

LAWRENCE- DOUGLAS COUNTY HOUSING AUTHORITY

2021 MTW ANNUAL PLAN



SUBMITTED
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LDCHA MISSION

To preserve and expand affordable housing, and provide opportunities for participants to thrive through services and partnerships.

Section I: Introduction

This 2021 MTW Plan provides the strategies for continuing the remarkable success of the MTW Demonstration, and also sets aggressive goals to facilitate the self-sufficiency of participants and significantly increase affordable housing choices in Lawrence, Kansas.

The LDCHA was created in 2001 through the merger of the Lawrence Housing Authority (KS053) and the Douglas County Housing Authority (KS160). The predecessor, Lawrence Housing Authority, was created in 1968 under the Kansas Municipal Housing Act as an independent agency of the City of Lawrence charged with developing, operating and managing low rent housing for the low income population of Lawrence, Kansas.

The LDCHA is governed by a five-member board of commissioners, two appointed by the Douglas County Commission and three by the Mayor of the City of Lawrence. One member must be a LDCHA program participant and is an appointee of the City. The LDCHA is operated by 40 dedicated staff members who administer a combined budget in excess of \$8 million.

Innovation Through Moving To Work

The LDCHA was selected by HUD as one of the original housing authorities to participate in the Moving to Work Demonstration program in 1998. The agency began implementation of the program on June 1, 1999, by adopting the following program initiatives to meet the Congressional MTW Objectives:

1. Abolish the separate public housing and Section 8 program (HCV) administrative structure and create a new program of housing assistance called General Housing.
2. Change or eliminate four basic federal rules under the 1937 Housing Act that contradict customary social and economic norms and create administrative expense. The changes include:
 - The institution of suitability criteria as a part of eligibility criteria.
 - Modifying the definition of countable income and adjusted income.
 - The establishment of the concept of annual rent and abolishing interim re-examinations.

- Comprehensive changes in the rent structure.
3. Establish a rent structure that provides affordability while it:
 - Values the unit.
 - Creates incentives to work.
 - Motivates households to work through a work requirement for all work able adults.
 - Establishes meaningful minimum and maximum rents.
 - Increases PHA income by reducing federal subsidy or increasing housing assistance without additional subsidy.
 4. Increase Housing Choice:
 - For all Section 8 participants increase housing choice by permitting full discretion as to location, size and cost without regard to local Fair Market Rents.
 5. Increase usage of existing federal funds:
 - Increase public housing rental income by \$150,000 per year.
 - Free \$500,000 per year of Section 8 subsidy.
 - Use these amounts to serve an additional 100 low income households without additional federal subsidy.
 6. Expand the Family Self Sufficiency program by 100% for MTW public housing and Section 8 households.
 7. Provide homeownership opportunities by awarding a \$3000 down payment match.

The above initiatives created a locally driven housing program, and all of these initiatives continue to be the foundation of LDCHA's MTW program.

In 2008 the agency signed a new 10 year standardized agreement extending the program to 2018. The new agreement provided expanded authorities for the agency, most significantly the establishment of LDCHA's MTW single fund budget with full flexibility that permits LDCHA through adoption of Activity 09-1 to combine its public housing operating subsidies, Capital Funds grants, and Section 8 HCV assistance into a single source to carry out its approved MTW activities. In May of 2016 the agency accepted HUD's offer of a 10-year extension of its existing MTW Restated Agreement, extending the MTW program according to its current terms through 2028.

The regulatory flexibility granted through the MTW Restated Agreement allows LDCHA to develop and implement innovative, market-based solutions to pursue and fulfill the three MTW statutory objectives:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children whose heads of households are either working, seeking work, or participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- Increase housing choices for low-income families.

LDCHA elected to participate in the MTW demonstration to make system-wide progressive changes to its housing programs in a way that allows the agency to provide the educational, vocational, and social supports that low-income households need to increase their self-sufficiency.

Due to efficiencies allowed by MTW, the LDCHA has significantly increased its affordable housing since joining the program at its inception, while actually decreasing the number of staff.

