is the focus of the Better Buildings Challenge and this Strategic Plan goal.

#### OBJECTIVES:

- Transition to 100% renewable energy sources by 2035
- Achieve Better Buildings Challenge goals by 2025
- Continue executing energy conservation and investment strategies to lower costs and reduce carbon footprint
- Integrate conservation and sustainability into modernization and development planning
- Continue accessing available energy efficiency rebate and incentive programs
- Stay informed about and take advantage of emerging public policies that incentivize energy efficiency and generation projects
- Promote KH's energy efficiency achievements to partners, stakeholders and the general public

#### PRIORITY PROJECTS:

- Implement Energy Strategic Plan in coordination with execution of Capital Plan **Underway**
- Maintain and update Energy Strategic Plan **Underway**
- Replace all Electric Thermal Storage (ETS) units with air source heat pumps or similar high efficiency HVAC system **Underway**
- Develop and implement a water conservation plan for community gardens **Not started**
- Continue monitoring utility consumption to inform choices and quantify savings from energy-related retrofits, improvements, and solar projects **Underway**
- Inform and educate residents about energy conservation benefits at lease up and periodically during tenancy **Underway**



## GOAL 3:

### Prudently Manage and Oversee Agency Finances

Scarce federal and state support for affordable housing severely constrains Keene Housing's ability to fully address capital, supportive service and other needs. Keene Housing must work diligently to maximize the resource leveraging impact of its available funds and seek new income sources, while simultaneously reducing operating costs by pursuing creative management and energy conservation strategies. KH's objectives in this area include diversifying funding sources, increasing non-federal financial reserves and containing operating costs.

#### OBJECTIVES:

- Strengthen and expand financial analysis and reporting capabilities
- Contain and, whenever possible, reduce operating costs
- Expand and diversify funding sources to reduce reliance on HUD and USDA
- Increase non-federal operating reserves
- Maximize rent and management fee potential
- Minimize vacancy loss across the portfolio
- Maximize occupancy and rent potential for commercial spaces

#### PRIORITY PROJECTS:

- Annually update and implement the agency-wide Financial Management Plan **Underway**
- Explore opportunities for residents to contribute to curb appeal **Not started**
- Conduct annual review of rent and management fees **Underway**
- Continually monitor vacancy loss **Underway**
- Regularly renew and update cost allocation methodology **Underway**
- Conduct annual review of benefits and health insurance costs, pursuing cost effective but equitable opportunities where feasible **Underway**
- Conduct annual review of property and casualty insurance costs, pursuing cost effective opportunities whenever feasible **Underway**
- Identify and secure additional revenue through grants, increased management fees, and other initiatives **Underway**
- Where permissible, repurpose and identify new revenue opportunities for underutilized community rooms in consultation with residents **Not started**



## GOAL 4:

### Achieve Excellence in Management

Providing high quality property management and maintenance services to all residents is a core value that is deeply ingrained into Keene Housing's organizational culture. This strategic goal focuses on achieving industry-leading performance outcomes in key performance indicators including occupancy, vacancy, unit turnaround time, rent collection and work order completion. In achieving its occupancy goals, KH is committed to fair and consistent lease enforcement, and to working closely with residents to minimize the need for evictions.

#### OBJECTIVES:

- Maximize utilization of available voucher and housing resources
- Meet or exceed performance goals related to voucher utilization, property management and maintenance indicators
- Document, maintain, and implement best practices that meet or exceed applicable regulatory requirements
- Maximize operational efficiencies created by 2019 reorganization of voucher and property management functions

#### PRIORITY PROJECTS:

- Achieve annual voucher program utilization goals **Underway**
- Achieve annual property management and maintenance goals **Underway**
- Annually update and implement Tenant Selection and Occupancy Plan and MTW Administrative Plan **Underway**
- Convert to a single enterprise software platform for voucher, property management and finance operations **Underway**
- Identify areas of risk, develop and implement quality control protocols where needed **Underway**
- Streamline and wherever possible consolidate housing and voucher administrative processes and systems to maximize efficiencies and improve operational outcomes **Underway**
- Receive accreditation from the Affordable Housing Accreditation Board **Completed**





## GOAL 5:

### Promote Wellness and Independence Among Seniors and Residents with Disabilities

Almost half of the households Keene Housing serves includes at least one member who is elderly or disabled. State and regional demographic data suggest that this trend will continue well into the future. This strategic goal recognizes this trend, and commits Keene Housing to facilitating aging in place, and to pursuing initiatives that enhance elderly and disabled residents' quality of life. Keene Housing will accomplish this goal by partnering with agencies that have the resources and expertise to help, and by integrating residents' physical needs into our capital planning process.

