

Louisville Metro Housing Authority

Moving to Work Annual Plan

Fiscal Year 2019

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I. Introduction

The Louisville Metro Housing Authority, formerly known as the Housing Authority of Louisville, is a nonprofit agency responsible for the development and management of federally assisted housing in the Louisville Metro area. In 2003, Louisville Metro Mayor Jerry Abramson and the Louisville Metro Council approved the merger of the Housing Authority of Louisville and Housing Authority of Jefferson County, thereby creating the Louisville Metro Housing Authority (LMHA). A nine-member Board of Commissioners, appointed by the Metro Mayor, serves as the policy making body of the agency. LMHA has over 4,000 public housing units, and administers rental assistance to approximately 9,400 families through its voucher programs.

A. Moving To Work (MTW) Demonstration Program Overview

LMHA, then the Housing Authority of Louisville, became one of a small group of public housing agencies designated to participate in the Moving to Work (MTW) Demonstration Program in 1999. The MTW Program, authorized by Congress and signed into law as part of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, provides public housing agencies (PHAs) with the flexibility to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families. The program allows waivers of certain existing low-income public housing (Section 9) and Housing Choice Voucher (Section 8) regulations and statutory provisions, and permits LMHA to combine public housing operating and capital funds, along with Housing Choice Voucher rental assistance funds, into a single agency-wide MTW Block Grant.

The terms and conditions of LMHA's participation in the MTW Program are defined in the MTW Agreement between LMHA and the US Department of Housing and Urban Development (HUD). The current MTW Agreement extends through 2028.

Under the MTW Program, LMHA creates and adopts an MTW Annual Plan that describes new and ongoing activities that utilize authority granted to LMHA under its MTW Agreement with HUD. HUD approval is required for the Annual Plan. This document is LMHA's MTW Annual Plan for Fiscal Year 2019, i.e. the period from July 1, 2018 through June 30, 2019. The MTW Annual Plan focuses primarily on the Public Housing, Housing Choice Voucher (HCV), and Capital Fund programs, as these are the LMHA programs that fall under the MTW demonstration. It provides information on newly proposed MTW activities, as well as MTW activities that were previously approved by HUD and are ongoing. The Annual Plan also contains information about some of LMHA's non-MTW initiatives, such as public housing site improvements, resident self-sufficiency programs, and new or upcoming grant opportunities. The MTW Annual Report, which is prepared at the end of each Fiscal Year, provides an update on the status and outcomes of those activities included in the MTW Annual Plan.

MTW Statutory Objectives

Under the MTW demonstration, all of LMHA's MTW activities must support at least one of the following three MTW statutory objectives:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to residents, especially families with children, to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

As part of the Annual Plan and Report processes, LMHA is required to specify and report on HUD-determined baseline and benchmark metrics for each MTW activity.

B. Long Term MTW Plan

LMHA believes that MTW designation provides an important set of tools that can be utilized to support the agency's mission, which is to provide quality, affordable housing for those in need, to assist residents in their efforts to achieve financial independence, and to work with the community to strengthen neighborhoods.

At the inception of LMHA's designation as an MTW agency, LMHA carefully evaluated its own goals and objectives, comparing them to those of the demonstration. The outcome of this process was the development of six long-term goals for LMHA's participation in the MTW program. These goals, as outlined in the FY 1999 Annual MTW Plan, are locally-determined refinements of HUD's statutory objectives:

- Increase the share of residents moving toward self-sufficiency;
- Achieve a greater income mix at LMHA properties;
- Expand the spatial dispersal of assisted housing;
- Improve the quality of the assisted housing stock;
- Reduce and/or reallocate administrative, operational and/or maintenance costs; and
- Enhance the Housing Authority's capacity to plan and deliver effective programs.

Over the course of its participation in MTW, LMHA has recognized a growing number of populations with specific needs that often go unmet by existing housing and support service infrastructure. The agency has revised and updated its goals to reflect changes in the local community and the evolution of the MTW demonstration into a performance-driven program. In addition to the goals above, LMHA has set the goal to develop programs and housing stock targeted to populations with special needs, especially those families not adequately served elsewhere in the community.

C. MTW Activity Overview

An MTW activity is defined as any activity LMHA engages in that requires MTW flexibility to waive statutory or regulatory requirements.

- LMHA is proposing a new "Enhancements to Local Project-Based Voucher Program" MTW Activity under this FY 2019 MTW Plan Amendment.
- LMHA is not proposing to close out any MTW activities during FY 2019:

A complete list of LMHA's MTW activities along with their current status is found in Table 1

Table 1: Moving to Work (MTW) Activity Matrix

#	Fiscal Year	MTW Activity	Status
51	2019	Enhancements to Local Project-Based Voucher Program	Proposed in FY2019 Plan Amendment
50	2018	Increasing Housing Options for Relocating Beecher Terrace Families	Approved in FY2018 Plan Amendment
49	2018	Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing	Implemented
48	2018	Local Project-Based Voucher Program	Implemented
47	2017	MTW Special Referral Program – ChooseWell Communities	Implemented
46	2017	MTW Special Referral Program – Riverport Scholar House	Implemented
45	2016	MTW Special Referral Program – Coalition for the Homeless “Move Up” Initiative	Implemented; To Be Closed Out in FY2018
44	2015	MTW Special Referral Programs	Implemented
43	2015	HCV Program - HUD/MDRC Rent Reform Demonstration	Implemented
42	2015	MTW Special Referral Program - Centerstone	Implemented
40	2014	HCV Program - Financial Aid Disregard in Calculation of TTP	Implemented
39	2014	HCV Program - Rent Increase Limit	Implemented
38	2013	MTW Special Referral Program – Parkland Scholar House	Implemented
37	2013, 2014	Public Housing - Sublease Agreement with Frazier Spinal Cord Rehab Institute	Not Approved in 2013, Approved in 2014, Implemented
36	2013	MTW Special Referral Program – Wellspring at Bashford Manor/Newburg	Implemented
35	2012	MTW Special Referral Programs – Allocation of MTW Housing Choice Vouchers	Implemented
34	2012	MTW Special Referral Program – Wellspring at Youngland Avenue	Implemented
33	2012	Public Housing - Rents Set at 30% of Adjusted Income	Closed Out
32	2012	HCV Program & Public Housing - Elimination of the Earned Income Disregard	Implemented
31	2012	MTW Special Referral Program - Stoddard Johnston Scholar House	Implemented
30	2012	MTW Special Referral Program – 100,000 Homes Initiative	Implemented
29	2011, 2015	Public Housing - Sublease Agreement with YouthBuild Louisville	Not Approved in 2011, Approved in 2015, Implemented
28	2011	Public Housing - Locally Defined Guidelines for Development, Maintenance, & Modernization	Not Yet Implemented
27	2011	HCV Program & Public Housing - Deduction of Child-Care Expenses in Determination of Eligibility	Implemented
26	2011	Public Housing - Acquisition of Mixed-Income Sites	Implemented
25	2010	Public Housing - Sublease Agreement with Catholic Charities	On Hold
24	2010	Public Housing - Increased Flat Rents for New Scattered Sites	Closed Out
23	2010	Public Housing - Lease-up Incentives for New Residents at Dosker Manor	Implemented
21	2010	Public Housing - Occupancy Criteria Changes for New Scattered Sites - Mandatory Case Management	Closed Out
20	2010	MTW Special Referral Program - Downtown Family Scholar House	Implemented
18	2009	Public Housing - Simplification of the Public Housing Development Submittal	Implemented
16	2009	Public Housing - Streamlined Demolition and Disposition Application Process for MTW Agencies	Closed Out
15	2009	MTW Special Referral Program - Louisville Scholar House	Implemented
14	2009	Center for Women and Families at the Villager - Determinations for Program Eligibility	Non-MTW

#	Fiscal Year	MTW Activity	Status
13	2009	HCV Homeownership Program – Exception Payment Standards (Revised 2016)	Implemented
11	2009	HCV Homeownership Program - Flexibility in Third-Party Verifications	Implemented
10	2008	Locally Defined Definition of Elderly	Implemented
9	2007	Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites (Revised 2014, 2016)	Closed Out
8	2008	HCV Program & Public Housing - Standard Medical Deduction	Implemented
7	2008	MTW Special Referral Program - Day Spring (Renewed 2012)	Implemented
6	2008	HCV Program - Earned Income Disregard for Elderly Families	Implemented
5	2007	HCV Program - Spatial Deconstruction of HCV Assisted Units	Closed Out
4	2007	HCV Program & Public Housing - Alternate Year Reexaminations of Elderly and Disabled Families (Revised 2012, 2014)	Implemented
3	2006	HCV Homeownership Program - Amount and Distribution of Homeownership Assistance	Implemented
2	1999	MTW Inspections Protocol	Implemented
1	2005	MTW Special Referral Program - Center for Women and Families	Implemented

D. FY 2019 Goals and Objectives

LMHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2019. As LMHA's funding for FY 2019 is unknown as of the publication date of the MTW Annual Plan, the activities described herein may be modified based on actual funding levels.

Highlights of planned FY 2019 activities include:

- **Housing Choice Vouchers:** LMHA projects that rental assistance and related services will be provided to 9,373 MTW households. At least 160 new Project Based Voucher (PBV) units are anticipated to be placed under contract in FY 2019. An additional 372 households are projected to be served through the VASH program.
- **Public Housing:** In FY 2019, LMHA projects serving 4,045 public housing households. Additionally, LMHA plans to dispose of 417 Beecher public housing units as part of its Choice Neighborhoods Initiative and an additional 42 units to resolve issues related to mold, lead and water damage. No new public housing units are planned for FY 2019.
- **Vision Russell:** LMHA will continue and expand its ambitious efforts to implement the Vision Russell Choice Neighborhoods Transformation Plan with the following FY 2019 activities:
 - Closing on approximately 117 Phase I units (Phase I consists of 113 replacement and 4 LIHTC only units)
 - Construction of Phase I units to be completed by the end of FY 2019
 - Work on conceptual plans for Phase II
 - Closing on approximately 108 Phase II units (Phase II consists of 39 replacement housing, 26 tax credit and 43 market rate)

- Third and final phase of Beecher relocation
- ***Housing Options for Beecher Relocates:*** As a large proportion of relocating Beecher families will need one bedroom units, LMHA sought to find a way to assist Beecher residents in finding replacement housing, LMHA received HUD approval in FY 2018 to increase payment standards for one bedroom eligible households and to provide owners with an incentive to lease one bedroom units. In FY 2019, LMHA will work on the third phase of the Beecher relocation and will use the flexibilities in this activity to assist the relocates. Residents in phases one and two of the Beecher relocation will also have access to these incentives.
- ***Local Project Based Voucher Program:*** To assist with the CNI Transformation Plan commitments, LMHA proposed and HUD approved an MTW activity to implement a Local Project Based (PB) Voucher Program. LMHA goal is to provide PB units as replacement units for Beecher Terrace households. In FY 2019, using the flexibilities granted under this activity, LMHA will complete proposal selection for approximately 160 to 200 off-site PB units. LMHA will continue to review its housing stock to determine the feasibility of adding additional PB units to its housing inventory for Beecher replacement as well as for additional housing once Beecher relocation is completed.
- ***Off-Site, Mixed Income Replacement Housing:*** LMHA anticipates that the vast majority of replacement units for Beecher Terrace households will be subsidized through its Local Project Based Voucher Program. Under this MTW activity, LMHA is also pursuing opportunities to acquire properties where the Housing Authority can provide off-site replacement housing without relying fully on 3rd party developers. In FY 2019, upon review of financing and building conditions, LMHA will look to purchase two 4-plexes to develop for replacement housing. This purchase will serve as a pilot for LMHA to determine the feasibility for pursuing additional acquisitions to further the CNI Transformation Plan commitments.
- ***Friary:*** During FY 2019, LMHA will continue to hold 24 units off-line at the Friary, a historic structure that LMHA purchased several years ago. More recently, the site was emptied because the structure is in need of comprehensive rehabilitation. LMHA procured a private developer to redevelop the site. The agency subsequently submitted a disposition application to HUD, which was approved in FY 2017. The developer applied and was approved for low-income housing tax credits during FY 2018. Once renovation work has been completed, LMHA will utilize 18 of the renovated units for public housing. An additional six replacement public housing units will be acquired in non-impacted areas. Disposition of the units occurred in FY 2018, and LMHA anticipates that acquisition will occur in FY 2019.
- ***Russell Neighborhood Transformation:*** In late FY 2018 and early FY 2019, LMHA will work to complete the CNI action activities for the Russell Neighborhood Transformation including completion of:
 - A “Spray ground” at Sheppard Park
 - Six SmART Stop bus shelter enclosures
 - Railroad overpass murals
 - Transformation of vacant lots into neighborhood gathering spots and amenities
- ***Sheppard Square HOPE VI Revitalization:*** A pediatric clinic and wellness center is slated to be fully operational by April 2018. The clinic and wellness center is located in the lower level of the

Historic Presbyterian Community Center at 760 S. Hancock Street. While this project is will not be operated by LMHA, this community resource will benefit both LMHA residents and the community at large.

- ***Special Referral Programs:*** Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. In FY 2019, LMHA anticipates that over 500 Housing Choice Vouchers will be utilized to assist these families in making strides toward self-sufficiency and increasing their housing choices. LMHA works with a number of partner agencies to assist the Special Referral Program participants with services and supports in their efforts to achieve housing stability and economic self-sufficiency.
- ***Self-Sufficiency and Development Programs*** – Financial literacy, adult education, employment and training are among the supportive service programs that will continue to be provided by LMHA and a network of partners in FY 2019. Credit Building, Homeownership, Special Referral and the Family Self-Sufficiency programs are vehicles for LMHA participants to assist them in achieving economic self-sufficiency. These initiatives all leverage MTW Block Grant funding to secure additional public and private funding. A critical ongoing objective is for LMHA to maximize and leverage its MTW Block Grant investments through innovative partnerships with State, City, and non-profit agencies, universities, and social services organizations.
- ***Homeownership:*** LMHA's Homeownership Program is anticipated to continue in FY 2019 including the program enhancements designed to promote homeownership in areas of opportunity. LMHA increased the subsidy for one bedroom eligible households as well as increased the maximum subsidy in areas of opportunity. These MTW homeownership activities continue to result in increases to the number of households purchasing units in areas of opportunity.
- ***Elderly/Disabled Housing:*** LMHA will continue to use MTW flexibility in FY 2019 to maximize leasing at elderly/disabled developments. Efforts include changing the definition of elderly from 62 to 55 and above and providing lease-up incentives. It is anticipated that these initiatives will continue to increase occupancy rates at these developments.
- ***Rent Policies:*** LMHA's rent policies address both participant self-sufficiency and LMHA administrative efficiency. In FY 2019, LMHA anticipates that it will continue to apply the policies related to alternate year reexaminations, application of a standard medical deduction, earned income disregard for elderly HCV families and elimination of the mandatory earned income disregard.
- ***Owner Rent Increase Limit:*** In FY 2019, LMHA will modify its MTW policy on owner rent increases. While LMHA will continue to place a cap on rent increases, LMHA will conduct a reasonable rent determination on a sample of the units where increases in rents are requested. This change will ensure that rents are reasonable while maintaining the administrative efficiencies gained through this activity.
- ***HUD Rent Reform Demonstration:*** FY 2019 represents the fourth of six years of the HUD Rent Reform Demonstration. The Study sets forth alternative rent calculation and reexamination strategies that have been implemented at several public housing authorities across the country in order to fully test the policies nationally. In FY 2019, as a result of households leaving the program, it is anticipated that the Alternate Rent Group will have 664 households and the Control Group will have 871 households. The study is scheduled to end in 2021.

- **Public Housing Development:** As part of its goal to transform aging portions of LMHA's physical housing stock while providing replacement units, LMHA developed and implemented two MTW Public Housing (PH) development activities. LMHA may use the Simplified PH Development Submittal and Acquisition of Mixed-Income Sites activities in FY 2019 as needed. These activities are designed to streamline the development process and reduce the time spent of development submittals. To date, LMHA has not used these flexibilities.
- **Accessible Units:** In its efforts to provide fully accessible units to individuals with disabilities, LMHA, under its MTW Activity with Frazier Rehab Institute, provides transitional housing for up to six months per family. Frazier Rehab sub-lessees are also referred to area service provider to assist them to leave the program and obtain stable housing. This activity is anticipated to continue in FY 2019.
- **YouthBuild:** LMHA provides temporary housing for low-income YouthBuild Louisville (YBL) participants who are experiencing homelessness. Up to three, 2 bedroom units are available for YBL participants who may stay in the unit as long as they are active in the YBL program. LMHA provides a PH preference to these individuals upon graduation from YBL. Due to the demolition at Beecher Terrace, temporary housing for YouthBuild participants is provided at 550 Apartments.

Along with its MTW implementation activities, LMHA will implement other initiatives in FY 2019 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of LMHA's planned Non-MTW activities include:

- **ConnectHome USA** is a pilot initiative with communities, the private sector, and the federal government that seeks to accelerate the adoption and utilization of broadband technology by children and families living in assisted housing. In August 2017, Louisville Metro Housing Authority (LMHA) was selected as one of these communities. In FY 2019 LMHA and partners will continue efforts to bridge the digital divide in LMHA communities and will be focusing on goals to assure LMHA public housing residents and Housing Choice Voucher Program participants have the opportunity to fully engage in the ever-evolving digital society. Through ConnectHome USA LMHA has a goal to connect 35% of HUD-assisted housing residents to a low-cost, in-home Internet connection by January 2019.
- **Smoke-Free Policy:** As part of HUD's *Instituting Smoke-Free Public Housing* Final Rule, LMHA will implement its No-Smoking Policy in July 2018. The new restrictions apply not just to residents, but also to visitors, service personnel, and LMHA employees. Per the Final Rule, Public Housing Agencies must ban cigarettes, cigars, pipes, and water pipes (hookahs) in no-smoking areas. LMHA has also opted to ban Electronic Nicotine Delivery Systems, such as e-cigarettes, e-cigars, e-pipes, and vape pens.
- **Grants and Grant Opportunities** – In FY 2019, LMHA will administer existing grants and utilize MTW funds where feasible to leverage new grant opportunities. Existing grants include the FSS Coordinator and Ross grants as well as the Choice Neighborhoods Implementation Grant. In FY 2019, LMHA will submit applications to continue funding existing programs, if funds are made available, and fund new programs that support LMHA's Strategic Plan. On all grant opportunities, LMHA will determine if any MTW flexibilities are required to implement the program and incorporate such flexibilities into future MTW Plans or Plan amendments.

- ***Prudent Fiscal Management and Internal Controls*** – LMHA will continue to implement a comprehensive program of internal audit, compliance reviews and fiscal management.