LDCHA is currently one of the smallest agencies in the MTW demonstration. The number of households served may seem few comparably, however the impact in a community the size of Lawrence is significant. Just a few examples include:

- 836, or 66% of LDCHA-assisted households, are at or below 30% of AMI and an additional 340, or 27%, are at or below 50% of AMI.
- 203 previously homeless households were transitionally housed from 2008 to 2020, with 83% of those moving to permanent housing assistance.
- 73 additional units of affordable housing were built or acquired by LDCHA since 2006.
- 20 special use MTW vouchers have been created since 2010 to help meet the needs of special populations in our community.
- 100 participants became homeowners with a \$3,000 down payment match between 2002-2020.

Furthermore, being an MTW agency has allowed LDCHA to fully participate in local discussions on affordable housing and homelessness issues, and to respond by partnering with community agencies and government to provide expanded solutions. The MTW program has been more successful than initially envisioned and LDCHA remains committed to the innovative changes and opportunities this program has made available for participants.

LDCHA Short-Term MTW Goals

- Maintain or expand core MTW initiatives that support employment, maintaining housing and increasing participant self-sufficiency.
- Execute sound management, maintenance, and preservation of the public housing stock according to the highest standards and provide responsive assistance to those we serve.
- Continue to foster the various community partnerships required to enhance participant opportunities and expand support services such as social services, education, transportation, mental health, and health care programs.

LDCHA Long-Term MTW Goals

- Continue to implement business and fiscal policies that result in long term financial viability and solvency.
- Pursue ways to reduce administrative burden, and costs.
- Continue to develop and institute policies and programs that create incentives for families to work, to increase household income, and to increase self-sufficiency. In so doing, the agency will continue to promote home ownership and create additional housing opportunities for participants.
- The LDCHA is committed to expanding the stock of affordable housing through the acquisition, new construction, reconstruction, moderate or substantial rehabilitation of housing as deemed appropriate by the agency in accordance with its mission. This could include assisted living or other types of housing, possibly in conjunction with commercial facilities or other mixed development consistent with the objectives of the demonstration. LDCHA plans to meet this goal through leveraging its MTW funds to create innovative financing and development strategies through joint ventures or other partnerships.

Non-MTW Related Housing Authority Programs and Partnerships

The LDCHA operates several additional housing programs besides the public housing and Section 8 HCV programs, and has developed several other partnerships that support LDCHA's MTW program.

Clinton Place

The largest is a 58-unit project based Section 8 multi-family development for the elderly which the agency purchased in late 2006 and significantly renovated in 2007 with MTW funds.

Peterson Acres II

The agency owns an 8-unit senior development that is fully handicapped accessible. This development is unsubsidized and operates with a below market sliding scale rate rent structure based on household income.

Lawrence Expanded Housing

Seven units of LDCHA owned property that is unsubsidized and operates with below market sliding scale rent structure based on income. Preference is given to youth aging out of foster care and /or veterans.

HOME - State

LDCHA administers a grant that funds an estimated 18 - 20 unit Tenant-based Rental Assistance (TBRA) program funded by the State of Kansas with HOME funds. The grantee for this program is the Bert Nash Community Mental Health Center. The LDCHA administers the program on behalf of the Bert Nash Center. Admission is restricted to Bert Nash clients.

HOME – City – Transitional Housing

The LDCHA administers a Transitional Housing program that issues an estimated 15 - 20 units of TBRA and is grant funded annually by the City of Lawrence's HOME allocation. This program is restricted to homeless families and individuals who do not otherwise qualify for public housing or Section 8 assistance.

In both the Bert Nash program and the City HOME program, participants must enter into a support service agreement. Participants have up to two years to meet the qualifications for public housing or Section 8 assistance. At the end of the two year period they are transferred to Section 8 assistance if they meet the eligibility qualifications. After their completion of the Transitional Housing program, many participants are then prepared to enter LDCHA's MTW program.