#### OBJECTIVES:

- Leverage resources to secure new funding and services
- Integrate accessibility features and resident comfort into new and retrofit project designs

#### PRIORITY PROJECTS:

- Explore opportunities for additional resident services through recurring federal and state sources including but not limited to Medicaid reimbursement **Not started**
- Implement strategies to ensure successful housing search and long-term tenancies for disabled residents and voucher holders, including educating residents on reasonable accommodations **Underway**
- Expand partnerships providing on-site quality of life programs and services **Not started**



## GOAL 6:

### Support Resident Economic Development

As evidenced by our resident-centric approach to property management and robust resident services programming, helping residents and voucher holders seek well-paying jobs, improve their educations and increase their assets are important KH goals. This strategic goal takes full advantage of Keene Housing's MTW flexibility to develop rent reform and resident service initiatives specifically designed to help working families achieve greater economic independence.

#### OBJECTIVES:

- Use MTW flexibility to explore resident service and rent models that provide incentives for employment and asset building
- Leverage internal and external resources to help residents and voucher holders build social connections and sense of community
- Focus on measurable outcomes and program evaluation

#### PRIORITY PROJECTS:

- Develop, implement and evaluate rent reform and services demonstration project, with support from third party private or academic researchers **Underway**
- Look for additional Transitional Housing Assistance Subsidy Program (THASP) partners **Underway**
- Increase the use of the Family Activity Centers by local service providers and residents **Not started**



## GOAL 7:

### Support Youth Development Through Collaboration with the Keene Housing Kids Collaborative

Keene Housing has been the driving force and primary financial supporter of the Keene Housing Kids Collaborative (KHKC), a non-profit organization established in 2014 to support the healthy development and educational success of KH youth. Working in collaboration with KH, the Keene School District and more than 30 partner agencies, KHKC is implementing an ambitious array of after school and summer programs that promote healthy youth development and support parents and children living in Keene Housing owned or assisted homes. During the Strategic Plan term, KH will support and collaborate with KHKC to increase its fund-raising capacity, and to help KHKC become a self-sustaining non-profit organization.

#### OBJECTIVES:

- Continue supporting and collaborating with KHKC to expand and strengthen programs that focus on youth development from preschool through high school
- Help KHKC become a self-sustaining organization

#### PRIORITY PROJECTS:

- Improve communications between KHKC and KH BOC **Underway**
- Continue reducing MTW contribution towards KHKC operating costs **Underway**
- Introduce KHKC leadership to additional potential affordable housing partners **Underway**



## GOAL 8:

### Build Board and Staff Capacity and Skills

An engaged, well-trained Board and staff are essential for Keene Housing to continue achieving excellence, fostering innovation and most importantly, addressing community needs. This goal incorporates ongoing efforts to increase the Board of Commissioner's engagement in, and advocacy on behalf of KH's strategic goals. It also encompasses supporting and building Board and staff capacity through continuing education, and initiatives that periodically solicit feedback from staff and the Board, especially when major organizational transitions are under consideration.

#### OBJECTIVES:

- Recruit and retain a qualified, motivated workforce
- Provide staff with the training, including cross training, needed to excel at their jobs and grow within the organization
- Ensure that new and current Board members are fully informed of their roles and responsibilities, appropriately engaged in governance and policy matters, and fulfilling their obligation to advocate for KH and the households we serve
- Provide opportunities for local stakeholders, including students, to learn about KH's work

#### PRIORITY PROJECTS:

- Continue bonus program to recognize extraordinary performance **Underway**
- Continue conducting employee satisfaction/feedback surveys **Underway**
- Annually update Board training materials and schedule, including on-boarding packet, using the AHAB accreditation standards for Governance as a source for best practices **Underway**
- Increase opportunities for Board members to participate in relevant trainings and to engage with KH staff **Underway**
- Continue developing strategies that attract and retain quality staff at all organizational levels **Underway**
- Implement intradepartmental cross training initiatives **Not started**
- Implement interdepartmental "Shadow Days" **Not started**



## GOAL 9:

### Enhance Customer Service and Operational Efficiency

Keene Housing is a service organization. Applicants, residents and voucher holders are our customers. KH is always focused on ways to streamline operations and improve customer service for applicants, residents and voucher holders. This strategic goal incorporates activities that leverage emerging technology, provide increasingly helpful and timely information to our customers and community, and minimize disruption to residents and operations in the event of a natural disaster or other unforeseen event.

#### OBJECTIVES:

- Integrate new technologies that streamline work processing and improves public/resident access to information
- Ensure that the providing high quality customer service, based in empathy and fairness, is a fundamental organizational principal
- Provide additional opportunities to easily receive and respond to public feedback
- Implement a disaster response and recovery plan

#### PRIORITY PROJECTS:

- Develop and implement a plan to improve the website **Completed**
- Develop and implement a security plan **Underway**
- Periodically assess and implement required enhancements to KH's hardware, software and telecommunications network **Underway**
- Develop and implement a Communications Plan that uses technology to improve the timeliness, accuracy and accessibility of information about KH plans and strategies for applicants, residents, voucher holders, community stakeholders and other target audiences **Not started**
- Regularly solicit input from residents and stakeholders on KH programs and initiatives **Not started**
- Develop a disaster response plan that accounts for the safety of residents and staff as well as the need to recover quickly from a natural disaster **Not started**
- Evaluate and, where cost effective, deploy technological tools such as video updates, kiosks, computers and publicly available printers to assist residents and applicants **Underway**



## GOAL 10:

### Be a Strong and Effective Advocate for Innovation in Affordable Housing and Supportive Service Programs

Keene Housing's organizational culture values and actively supports innovation and excellence in the administration of housing and supportive service programs for low- and moderate-income people. KH strongly believes that we achieve excellence by learning from, and sharing with others engaged in activities that benefit our customers. To that end, KH strives to play a prominent role in local, state and federal efforts to improve, promote and expand affordable housing programs and supportive services. Central to this effort is KH's leadership in the Moving to Work (MTW) program.