II. General Housing Authority Operating Information

A. Housing Stock Information

Planned New Public Housing Units

LMHA does not plans to add any new public housing units to its inventory in FY 2019.

Table 2: Planned New Public Housing Units in FY 2019

AMP Name and Number	Bedroom Size							Total Units	Population Type*	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
No new PH is Planned											
Total Public Housing Units to be Added								0			

*Population Type: Elderly, Disabled, Elderly/Disabled, Other

Table 3: Planned Public Housing Units to Be Removed in FY 2019

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Beecher Terrace (KY001000002)	417	LMHA received a Choice Neighborhoods Implementation Grant in December 2016. LMHA planned to remove 121 units in FY 2018 for the first phase of the 120-unit senior building. These units were not removed in FY 18 and will be removed in FY 19 plus an additional 296 units for phase two of the Implementation Grant
Fegenbush-Whipps Mill (KY001000017)	15	8 units to be removed for excessive mold and/or lead abatement costs. An additional 7 units may be disposed of through a competitive bid process, pending HUD approval.
HOPE VI Scattered Sites (KY001000034)	34	10 units for recurring water damage. 24 units at the Friary.
Total Number of Units to be Removed		466

Planned Rental Assistance Demonstration (RAD) Program Conversions

There has been no further activity or additional discussions regarding the Park DuValle acquisitions being converted to RAD. However, this is an ongoing consideration based upon the assumption that the financial impact of the RAD conversion remains positive. LMHA will continue to review the potential for RAD conversions in FY 2019. Should LMHA make a determination to proceed with any RAD conversions during FY 2019, LMHA will conduct meetings with residents of the affected developments to discuss conversion plans and provide opportunity for comment.

Planned New Project-Based Voucher Leasing

LMHA provides project-based subsidies to non-profit sponsors and other private property owners through its Project-Based Leasing and Development program. Table 4 below provides details on new PBV developments that LMHA plans to subsidize during the Plan Year. Overall, LMHA projects that at least an additional 160 vouchers will be project based in FY 2019; with 90 of those units placed under contract by the fiscal year end. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the LHMA Board during the Plan year and other considerations.

Table 4: New Housing Choice Vouchers to be Project-Based in FY 2019

Property Name	Anticipated # of New Vouchers to be Project-Based	Description of Project
Various	160	As part of its Beecher Terrace Choice Neighborhoods Initiative Transformation Plan, LMHA has committed to providing 442 off-site replacement units by September 30, 2023. Most, if not all, of these units will be funded with project-based vouchers. For units that the Housing Authority does not own, LMHA will begin a rolling competitive process at the beginning of FY 2019 to select PBV recipients. This competitive process will remain open until all 442 replacement units have been provided. Units will be developed as qualified PBV recipients are selected. The Housing Authority anticipates that at least 160 tenant-based vouchers will be project-based as part of this process during FY 2019, although LMHA may exceed this number should additional eligible units be identified. Information on the actual number of new vouchers that are project-based will be provided in the FY 2019 Annual Report.

Anticipated Total New Vouchers to be Project-Based

160

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year

Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year

90*

75

*Assumes that 50% are under AHAP and the other 50% are under HAP by the end of the FY. LMHA is counting only units under HAP contract and not units under AHAP.

Other Planned Changes to Housing Stock

In 2013, LMHA acquired full ownership of the 100 units built through Phase I of the Park DuValle HOPE VI project (59 public housing units, 21 tax credit, and 20 market rate). During FY 2017, LMHA acquired full ownership of all 213 units built through Park DuValle Phase II (95 public housing, 54 tax credit, and 64 market rate). LMHA will acquire full ownership of all 108 units built through Park DuValle Phase III (79 public housing, 18 tax credit, and 11 market rate). The acquisition of 192 Park DuValle Phase IV units (134 public housing/tax credit and 58 market rate) is anticipated to occur in FY 2020. As the public housing units are already under an ACC, this will not result in a net increase of public housing units.

During FY 2019, LMHA will continue to hold 24 units off-line at the Friary, a historic structure that LMHA purchased several years ago and had used as Liberty Green HOPE VI replacement public housing. More recently, the site was emptied because the structure is in need of comprehensive rehabilitation. In FY 2016,

LMHA procured a private developer to redevelop the site. The agency subsequently submitted a disposition application to HUD, which was approved in FY 2017. The developer applied and was approved for low-income housing tax credits during FY 2018. Once renovation work has been completed, LMHA will utilize 18 of the renovated units for public housing. An additional six replacement public housing units will be acquired in non-impacted areas. Disposition of the units occurred in FY 2018, and LMHA anticipates that any acquisition will occur in FY 2019.

LMHA is committed to one-for-one replacement of all units removed from its public housing stock beginning with the demolition of Iroquois Homes. Acquisition does not occur on a fixed schedule, but rather as suitable properties become available. During FY 2019, LMHA will continue to work toward one-for-one replacement of the units listed in the Planned Public Housing Units to be Removed During the Fiscal Year table, as well as the continued replacement of units removed through the demolition of Iroquois Homes. Replacement units may be PBV, public housing, or local, nontraditional units.

LMHA is also committed to one-for-one replacement of all 758 Beecher Terrace units that will be demolished as part of its Choice Neighborhoods Initiative Transformation Plan. Although LMHA currently plans to create replacement units using PBV, a portion of the replacement units may be provided as public housing should this favorably impact the financing of a particular project or be deemed advantageous in order to allow the units to serve households with incomes up to 80% of AMI.

In FY 2019, pending a review of financial impacts and building conditions, LMHA may purchase of two 4-plexes (located in the Russell Neighborhood) from New Directions Housing Corp. Four of these units will be used as Beecher replacement housing. Four of the units will be acquired using MTW Broader Use of Funds authority. These units will be restricted to households with incomes below 80% of AMI, but will not receive direct, ongoing operating subsidy. LMHA is also examining the feasibility of acquiring a second, 12-unit apartment building in Russell where the same funding structure would be used.

General Description of Planned Capital Expenditures

LMHA's capital planning and development strategies are designed to support, rehabilitate, and modernize existing LMHA sites. Utilization of MTW Block Grant funding and programmatic flexibility remains a critical element in LMHA's modernization and development efforts. LMHA maintains updated physical needs assessments including estimated replacement and/or repair costs for all LMHA developments.

Table 5 provides information on LMHA's planned capital and development expenditures for FY 2019 including projects funded from MTW Block Grant and other sources. The information on Table 5 is preliminary and subject to change based on actual funding and other factors. Actual obligations and expenditures may vary based on factors such as construction schedules, timing of HUD and local approvals, availability of leveraged funding and new and emerging repair needs. Note also that capital projects often are implemented over multiple years.

Table 5: Planned Capital Expenditures in FY 2019

Project Type	Site Name	Project Description	Total Estimated Budget/ Expenditures *
Capital Improvements	Beecher Terrace	Choice Implementation	\$2,000

Project Type	Site Name	Project Description	Total Estimated Budget/ Expenditures *
Capital Improvements	Parkway	Roof repair, smoking huts	\$90
Capital Improvements	Dosker Manor	Building Lobby B & C, dwelling equipment, plumbing infrastructure, safety & security enhancements; structural repairs; office equipment, smoking hut, replacement vehicle	\$952
Capital Improvements	St. Catherine Court	Building equipment, safety and security enhancements, lighting, accessibility enhancements	\$280
Capital Improvements	Avenue Plaza/550 Apartments	Dwelling furnishings, safety and security enhancements, office equipment, smoking huts, signage, dwelling equipment; generator, sidewalks/curbing, painting,	\$297
Capital Improvements	Scattered Sites	Driveways, parking lots, roof replacements, painting, windows, kitchens, bathrooms, abatement, air conditioning, siding, gutters, erosion repair, panel van, dire damage repair, demolition; retaining wall, rails and balconies, waterproofing; steps, brick and mortar, flooring, replacement doors, dwelling furnishings and equipment, maintenance tools, safety & security enhancements, decks, mailboxes, drainage improvements, furnaces	\$1,885
Capital Improvements	Lourdes Hall/Will E Seay Plaza	Express Van, office and site furnishing, curbing, painting, carpeting, maintenance shop upgrades, dumpsters, safety and security enhancements, heaters, roof repair	\$226
Capital Improvements	Park DuValle	Mixed finance capital contributions	\$130
Capital Services	Service Contracts	Environmental, asbestos, AE, trees, software, appliances, resident stipend, eviction prevention, security enhancements, , capital assets	\$1,557
Capital Services	Administrative Costs	Construction administration, general fund for operations, contingency,	\$1,226
Central Services	Central Maintenance	Regional maintenance roof repair, trailers, mowers, van	\$200
Central Services	Central Office	Folder/pressure sealer machine, office and IT equipment, salt spreaders	\$112
		TOTAL	\$8,955

*Amounts are listed in \$1,000's

B. Leasing Information

Table 6: Planned Number of Households Served at End of FY 2019

MTW Households to be Served Through:	Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
Federal MTW Public Housing Units to be Leased	4,045	48,540
Federal MTW Voucher (HCV) Units to be Utilized	9,373	112,476
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs	7	84
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs	0	0
Total Households Projected to be Served	13,425	161,100

Reporting Compliance with Statutory MTW Requirements

LHMA is in compliance with all applicable MTW statutory requirements.

Description of Anticipated Issues Related to Leasing

Public Housing Program

Dosker Manor: LMHA continues to have difficulty fully leasing Dosker Manor, an elderly/disabled high rise development. There is a high turnover rate at the development and the location and market conditions in the area make this development difficult to lease. LMHA reduced the elderly age to fifty-five and provides leasing incentives both of which have had a positive impact on leasing at Dosker Manor. LMHA will continue to consider if an official elderly and/or disabled-only designation of one or more buildings at the site is appropriate.

The Friary: Units at the Friary are not yet online which continues to impact leasing figures. LMHA anticipates that units may be on line by the latter part of FY 2019.

Beecher Relocation: LMHA continues to relocate public housing families from Beecher Terrace during, and anticipates leaving units at other public housing sites temporarily unoccupied to make certain there are sufficient housing options available to relocating residents.

Scattered Sites

LMHA has also had difficulty fully leasing single-family scattered site units, which had work/school requirement. In FY 2017 LMHA removed the employment/education requirement closing out Activity #9-2007, "Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites." LMHA hopes to see a gradual change in leasing of these scattered site units now that the residency and work/education requirements have been lifted.

Housing Choice Voucher

In an effort to maximize utilization and leasing of Housing Choice Vouchers LMHA is employing a number of different strategies including absorbing port-in vouchers, maintaining an open waiting list, increasing the number of special referrals, hiring additional staff to better service clients and expedite the leasing process and having access to additional inspectors.

C. Waiting List Information

LMHA administers its waiting lists in accordance with the HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable. Administration of the waiting list for the Conventional program areas is managed under the Public Housing Admissions Department to ensure consistent and efficient management of applicants on the various waitlists. Administration of the Site Based Waiting Lists is overseen by each respective management company.

LMHA operates its waiting lists in a nondiscriminatory manner that seeks to avoid unintended discriminatory effects. LMHA affirmatively markets its sites in a variety of venues and periodicals to ensure that the public is aware of the availability of LMHA housing. LMHA treats all applicants in a non-discriminatory manner. LMHA also monitors its waiting lists to determine if there are significant changes in the percentage of protected classes and, if there were, would determine whether its affirmative marketing methods should be modified. Table 7 provides information on LMHA's waiting lists in the format required by HUD.

Table 7: Waiting List Information

Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Program	Community Wide	13,822	Open	N/A
Federal MTW Public Housing Units	Site Based	6,785	Open	N/A
Federal MTW Public Housing Units	Community-Wide	3,514	Open	N/A
Federal MTW Public Housing Units/ Federal MTW Housing Choice Voucher Program	Merged – Program Specific	953	Open	N/A
Project Based Local Non-Traditional MTW Housing Assistance	Program Specific	0	Open	N/A

Information on Partially Open Wait Lists

N/A
N/A

Information on Local, Non-Traditional Housing Programs

LMHA provides temporary housing in units located at the Liberty Green Community Center to Spinal Cord Injury out-patients of the Frazier Rehab Institute. Housing is also provided to homeless YouthBuild participants in units located at 550 Apartments. Households must be low-income to qualify.
N/A
N/A

Description of “Other” Wait List Type

N/A

Planned Wait List Organizational or Policy Change

Waiting List Name	Description of Planned Changes to the Waiting List
Local Project Based Voucher Program Owner Managed Site-Based Waiting Lists	In accordance with proposed MTW Activity #51-2019, LMHA may allow owners who participate in the LMHA Local Project Based Voucher program to establish and maintain site based waiting lists for individual Local PBV developments. LMHA will determine whether to allow owner-managed site based waiting lists based on LMHA's assessment of each owner's management capacity. Owners will be required to adhere to Fair Housing, Americans with Disabilities Act and other applicable guidelines as further described in MTW Activity #51-2019. Owners who are approved for this activity will submit applicant who are nearing the top of the waiting list to LMHA for eligibility determination. LMHA will establish and implement a monitoring protocol to ensure that owners adhere to all relevant program requirements.

III. Proposed MTW Activities

LMHA is proposing one new MTW activity in FY 2019:

Proposed Activity 51-2019: Enhancements to Local Project-Based Voucher (PBV) Program

A. Activity Description

This activity will build on and expand the MTW flexibilities included in LMHA's Local Project-Based Voucher Program (MTW Activity 48-2018), which was initially approved by HUD in FY 2018. The proposed enhancements described herein require additional MTW authorizations; therefore, a new MTW Activity 51-2019 is proposed.

As detailed in the FY 2018 Annual Plan, HUD awarded LMHA a \$29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All buildings on the current Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community. Per the CNI Implementation Grant Agreement, LMHA committed to replacing 758 units (1,317 bedrooms), ensuring that the same number of households residing at Beecher today will be housed post-revitalization. Replacement units will be affordable to low-income families for a minimum of 40 years, and all replacement housing must be available to families by the end of the CNI Implementation Grant term, which expires September 30, 2023. LMHA anticipates that all or nearly all of the 758 Beecher Terrace replacement units will be subsidized with Project-Based Voucher (PBV) assistance at on and off-site locations.

In order to deliver on this large-scale commitment within a limited timeframe, LMHA secured HUD approval for Activity 48-2018, which utilizes MTW regulatory flexibilities to create a Local PBV Program. LMHA's Local PBV Program is not limited to Beecher Terrace replacement units; however, the provision of these units will be the central objective until all 758 replacement units are completed.

i. Description of Proposed Activity

Based on its initial experiences soliciting quality owner proposals, LMHA has identified additional MTW flexibilities that will enhance the Local PBV Program, provide additional housing choices for low-income households in high opportunity areas, and incentivize developers to preserve or create affordable housing units:

1. Local PBV Program Payment Standards – Current HUD regulations at 24 CFR 983.2 and 982.503 define the parameters for establishing payment standard schedules in the PBV and tenant-based Housing Choice Voucher (HCV) programs. Under this activity, LMHA proposes to utilize MTW flexibility to establish payment standard policies that are applicable only to the Local PBV Program. LMHA will establish Local PBV payment standards that are equal to the greater of 110% of the Metropolitan Area Fair Market Rent (MAFMR) or 110% of the Small Area Fair Market Rent (SAFMR) schedules published annually by HUD. This policy is in response to local housing market conditions, and the need to attract owners of high quality housing units in high opportunity areas to the Local PBV Program. LMHA projects that this policy will expand the universe of potential Beecher Terrace replacement units; attract owners that offer new housing opportunities for low-income households in high opportunity areas; and,

attract owners that offer new mixed income housing opportunities for low-income households. Initial rent levels for a specific project will continue to require a rent reasonableness determination.

2. Local PBV Program Site-Specific Utility Allowances – Current HUD regulations at 24 CFR 983.2 require the use of a single Utility Allowance schedule for both the PBV and tenant-based HCV programs. However, HUD has waived this requirement and established alternative Utility Allowance policies for Rental Assistance Demonstration (RAD) conversion projects. Pursuant to PIH Notice 2018-11, Utility Allowances for RAD projects may be calculated on a site-specific project basis in accordance with the HUD Multifamily program requirements at Notice H 2015-04 “Methodology for Completing a Multifamily Housing Utility Analysis.” Under this MTW activity, LMHA will allow the same flexibility to owners who participate in the Local PBV program. LMHA will allow PBV owners to calculate site-specific Utility Allowances in accordance with the provisions of Notice H 2015-04 or successor notices, subject to LMHA’s review and approval prior to implementation. LMHA anticipates that the majority of Local PBV program projects will be for new construction, substantial rehab or recently constructed projects, and that these types of projects generally are built to much higher energy efficiency standards. By allowing for lower cost, site-specific Utility Allowance schedules, LMHA will increase the range of new and/or high opportunity area properties that can be subsidized under the Local PBV program and, thus, increase housing options for relocated Beecher Terrace residents and other program participants.

3. Owner Managed Site Based Waiting Lists – Section 106(a)(7) of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) authorizes the use of owner-maintained, site-based waiting lists for PBV units; however, PHAs must wait for HUD to promulgate regulations prior to implementing such policies. LMHA notes that owner-maintained, site-based waiting lists are widely in use in the HUD Multifamily Program. LMHA proposes to utilize MTW authority to waive the current regulations at 24 CFR 983.251 to allow individual owners participating in the LMHA Local Project Based Voucher Program to maintain site-based waiting lists. LMHA will determine whether to allow owner-maintained, site-based waiting lists based on LMHA’s assessment of each individual owner’s management capacity. Owners will be required to adhere to fair housing, Americans with Disabilities Act and other applicable federal guidelines including, but not limited to: providing public notification of waiting list opening and closings; providing community-wide notice of housing availability; providing reasonable accommodations; and, conducting the application process in compliance with LMHA’s Language Access Plan. Subject to LMHA approval, tenant selection preferences may be adopted for individual projects in accordance with LMHA’s Administrative Plan; however, post-revitalization, relocated Beecher Terrace households will continue to receive a lifetime admission preference for all units designated as Beecher Terrace replacement units. Owners will forward applications nearing the top of the waiting list to LMHA, and LMHA will continue to maintain responsibility for eligibility determination. Upon implementation, LMHA will establish and implement a monitoring protocol to review and confirm owner compliance with fair housing, ADA and other requirements. Based upon this monitoring, LMHA will require owners to make any necessary corrective actions or may require individual owners to utilize an LMHA-managed waiting list. LMHA believes that this alternative MTW policy will expand the range and number of potential Local Project Based Voucher Program units in opportunity neighborhoods.