New Horizons

LDCHA administers a grant from the City of Lawrence and Douglas County to house homeless families from the Lawrence Community Shelter. The program operates with the same requirements as the Transitional Housing Program. This program was developed to address the needs of homeless families with children and supplement the LDCHA Transitional Housing program which has received significant reductions in HOME funds. It currently serves 10 households.

HOPE Building

The LDCHA also operates 6 units under the Continuum of Care Permanent Supportive Housing program for chronically homeless individuals who are dual diagnosed with mental health and substance abuse problems. The LDCHA uses MTW funds to provide the required match for this program.

Building Independence III

Building Independence III is a Section 811 PRAC 4-unit property located in Baldwin City, Kansas. The property is owned by the Bert Nash Center and operates under an annual housing assistance payment contract with HUD. The LDCHA is the owner's management agent responsible for all aspects of administration, management, operations and maintenance of the property.

Partnership with Douglas County Child Development Association (DCCDA)

The LDCHA leases Units 159 and 160 at Edgewood Homes without a fee to Positive Bright Start to operate an early childhood education program. The lease requires that at least 16 children of LDCHA residents be enrolled per year in a Positive Bright Start program. This space is also used for special educational services for these students and for providing evening childcare services for LDCHA parent/guardian MTW training opportunities. This program supports LDCHA's MTW program by providing convenient and affordable childcare for working parents.

HUD-VASH Vouchers

The HUD-Veterans Affairs Supportive Housing Program (HUD-VASH) combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA). LDCHA was given the opportunity to join in this effort in 2013 and to expand its participation in 2014 and 2015. The LDCHA readily accepted this opportunity to serve our veterans, and for 2019 will administer a total of 45 VASH vouchers.

Mainstream Vouchers – Non-Elderly Disabled (NED)

Voucher rental assistance to households that include a non-elderly person with disabilities, aimed primarily to assist persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless. Along with housing, a large component in serving these populations is partnerships with health and human service agencies and other community-based organizations serving persons with disabilities.

THE LDCHA VISION

To transform lives through accessible, affordable housing opportunities for all Douglas County residents.

(II) GENERAL OPERATING INFORMATION**ANNUAL MTW PLAN****A. HOUSING STOCK INFORMATION****i. Planned New Public Housing Units**

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

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added in the Plan Year

0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Name/Number	0	N/A
Name/Number	0	N/A
Name/Number	0	N/A

0

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Cottages at Green's Lake	10	No	Supportive Housing for participants with serious persistent mental illness
Name	0	N/A	N/A

10

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

N/A

Planned Total Existing Project-Based Vouchers

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
Cottages at Green's Lake – 10 units planned to be developed in 2019 and 2020, 100% leased in 2021

vi. General Description of All Planned Capital Expenditures During the Plan Year

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
LDCHA will use its 2021 Capital Funds grant exclusively for maintenance and improvements to public housing developments. The agency anticipates major expenditure for upgrades at turnover to the interiors of all its developments to include new kitchens, baths, and HVAC units.

B. LEASING INFORMATION

A. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	4,272	356
MTW Housing Choice Vouchers (HCV) Utilized	8,796	733
Local, Non-Traditional: Tenant-Based^	12	1
Local, Non-Traditional: Property-Based^	960	84
Local, Non-Traditional: Homeownership^	24	2

Planned Total Households Served

13,944

1,176

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Property-Based	Cottages at Green's Lake	120	10
Property-Based	Clinton Parkway Apts./58	684	57
Property-Based	Peterson Acres II/8	96	8
Property-Based	1725 New Hampshire/6	60	5
Homeownership	Homeowner Matching Grant/N/A	24	2
Tenant Based	Moving On Voucher	12	1