#### OBJECTIVES:

- Support and participate in the growth of the MTW Collaborative and advocate for the permanent extension of current MTW Agreements
- Participate in local, state and national efforts to improve public policy affecting affordable housing development, management and administration
- Contribute to efforts to improve local, state and national renewable energy incentive programs and related public policies
- Contribute to efforts to improve local, state and national supportive service programs and policies

#### PRIORITY PROJECTS:

- Actively participate in and support the MTW Collaborative [Underway](#)
- Actively participate in and support the Affordable Housing Accreditation Board [Underway](#)
- Actively participate in and support the New Hampshire Housing Authority Corporation [Underway](#)
- Actively participate in and support the Public Housing Authorities Directors Association [Underway](#)
- Actively support the advocacy efforts of Housing Action New Hampshire [Underway](#)
- Ensure that members of senior staff hold leadership positions with local, state and federal organizations, committees and councils [Underway](#)
- Continue advocating for low- and moderate-income people to local, state and federally elected officials [Underway](#)



# APPENDIX II. Safety Net

## Safety Net

The Safety Net (SN) program provides temporary relief to participating households experiencing significant, unexpected increases in rent burden. Safety Net is not meant to take the place of full-time employment for participants who are able to work. Work-able participants are encouraged to find employment rather than use the Safety Net program. Safety Net is meant to be temporary assistance during times of economic hardship. Applications for Safety Net must be submitted monthly unless KH approves a longer term.

Safety Net applications are reviewed by the SN Committee which consists of Resident Service Coordinators (RSC), Tenant Assistance Specialist, Voucher Program Specialist and the Director of Programs and Services. Applicants do not have to attend a SN Committee meeting, however applicants are encouraged to attend Review Board meetings to explain their need for Safety Net.

## Eligibility Guidelines

The proposed 2017 Mainstream (2017 MS) Rent Reform activity provides a streamlined rent calculation methodology for households with 90% or more of their income coming from fixed sources. By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

1. Applicants must complete a Safety Net application and provide supporting documentation by the 20th of the month the hardship occurs.
2. KH may consider applications after the 20th in cases of unanticipated income loss for Stepped Subsidy households.
3. Applicants must meet all three of the following criteria to be eligible for Safety
4. Net.
5. In compliance with the MTW Housing Contract
6. If the applicant lives in a PBV unit, the applicant must be in compliance with their lease and not owe money to KH.
7. If the applicant owes KH money, they must execute a Payment Agreement (PA) and not be in default of the Payment Agreement.
8. In compliance with the Resident Self-Reliance program (if applicable)
9. An Income Based (IB) participant pays more than 45% of their adjusted income towards rent and allowable utilities.
10. A Stepped Subsidy participant pays more than 45% of their gross income toward rent and allowable utilities.
11. A change in the Stepped Subsidy does not qualify a household for Safety Net.
12. For mixed households, safety net determination is based solely upon eligible household members.
13. Households within the 180-day \$0 HAP period (Chapter 13) with verified unforeseen changes in household composition or decreases in income may complete a Safety Net (SN) application to request consideration to recalculate housing assistance.

Consistent with KH interim policies in Chapter 13 subsidy will be calculated based upon the household's current



circumstances.

Households participating in the Stepped Subsidy Program prior to the HAP decreasing to \$0 will have their subsidy reinstated at their previous step level.

## **Safety Net Committee**

The Safety Net Committee is comprised of KH staff.

Applications are presented by a Resident Services Coordinator (RSC) to the Safety Net Committee.

The Safety Net committee may require an applicant to complete a Career Plan as part of accepting the additional housing assistance. This Career Plan may include, but is not limited to:

- Training program participation
- Proof of an active job search
- Updated financial plan
- Proof of volunteer activities
- Additional meetings with the RSC
- Other activities deemed appropriate

## **Setting Safety Net Tenant Payment**

The Safety Net Committee has several options to help eligible households depending on the household's individual circumstances. The Committee can choose any combination of the following:

Set the household's tenant payment temporarily to the greater of:

- Minimum rent
- 30% of gross income (for Stepped Subsidy)
- 30% of adjusted income (for Income Based Subsidy)
- Extend the period of Safety Net for which the household was previously approved.
- Transfer a household from Stepped Subsidy to Income Based subsidy, if applicable.
- Recommend an Income Based Subsidy household for an interim recertification.