4. Waiver of Independent Entity Requirements for LMHA-Owned Units – Current HUD regulations at 24 CFR 983.59 require that an independent entity approved by HUD perform certain functions for PHA-owned units that are selected under the PBV program. As part of its Local PBV program, LMHA proposes to waive the independent entity requirements of 24 CFR 983, and to allow LMHA to directly perform the functions delegated to the independent entity for all LMHA-owned units including the following: review of selection process (24 CFR 983.51(e)); unit inspections, exercise of contractual remedies for violation of the HAP contract and the provision of inspection reports to the HUD Field Office (24 CFR 983.103(f)); and, determination of rent to owner, including initial rent (24 CFR 983.301(g) and 983.303(f)). Requiring approval from an independent entity increases costs and creates

potential delays in the availability of critically needed replacement housing units, while adding no measurable value to the process. Under this MTW activity, LMHA will process rent determination, inspections, contract renewal and other necessary program transactions on LMHA-owned units in accordance with the policies and procedures applicable to all other units that are part of LMHA's Local PBV Program. In the future, LMHA will provide HUD with documentation related to LMHA-owned units upon HUD's request. Also, LMHA's transactions will continue to be subject to audit as part of the annual Independent Audit process.

ii. Relationship to Statutory Objectives and Projected Impacts

The proposed activities will increase high quality housing choices for low-income families by encouraging the development of affordable, mixed-income housing in areas of opportunity and in neighborhoods undergoing targeted revitalization and will reduce cost and achieve greater cost effectiveness. By approximately September 30, 2023, LMHA plans to develop 758 new PBV units, leveraging a \$29,575,000 CNI Implementation grant and more than \$200 million in additional committed funds, to create a diverse array of housing choices for low-income families.

iii. Implementation Timetable

LMHA will begin implementation of this activity immediately upon HUD approval.

B. Activity Metrics Information

LMHA proposes to utilize several of the same baseline and benchmark metrics as those utilized in approved MTW Activity 48-2018 for this activity. The rationale for utilizing these metrics is that both MTW Activity 48-2018 and this proposed activity directly relate to the LMHA's Local PBV Program, and both support the same overall housing production goals and MTW statutory objectives. In addition, LMHA will utilize CE#1 and CE#2 standard metrics for tracking the impact of waiving the independent entity requirements for LMHA-owned units, and of implementing site-specific utility allowances. Proposed metrics include:

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Waiver of Independent Entity for LMHA Owned Units			
	As of FY2019: Total cost is \$0 (No PBV units)* Baseline of \$400(estimate) per PBV development for verification of site selection process. Baseline of \$48.14 per unit inspection (estimate) based on 30% increase over LMHA's FY 2017 average inspection costs.	\$0 per Local PBV project to verify site selection. \$37.03 per unit per Local PBV inspection as performed by LMHA.	TBD	TBD

Site-Specific Utility Allowances				
	As of FY2019: Total cost is \$0 (No PBV units)	\$206 per unit, based on an assumption of 10% savings for	TBD	TBD
	FY2019 2BR utility allowance for HCV tenant-based unit: \$229			
Data Source(s): Emphasys; PHA financial records				
*LMHA will identify a baseline cost and benchmark savings in the Annual Report. The baseline cost will estimate the cost associated with having an independent entity conduct the required activities for LMHA-owned units.				

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	Waiver of Independent Entity Requirements for LMHA Owned Units			
	As of FY2019: 0 hrs (No PBV units)	0 (No staff time savings projected)	TBD	TBD
	Site-Specific Utility Allowances			
	As of FY2019: 0 hrs (No PBV units)	0 (No staff time savings projected)	TBD	TBD
Data Source(s): Emphasys; PHA financial records				

CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2019: \$0 (No PBV units)	\$19,048,700 (\$190,487 (TDC for a 2-BR walkup) * 100 units)	TBD	TBD
Data Source(s): CNI quarterly reports; PHA financial records				

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number (#) of new housing units made available for households (HHs) at or below 80% AMI as	Housing units of this type prior to implementation of the activity (#). This # may be zero.	Expected housing units of this type after implementation of the activity (#).	Actual housing units of this type after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.

a result of the activity (increase). If units reach a specific type of HH, give that type in this box.	As of 2019: 0 (No PBV units)	100	TBD	TBD
Data Source(s): CNI quarterly reports; Emphasys				

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: 65 months	63 months	TBD	TBD
Data Source(s): Emphasys				

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# of HHs able to move to a better unit &/or neighborhood of opportunity as a result of the activity (increase).	HHs able to move to a better unit &/or neighborhood of opportunity prior to implementation of the activity (#). This # may be zero.	Expected HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Actual increase in HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2019: 0 (No PBV units)	100	TBD	TBD
Data Source(s): Emphasys				

C. Cost Implications

Owner management of site-based waiting list is projected to result in a *de minimis* amount of savings, primarily the cost associated with maintaining and pulling from the waiting list. However, LMHA's overall waiting list management and eligibility determination costs will not be impacted.

The waiver of independent entity requirements for LMHA-owned units will eliminate the costs associated with contracting with the independent entity, and allow LMHA to perform these functions using existing staff resources.

D. Need/Justification for MTW Flexibility

1. Local PBV Program Payment Standards – MTW Agreement, Attachment C, Section D.2: “*The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.*” The waiver of 24 CFR 983.2 and 982.517 is required to implement this flexibility.

2. Local PBV Program Site-Specific Utility Allowances – MTW Agreement, Attachment C, Section D.2: *“The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.”* The waiver of 24 CFR 983.2 and 982.503 is required to implement this flexibility.

3. Owner Managed Site Based Waiting Lists – MTW Agreement, Attachment C, Section D.4: *“The Agency is authorized to determine waiting list procedures...that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.”* The waiver of 24 CFR 983.251 is required to implement this flexibility.

4. Waiver of Independent Entity Requirements for LMHA-Owned Units – MTW Agreement, Attachment C: Section D.5 *“The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD...This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982, Subpart I as necessary to implement the Agency’s Annual MTW Plan”*; and, Section D.7: *“The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD’s requirements regarding subsidy layering...This authorization waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and...24 CFR Part 983 as necessary to implement the Agency’s Annual MTW Plan”*. The waiver of 24 CFR 982, Subpart I, and 24 CFR 983.59, 983.51(e), 983.103(f), 983.301(g) and 983.303(f) is required to implement this flexibility.

E. Rent Reform/Term Limit Information

Not applicable. This is not a rent reform or term limit initiative.

IV. Approved MTW Activities

A. Implemented MTW Activities

Within this Plan, implemented MTW activities have been grouped by topic area as follows:

- A.1 Occupancy at Elderly/Disabled High Rise Developments
- A.2 MTW Rent Policies (Non HCV Rent Reform Demonstration)
- A.3 HCV Rent Reform Demonstration
- A.4 Public Housing Development
- A.5 Expanded Homeownership Opportunities
- A.6 Local Leased Housing Program
- A.7 Broader Use of Funds Initiatives

A.1 Occupancy at Elderly/Disabled High Rise Developments

By FY 2008, when LMHA implemented a local definition of “elderly” (Activity #10-2008), the agency had been experiencing decreased occupancy rates at several of its elderly/disabled-only sites for a number of years. Through a combination of MTW initiatives, LMHA has been able to increase the average occupancy rate for these developments from 90% at FYE 2007 to 94% at FYE 2016. Higher occupancy rates at these sites improve LMHA’s operating revenues and achieve greater cost effectiveness, and increase housing choices for 0- and 1-bedroom qualified applicants age 55 to 61.

Activity #10-2008: Local Definition of Elderly

Description/Update of MTW Activity: This activity has permitted LMHA to use the following local definition of “elderly”: any family whose head of household, co-head, or spouse is age 55 or above. Within the Public Housing Program, this definition is only used to determine eligibility for occupancy at the Housing Authority’s elderly/disabled high-rise towers. In all other public housing contexts, “elderly” begins at age 62.

LMHA had been experiencing decreased occupancy rates at its elderly and/or disabled high-rises prior to adopting a local definition of elderly for these communities. The MTW age criteria are used to determine eligibility for residency at Dosker Manor, Avenue Plaza, Will E. Seay Plaza (formerly Bishop Lane Plaza), and Lourdes Hall. Opening up these sites to non-disabled households between ages 55 and 61 has raised occupancy rates and increased the pool of one-bedroom and efficiency units available to these applicants.

Approval and Implementation: Approved and implemented in FY 2008.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #23-2010: Lease-Up Incentives for New Residents at Dosker Manor

Description/Update of MTW Activity: This activity which gives lease-up incentives to new residents at Dosker Manor, an elderly/disabled high-rise located in downtown Louisville. New residents receive a waiver of the initial deposit and the first month’s rent free. The incentives have successfully increased occupancy rates Dosker Manor.

Approval and Implementation: Approved and implemented in FY 2010

Proposed Changes: No changes are proposed that require MTW authority.

Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.2 MTW Rent Policies

The MTW Demonstration also allows LMHA to rethink other policies – like the rent policy for its Public Housing and HCV programs – to encourage families to work towards housing self-sufficiency. Alternate rent structures also ease the administrative burden on residents and the agency. As part of LMHA’s rent reform goals, the Authority will continue to use HUD’s Enterprise Income Verification (EIV) System in its day-to-day operations.

Activity #40-2014: Financial Aid Disregard in Calculation of TTP – HCV Program

Description/Update of Activity: When calculating an HCV participant’s Total Tenant Payment (which is based on their annual income), LMHA disregards financial aid exceeding amounts received for tuition and fees for all adult full time student.

Approval and Implementation: Activity #40-2014 was proposed and approved in FY 2012. The activity was implemented in FY 2016.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #32-201: Elimination of the Mandatory Earned Income Disregard

Description/Update of Activity: LMHA eliminated the HUD Mandatory Earned Income Disregard from the calculation of total tenant payment for families who are in the Public Housing and HCV programs. This activity increases rent revenues and simplifies the rent calculation.

Approval and Implementation: Approved and implemented in FY 2012.

Hardship: When first proposed, households who had existing EIDs were able to complete their EID terms and receive the applicable income disregards.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #8-2008: Standard Medical Deduction

Description/Update of Activity: Under this activity disabled and elderly families are eligible to receive a \$1,600 standard medical deduction. The standard medical deduction is flexible in that if the families’ health care costs exceed the \$1,600 exemption, the family can choose to have their expenses itemized. The initiative covers families in both the Public Housing and the HCV program. Taken together, the Public Housing and HCV programs greatly reduced administrative costs associated with verifying and calculating medical expense deductions.

Approval and Implementation: Approved and implemented in FY 2009

Hardship: LMHA conducts third party verification of medical expenses for households who claim medical expenses greater than \$1,600. The additional medical expense deduction, beyond the \$1,600 is allowed for these households.

Proposed Changes: LMHA may periodically adjust the standard medical deduction to reflect historical patterns of expenses and/or increases in standard medical insurance premiums. LMHA will report on outcomes in the MTW report. No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #4-2007: Alternate Year Reexaminations

Description/Update of Activity: This activity allows LMHA to conduct a re-certification of elderly and disabled families in the Public Housing and HCV programs once every two years instead of annually.

In the HCV program, eligible households receive a full reexamination every odd numbered fiscal year. In even numbered years, families are required to complete a mini-reexamination packet, which they return to the agency by mail. In the Public Housing program, each year 50% of eligible families receive a full reexamination of eligibility on the anniversary of their lease-up date.

When first implemented, the only households eligible for biennial reexaminations were elderly families and disabled families where the head of household and/or spouse was age 55+. The activity was amended in FY 2012 to include all disabled families; however HCV did not implement this change. In the Public Housing Program, biennial reexaminations for all elderly and/or disabled families began in FY 2016.

Approval and Implementation: Approved and implemented in FY 2008. Amended in FY 2012

Hardship: LMHA will conduct annual reexaminations for any household who believes they would benefit from an annual reexamination frequency.

Proposed Changes: No changes are proposed that require MTW authority; however, LMHA is clarifying that for the HCV program, the biennial reexamination frequency applies to HCV households where the head, co-head or spouse is elderly or over age 55 and disabled and the only source of income for the household is SS or SSI. For these households, LMHA will complete biennial reexaminations and a mini-reexamination on the years between biennial reexaminations during which payment standards and contract rents will be updated.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #6-2008: Earned Income Disregard for Elderly HCV Families

Description/Update of Activity: Under this activity, LMHA provides a \$7,500 earned income disregard to elderly families in the HCV Program whose only other source of income is their Social Security

entitlement. While the disregard affects only a small number of families, it gives elderly families who do choose to work the ability to retain all of the earned income that falls below the threshold.

Approval and Implementation: Approved and implemented in FY 2009

Hardship: Not applicable

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.3 HCV Rent Reform Demonstration

Activity #43-2015: HCV Program - HUD/MDRC Rent Reform Demonstration

Description/Update of Activity: LMHA was selected to participate in a HUD-commissioned six year study to evaluate an alternative HCV rent reform policy (the “Study”). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and reexamination strategies that have been implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency;
- Simplify the administration of the HCV Program;
- Reduce housing agency administrative burden and costs;
- Improve accuracy and compliance of program administration;
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under current rules; and
- Improve transparency of the program requirements.

The Control Group vouchers are being managed using the LMHA’s standard policies. The Alternate Rent Group rent policy includes the following features:

- A revised formula to calculate tenant share of rent and utilities at 28% of gross annual income
- A minimum rent payment from tenants to owners of \$50
- A revised method for determining gross annual income
- Elimination of deductions and allowances
- A disregard of income from assets valued below \$25,000
- A triennial reexamination procedure
- A limited number of interim re-certifications per household per year
- A revised methodology for determining tenant rent to owner
- A simplified utility allowance schedule
- A hardship policy to protect tenants from excessive rent burden

Only vouchers administered under the MTW Program are eligible for the Study; however households receiving a biennial certification are also excluded. The Study is focused on work-able populations, and does not include Elderly Households, Disabled Households, or households headed by people older than 56 years of age (who will become seniors during the course of this long-term study). Households utilizing the childcare expense deduction for purposes of determining adjusted annual income, as well as households participating in Family Self Sufficiency and Homeownership programs, were not eligible for Study selection. In addition, households that contain a mix of members: 1) with an immigration status that is eligible for housing assistance, and 2) with an immigration status that is non-eligible for housing assistance, are not included in the Study. Finally, households receiving case management or supportive services through one of the Housing Authority’s MTW Special Referral Programs are also excluded from the Study.

Households selected for the Alternate Rent Group met with an LMHA Housing Specialist to review the Study and their specific calculation of Total Tenant Payments under both the traditional and Study policies. They then had a period of 30 days to consider whether to select to be excluded from the Study. Study enrollment was completed in December 2015, at which time 775 participants had been enrolled in the Alternate Rent Group and 1,037 in the Control Group. In FY 2019, as a result of households leaving the

program, it is anticipated that the Alternate Rent Group will have 664 households and the Control Group will have 871 households. The study is scheduled to end in 2021.

Approval and Implementation: Approved and implemented in FY 2015

Hardship: The Study offers appropriate hardship protections to prevent any Alternate Rent Group member from being unduly impacted including:

- If the household has a decrease in annual income, the household may request an interim re-certification or other remedies under the hardship process.
- If the limit on interim certification presents a hardship, the household can apply for a Hardship Exemption.
- Where minimum rent to owner exceeds 40% of the household current anticipated gross income, the household may request a Hardship Waiver.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.4 Public Housing Development

LMHA's goal is to transform the aging portions of its physical housing stock in the coming years, replacing these developments with mixed income communities, while at the same time providing replacement units so that the overall number of public housing families served will not decrease. LMHA has implemented several initiatives (both MTW and non-MTW) designed to expedite the redevelopment process and to ensure that all new and newly acquired properties are energy-efficient and cost effective.

Activity#18-2009: Simplification of the Public Housing Development Submittal

Description/Update of Activity: Under this activity LMHA simplifies the proposal process for each acquired or developed public housing property. Twice yearly, LMHA submits a six month report summarizing the agency's acquisition and development activities to the HUD Louisville Field Office. The activity is anticipated to reduce the amount of time staff spends preparing development submittals and reduce the average length of time to close on a property.

Approval and Implementation: Approved and implemented in FY 2009

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #26-2011: Acquisition of Mixed-Income Sites for Public Housing

Description/Update of Activity: This activity was proposed and implemented in the FY 2011 Plan; however, the policy has not yet been used to acquire property at mixed-income sites. The activity authorizes LMHA to acquire units for public housing or vacant land for developing public housing without prior HUD authorization if HUD does not respond to LMHA's request for authorization within 10 days of the submittal date. All acquired properties will meet HUD's site selection requirements. LMHA will request approval of the HUD Field Office when a pending acquisition deviates from the selection requirements and/or at the discretion of the Executive Director. Copies of all required forms and appraisals will be maintained in the project file.

LMHA will utilize the regulatory flexibility provided by this activity in the event that HUD has not responded to LMHA's request for authorization within 10 days of the submittal date. Where applicable, LMHA will use this MTW authority in FY 2019.

Approval and Implementation: Approved and implemented in FY 2011

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.5 Expanded Homeownership Opportunities

The agency continues to focus on expanding homeownership opportunities for low-income families in its Public Housing and HCV programs. LMHA has implemented several MTW policy changes to its HCV Homeownership Program.

Activity #3-2006: Amount and Distribution of HCV Homeownership Assistance

Description/Update of Activity: LMHA uses MTW flexibility to allow for the utilization of a two-bedroom payment standard for all one bedroom eligible HCV Homeownership households. The activity maintains the 110% of Fair Market Rent (FMR) local payment standard for census tracts that are not considered to be exception payment standard areas. In exception areas, 120% of FMR is used.

Approval and Implementation: Approved and implemented in FY 2006

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #13-2009: HCV Homeownership Program – Exception Payment Standards

Description/Update of Activity: Under this activity LMHA adjusts payment standards for the HCV Homeownership Program to 120% of Fair Market Rent in high opportunity census tracts that LMHA has designated as exception payment standard areas.

Exception census tracts are determined by analyzing 5-Year American Community Survey data published by the U.S. Census Bureau. When this activity was first implemented in FY 2009, an exception census tract was defined as one where the *Owner Occupied Median Value* was greater than 100% of the same value for the Metropolitan Statistical Area (MSA) as a whole.

Post implementation of this activity, the vast majority of Homeownership Program participants (nearly 90%) were still purchasing houses in non-exception payment standard areas. In order to boost participants' buying power in areas of opportunity, in FY 2016 LMHA increased the number of exception census tracts by re-defining the criteria to encompass any census tract where the *Owner Occupied Median Value* exceeded 80% of the *Owner Occupied Median Value* for the Louisville MSA as a whole.