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

B. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	<p>The Public Housing occupancy rate averages between 97% - 98%. There is a high turnover rate at the family developments as a result of LDCHA's strict lease enforcement of rent payment and anti-crime policies. The LDCHA conducts monthly outreach to households with non-payment of rent issues.</p> <p>The Kansas Residential Landlord Tenant Act requires all lease holders to give 30 day notice of termination of the lease. This state law notice provision creates a 30 day delay from when a tenant accepts a public housing unit to when they can take occupancy. Vacancy days created by state law are beyond the ability of the agency to control.</p>
MTW Housing Choice Voucher	The time voucher holders are requiring to lease up due to unit availability has significantly increased, causing a reduction in utilization.
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
General Housing Federal MTW Public Housing – Section 8 HCV	Community-Wide Combined/Merged	428	Open	N/A
Babcock Place / Peterson Acres I Federal MTW Public Housing Units	Site Based	180	Open	N/A
Clinton Parkway Project Based Local Non-traditional MTW	Site Based	75	Open	N/A
Peterson Acres II Project Based Local Non-Traditional MTW	Site Based	75	Open	N/A
Next Step Federal MTW Housing Choice Voucher Program	Program Specific	3	Open	N/A
Safe Housing Federal MTW Housing Choice Voucher Program	Program Specific	26	Open	N/A
Douglas County Re-Entry Program Federal MTW Housing Choice Voucher Program	Program Specific	1	Open	N/A
HOPE House Project Based Local Non-traditional MTW	Site Based	0	Open	N/A

Please describe any duplication of applicants across waiting lists:

The LDCHA has a combined public housing and Section 8 HCV waiting list per Activity 99-1, and all applicants receive offers for HCV and public housing units.

Additionally, there are three site based waiting lists that are designated for elderly and near elderly and an applicant can be on any site based wait list for which they meet the eligibility criteria.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Name	N/A
Name	N/A

Section III: Proposed MTW Activities: HUD Approval Requested

LDCHA has no Proposed MTW Activities for the 2021 Plan year.

Section IV: Approved MTW Activities: HUD approval previously granted

A. IMPLEMENTED ACTIVITIES

<i>Activity 20-1</i> Moving On Program Vouchers – Rent Assistance for Permanent Supportive Housing Graduates
<i>i. Plan Year Approved, Implemented, Amended</i>
Approved for 2020 Plan Implemented 2020
<i>ii. Description / Update</i>
<p>i. The Activity utilizes MTW flexibility to provide up to three (3) Moving On Housing Program vouchers to individuals who complete their treatment plan and are identified as eligible to exit from the LDCHA's Permanent Supportive Housing (PSH) programs. The decision to exit is made by the participant and promotes self-sufficiency in the least restrictive environment, while opening up the permanent supportive housing units to others in immediate need. Participants are referred by Bert Nash or another service provider. To be eligible participants must meet the LDCHA General Housing eligibility requirements, except the good residential history, and are evaluated by their residency in the PSH program. The LDCHA administers the program including income calculation, determining program eligibility and completing all required fields in HUD-50058 MTW.</p> <p>The Moving On Program (MOP) voucher is for a 24-month period and participants must be in a support services agreement while receiving MOP housing assistance. Support services are provided by the Bert Nash Community Mental Health Team or another approved provider.</p> <p>The MOP participant must find a rental unit in Lawrence or Douglas County, Kansas, with a landlord who will enter into a lease and are not subsidy contracted with the LDCHA. The unit must be able to pass an HQS inspection by the LDCHA. The rent and utilities are calculated according to the current income based calculation used in the regular Section 8 program. The MOP participants are exempt from MTW rent structure and work requirement, but can voluntarily participate in the MTW rent structure (MTW Vol) if working.</p> <p>Vouchers issued under this activity are not portable except for reasonable accommodation or VAWA reasons. MOP voucher-holders that are in good standing at the end of the 24-month</p>

period, including working at least 15 hours per week (or exempt from MTW as disabled or elderly), positive landlord recommendation, and no unresolved pending lease violations or eviction actions, are transferred to a standard Section 8 voucher.
<u>Update:</u> In 2020, one Moving On voucher was issued.
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 17-1 Exclude Asset Income from Income Calculations for Households with Assets of \$20,000 or less and Allow Self-Certification of Assets valued at less than \$20,000 after initial certification
i. Plan Year Approved, Implemented, Amended
Approved for 2017 Plan Implemented 2017
ii. Description / Update
This Activity uses MTW flexibility to exclude asset income from income calculations for assets of \$20,000 or less and allow self-certification of the value of assets of \$20,000 or less after initial certification. This meets the statutory objective to reduce administrative costs of recertifications because the verification of asset income process is very time consuming and yields little benefit or impact on rent calculation.
<u>Update:</u> This Activity is fully implemented for all participants, including all households biennially recertified.
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

Activity 16-1

Safe Housing Program: Rent Assistance for Victims of Domestic Violence

i. Plan Year Approved, Implemented, Amended

**Approved for 2016 Plan
Implemented 2016**

ii. Description / Update

This Activity uses MTW flexibility to provide ten (10) Safe Housing Program (SHP) transitional housing vouchers issued to eligible households / individuals in the Willow Domestic Violence Center Program (WDVC), or another service provider who certifies the applicant's status as a victim of domestic violence, and is a Douglas County, Kansas resident. To be eligible a SHP participant must meet the LDCHA General Housing eligibility requirements, except the good residential history.

The SHP participants must be in a support services agreement while receiving SHP housing assistance. Support services will be administered by the WDVC or another provider. Participants refusing to participate in a support service agreement will not have their housing assistance renewed at the next annual recertification.

The SHP participant must find a rental unit in Lawrence or Douglas County, Kansas, with a landlord who will enter into a lease and a rent subsidy contract with the LDCHA. The unit must be able to pass an inspection by the LDCHA.

Vouchers issued under this activity are not portable except for reasonable accommodation or VAWA reasons. SHP voucher-holders that are in good standing at the end of the 24-month period, including working at least 15 hours per week (if in the MTW rent structure), positive landlord recommendation, no pending lease violations or eviction actions, and similar factors will be transferred to a standard Section 8 voucher.

Update:

The SHP has been exceptionally successful. As of November 2020, 6 participants are actively housed and on track to complete the program due to the partnership with the WDVC. Since its inception, 15 households successfully completed this program and transitioned to the regular HCV program.

In September of 2018, due to available Section 8 funding an additional 10 vouchers were authorized to be issued pursuant to this Activity for a total of 20 vouchers issued when funds are available.

iii. Planned Non-Significant Changes

No changes or modifications are planned.
<i>iv. Planned changes to Metrics/Data Collection</i>
No changes or modifications are planned.
<i>v. Planned Significant Changes</i>
No changes or modifications are planned.

Activity 16-2 Next Step Vouchers (NSV): Housing Assistance for Youth who have Aged Out of Foster Care
<i>i. Plan Year Approved, Implemented, Amended</i>
Approved for 2016 Plan Implemented 2016 Re-Proposed for 2018 Plan
<i>ii. Description / Update</i>
<p>This Activity description and administration was modified to place the Next Step participants in the income based rent structure while maintaining the requirement that the participants meet the MTW work requirement which can be accomplished through working or participation in an educational program. This will treat these participants 18-21 years of age consistently with other young adults in MTW as set out in Activity 09-6.</p> <p>This will eliminate the requirement that these participants pay the MTW minimum rent as set in Activity 99-2. This will make interim recertifications available to these participants including the ability to be recertified to zero income and eligible for a utility allowance.</p> <p>The impact of this change will be to encourage work while reducing the risk of eviction due to the fluctuation of employment normally experienced by this age group of participants.</p> <p>These participants are able to voluntarily participate in the MTW rent structure (MTW Vol) if the rent calculation is advantageous to them due to the additional deductions. If a participant voluntarily participates in the MTW rent structure, the MTW hardship policy as outlined in Activity 99-2 is available to them. They may also elect to return to the income based rent structure one time between annual re-examinations.</p> <p>This Activity uses MTW flexibility to create up to five vouchers depending on available funding to house aged out foster youth for up to 36 months or until age 23, whichever comes first. To be eligible a youth must meet the LDCHA General Housing eligibility requirements except the good residential history. The NSV participant must find a rental unit in Lawrence or Douglas County, Kansas, with a landlord who will enter into a lease and a rent subsidy contract with the LDCHA. The unit must be able to pass an inspection by the LDCHA.</p>