Approval and Implementation: Approved and implemented in FY 2009. Amended in FY 2016.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #11-2009: Flexibility in Third Party Verification for HCV Homeownership

Description/Update of Activity: Once approved for the HCV Homeownership Program, families have eight months to execute and close on a proposed sales agreement. Under this activity the income verification completed during the program application process is valid for eight months, staff no longer has to re-verify income for families who take more than 60 days to close on a sale

Approval and Implementation: Activity #11-2009 was proposed and implemented in FY 2009.

Proposed Changes: No changes are proposed that require MTW authority. In the FY 2014 LMHA discontinued the portion of this activity which allowed LMHA to accept tenant provided documents for verification. MTW authority was no longer needed for this portion of the activity. LMHA has removed this change from the closed-out activities matrix as it should just be reflected as a change to this existing activity.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.6 Local Leased Housing Program

LMHA continues to look at its leased housing program to see what policy and program changes might strengthen communities and make them better places to live. Developing comprehensive initiatives in this area will continue to require regulatory relief.

In FY 2019 LMHA will continue to identify Special Referral partners in an effort to provide housing opportunities for vulnerable populations. Additionally, LMHA will continue to review issues surrounding special referral vouchers such as resident choice, portability, term-limits, and voucher replacement to determine feasible alternatives to Special Referral Program structure.

Activity #44-2015: Special Referral MTW HCV Programs

Note: LMHA tracks standard metrics for all of its MTW Special Referral Programs jointly under the umbrella of this single master activity. Individual Special Referral Programs are referred to as “sub-activities”; however, many of these “sub-activities” were originally approved by HUD as individually numbered, standalone MTW activities.

Description/Update of Activity: Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. LMHA provides housing subsidy to HCV-eligible households, while the partnering agency provides social services support. The provision of services helps families make strides towards self-sufficiency, and the programs increase housing choices for low-income families who might otherwise have difficulty succeeding in the privately-managed real estate market.

Families are referred to LMHA by the partner agencies, and program applicants receive an admissions preference for the authority’s HCV Program. Households are required to meet basic HCV eligibility criteria, and the amount of housing assistance each family receives is determined according to traditional HCV Program rules as modified through LMHA’s HUD-approved MTW initiatives.

The voucher recipients participating in some of the agency’s MTW Special Referral Programs are initially required to reside on-site and to meet the partner’s program requirements. However, their voucher resumes full portability after they successfully graduate from the program. As a participant moves from the site, LMHA issues a voucher to the next eligible applicant. For other Special Referral Programs, the voucher is fully portable from the time of admission.

Many of the residential facilities operated by these Special Referral partners are newly constructed or renovated. As such, LMHA has used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HUD Housing Quality Standards (HQS) inspection. This inspection alternative has saved the authority thousands of dollars since Louisville Scholar House first came online in 2008.

Approval and Implementation: Each Special Referral sub-activity is approved in the applicable MTW Plan under which it was submitted.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: LMHA will update the benchmarks for this activity to reflect the addition of 20 vouchers, and will report on outcomes in the FY 2019 MTW Annual Report.

The Villager - Center for Women and Families (CWF) (Sub-Activity #1-2005)

Proposed and implemented in the FY 2005 Plan, LMHA allocates up to 22 vouchers to an MTW Special Referral Program with the Center for Women and Families for their long-term transitional housing on their downtown campus. Programs at the Center focus on the elimination of domestic violence, sexual violence, and economic hardship. Voucher utilization has remained 100%. This activity has increased housing choices and the cost effectiveness of federal funds.

Day Spring (Sub-Activity #7-2008)

This activity was initially proposed and approved in the FY 2009 Plan. It was tabled at the end of FY 2009 due to low voucher utilization, and then re-authorized under the FY 2012 Plan. LMHA provides housing assistance to up to four households with members who have a severe mental illness, as long as they initially reside at a Day Spring constructed unit, while they are participating in the program Day Spring, a faith-based charitable organization, provides residential and supportive services to adults with developmental disabilities who want the opportunity to live independently in a supportive community setting. Under this initiative, not all of the residential units are subject to typical HUD HQS and rent reasonableness requirements.

Louisville Scholar House - Family Scholar House (formerly Project Women) (Sub-Activity #15-2009)

Proposed and implemented in the FY 2008 Plan, LMHA allocates up to 56 vouchers to a Special Referral Program with Family Scholar House for their Louisville Scholar House facility. These solo heads of households often face multiple barriers to furthering their education and obtaining employment that will provide their families with adequate income to become self-sufficient.

Downtown Scholar House - Family Scholar House with Spalding University (Sub-Activity #20-2010)

This activity was proposed in the FY 2010 Plan and implemented in FY 2011. The activity allocates up to 43 Housing Choice Vouchers annually to a Special Referral Program with the Family Scholar House and Spalding University at the Downtown Scholar House.

100,000 Homes Initiative (Sub-Activity #30-2012)

Proposed and approved in FY 2012, LMHA has set aside up to 50 vouchers for a Special Referral Program with the 100,000 Homes initiative of the Louisville Substance Abuse and Mental Health Services Administration (SAMHSA) Community Consortium. This activity increases housing choices and access to services for up to 50 of the most vulnerable homeless persons on the streets of Louisville Metro. Participants in this Housing First model program, who are identified and referred by the Louisville SAMHSA, must be chronically homeless.

Stoddard Johnston Scholar House - Family Scholar House (Sub-Activity #31-2012)

This activity was proposed and approved in the FY 2012 Plan. The activity sets aside up to 57 vouchers for a Special Referral Program with Family Scholar House for their new Stoddard Johnston Scholar House location.

Wellspring - Youngland Avenue Facility (Sub-Activity #34-2012)

This activity was proposed and approved in the FY 2012 Plan and implemented in FY 2012. The activity establishes a Special Referral Program to provide housing assistance to up to five households with members with severe mental illness, as long as they initially reside at Wellspring's Youngland Avenue facility, while they are participating in the program. Wellspring is a charitable organization that addresses Louisville's

need for supportive housing for adults with severe and persistent psychiatric illnesses. Referrals accepted for this initiative are considered to be Mainstream Program participants.

Wellspring – Bashford Manor / Newburg Facility (Sub-Activity #36-2013)

This activity was proposed in the Amended FY 2012 Plan and implemented in FY 2012. The activity establishes a Special Referral Program that provides housing assistance to up to eight households with members with severe mental illness, as long as they initially reside at Wellspring's Bashford Manor / Newburg facility, while they are participating in the program. Referrals accepted for this initiative are considered to be Mainstream Program participants.

Parkland Scholar House - Family Scholar House (Sub-Activity #38-2013)

This activity was proposed and approved through in FY 2013. The activity sets aside up to 53 vouchers, including five vouchers for participants who reside off-campus, for a Special Referral Program with Family Scholar House at their Parkland Scholar House facility. Vouchers become portable upon graduation.

Centerstone (Formerly Seven Counties Services, Inc.) Initiative (Sub-Activity #42-2015)

Proposed and approved in FY 2015, LMHA set aside 50 vouchers to a Special Referral HCV program with Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices and access to services for 50 families referred through Centerstone's Assertive Community Treatment (ACT) team. Assertive Community Treatment is an Evidenced Based Practice approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) and designed to engage persons with a Severe Mental Illness (SMI) whose needs are not met by traditional outpatient services. Services are delivered in the context and environment where they are needed (i.e. the team goes to the person). The priority population is adults with a severe mental illness who are currently institutionalized at a personal care home or at risk of being institutionalized because of a lack of adequate community support. Lack of on-site support is one of the primary reasons this priority population has been unsuccessful in achieving sustained psychiatric stability in the past. Assertive Community Treatment fills this gap, and assists the program participants in achieving and maintaining community integration. Those persons originally from Jefferson County but placed in a personal care home in another region of the State will be considered for return to the Louisville area.

Riverport Scholar House - Family Scholar House (Sub-Activity #46-2017)

Proposed and approved in FY 2017, the activity sets aside up to 64 vouchers for a Special Referral Program with Family Scholar House at their new Riverport Scholar House facility. Vouchers become portable upon graduation.

ChooseWell Communities, Inc. (Sub-Activity #47-2017)

Proposed and approved in FY 2017, LMHA expanded its successful existing partnership with ChooseWell Communities' Thrive Program, which assists families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance. In FY 2016, LMHA allocated up to 10 vouchers to this program; this was increased by 60 vouchers in FY 2017. Seventy (70) vouchers are allocated to referrals from ChooseWell Communities.

Allocate MTW Housing Choice Vouchers to Special Referral Programs (Sub-Activity #35-2012)

Proposed and approved in FY 2012, LMHA may, without prior HUD approval, allocate up to 10 MTW Housing Choice Vouchers to an MTW Special Referral Program for service-enriched, affordable housing programs within the agency's jurisdiction. Eligible programs will offer housing and supportive services targeted to families whose needs are not adequately served elsewhere in the community. Some allocations may be incremental additions to existing Special Referral Programs while others will be allocations to newly established programs.

- **FY 2012**
Up to 10 vouchers to Coalition for the Homeless for homeless families with children.
- **FY 2013**
Up to 10 additional vouchers to the Coalition for the Homeless for homeless families with children.
- **FY 2014**
Up to 4 vouchers to Choices, Inc. to provide permanent supportive housing for homeless families, including case management.
- **FY 2016**
One additional voucher to Choices, Inc. to provide permanent supportive housing for homeless families, including case management;

Up to 10 vouchers to Wellspring for families with members with severe mental illness who are exiting Wellspring's Ardery House facility for permanent housing. These vouchers are only issued to households that are not eligible for an Olmstead voucher. Wellspring continues to provide case management / peer specialist services to all clients utilizing these vouchers

Up to 10 vouchers to the Kentucky Housing Corporation. These vouchers are available to low-income households where a family member meets one of the following criteria:
 1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals
 2. Persons with severe mental illness who are at risk of institutionalization
 3. Persons with disabilities exiting nursing homes and intermediate care facilities for individuals with intellectual or other developmental disabilities
Up to 10 vouchers to ChooseWell Communities' Thrive Program to assist families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance.
- **FY 2017**
Up to 10 vouchers to Family & Children's Place for Olmsted-eligible families participating in the organization's Homeless Prevention Program, which serves families that include at least one individual who is leaving an institution and is also at risk of homelessness. This population includes individuals leaving prison after being paroled or serving out their sentence; individuals who have aged out of foster care; and individuals who have a high rate of hospitalization due to a Severe Mental Illness. Participants receive case management.
- **FY 2018**
Up to 10 vouchers to St. Vincent DePaul's Transitional Housing Program, which assists families with children, where the family is either homeless or at risk of becoming homeless, combining housing support with case management services. Participants will initially reside at 1015-A S Preston Street; however, vouchers remain fully portable. Inspections will be conducted with each new occupant and once per year concurrently.

Up to 10 vouchers to the House of Ruth to assist individuals who are homeless and HIV-positive, combining housing with wraparound social service support services, including:

1. A safe, drug and alcohol-free community living environment;
2. Intensive case management;
3. Group and individual mental health counseling;
4. Intensive outpatient substance abuse treatment;
5. Life skills education; and
6. Transportation assistance.

Special Referral Program participants will be required to live at the House of Ruth's Glade House, a single-room occupancy facility for two years, after which time vouchers become fully portable. Inspections will be conducted with each new occupant and once per year concurrently.

- **FY 2019**

Up to 10 vouchers will be allocated to individuals participating in the ShelterWorks program. The Office of Resilience and Community Services (RCS) started the ShelterWorks program which connects individuals in shelters to intensive wrap around services, training and job connections. As housing is such a basic need, it is anticipated that providing the Housing Choice Vouchers will increase the rate of attainment of self-sufficiency for program participants.

Up to 10 vouchers will be allocated to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (*the Home*) is where Louisville's vulnerable children and youth find emotional, physical, and intellectual support that can transform their lives. The Home provides the community with a range of important residential, treatment and community-based programs.

One additional voucher will be allocated to Choices, Inc. to provide permanent supportive housing for homeless families including case management.

Table 8: LMHA Special Referral MTW Voucher Programs FY 2019

Organization	Site	Voucher Allocation	FY Proposed	FY First Voucher Issued	Portable?	Streamlined Admission?	MTW Inspections?
100K Homes Initiative	N/A	50	2012	2012	Full portability upon program completion	No	No: Traditional inspection protocol.
Center for Women and Families	Villager	22	2005	2005	Full portability upon program completion	Yes	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and once per year concurrently.
Centerstone	N/A	50	2015	2015	Full portability upon program completion	No	No: Traditional inspection protocol.
Choices, Inc.	Choices owned units	6	2014	2014	Full portability upon program completion	No	No: Traditional inspection protocol.
ChooseWell Communities	N/A	10 in 2016 + 60 in 2017	2016, 2017	2016	Full portability upon program completion	No	No: Traditional inspection protocol.
Coalition for the Homeless	N/A (Rapid Re-housing)	20	2012	2013	Full portability upon program completion	No	No: Traditional inspection protocol.
Day Spring	Day Spring constructed units	4	2009	2009, 2012*	Full portability upon program completion	Yes	No: Traditional inspection protocol.
Family & Children's Place	N/A	10	2017	2017	Full portability upon program completion	No	No: Traditional inspection protocol.
Family Scholar House	Louisville	56	2008	2008	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used. After initial move-in, with new occupant and once per year concurrently.
	Downtown	54	2010	2011			
	Stoddard Johnston	57	2012	2012			
	Parkland + 5 off-site	53	2012 Amended	2012			
	Riverport	64	2017	---			
House of Ruth	Glade House	10	2018	---	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Kentucky Housing Corporation	N/A	10	2016	2016	Full portability upon program completion	No	No: Traditional inspection protocol.
St. Vincent dePaul	1015-A S. Preston St.	10	2018	---	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Wellspring	Youngland Avenue	5	2012	2012	Full portability upon program completion	Yes	No: Traditional inspection protocol.
	Bashford Manor/Newburg	8	2012	2013		No	
	N/A	10	2016	2016		No	
Office of Resilience and Community Services (ShelterWorks)	N/A	10	2019	2019	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Home of the Innocents	Home of the Innocents	10	2019	2019	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.

*Referral program suspended during FY 2010 and FY 2011.

Activity #2-1999: MTW Unit Inspection Protocol

Description/Update of Activity: Unit inspections of facilities at LMHA’s Section 8 certificate programs that are managed by organizations with which the Agency has had a long-term and outstanding relationship, are waived upon initial occupancy and held once per year concurrently. Section 8 certificate programs include YMCA SRO, Roberts Hall and St. Vincent de Paul, and Willow Place. These facilities have been receiving assistance for over 10 years. This activity has significantly reduced costs to inspect the units “tied” to these programs. In 2013, LMHA began inspecting units at Villager at the Center for Women and Families once per year, concurrently. At the time of initial occupancy by voucher holders, the units were new and had achieved certificate of occupancy issued by Louisville Metro inspectors.

Approval and Implementation: Approved and implemented in FY 1999

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #27-2011: Amend HCV Admissions Policy to Allow for Deduction of Child-Care Expenses in Determination of Eligibility

Description/Update of Activity: This activity allows for the deduction of verified ongoing child-care expenses from a working household’s gross income when determining income eligibility. In order to qualify for the adjustment, the family must include a head of household, co-head, and/or spouse with a demonstrated work history for a period of 12 months or longer. While this activity was designed to increase housing choice for working families with children who may be struggling to make ends meet, LMHA has determined that it also achieves the HUD Standard metrics of “Reducing the per Unit Subsidy Costs” for participating households and “Increases Agency Rental Revenue.”

Approval and Implementation: Approved and implemented in FY 2011

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #39-2014: HCV Program Rent Increase Limit

Description/Update of Activity: Under this MTW activity LMHA places a 2% cap on annual contract rent increases for units where the tenant is already receiving HCV rental assistance. At contract renewal, LMHA limits the landlord’s requested rent to whichever is least: 102% of the previous contract rent for the same tenant; the (exception) payment standard; or to the rent as determined through a rent reasonableness analysis.

Approval and Implementation: Approved and implemented in FY 2014

Proposed Changes: In FY 2019 LMHA proposes to modify this activity by revising the landlord’s requested rent to reflect the lesser of 102% of the previous contract rent for the same tenant or the

(exception) payment standard. LMHA will conduct reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. LHMA will use the SEMAP sample size requirements to dictate the number of RR determinations to be completed and will establish the universe as the number of units with requested rent increases. If the rent on more than 20% of sampled units, as a result of application of the policy, is not reasonable when compared with the RR determination, LMHA will conduct RR determinations on double the initially established sample size. LMHA will monitor outcomes and may modify this policy to ensure rents are reasonable, i.e. revise sample size requirements.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #50-2018: Increasing Housing Options for Relocating Beecher Terrace Families

Description/Update of Activity: HUD awarded LMHA a \$29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. To facilitate this revitalization effort, Beecher families are being relocated in three phases. The first began in May 2017 (121 units); the second phase will follow in 2018 (370 units); and the third phase will occur in 2019 (267 units).¹

LMHA estimates that 409 families are eligible for one-bedroom units based on their household size and composition. While the first phase of relocation included a relatively small number of one-bedroom-eligible families (49), phases II and III will include significantly more families moving to one-bedroom units – an estimated 180 families in each phase.

LMHA is committed to offering these families as wide a range of housing options as possible, including Housing Choice Voucher (HCV) units (often referred to as Section 8). Additionally, over the next few years, LMHA anticipates that the HCV Program will be tasked with absorbing more new one-bedroom-eligible families.

While successfully relocating Beecher residents is the Housing Authority's top priority, LMHA is also dedicated to serving especially vulnerable populations within the Louisville community. Increasing the number of HCV units available to Beecher residents will ensure that an adequate supply of units is available to meet both goals.

To increase the range of housing options available to relocating Beecher Terrace families and to increase the ability of the Housing Authority's HCV Program to absorb additional one-bedroom-eligible households, LMHA will adopt the following policies:

- Increase Payment Standard for One-Bedroom-Eligible Households (Relocating Beecher Terrace Households Only).
LMHA will offer a two-bedroom payment standard to all one-bedroom-eligible households moving from the Beecher Terrace public housing development to an HCV unit in relocation

¹ Beecher households will be relocated in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), as described at 49 CFR Part 24, and in accordance with Section 104(d) of the Housing and Community Development Act, whose requirements are specified at 24 CFR Part 42.

phase II or III.² Both the regular two-bedroom payment standard (set at 100% of FMR) and the increased two-bedroom payment standard offered to families leasing in high opportunity census tracts (set at 110% of FMR) will be available to these households.

One-bedroom-eligible families will only be permitted to use the two-bedroom payment standard to lease a two-bedroom unit. If a family chooses to lease a one-bedroom unit, they will receive the one-bedroom payment standard. Although LMHA does not anticipate any relocating households will select a zero-bedroom unit, should they do so, they will receive the zero-bedroom payment standard.

Of the 360 one-bedroom-eligible households to be relocated from Beecher in relocation phases II and III (approximately 180 in each phase), LMHA estimates 190 will elect a tenant-based voucher for their move. Of these 190 households, the Housing Authority further anticipates that approximately 150 families will opt for the two-bedroom payment standard and lease a two-bedroom unit.

- HCV Owner Incentive Fee (HCV Program-Wide).

To encourage owner participation in the HCV Program and increase the inventory of one-bedroom units available to these relocating Beecher families within the Louisville Metro area, LMHA will pay a \$1,000 incentive fee to owners who lease a one-bedroom unit to a family entering LMHA's HCV Program (to include relocating Beecher families). For the purposes of this activity, a family will be considered to be "newly-admitted" and the unit eligible for an incentive fee if:

- The family is signing a lease under the HCV Program for the first time;
- The family is moving from one LMHA housing program to another (e.g., moving from the Public Housing Program to the HCV Program);
- The family is using the portability provisions provided through the HCV Program to move with continued HCV assistance from another Public Housing Agency's jurisdiction to LMHA's jurisdiction; or
- The family has experienced an interruption of voucher assistance where the Public Housing Agency formerly assisting the family submitted an End of Participation action to HUD using form HUD-50058 or HUD-50058 MTW.

The incentive fee will be paid in two installments of \$500 each, with the first installment paid during the first month of the HAP contract and the second installment paid following the first anniversary of the HAP contract's effective date. Should the HAP contract be terminated for any reason within the first year, the owner will not receive the second \$500 installment.

The current Russell CNI Implementation Grant Program Schedule anticipates that families included in the second phase will be relocated between April 2018 and September 2018, while families included in the third phase will be relocated between March 2019 and September 2019.

In FY 2018 LMHA will begin offering incentive fees to owners who lease one-bedroom units to newly-admitted HCV families. LMHA will stop offering new incentive fees to owners once all Beecher Terrace households have been relocated (The current Russell CNI Implementation Grant Program Schedule

² Relocation Phase I was completed in December 2017. Thus, this activity will only apply to families relocating from Beecher in phases II and III.

anticipates relocation will be completed in September 2019). The Housing Authority will continue to pay out second installments of the incentive fee to eligible owners for approximately one additional year (through late 2020).

MTW activity #50-2018 will be closed out once the second incentive fee installment has been paid to all eligible owners, approximately one year after Beecher relocation is completed.

Approval & Implementation: Approved and implemented in FY 2018

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

A.7 Broader Use of Funds Initiatives

Activity #37-2014: Accessible Units Sublease Agreement with Frazier Rehab Institute

Description/Update of Activity: This activity allows LMHA to sublease fully accessible units as temporary housing for Spinal Cord Injury (SCI) out-patients of Frazier Rehab Institute. The units are transitional housing provided for up to six months per family. Frazier Rehab Institute is responsible for verifying that the family is eligible to live in the unit (e.g., a program participant, household income is at or below 80% AMI). Two fully-accessible units located at the Liberty Green Community Center are dedicated to this activity. The Community Center is ideally located one-half mile from the Frazier Rehab Institute. Frazier Rehab leases the apartments from LMHA and pays the cost of all utilities. Rent to Frazier Rehab is set at \$210 per month (or roughly 30% of monthly SSI for one person), and Frazier Rehab has agreed to pass on no more than 100% of the rent plus utilities to the tenant (the sub lessee). Frazier Rehab uses a modified version of LMHA's public housing lease as its tenant sublease. Frazier Rehab also refers sub lessees to area service providers, including the Center for Accessible Living (Kentucky's first Independent Living Center), who can assist households with leaving the program.

Approval and Implementation: Approved and implemented in FY 2014

Hardship: Frazier Rehab has established a hardship policy to define circumstances under which households may be exempted or temporarily waived from the rent Frazier Rehab may charge to the sub lessee. Examples could include involuntary loss of income or unexpected medical expenses.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #29-2015: Public Housing Sublease Agreement YouthBuild Louisville

Description/Update of Activity: This activity allows YouthBuild Louisville (YBL) to sublease public housing units to provide temporary housing for low-income YBL participants who are experiencing homelessness. LMHA subleases up to three 2-bedroom apartments for the use of YBL participants (and their families) and facility space for the YBL program. Units are provided to YBL on an as needed basis. This activity using public housing as an incentive for young people to enroll in the YBL job training program, which increases their chances of becoming self-reliant.

For each month a unit is occupied by an YBL program participant, YBL pays LMHA \$60. YBL certifies that students are income eligible upon entry to the YBL program through the application process and follow-up verification through local and state subsidy programs. The participant and their household may continue to live in the unit as long as they are active in the YBL program. Upon graduation, the household may elect to receive preference for a public housing unit.

All participants residing in the subleased public housing units must meet basic Public Housing Program eligibility criteria (no outstanding rent balance with LMHA or other public housing authority, criminal background check, age 18 or older). LMHA staff verifies that the YBL program participant is eligible for this MTW initiative. Temporary housing for Youthbuild participants is provided at 550 Apartments.

Approval and Implementation: Approved and implemented in FY 2015.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #49-2018: Beecher Terrace CNI Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing

Description/Update of Activity: HUD awarded LMHA a \$29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All buildings on the current Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community.

Current Beecher Terrace households will be relocated in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), as described at 49 CFR Part 24, and in accordance with Section 104(d) of the Housing and Community Development Act, whose requirements are specified at 24 CFR Part 42. Post-revitalization, relocated Beecher Terrace households will receive a lifetime admission preference for both on-site and off-site replacement units.

LMHA anticipates that most (if not all) of the 442 off-site replacement units will be subsidized through the Housing Authority's Local Project-Based Voucher (PBV) Program. While LMHA believes that there will be a strong response from local developers and owners interested in project-based assistance for their developments, the provision of such a large number of Beecher Terrace replacement units by September 30, 2023 will be a challenge, and the Housing Authority has no interest in waiting to see if the private market will fully accomplish this task.

To this end, LMHA is actively pursuing opportunities to acquire properties where the Housing Authority can provide off-site replacement housing itself without relying on a 3rd-party developer or owner.

The challenge then becomes how to structure the financing of the acquisition in such a way that at least half of the units will not receive direct, ongoing operating subsidy and at least 20% of the units will be available to households with incomes above 60% of AMI. Since half of the units cannot receive direct, ongoing operating subsidy, they must be purchased outside of Section 8 and Section 9. The only way for LMHA to accomplish this goal is through the exercise of MTW Broader Use of Funds authority, which would allow the Housing Authority to acquire the unsubsidized units outside of Section 8 and Section 9 using MTW Single Fund dollars, provided the purchased units are restricted to households whose income does not exceed 80% of AMI.

If FY 2019, LMHA will consider the purchase two 4-plexes. Four of the units will be used as Beecher replacement housing and four of the units will be acquired using MTW Broader Use of Funds. The purchase is contingent upon financing and building conditions. These units will be restricted to households with incomes below 80% of AMI, but will not receive direct, ongoing operating subsidy. LMHA is also examining the feasibility of acquiring a second, 12-unit apartment building in Russell where the same funding structure would be used.

LMHA views the acquisition of the two Russell neighborhood 4-plexes as a pilot project to determine whether this unique approach to the provision of mixed-income replacement housing developments is indeed feasible. Once the agency has "proof of concept," the Housing Authority plans to pursue additional

acquisitions of this nature in furtherance of its CNI Transformation Plan commitments. Given the tight time restraints of the CNI Implementation grant, LMHA anticipates the pilot phase will last no more than one year.

Approval and Implementation: Approved and implemented in FY 2018

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LHMA will report on outcomes in the MTW Annual Report.

Activity #48-2018: Local Project-Based Voucher (PBV) Program

Description/Update of Activity: HUD awarded LMHA a \$29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All buildings on the current Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community.

Today's Beecher Terrace includes 758 public housing dwelling units that together contain 1,317 bedrooms. Per the Housing Authority's CNI Implementation Grant Agreement with HUD, LMHA must replace **all 1,317 bedrooms** currently on the site. LMHA has further committed to replacing **all 758 units** on the site, ensuring that the same number of households residing at Beecher today will be housed post-revitalization.

By September 30, 2023, LMHA plans to develop 758 new Beecher Terrace Replacement units, leveraging a \$29,575,000 CNI Implementation grant and more than \$200 million in additional committed funds, to create a diverse array of housing choices for low-income families. The new housing will be operated in a manner that increases the cost effectiveness of federal expenditures by reducing income/asset verification and inspection costs. The Housing Authority anticipates that all or nearly all of the 758 Beecher Terrace replacement units will be subsidized with Project-Based Voucher (PBV) assistance.

In order to deliver on this large-scale commitment within a limited time frame, and while meeting all other CNI program requirements, LMHA plans to utilize the regulatory flexibilities provided through MTW to create a Local PBV Program.

This Local PBV Program will not be limited to Beecher replacement units; however, the provision of these units will be the central goal of the Program until all 1,317 pledged bedrooms have been delivered through the creation of approximately 758 affordable dwelling units.

The Housing Authority's Local PBV Program has been designed with the following key objectives in mind:

- Supporting neighborhood revitalization, especially the transformation of the Russell neighborhood (which includes Beecher Terrace), by creating new housing choices that provide in-neighborhood relocation options for displaced LMHA residents and attract new residents to the neighborhood;
- Increasing housing choices for low-income families in high-opportunity areas;
- Providing options for low-income families to live in mixed-income and mixed-use developments; and
- Incentivizing developers to preserve or create affordable housing units that expand housing options for low-income families.

LMHA's Local Project Based Program includes the following:

- PBV proposals may be selected based on any one of the following three methods:
 - The results of a previous competition (no MTW authority required);
 - Issuance of a Request for Proposals, which may be limited to a specific site or sites or to geographic areas that meet certain criteria (for example, non-impacted census tracts); or
 - Selection of LMHA-owned properties without a competitive process or prior HUD approval.
- Up to 100% of units within any given project may be awarded PBV assistance. However, in furtherance of the Housing Authority's commitment to the development of mixed-income housing, at its sole discretion, LMHA may limit the percentage of units that may be project-based at any given project to some amount less than 100%.
- When LMHA has received owner notice that the rehabilitated or newly constructed housing is completed, the Housing Authority will inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter a HAP Contract (AHAP), including compliance with HQS standards, except that in lieu of LMHA inspection of the units, the owner may submit the Certificate of Occupancy issued by Louisville Metro Government as evidence of compliance.
- LMHA will not inspect units at new tenant turnover. LMHA will inspect all units within a specific building concurrently once per year. Should the owner add or substitute a unit covered under the HAP contract, LMHA will inspect the new or substitute unit before providing assistance to that unit. LMHA will also conduct complaint inspections upon tenant request. LMHA may still choose to rely on an alternative inspection process at mixed-finance properties in lieu of an annual inspection. However, the LMHA will ensure that all units are inspected at least once per year.
- For the purpose of determining the order in which families on the Housing Authority's PBV waiting list are referred by LMHA to the owner of a project-based elderly or elderly/disabled building, an "Elderly Family" will be defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 55 years of age. It may include two or more persons who are at least 55 years of age living together, or one or more persons who are at least 55 years of age living with one or more Live-In Aides.
- The income eligibility limit for PBV units will be increased from 50% to 80% of Area Median Income (AMI) except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd-party funding sources (for example, units that also have low-income housing tax credits or funding awarded through the National Housing Trust Fund). In the case of funding sources that impose an income cap that falls between 50% and 80% of AMI, the maximum allowable income cap will be used (For example, PBV units that also have low-income housing tax credits capped at 60% of AMI, would have an income eligibility limit of 60% of AMI).
- For PBV units that are also low-income housing tax credit (LIHTC) units, LMHA will utilize the LIHTC program's Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at reexamination.

LMHA will prepare a local HAP contract that reflects the approved modifications of LMHA's Local Project Based Program as well as prepare PB Tenancy Addendums which reflect the MTW policies.

LMHA already uses a number of HUD-approved MTW activities within its HCV Program. The Housing Authority plans to use the following eligibility, rent, and occupancy flexibilities in its PBV Program as well:

- Alternate year reexaminations of elderly and disabled families (Activity #4-2007)
- Elimination of standard earned income disregard (Activity #32-2012) and creation of new earned income disregard for elderly families (Activity #6-2008)
- Standard medical deduction (Activity #8-2008)
- Deduction of childcare expenses when determining Program eligibility (Activity #27-2011)
- Annual contract rent increase limit (Activity #39-2012)
- Financial aid disregard in calculation of Total Tenant Payment (Activity #40-2014)

LMHA is reviewing financing and existing conditions for two turnkey four-plexes (8 units in total) in the Russell neighborhood at which it would like to project-base assistance for four units. As all Beecher replacement units will be in mixed-income developments, the other four units will also be restricted to families whose household income is below 80% of AMI, but these non-PBV units will not receive direct, ongoing subsidy. LMHA is also examining the feasibility of acquiring a second, 12-unit apartment complex in the Russell neighborhood, at which it would also like to project-base assistance at half of the units, while restricting the balance to families whose household income is below 80% of AMI. LMHA will continue to pursue the acquisition of properties suitable for use or development as Beecher Terrace replacement units and will project-base assistance at such properties

LMHA will complete proposal selection for PBV awards in FY 2019, awarding approximately 160-200 PBV vouchers annually in order to fulfill its commitment to create 758 new PBV units by September 30, 2023. Once all Beecher Terrace replacement units have been provided, the Housing Authority will make a determination as to whether or not it should close the application process for its Local PBV Program.

Approval and Implementation: Approved and implemented in FY 2018

Hardship: At the family's request, LMHA staff will conduct a second verification of income and assets instead of relying on the PBV owner provided Tenant Income Certification form. Families will also have recourse through the Housing Authority's informal hearing process.

Proposed Changes: Under the Housing Opportunity Through Modernization Act, the length of the term of the initial HAP contract for any HAP contract unit may not be less than one year nor more than 20 years. In addition, PHA's may agree to enter into an extension (at the time of the initial HAP contract execution or any time before the expiration of the contract, for an additional term of up to 20 years. As MTW authority is no longer needed to implement this portion of the LHMA's Local Project Based Program, LMHA removing this provision from the MTW activity.

Through this FY 2019 MTW Annual Plan Amendment, LMHA is proposing a modification to MTW Activity 48-2018. This modification does not require any additional MTW authorizations beyond those previously approved by HUD:

1. **PBV Proposal Selection** – Pursuant to 24 CFR 983.51(b)(2), "The PHA may select, without prior competition, a proposal for housing assisted under a federal, State or local government housing assistance, community development or supportive services program that required competitive selection of proposals (e.g. HOME, and units for which competitively awarded low-income housing tax credits (LIHTC) have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within 3 years of the PBV proposal selection date, and the earlier

competitively selected housing assistance proposal did not involve any consideration that the project would receive PBV assistance.” LMHA proposes to waive this regulatory provision and to implement the following policy: *LMHA may select, without prior competition a) a proposal for housing currently assisted with either 4% or 9% Low Income Housing Tax Credits (LIHTC), provided that the LIHTC award did not involve any consideration that the project would receive PBV assistance; or, b) a proposal for housing assisted under a federal, State or local government housing assistance, community development or supportive services program that required competitive selection of proposals, where the proposal has been selected in accordance with such program’s competitive selection requirements within 10 years of the PBV proposal selection date, and the earlier competitively selected housing assistance proposal did not involve any consideration that the project would receive PBV assistance.* Based on its assessment of the local housing market, LMHA believes that this alternative MTW policy will expand the range and number of potential Local Project Based Voucher Program units in opportunity neighborhoods. The waiver of 24 CFR 983.51 is authorized per the FY 2018 MTW Annual Plan approval for the Local Project Based Voucher program activity; thus, no additional MTW waivers are required.

Changes to Metrics: There are no changes to baselines or benchmarks. LMHA will report on outcomes in the MTW Annual Report.

Activity #50-2018: Increasing Housing Options for Relocating Beecher Terrace Families

Description/Update of Activity: HUD awarded LMHA a \$29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All 758 public housing units currently on the Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community.

As units must be emptied before each new phase of demolition and construction can begin, Beecher families are being relocated in three phases. LMHA staff has determined that a larger proportion of households than originally anticipated will need one-bedroom units. While today’s site has 355 one-bedroom units, there are a number of other current Beecher families who are over-housed resulting in an estimated 409 families who are one-bedroom-eligible based on their household size and composition.

LMHA is committed to offering these families as wide a range of housing options as possible, including Housing Choice Voucher (HCV) units (often referred to as Section 8). Thus, the Housing Authority is proposing several changes to its HCV Program to ensure that the local housing market is able to absorb the approximately 95 one-bedroom-eligible Beecher households who are projected to seek an HCV unit in 2018 and the additional 95 families expected to do the same in 2019.

While successfully relocating Beecher residents is the Housing Authority’s top priority, LMHA is also dedicated to serving especially vulnerable populations within the Louisville community. Increasing the number of HCV units available to Beecher residents will ensure that an adequate supply of units is available to meet both goals.

To increase the ability of the Housing Authority’s HCV Program to absorb additional one-bedroom-eligible households, LMHA will offer two options:

- **Increased Payment Standard for One-Bedroom-Eligible Households** (Relocating Beecher Terrace Households Only): LMHA will offer a two-bedroom payment standard to all one-bedroom-eligible households moving from the Beecher Terrace public housing development to an HCV unit in relocation phase II or III. Both the regular two-bedroom payment standard (set at 100% of FMR)

and the increased two-bedroom payment standard offered to families leasing in high opportunity census tracts (set at 110% of FMR) will be available to these households.

One-bedroom-eligible families will only be permitted to use the two-bedroom payment standard to lease a two-bedroom unit. If a family chooses to lease a one-bedroom unit, they will receive the one-bedroom payment standard. Although LMHA does not anticipate any relocating households will select a zero-bedroom unit, should they do so, they will receive the zero-bedroom payment standard.

- **HCV Owner Incentive Fee (HCV Program-Wide):** To encourage owner participation in the HCV Program and increase the inventory of one-bedroom units available to these relocating Beecher families within the Louisville Metro area, LMHA will pay a \$1,000 incentive fee to owners who lease a one-bedroom unit to a family entering LMHA's HCV Program (to include relocating Beecher families). For the purposes of this activity, a family will be considered to be "newly-admitted" and the unit eligible for an incentive fee if:
 - The family is signing a lease under the HCV Program for the first time;
 - The family is moving from one LMHA housing program to another (e.g., moving from the Public Housing Program to the HCV Program);
 - The family is using the portability provisions provided through the HCV Program to move with continued HCV assistance from another Public Housing Agency's jurisdiction to LMHA's jurisdiction; or
 - The family has experienced an interruption of voucher assistance where the Public Housing Agency formerly assisting the family submitted an End of Participation action to HUD using form HUD-50058 or HUD-50058 MTW.

The incentive fee will be paid in two installments of \$500 each, with the first installment paid during the first month of the HAP contract and the second installment paid following the first anniversary of the HAP contract's effective date. Should the HAP contract be terminated for any reason within the first year, the owner will not receive the second \$500 installment.

In FY 2019 LMHA will complete the third phase of Beecher relocation. LMHA anticipates that this activity will be closed out once the second incentive fee installment has been paid to all eligible owners, approximately one year after Beecher relocation is completed (late 2020).

Approval and Implementation: Approved and implemented in FY 2018

Proposed Changes: **Proposed Changes:** No changes are proposed that require MTW authority.

Changes to Metrics: There are no changes to baselines or benchmarks. LMHA will report on outcomes in the MTW Annual Report.

B. MTW Activities Not Yet Implemented

Develop Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing (Activity #28-2011)

The activity is to explore using MTW authority to create locally defined guidelines for the re/development, maintenance, and modernization of public housing. LMHA plans to develop reasonable and modest design guidelines, unit size guidelines, and unit amenity guidelines for new and ongoing public housing development activities. The criteria will focus on strategies for developing sustainable housing, preserving affordable housing, and developing low-income housing in low-concentration, non-impacted areas of the agency's jurisdiction. Strategies include rehabilitation and new construction standards that reduce energy consumption, including Energy Star criteria, and that increase the supply of accessible housing in the community.

There have been no non-significant changes or modifications to this activity since its approval. Planning for this activity will be ongoing during FY 2019 in conjunction with the Housing Authority's Choice Neighborhoods Initiative efforts for the Russell neighborhood and the Beecher Terrace public housing development. As part of this process, LMHA is examining innovative ways to provide one-for-one replacement of the 758 Beecher Terrace public housing units, including the potential use of locally defined guidelines for the development, maintenance, and modernization of public housing. Any locally defined guidelines resulting from the Choice process would be officially proposed to HUD as an amendment to this Plan.

Activity #28-2011 was proposed and approved in FY 2011. It has not yet been implemented.

C. MTW Activities On Hold

Public Housing Sublease Agreement with Catholic Charities (Activity #25-2010)

Proposed and approved in the FY 2010 Plan, this activity has been tabled. HUD OGC investigated the use of public housing as emergency housing for victims of human trafficking and found that it was not feasible under MTW to permit families who could not produce valid identification to live in public housing communities. During FY 2019, LMHA will continue to investigate both MTW and non-MTW methods for serving this extremely vulnerable population.

D. Closed-Out MTW Activities

Spatial Deconstruction of HCV Assisted Units (Activity #5-2007)

LMHA proposed this initiative in the 2007 Annual Plan and it was approved by HUD. The activity was to limit the concentration of Housing Choice Voucher assisted units in complexes of one hundred or more units to 25% (excluding both elderly/disabled and special referral program sites). This activity was closed at fiscal yearend 2009 because of its potential to limit voucher holders' universe of housing choices.

Public Housing - Term Limits and Employment/Education Requirements for New Scattered Sites (Activity #9-2007)

Proposed and implemented in FY 2007, this activity revised the occupancy criteria for detached, single family, scattered site units to include 5-year residency term limits and employment/education requirements for admission and ongoing occupancy. Due to continued low occupancy rates at these sites, the activity was revised in FY 2016 to remove the 5-year residency term limit; however, this change did not increase occupancy rates to levels LMHA deemed acceptable. LMHA stopped enforcing the employment/education requirements associated with these units effective April 1, 2017, and closed out this activity in the FY 2017 Annual Report, reporting final outcomes and lessons learned at that time.

Explore HUD's Streamlined Demolition and Disposition Application Process for MTW Agencies (Activity #16-2009)

Proposed and approved in the FY 2009 Plan, this activity was never implemented. HUD investigated the possibility of streamlined demolition/disposition activities for MTW agencies but found that it was not feasible under MTW. Out of concern for residents' rights and the public process, HUD decided that MTW agencies must follow the established procedures for demolition and disposition of property.

Occupancy Criteria Changes for New Scattered Sites – Mandatory Case Management (Activity #21-2010)

Proposed and implemented in FY 2010, this activity revised the occupancy criteria for detached, single-family scattered site units to include mandatory participation in a case management program and movement toward self-sufficiency. Residents moving into one of these units could choose between General Case Management and the Family Self-Sufficiency (FSS) Program.

Due to low occupancy rates at these sites, this activity was closed out in early FY 2016.

Increased Flat Rents (Activity #24-2010)

LMHA proposed this initiative in the 2010 Annual Plan and it was approved by HUD. LMHA proposed flat rents for the Agency's scattered sites be raised and adjusted based on the square footage, location, age and amenities at the property as rent comparables for the site are completed. LMHA will not implement this activity in lieu of adopting the MTW policy total tenant payment is calculated based on 30% of income, which was approved in FY 2012 and marked the "close out" of the Flat Rent Activity.

Rents Set at 30% of Adjusted Income – Public Housing Program (Activity #33-2012)

Proposed and implemented in the FY 2012 Plan, families receiving rental assistance under the Public Housing program will pay either 30% of their monthly adjusted income for rent, or the minimum rent established by the LMHA, whichever is higher.

In 2012, LMHA proposed to eliminate flat rents and, upon further consideration, because the Authority's housing stock includes units financed with tax credits, LMHA is considering an amendment to the activity. LMHA may amend the activity to include "ceiling rents" that will vary by bedroom size and that will be in

accordance with the annual tax-credit ceiling rents, as published by the Kentucky Housing Corporation (KHC). KHC is the tax credit allocating agency for the Commonwealth of Kentucky. The proposal to change this activity will be made via a future Plan amendment including the planned ceiling rents and the associated impact analysis as required by the Agency's Standard MTW Agreement with HUD.

In 2014, LMHA decided not to pursue this activity. Instead, the Agency revised its flat rent structure. LMHA anticipates that higher flat rents will achieve the goals of the proposed activity within HUD's existing regulatory framework.

MTW Special Referral Program – Coalition for the Homeless “Move Up” Initiative (Activity #45-2016)

Proposed and implemented in FY 2016, the “Move Up” Special Referral Program in partnership with the Coalition for the Homeless allocates up to 100 vouchers to formerly homeless families, allowing them to transition from homeless services vouchers to HCV vouchers, thus freeing up additional homeless services vouchers to serve currently homeless families. Upon further review of this activity, the Housing Authority, with MTW Office concurrence, has determined that this partnership can be continued without MTW authority through the provision of a “limited admission preference” to the agency's HCV Program.

This determination is based on HUD guidance provided through PIH Notice 2013-15, “Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher programs,” which makes the following provision on page 6:

PHAs may create a preference or limited preference specifically for people who are referred by a partnering homeless service organization or consortia of organizations (for example, an organization that refers people transitioning out of a shelter, transitional housing program, or rapid re-housing program)...

...A PHA may also have a preference for individuals and families transitioning, or “moving up,” from Permanent Supportive Housing (PSH) units. These are persons that were previously homeless prior to entry into the PSH program but who no longer need that level of supportive services. While these persons would not be considered homeless for reporting purposes on the Form HUD 50058, creating such a “move up” preference will contribute significantly to the community's overall efforts to end homelessness by freeing up units for currently homeless families and individuals with disabilities who need housing combined with services.

LMHA will report on final activity outcomes on the “Move Up” activity in the FY 2018 annual report.

V. Sources and Uses of Funds

A. Estimated Sources and Uses of MTW Funding for Fiscal Year 2019

Tables 9 and 10 below provide estimated sources and uses of MTW funds for FY 2019. As LMHA's funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to LMHA and the level of actual expenses. LMHA's estimated Sources and Uses budget for FY 2019 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The tables follow HUD's required formats and do not include information on Non-MTW funding sources and uses.

Table 9: Estimated Sources of MTW Funding for FY 2019

SOURCES		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$6,545,000
70600	HUD PHA Operating Grants	\$99,924,939
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$75,538
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$260,000
70000	Total Revenue	\$106,805,477

Table 10: Estimated Uses of MTW Funding for FY 2019

USES		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$8,033,772
91300+91310+92000	Management Fee Expense	\$5,312,307
91810	Allocated Overhead	\$0
92500(92100+92200+92300+92400)	Total Tenant Services	\$689,323
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$7,083,302
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$10,638,094
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,055,870
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$693,813
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$233,998
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$6,092,015
97300+97350	Housing Assistance Payments + HAP Portability-In	\$63,505,290
97400	Depreciation Expense	\$4,686,368
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$108,024,152

LMHA's uses for FYE 6/30/19 exceed sources by \$1,218,675. This is because of depreciation expense of \$4,686,368 in the Uses section of the worksheet for FDS line number 97400. Depreciation expense is a non-cash item (book entry) that is requested on the worksheet, but is not really part of LMHA's spending plan for 2019. The depreciation expense of \$4,686,368 is offset by a projected operating surplus of \$3,467,693 (contained entirely in the Section 8 HCV Program). The sum of these two items equals the perceived deficit of \$1,218,675. However, the apparent deficit is not a true operating deficit, but a deficit resulting only from the estimated depreciation expense that is requested on the budget worksheet.

B. Use of Single Fund Flexibility

Under the MTW Program, LMHA is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are summarized below:

- Approx. \$5,474,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall of \$2,100,000 in the Public Housing program for calendar year 2018 and 2019, and the continued ability to operate AMPs at a high level and maintain a balanced operating budget. The HUD approved project expense levels (PEL) at some AMPs do not adequately provide for operational services at the level deemed necessary by LMHA.
- Approx. \$1,216,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Central Office Cost Center. COCC revenues have declined in recent years with the reduction in public housing units associated with LMHA's participation in multiple HOPE VI Programs and the CHOICE Program. Although the current fee structure funds basic property management functions that would occur at a traditional PHA, it is not sufficient to pay for all of the costs associated with MTW activities and the complex tasks and personnel necessary to put together development and financing packages for mixed-finance (HOPE VI) and CHOICE projects.
- Although LMHA has traditionally made transfers to the public housing program from both the CFP program and Section 8 program in past years, the proposed budget year's transfer is made entirely from the Section 8 program. However, LMHA wishes to retain the authority and flexibility to transfer CFP funds as necessary under current MTW regulations.
- Although LMHA utilizes the funding fungibility available in the MTW Program, LMHA adheres to statutes and regulations relative to HUD's asset management program. All budgeting and reporting within the public housing program is done on an individual site basis, and LMHA utilizes a "fee for service" methodology that charges sites only for the services they receive.
- Louisville continues to experience a growing demand from Somali and other African immigrant families living within its jurisdiction for housing and supportive services. LMHA has hired a staff person who is knowledgeable about this community and who can interpret and translate for families that speak several dialects commonly used in Somalia. This staff person is able to address the unique needs of African immigrant families, with the added benefit of helping the agency with property management, operations, and lease enforcement.

Uses of Reserve Funds:

LMHA is currently utilizing and planning to use HUD held project reserve funds in the Section 8 Voucher Program to assist with the following projects:

- Public housing acquisition and development - acquiring new off-site public housing units in non-impacted areas related to the Sheppard Square HOPE VI effort; replacing demolished units at Iroquois Homes; other misc. projects (approx. \$6,000,000)
- New facility to house LMHA's Vine Street Section 8 office (approx. \$2,850,000); this includes \$2,650,000 for purchase of the building, and \$200,000 to perform renovations necessary prior to occupancy.

- To acquire 108 units and retire related debt on a tax-credit project that will soon reach the end of its tax-credit compliance period (approx. \$650,000 [Park Duvalle Phase III])
- To acquire 192 units and retire related debt on a tax-credit project that will reach the end of its tax-credit compliance period (approx. \$1,502,000 [Park Duvalle Phase IV])
- To supplement the CHOICE grant for neighborhood revitalization of the Russell area, which includes Beecher Terrace Homes (approx. \$29,450,000 [includes Porter Paint and Plymouth Apts. activities]).

Additionally, reserves are generally necessary to allow for such things as:

- Emergencies and catastrophic events
- Funding shortfalls
- Planned operating deficits
- To provide adequate cash flow when receipt of federal subsidy is delayed
- To increase housing inventory (Section 8 Vouchers)
- To provide gap financing in mixed-finance projects

C. Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes

Is the PHA implementing a local asset management plan (LAMP)?

No

Has the PHA provided a LAMP in the appendix?

No

VI. Administrative

A. Board Resolutions Adopting the Annual Plan & Annual Plan Amendment

Annual Plan Amendment Board Resolution

RESOLUTION NO. _____

APPROVAL OF AMENDMENT TO FY 2019 MOVING TO WORK ANNUAL PLAN
(APPROVAL OF VERSION 3)

Item No. 5f

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville, executed a Moving to Work (MTW) Agreement on August 2, 1999 and an Amended and Restated Agreement on April 15, 2008, which provides the LMHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as required by the Amended and Restated MTW Agreement with HUD, the Fiscal Year 2019 MTW Annual Plan (Version 1) was adopted by the LMHA Board of Commissioners on April 17, 2018 and submitted to HUD on April 18, 2018; and

WHEREAS, the LMHA made changes to the FY 2019 MTW Annual Plan (Version 1) in response to comments received from HUD and submitted a revised FY 2019 MTW Annual Plan (Version 2) to HUD on July 9, 2017; and

WHEREAS, the LMHA received HUD approval of the FY 2019 MTW Annual Plan (Version 2) on July 11, 2018; and

WHEREAS, the LMHA now finds it necessary to amend the FY 2019 MTW Annual Plan (Version 2) and submit a new FY 2019 MTW Annual Plan (Version 3) in order to propose new MTW activities and modify previously approved MTW activities that would increase housing options for relocating Beecher Terrace residents and for Special Referral Programs; and

WHEREAS, a Board Resolution approving the FY 2019 MTW Annual Plan (Version 3) and required Certifications of Compliance must be included in the submission provided to HUD; and

RESOLUTION NO. _____

APPROVAL OF AMENDMENT TO FY 2019 MOVING TO WORK ANNUAL PLAN
(APPROVAL OF VERSION 3)

Item No. 5f

WHEREAS, the FY 2019 MTW Annual Plan (Version 3) was made available for public comment from October 18, 2018 through November 16, 2018, and a public hearing was held on October 25, 2018; and

WHEREAS, the proposed revisions to the Special Referral Programs were added during the public comment period but after the public hearing.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2019 MTW Annual Plan (Version 3) is approved, and that the Interim Executive Director and Contracting Officer, Lisa Osanka, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development; and

BE IT FURTHER RESOLVED that Board Chairman, Manfred Reid, is hereby authorized to sign the required Certifications of Compliance.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF AMENDMENT TO FY 2019 MOVING TO WORK ANNUAL PLAN (APPROVAL OF VERSION 3)

Item No. 5f

I. STATEMENT OF FACTS:

Moving to Work (MTW) is a demonstration program legislated by Congress in 1996 that provides increased autonomy for selected Public Housing Agencies (PHAs) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families. MTW legislation allows participating PHAs to combine federal resources from the Operating Budget, Capital Fund, and the Housing Choice Voucher Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

In October 1997, the former Housing Authority of Louisville (HAL) was chosen as one of 24 MTW Demonstration awardees. HAL's MTW Agreement, which specified the regulatory relief afforded to the organization, was finalized and signed on August 2, 1999, and was originally for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire as of June 30, 2005. LMHA was fortunate to receive a one-year extension, followed by an additional three-year extension.

On December 20, 2007, HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board on April 15, 2008, and extended participation in the MTW Program until June 30, 2019.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other agencies. In compliance with this requirement, the LMHA Board of Commissioners adopted the FY 2019 MTW Annual Plan (Version 1) on April 17, 2018, and the Plan was submitted to HUD on April 18, 2018.

HUD subsequently provided comments on the submitted FY 2019 MTW Annual Plan (Version 1). In response to these comments, LMHA made changes to the FY 2019 MTW Annual Plan (Version 1) and submitted a revised FY 2019 MTW Annual Plan (Version 2) to HUD on July 9, 2018. The FY 2019 MTW Annual Plan (Version 2) was approved by HUD on July 11, 2018.

The following items have been added to the FY 2019 MTW Annual Plan in Version 3:

1. Modification to Previously Approved MTW Activity #44-2015: Special Referral MTW HCV Program.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF AMENDMENT TO FY 2019 MOVING TO WORK ANNUAL PLAN (APPROVAL OF VERSION 3)

Item No. 5f

I. STATEMENT OF FACTS (cont'd):

2. Modification to Previously Approved MTW Activity #48-2018: Local Project-Based Voucher (PBV) Program.
3. Proposed New MTW Activity: Enhancement to Local Project Based Voucher (PBV) Program.

The required Certifications of Compliance are provided as Attachment A to this resolution. Full copies of the new MTW activities are provided as Attachment B.

The full text of the Annual Plan amendment was made available for public comment from October 18, 2018 through November 16, 2018. A public hearing to discuss the proposed amendment was held on October 25, 2018.

II. ALTERNATIVES:

- A. Approve the submission of the proposed FY 2018 Moving to Work Annual Plan (Version 3).
- B. Do not approve the submission of the proposed FY 2018 Moving to Work Annual Plan (Version 3).

III. RECOMMENDATION:

Staff recommends Alternative "A."

IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2019 MTW Annual Plan (Version 3).

Approval of the FY 2019 MTW Annual Plan (Version 3) by Board Resolution is necessary to permit LMHA to take advantage of the flexibilities afforded through the MTW Program to increase housing options available to relocating Beecher Terrace households and to Special Referral Programs. All proposed revisions are subject to HUD approval.

Submitted by: Heath Rico-Storey, Compliance Manager
November 20, 2018

Annual Plan Resolution

RESOLUTION NO. 30-2018 (4/17/18)

APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5i

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville, executed a Moving to Work (MTW) Agreement on August 2, 1999 and an Amended and Restated Agreement on April 15, 2008, which provides LMHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the Amended and Restated MTW Agreement, and MTW Annual Plan for Fiscal Year 2019 must be developed and submitted to HUD to formally enable the Housing Authority to fully use the policy and budget flexibility provided to public housing agencies participating in the MTW Program; and

WHEREAS, a Board Resolution approving the proposed MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, the proposed FY 2019 MTW Annual Plan was made available for public comment between March 14, 2018 and April 12, 2018 and a public hearing was held on March 22, 2018, to discuss the Proposed FY 2019 MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2019 MTW Annual Plan is approved, and that the Executive Director and Contracting Officer, Tim Barry, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development.

RESOLUTION BACKGROUND STATEMENT
APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5j

I. STATEMENT OF FACTS:

Moving to Work (MTW) is a demonstration program legislated by Congress in 1996 that provides increased autonomy for selected Public Housing Agencies (PHAs) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families. MTW legislation allows participating PHAs to combine federal resources from the Operating Budget, Capital Fund, and the Housing Choice Voucher Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

In October 1997, the former Housing Authority of Louisville (HAL) was chosen as one of 24 MTW Demonstration awardees. HAL's MTW Agreement, which specified the regulatory relief afforded to the organization, was finalized and signed on August 2, 1999, and was originally for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire as of June 30, 2005. LMHA was fortunate to receive a one-year extension, followed by an additional three year extension.

On December 20, 2007, HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board on April 15, 2008, and will extend participation in the MTW Program until June 30, 2018. This date was later extended to June 30, 2028.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other agencies. In compliance with this requirement, the LMHA Board of Commissioners adopted the FY 2019 MTW Annual Plan on April 17, 2018, and the Plan was submitted to HUD on April 18, 2018.

LMHA hired Edgemere Consulting Corporation (Edgemere) to assist in the development of MTW Plans and Reports and other related MTW activities. Edgemere commenced work in mid-January 2018. The FY 2019 MTW Annual Plan has been prepared and was made available for public comment on March 14, 2018 through April 12, 2018. A public hearing to discuss the proposed Plan

RESOLUTION BACKGROUND STATEMENT
APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5i

I. STATEMENT OF FACTS (cont'd)

was held on March 22, 2018. The FY 2017 MTW Annual Report has been prepared and reviewed. The report will be submitted to HUD in March.

The FY 2019 MTW Annual Plan requests HUD approval of changes to four current MTW activities as noted below.

1. *Activity #50-2018: Increasing Housing Options for Relocating Beecher Terrace Families.* This activity was previously approved by the Board and submitted to HUD on January 16, 2018 as part Version 4 of LMHA's FY 2018 MTW Plan. As HUD has not yet approved this activity, LMHA included the activity in the "Proposed Activity" section of the FY 2019 Plan.

2. *Activity #8-2008: Standard Medical Deduction.* Under this approved MTW activity, disabled and elderly families are eligible to receive a \$1,600 standard medical deduction. The

standard medical deduction is flexible in that if the families' health care costs exceed the \$1,600 exemption, the family can choose to have their expenses itemized.

LMHA here proposes to periodically adjust the standard medical deduction to reflect historical patterns of expenses and/or increases in standard medical insurance premiums. LMHA will report on outcomes in the MTW report. This activity does not require MTW authority.

3. *Activity #4-2007: Alternate Year Reexaminations.* This activity allows LMHA to conduct a re-certification of elderly and disabled families in the Public Housing and HCV programs once every two years instead of annually. In the HCV program, eligible households receive a full reexamination every odd numbered fiscal year. In even numbered years, families are required to complete a mini-reexamination packet, which they return to the agency by mail.

When first implemented, the only households eligible for biennial reexaminations were elderly families and disabled families where the head of household and/or spouse was age 55+. The activity was amended in FY 2012

RESOLUTION BACKGROUND STATEMENT
APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5i

I. STATEMENT OF FACTS (cont'd)

to include all disabled families; however HCV did not implement this change. In the Public Housing Program, biennial reexaminations for all elderly and disabled families began in FY 2016.

No changes are proposed that require MTW authority; however, LMHA is clarifying that for the HCV program, the biennial reexamination frequency applies to HCV households where the head, co-head or spouse is elderly or over age 55 and disabled and the only source of income for the household is SS or SSI. For these households, LMHA will complete biennial reexaminations and a mini-reexamination on the years between biennial reexaminations during which payment standards and contract rents will be updated.

4. *Activity #39-2014: HCV Program Rent Increase Limit.* Under this MTW activity, LMHA places a 2 percent cap on annual contract rent increases for units where the tenant is already receiving HCV rental assistance. At contract renewal, LMHA limits the landlord's requested rent to whichever is least: 102 percent of the previous contract rent for the same tenant; the (exception) payment standard; or to the rent as determined through a rent reasonableness analysis.

In FY 2019, LMHA proposes to modify this activity by revising the landlord's requested rent to reflect the lesser of 102 percent of the previous contract rent for the same tenant or the (exception) payment standard. LMHA will conduct reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. LMHA will use the SEMAP sample size requirements to dictate the number of RR determinations to be completed and will establish the universe as the number of units with requested rent increases. If the rent on more than 20 percent of sampled units—as a result of application of the policy—is not reasonable when compared with the RR determination, LMHA will conduct RR determinations on double the initially established sample size. LMHA will monitor outcomes and may modify this policy to ensure rents are reasonable (i.e., revise sample size requirements).

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5i

I. STATEMENT OF FACTS (cont'd)

5. *Activity #44-2015: Special Referral MTW HCV Programs:* Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. LMHA provides housing subsidy to HCV-eligible households, while the partnering agency provides social services support. The provision of services helps families make strides towards self-sufficiency, and the programs increase housing choices for low-income families who might otherwise have difficulty succeeding in the privately-managed real estate market.

In FY 2019 LMHA will provide additional vouchers allocations as follows:

Up to 10 vouchers will be allocated to individuals participating in the ShelterWorks program. The Office of Resilience and Community Services (RCS) started the ShelterWorks program which connects individuals in shelters to intensive wrap around services, training and job connections. As housing is such a basic need, it is anticipated that providing the Housing Choice Vouchers will increase the rate of attainment of self-sufficiency for program participants.

Up to 10 vouchers will be allocated to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (*the Home*) is where Louisville's vulnerable children and youth find emotional, physical, and intellectual support that can transform their lives. The Home provides the community with a range of important residential, treatment and community-based programs.

6. *Activity #48-2018: Local Project-Based Voucher (PBV) Program:* LMHA will use the regulatory flexibilities provided through MTW to create a Local PBV Program. As part of this, LMHA would increase the initial HAP contract from 15 to 20 years.

Under the Housing Opportunity Through Modernization Act, the length of the term of the initial HAP contract for any HAP contract unit may not be less than one year nor more than 20 years. In addition, PHAs may agree to enter into

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2019 MOVING TO WORK ANNUAL PLAN

Item No. 5i

I. STATEMENT OF FACTS (cont'd)

an extension (at the time of the initial HAP contract execution or any time before the expiration of the contract) for an additional term of up to 20 years. As MTW authority is no longer needed to implement this portion of the LHMA's Local Project Based Program, LMHA removing this provision from the MTW activity.

The required Certifications of Compliance are provided as Attachment A to this resolution.

II. ALTERNATIVES:

A. Approve the submission of the proposed FY 2019 Moving to Work Annual Plan.

B. Do not approve the submission of the proposed FY 2019 Moving to Work Annual Plan.

III. RECOMMENDATION:

Staff recommends Alternative "A."

IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2019 MTW Annual Plan.

Approval of the FY 2019 MTW Annual Plan by Board Resolution is necessary to permit LMHA to update, maximize, and improve the MTW activities already approved by the Board and HUD.

Submitted by: Tim Barry
Executive Director
April 17, 2018

B. Certifications of Compliance

Annual Plan Amendment Certifications of Compliance

OMB Control Number: 2557-0216
Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE
<p align="center">U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p align="center">Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</p> <p>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 (07/01/2018), 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:</p> <ol style="list-style-type: none">(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 identity, 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.

HUD FORM 50900: Certifications of Compliance

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- (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.

Louisville Metro Housing Authority
MTW PHA NAME

KY001
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).

Manfred Reid
NAME OF AUTHORIZED OFFICIAL

Chairman of the Board
TITLE

Manfred Reid
SIGNATURE

11/27/18
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.

Annual Plan Certifications of Compliance

OMB Control Number: 2577-0218
Expiration Date: 5/31/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report	
Attachment B	
Certifications of Compliance	
Annual Moving to Work Plan 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*	
<p>Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning <u>July 1, 2018</u> 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:</p> <ol style="list-style-type: none">1. The 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 PHA conducted a public hearing to discuss the Plan and invited public comment.2. The 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 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-50075.1.4. The 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 PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.9. The 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.10. The 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 135.11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.12. The 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.	

Attachment B
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13. The 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The 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 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.
16. With respect to public housing the 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The 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 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The 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.
21. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Louisville Metro Housing Authority
PHA Name

KY001
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)

Manfred Reid
Name of Authorized Official

Chairman of the Board
Title

Manfred Reid
Signature

7/5/2018
Date

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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.

C. Public Review Process

Annual Plan Amendment Public Review Process

The FY 2019 MTW Annual Plan Amendment was made available for public comment from October 16 to November 15, 2018. Copies of the draft Plan Amendment were made available for public review on the Housing Authority's website (www.lmha1.org), at the Authority's central office (420 S. 8th St., Louisville, KY 40203), at the Housing Authority's Section 8 office (801 Vine St., Louisville, KY 40204), and by mail as requested. Resident councils were emailed an electronic copy, as were members of the public who had previously requested to be notified of changes to LMHA policies.

A public hearing was held on October 25, 2018. A notice advertising the hearing and public comment period appeared in the *Courier-Journal* newspaper. Approximately 24 people attended the hearing including LMHA staff, residents and local housing advocates.

Documentation of the public review process is included in the Annual Plan Amendment including:

- a. Newspaper notice advertising the Annual Plan Amendment public hearing and public comment period
- b. Resident flyer advertising the Annual Plan Amendment public hearing and public comment period
- c. Public hearing sign-in sheet
- d. Summary of comments received from the public regarding the Annual Plan Amendment & related LMHA responses

Annual Plan Public Review Process

The Housing Authority's FY 2019 MTW Annual Plan was made available for public comment from March 14, 2018 thru April 12, 2018. Copies of the draft Plan were made available for public review on the Housing Authority's website (www.lmha1.org), at the Authority's central office (420 S. 8th St., Louisville, KY 40203), at the Housing Authority's Section 8 office (801 Vine St., Louisville, KY 40204), and by mail as requested. Resident councils were emailed an electronic copy, as were members of the public who had previously requested to be notified of changes to LMHA policies.

A public hearing was held on March 22, 2018 at 6:00 PM at Avenue Plaza (400 S. 8th St., Louisville, KY 40203). A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 14, 2018. Approximately 19 people attended the hearing, including LMHA staff, Housing Authority residents, and local housing advocates.

Documentation of the public review process is included in the following order:

- a. Newspaper notice advertising the Annual Plan public hearing and public comment period
- b. Resident flyer advertising the Annual Plan public hearing and public comment period
- c. Annual Plan public hearing sign-in sheet
- d. Comments received from the public regarding the Annual Plan & related LMHA responses

Annual Plan Amendment Public Hearing and Comment Period Documentation

Louisville Metro Housing Authority (LMHA) – Public Hearing & Public Comment Period for: 1) Amendment to FY2019 Moving to Work (MTW) Annual Plan to Expand the Project Based Voucher program; 2) Changes to Public Housing Admissions & Continued Occupancy Policy; & 3) Changes to Housing Choice Voucher Program Administrative Plan. There will be a public hearing to discuss the topics listed above on October 25, 2018 at 6:00 PM at Avenue Plaza (400 S. 8th St.) in the Community Room on the 2nd floor. Draft documents will be available for review and public comment from October 16 thru November 15, 2018 on LMHA's website (www.lmha1.org); at LMHA's main office (420 S. 8th St.); Section 8 office (801 Vine St.); at PH Management Offices; or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-4471. TDD: (502)587-0831.

LOUISVILLE METRO HOUSING AUTHORITY

Public Hearing

Why? To get your input on the Housing Authority's
FY 2019 Moving to Work Plan,
Administrative Plan, and Admissions and
Continued Occupancy Policy

When? Thursday, October 25, 2018 at 6:00 P.M.

Where? Avenue Plaza - 2nd Floor Community Room
400 S. 8th St., Louisville, KY 40203

Drafts of these documents will be available for review from October 18, 2018 thru November 16, 2018 on the agency's website (www.lmha1.org); at the Central Office (420 S. 8th St.); at the Section 8 Office (801 Vine St.); at public housing Management Offices; or you can call (502) 569-4471 to request that a copy be mailed to you.

Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, please call (502) 569-4471. TDD: (502) 587-0831.



Public Hearing
FY18 MTW Plan Amendment, HCV Admin Plan, ACOP
October 25, 2018

Would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings?

Name (Magac)	Organization / Development	Address / Phone Number	Email Address	Yes / No
Example: Jane Doe	Avenue Plaza	400 S. 8th St., Unit 1, 40203 (502) 555-1234	jdoe@gmail.com	Yes
1 Michael D Smith	St. Catherine Ct.	1114 54th St Apt. 1202	—	—
2 Ken Heacock	Ln HA	—	—	—
3 Tonya Wise	Ln HA	—	Wise@LnHA1.org	—
4 DeAnn Jones	Ln HA Avenue	Apt 1010	—	—
5 Catherine Hinton	MHC	—	cathy@metrohousing.org	X
6 Antwan FRED	Ln HA Avenue Plaza	#1611	—	—
7 Jumpy Thomas	Ln HA	5th St	—	—
8 Heather Newlove	Ln HA	—	—	—
9 Lisa Osandt	Ln HA	—	—	—
10 Sue Lagon	Avenue	—	—	—
11 Ann O. Pehys	Ave Plaza	Apt 1610	—	—
12 Jessica Sisk	Ln HA	—	—	—
13 Doraine Hinton	808 Avenue Plaza	—	—	—
14 Teri Con	Ave	Ave	—	—
15 M. L. Hunter	Ave. Poya	—	—	—

Public Hearing
FY18 MTW Plan Amendment, HCV Admin Plan, ACOP
October 25, 2018

Would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings?

Name (Magac)	Organization / Development	Address / Phone Number	Email Address	Yes / No
Example: Jane Doe	Avenue Plaza	400 S. 8th St., Unit 1, 40203 (502) 555-1234	jdoe@gmail.com	Yes
1 Roxannymanon	Avenue Plaza	400 S. 8th St., 1509 502 322-3468		NO
2 William Thornton	Avenue			
3 Ramonda Howard	Avenue	400 S 8th Street #1100 402 40203		
4 Patricia Kilian	river more	400 south 2nd St 400 S. 2nd		
5 Jacqueline Bouch	Ave	400 S 8th #1103		
6 Mueh Harris	Ave.	1114 S. 4th St		
7 George Winston	ST Catherine CT.	550 S 8th St 969		
8 Daniel White	SSUS	400 So 2nd St 704		
9 Gary Taylor				
10				
11				
12				
13				
14				
15				

Public Hearing and Comment Period Advertisement

classifieds

the job network



HomeFinder.com

1st & 2nd job network

To place your ad, call 502.582.2622.

or email classifieds@courier-journal.com

ATTENTION!

Annual Leather, Machinery, Saddle and Tack Auction to be held at Floyd County Fairgrounds at 2818 Green Valley Road in New Albany, Indiana 47150 on Friday March 16th, and Sat March 17th starting at 9:30 each day till finished. See moseleatherco.com and double click on the Western Leather and Equipment Show / Auction tab for more details & terms of sale.

On-Line Self Storage Auction on WWW.STORAGETREASURES.COM March 15th, 2018 @ 10 am. One and Done 55, 6500 Jefferson Blvd., 40219, will hold on-line auction 3/15/18 @ 10 am on www.storagetreasures.com to sale the following units #190 & #244., \$50. (502)895-2700

All classified ads are subject to the applicable rate card, copies of which are available from our Advertising Dept. All ads are subject to approval before publication. The Courier-Journal reserves the right to edit, refuse, reject, classify or cancel any ad at any time. Errors must be reported in the first day of publication. The Courier-Journal shall not be liable for any loss or expense that results from an error in or omission of an advertisement. No refunds for early cancellation of order.

PROPERTY LOTS

L & S Family Entertainment located at 90 Volunteer Drive, Suite 300, Hendersonville, TN 37075 hereby declares its intentions to apply for:

Quota Retail Drink License, NQ4 Retail Malt Beverage Drink License, Special Sunday Retail Drink License, Supplemental Bar License with extended 4 am hours.

The businesses to be licensed are located at:

911 Phillips Lane, Louisville, KY 40209 doing business as Executive Strike & Spare Bowling 6220 Shepherdsville Road, Louisville, KY 40228 doing business as Fern Valley Strike & Spare Bowling

200 Ten Pin Lane, Louisville, KY 40207 doing business as Ten Pin Strike & Spare Bowling

816 Joe Clifton Drive, Paducah, KY 42001 doing business as Cardinal Lanes Strike & Spare Bowling.

The owners are as follows: Larry Schmittou of 1917 Old Hickory Blvd, Brentwood, TN 37027.

Any person, association, corporation or body politic may protest the granting of this license(s) by writing the Dept of Alcoholic Beverage Control, 1003 Twilight Trail, Frankfort, KY, 40601-8400 within 30 days (KRS 243.430) of the date of this legal publication.

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NEWSLETTER

courier journal

PUBLIC NOTICES

Louisville Metro Housing Authority (LMHA)- Public Hearing & Public Comment Period for FY2019 Moving to Work (MTW) Annual Plan

There will be a public hearing to discuss LMHA's FY2019 MTW Annual Plan on March 22, 2018 at 6:00 PM at Avenue Plaza (400 S. 8th St.) in the Community Room on the 2nd floor. Draft documents will be available for review and public comment from March 14, 2018 thru April 12, 2018 on LMHA's website (www.lmha.org); at LMHA's main office (420 S. 8th St.); Section 8 office (801 Vine St.); at Public Housing Management Offices; or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-3420. TDD: (502)587-0831.

Resident Flyer

LOUISVILLE METRO HOUSING AUTHORITY

Public Hearing

Why? To get your input on the Housing Authority's FY 2019 Annual Plan

When? Thursday, March 22, 2018 at 6:00 P.M.

Where? Avenue Plaza
2nd Floor Community Room
400 S. 8th St., Louisville, KY 40203

Drafts of these documents will be available for review from March 14, 2018 thru April 12, 2018 on the agency's website (www.lmha1.org); at the Central Office (420 S. 8th St.); at the Section 8 Office (801 Vine St.); at public housing Management Offices; or you can call (502) 569-3420 to request that a copy be mailed to you.

Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, please call (502) 569-3420. TDD: (502) 587-0831.



Public Hearing Sign-In Sheet

Page 1

PUBLIC HEARING
MARCH 22, 2018
6:00 p.m.

	NAME	ADDRESS OR COMPANY	EMAIL
1	Deann Jones	1400 S. Eighth St. Apt 1070 Louisville, KY 40203	
2	Tonya Wise	LMHA	wise@lmha1.org
3	STAN DICKSON	LMHA #315 Avenue	
4	Gwendolyn Jackson	#1503 Avenue	gwendolynjackson43@gmail.com
5	Norris Staley	400 S. 8th St. Apt 1610	
6	Lisa Osanick	LMHA	osanick@lmha1.org
7	Sackie Phillips	40058 APT 1414	
8	Ken Heacock	LMHA	heacock@lmha1.org
9	Ms Brackering	806 Avenue Plaza	387-3659
10	James & Patricia Carter	Ave Plaza 400 South 8th Apt 509	
11	Lorecia Sistrunk	LMHA	
12	Mohamed Ambur	LMHA	ambur@lmha1.org
13	CYNTHIA HALE	400 S. 8th St. 409	
14	ROBERT ERDMAN	735 EASTERN PKwy 408	
15	Michael Johnson	" " 405	

Sign-In Sheet

MTW FY2019 Annual Plan

Public Hearing Sign-In Sheet Page 2

MOVING TO WORK (MTW)

PUBLIC HEARING

MARCH 22, 2018

6:00 p.m.

	NAME	ADDRESS OR COMPANY	EMAIL
1	Glenn Rapp	400 S 8th St 612	
2	Edna Sibb	400 S. 8th St. 1108	
3	Milfred Whittaker	400 S 8th 1810	
4	Pattika Leslie	400 S 8th 1311	
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Sign-In Sheet

MTW FY2019 Annual Plan

Comments & Responses

Annual Plan Amendment

Below is a summary of comments received during the public comment period and/or at the public hearing held on October 25, 2018 for the Fiscal Year 2019 MTW Plan Amendment, along with LMHA's responses to the comments.

Topic: Owner-managed site-based waiting lists for PBV developments
(Proposed Activity #51-2019)

Comments: At both the public hearing and in written comments submitted to LMHA, several commenters objected to the proposed activity that allows the option of owner-managed site-based waiting lists for PBV developments. Commenters expressed concerns that this process would present a hardship to relocated Beecher Terrace residents and other applicants due to the potential need to submit multiple applications; the time and cost of transportation; and, the inconvenience associated with this activity. Commenters expressed concerns that this activity was discriminatory, and could result in variances in criminal background check policies and violations of the Fair Housing Act.

LMHA Response: LMHA appreciates, and has carefully considered, the comments received on the Plan Amendment. The proposed MTW activity allows LMHA the option to utilize owner-managed, site-based waiting lists in the PBV program. Under the recent federal HOTMA legislation, Congress authorized owner-managed, site-based waiting lists in the PBV program. However, HUD has not yet published regulations and does not have a firm timetable for when such regulations will be published. In the interest of expanding housing options for relocated Beecher Terrace residents and attracting quality affordable housing developers to the PBV program, LMHA is utilizing its MTW flexibility to allow this option now.

Owner-managed, site-based waiting lists are currently in use at some other MTW agencies, and throughout the HUD Multifamily portfolio, which has over 1.4 million Section 8 units at more than 22,000 properties nationwide. LMHA believes this approach represents an industry best practice that is widely and effectively utilized, and that fully conforms to the Fair Housing Act. Allowing LMHA the option to approve owner-managed, site-based waiting lists for PBV developments will help to attract quality developers to the PBV program, expand the range of housing choices for Beecher Terrace households and future applicants, and may result in shorter waiting times. LMHA and PBV owners will continue to be subject to the Fair Housing Act, HUD regulations, and State of Kentucky and local laws and regulations that prohibit discrimination based on protected class status.

LMHA strongly believes that the proposed MTW activity will not result in hardships to Beecher Terrace households or other applicants. LMHA notes that the approved relocation plan for Beecher Terrace includes transportation assistance and/or special tours of sites, compensation for moving expenses through upfront payments or reimbursements, assistance with security and utility deposits and reimbursements for application fees and credit checks. Beecher residents will also be offered this same level of assistance should they choose to make a second move to an on- or off-site Beecher Terrace unit including PBV units. Thus, there should be no financial or other hardship incurred as a result of the new policy.

In the event that persons with disabilities experience a hardship related to this policy, LMHA will evaluate and act on reasonable accommodation requests.

LMHA also notes the only occupancy criteria applicable to relocated Beecher Terrace households who select a PBV development is that the household is lease compliant at the time of relocation and remains lease compliant during the lease term.

In light of the above, LMHA intends to proceed with the proposed MTW Activity 51-2019 as described in the MTW Plan Amendment.

Annual Plan

The table below includes a summary of the comments received at the Fiscal Year 2019 MTW Plan Public Hearing held on March 22, 2018 at Avenue Plaza in Louisville. Also included in are comments received, in writing, regarding the Fiscal Year 2019 MTW Plan. Finally, the table includes LMHA's responses to the comments.

No.	Topic	Comment	LMHA Response
Public Hearing Comment			
1.	Increasing Housing Options for Relocating Beecher Terrace Families (Activity #50-2018)	<ul style="list-style-type: none"> Why did this activity only apply to Beecher residents. 	<ul style="list-style-type: none"> This activity was developed to assist in the relocation efforts for Beecher residents and to improve their housing opportunities. Additionally, this activity was developed to incentivize owners to lease 1 bedroom units in the HCV program. Please note that the increased payment standard portion of this activity is available only to Beecher relocating families; however the Owner Incentive Fee portion of this activity is not just targeted to units leased by Beecher relocating families
Coalition for the Homeless. N. Harris			
2.	Special Referrals: MTW HCV Program (Activity# 44-2015)	<ul style="list-style-type: none"> I saw all the set asides you have done over the past years except the 10 vouchers most recently allocated to Home of the Innocents for young adults. Is there a reason they are not included? Maybe because they haven't been filled yet? 	<ul style="list-style-type: none"> LMHA had inadvertently left this allocation out of the draft FY 2019 MTW Plan. The Plan has been updated and includes the following: <i>Up to 10 vouchers will be allocated to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (the Home) is where Louisville's vulnerable children and youth find emotional, physical, and</i>

No.	Topic	Comment	LMHA Response
			<i>intellectual support that can transform their lives. The Home provides the community with a range of important residential, treatment and community-based programs</i>
3.	Special Referrals: MTW HCV Program (Activity# 44-2015)	<ul style="list-style-type: none"> I noticed it said the Move Up voucher program would close out in FY 2018. When does that mean? I need to check to see if they have used them all and if possible and needed ask for an extension to finish using. 	<ul style="list-style-type: none"> LMHA is no longer including the Move-Up vouchers as a special allocation; however LMHA has amended its Administrative Plan to include a special admission preference for up to 200 families referred by the Family Health Centers Common Assessment Team who are currently assisted through a homeless services voucher.
4.	Various	<ul style="list-style-type: none"> LMHA received comments from the Metropolitan Housing Coalition (MHC) dated April 12, 2018 	LMHA sent a letter which included both the original comments from MHC and LMHA's responses. Letter is attached.



April 16, 2018

Cathy Hinko
Executive Director
Metropolitan Housing Coalition
P.O. Box 4533
Louisville, KY 40204

Re: Response to April 12, 2018 Comments on Fiscal Year 2019 Moving to Work Annual Plan

Dear Ms. Hinko:

Thank you for your comments made on behalf of the Metropolitan Housing Coalition (MHC) concerning the Fiscal Year 2019 Moving to Work (MTW) Annual Plan that was posted for public comment by the Louisville Metro Housing Authority (LMHA). Detailed below are your original comments, followed by LMHA's responses.

MHC Comment

The fact that LMHA is forced to define "elderly" as 55 shows that the shift from family units to one bedroom units from prior HOPE VI programs has resulted in an oversupply of one bedroom units at cost to families. LMHA has turned its back on families in many ways, this is just one. MHC is not sure how lowering the age of elderly at the Beecher site would actually give more access to households already living there. This is not a sound reasoning for lowering the age of "elderly". But it is an excuse to replace with one-bedroom units. This may violate the Fair Housing Act as disparate impact by familial status.

LMHA Response

LMHA respectfully disagrees with this comment. In 2008, LMHA changed the definition of "elderly" to include persons 55 and over in response to decreased occupancy rates at its elderly and/or disabled high-rises prior. The MTW age criteria are used to determine eligibility for residency at Dosker Manor, Avenue Plaza, Will E. Seay Plaza (formerly Bishop Lane Plaza), and Lourdes Hall. Opening up these sites to non-disabled households between ages 55 and 61 has raised occupancy rates and increased the pool of one-bedroom and efficiency units available to these applicants.

In response to the strong demand among original Beecher Terrace households, the same definition of elderly will be used at the planned new 120-unit senior building to be built on-site as part of the Choice Neighborhoods Initiative (CNI) Implementation grant. By the end of the CNI grant period in 2023, 293 of the original Beecher Terrace families will include a head of household or spouse who is at least 55 years of age, which equates to 2.4 eligible households for every one senior unit to be built back on the site.

With respect to the Fair Housing Act, LMHA has previously communicated to MHC that the Fair Housing Act exempts certain types of senior housing families from liability for familial status discrimination.



420 South Eighth Street | Louisville, KY 40203 | 502.569.3400 | fax 502.569.3459



Housing that is “(i)ntended and operated for occupancy by persons 55 years of age or older” is exempted provided the facility satisfies three requirements:

- At least 80% of the units have at least one occupant who is 55 years of age or older;
- The facility publishes and adheres to policies and procedures that demonstrated the intent to operate as “55 or older” housing; and,
- The facility complies with HUD’s regulatory requirements for verification of residents.

The new senior building at Beecher Terrace will comply with these requirements. The existing Dosker Manor, Avenue Plaza, Will E. Seay Plaza and Lourdes Hall developments also meet these requirements.

MHC Comment

MHC finds it deplorable to reward the failure of LMHA to move Beecher Terrace households to their proper bedroom size as family members decreased. LMHA is going to give a larger voucher than that to which a household would be entitled to solely because LMHA failed to do their job properly, thereby depriving households with larger composition, perhaps in violation of the Fair Housing Act in the areas of familial status and national origin. Do not continue this violation! Households in Beecher Terrace should be able to get the enumerated advantages for displacement, but NOT get larger vouchers solely because they were living in, for instance, a three bedroom unit with only one or two people in occupancy.

LMHA Response

LMHA respectfully disagrees with this comment. This initiative is designed to expand the range of housing choices available to Beecher Terrace residents during the relocation phase, in light of the limited availability of one-bedroom apartments in the private rental market. As noted in the MTW Annual Plan, LMHA will offer a two-bedroom payment standard to one-bedroom-eligible households moving from Beecher Terrace to Housing Choice Voucher (HCV) unit in relocation phase II or III. These households will be allowed to use the two-bedroom payment standard only to lease a two-bedroom unit. If a household chooses to lease a one-bedroom unit, the one-bedroom payment standard will apply. Of the 360 one-bedroom-eligible households to be relocated from Beecher in relocation phases II and III, LMHA estimates 190 will elect a tenant-based voucher for their move. Of these 190 households, the Housing Authority further anticipates that approximately 150 families will opt for the two-bedroom payment standard and lease a two-bedroom unit.

This policy option has no negative impact on larger households in the HCV program and does not violate the Fair Housing Act. With the exception of the one-bedroom Beecher Terrace households, all other HCV households will continue to have their voucher size calculated in accordance with the subsidy standards described in LMHA’s Administrative Plan.

MHC Comment

I remind LMHA that there are people on the waiting list- remember them?

This is exacerbated by robbing the Section 8 voucher program of \$5,474,000. The stripping of these dollars from Section 8 means THOUSANDS, certainly over 5,000 (\$5,000,000 divided by \$1,000) of households on the waiting list must live in misery because LMHA has turned their back on the people on the waiting list. For shame! You are not using the money to house these families from the waiting list another way, just lessening the number of households you serve. This amount is almost 9% of the

\$63,505,290 for Section 8. This violates the federal law governing Moving to Work which mandates that the number served in Section 8 not be significantly less than that for which funding was given. MHC recommends keeping the Waiting List open. (Note: MHC subsequently submitted the following correction, which it requested be noted: "It should be a MERE 1,000 deprived families, the \$5,474,000 is correct and the \$63 million is correct and it is almost 9 percent."

LMHA Response

LMHA respectfully disagrees with this comment. LMHA is continuing its efforts to increase utilization in the voucher program, and we project higher voucher utilization in FY 2019. However, as an MTW agency, LMHA receives its funding as a Block Grant based on a formula established in the MTW Agreement. Under the MTW Block Grant, LMHA is allowed to utilize certain federal funds interchangeably for any authorized purpose. Thus, HCV Housing Assistance Payments funds can be, and are, used by LMHA and other MTW agencies around the country to fund public housing operating costs, affordable housing development gap financing, special referral leasing programs and local non-traditional housing programs with local supportive service partners, and other MTW initiatives. LMHA's use of MTW Block Grant funds is subject to approval by the US Department of Housing and Urban Development as part of the MTW Annual Plan approval process. LMHA remains in compliance with the MTW Agreement and all other applicable federal laws.

MHC Comment

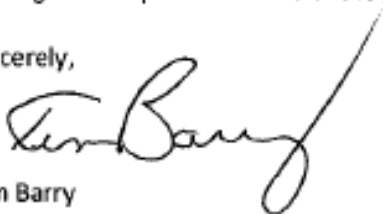
MHC recommends one application for ALL units of public housing/ Project-Based housing HOPE VI housing and /or Choice Neighborhood housing and Housing Choice Vouchers. Why continue to torture those in need by making them guess where to apply to get assistance operated by LMHA. The single point of entry for homeless families is a best practice and that entailed different agencies. Surely LMHA can operate as one agency for those in need. LMHA simplified their entry criteria, so why not give that benefit to those who are in desperate need?

LMHA Response

LMHA agrees that simplifying the application process across all housing programs is a worthwhile goal, and will continue to examine the feasibility of combining applications where possible. A unified application system will require significant and costly modifications to LMHA and private property management companies' computer systems. In light of ongoing funding constraints and competing priorities, LMHA will continue to look for grant funding and/or other opportunities to fund such a conversion.

Thank you again for your comments. LMHA looks forward to a continuing dialogue with MHC on strategies to improve the lives of the residents we serve.

Sincerely,



Tim Barry
Executive Director

D. PHA-Directed Evaluations

LMHA has not directed an evaluation of its MTW program beyond those to be conducted and reported on in the MTW Annual Report and the impact analysis and annual reevaluation of ongoing rent reform initiatives.

E. Annual Statement / Performance and Evaluation Reports (HUD 50075.1)

Page 1

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

Part I: Summary

PHA Name: Louisville Metro Housing Auth	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 15 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2015 FFY of Grant Approval:
--	---	--

Type of Grant					
Original Annual Statement		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:)	
x Performance and Evaluation Report for Period Ending: 12/31/17				Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements	45,378	45,378	45,378	45,378
4	1410 Administration (may not exceed 10% of line 21)	764,866	764,866	764,866	764,866
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	6,838,412	6,838,412	6,838,412	3,555,401
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 6/30/2017

Part I: Summary

PHA Name: Louisville Metro Housing Auth	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 15 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2015 FFY of Grant Approval: 0
---	--	--

Type of Grant

Original Annual Statement		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:)	
x Performance and Evaluation Report for Period Ending: 12/31/17				Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	7,648,656	7,648,656	7,648,656	4,365,645
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary

PHA Name: Louisville Metro Housing Authority		Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2015		
Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
Park DuValle	Phase III Mixed Fin Contribution	1408	100%	45,378	45,378	45,378	45,378	
PHA Wide	Admin Salaries	1410	100%	764,866	764,866	764,866	764,866	
PHA Wide	MTW Demonstration	1492	100%	6,838,412	6,838,412	6,838,412	3,555,401	
				7,648,656	7,648,656	7,648,656	4,365,645	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 6/30/2017

Part I: Summary

PHA Name: Louisville Metro Housing Authority	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 16 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2016 FFY of Grant Approval:
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Type of Grant

☒ **Original Annual Statement** **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no:)**
Performance and Evaluation Report for Period Ending: 12/31/17 **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	8,276,117	8,276,117	6,989,552	1,482,708
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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Annual Statement/Performance and Evaluation Report Capital Fund Program, Capital Fund Program Replacement Housing Factor and Capital Fund Financing Program				U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 6/30/2017	
Part I: Summary					
PHA Name: Louisville Metro Housing Auth		Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 16 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2016 FFY of Grant Approval: 0
Type of Grant <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) </div> <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/17 <input type="checkbox"/> Final Performance and Evaluation Report </div>					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
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20	Amount of Annual Grant: (sum of lines 2-19)	8,276,117	8,276,117	6,989,552	1,482,708
21	Amount of line 20 Related to LBP Activities				
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23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director <div style="border-top: 1px solid black; height: 20px;"></div>		Signature of Public Housing Director <div style="border-top: 1px solid black; height: 20px;"></div>		Date <div style="border-top: 1px solid black; height: 20px;"></div>	

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U.S. Department of Housing and Urban Development
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 Expires 6/30/2017

Part I: Summary

PHA Name: Louisville Metro Housing Authority	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 17 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2017 FFY of Grant Approval:
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Type of Grant	Original Annual Statement	Reserve for Disasters/Emergencies	Revised Annual Statement (revision no:)
x	Performance and Evaluation Report for Period Ending: 12/31/17		Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
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13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	8,557,380	8,557,380	2,509,758	855,738
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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Annual Statement/Performance and Evaluation Report Capital Fund Program, Capital Fund Program Replacement Housing Factor and Capital Fund Financing Program				U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 6/30/2017													
Part I: Summary																	
PHA Name: Louisville Metro Housing Auth	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 17 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2017 FFY of Grant Approval: 0													
Type of Grant <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; text-align: center;">Original Annual Statement</td> <td style="width: 33%; text-align: center;">Reserve for Disasters/Emergencies</td> <td style="width: 33%; text-align: center;">Revised Annual Statement (revision no:)</td> </tr> <tr> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td colspan="3" style="text-align: center;">Performance and Evaluation Report for Period Ending: 12/31/17</td> </tr> <tr> <td colspan="3" style="text-align: center;">Final Performance and Evaluation Report</td> </tr> </table>						Original Annual Statement	Reserve for Disasters/Emergencies	Revised Annual Statement (revision no:)	x			Performance and Evaluation Report for Period Ending: 12/31/17			Final Performance and Evaluation Report		
Original Annual Statement	Reserve for Disasters/Emergencies	Revised Annual Statement (revision no:)															
x																	
Performance and Evaluation Report for Period Ending: 12/31/17																	
Final Performance and Evaluation Report																	
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹													
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24	Amount of line 20 Related to Security - Hard Costs																
25	Amount of line 20 Related to Energy Conservation Measures																
Signature of Executive Director _____ Date _____		Signature of Public Housing Director _____ Date _____															
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Annual Statement/Performance and Evaluation Report
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U.S. Department of Housing and Urban Development
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Part II: Supporting Pages

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