NSV voucher-holders that are in good standing, including stabilization, working at least 15 hours per week positive landlord recommendation, no pending lease violation or eviction actions, and similar factors at the end of the 24 - 36-month period, or longer if required for educational purposes, will be transferred to a standard Section 8 voucher. Participant would be able to transfer after 24 months but prior to 36 months if the LDCHA eligibility requirements are met and the participant requests the transfer.

All NSV participants must complete the LDCHA Renters Education program. LDCHA will also require voucher-holders under this activity to begin, continue, and/or maintain appointments and visits with social service providers as recommended by assessment to assist these households in the preparation of living independently and creating a stable living environment.

Vouchers issued under this activity are not portable except for reasonable accommodation or VAWA reasons. LDCHA reserves the authority to extend NSVs up to 12 months to allow full time students to complete their degree.

Update:

3 Next Step households are being utilized, and 2 current participants are employed.

iii. Planned Non-Significant Changes

No changes or modifications are planned.

iv. Planned changes to Metrics/Data Collection

No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

Activity 14-2

Create a Landlord On-Site Self-Certification that minor repairs are complete

i. Plan Year Approved, Implemented, Amended

**Approved for 2014 Plan
Implemented 2014**

ii. Description / Update

This Activity uses MTW flexibility to revise the HQS certification to allow Landlord Self-Certification of Correction at LDCHA's discretion and in cases where all deficiencies are minor non-life-threatening, non-safety-hazard deficiencies as determined by an approved list maintained by LDCHA. The "Landlord On-Site Verification and Re-Inspection Form" is included in Appendix II.

<u>Update:</u> This Activity continues to be actively promoted to landlords, and more are using the Self-Certification.
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 14-3 Change the effective dates of variables affecting rent calculations to January 1
i. Plan Year Approved, Implemented, Amended
Approved for 2014 Plan Implemented 2014
ii. Description / Update
<p>This Activity uses MTW flexibility to change the effective dates for program changes that affect rent calculations such as Fair Market Rent, Voucher Payment Standard and Utility Allowance, etc., to correspond with the beginning of LDCHA's fiscal year, January 1. This reduces cost and achieve greater cost effectiveness by eliminating unnecessary reprinting of key agency documents.</p> <p><u>Update:</u> The 2020 FMR, VPS and Utility Allowances were adopted in 4th quarter of 2019 and implemented on January 1, 2020. All materials were reprinted only after all changes were made by the agency. The same will occur in 2021.</p>
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 13-1

Create an Affordable Housing Acquisition and Development Fund

i. Plan Year Approved, Implemented, Amended

Approved for 2013 Plan
Implemented 2013

ii. Description / Update

The LDCHA Board of Commissioners authorized the use of MTW reserve funds for the development of new low income affordable housing, and LDCHA may use its MTW flexibility to purchase land and/or improvements, or participate in project ownership and/or development by providing financing for direct construction or rehabilitation costs. LDCHA may leverage, where possible, additional funds from private and public sources (including Low Income Housing Tax Credits, Private Activity Bonds, or other available financing methods). This activity is designed to increase housing choice for low-income households utilizing MTW reserves.

Update:

The LDCHA has entered into a long-term lease for a new property of 10 units to serve special populations including participants with severe and persistent mental illness (SPMI) and/or substance abuse disorder. All units will be leased to households at or below 50% of AMI. Construction began in late 2019, and completion is anticipated in October of 2020 with first occupancy expected the first quarter of 2021.

iii. Planned Non-Significant Changes

No changes or modifications are planned.

iv. Planned changes to Metrics/Data Collection

No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

Activity 10-1

Biennial recertification for public housing and Section 8 elderly and disabled households

i. Plan Year Approved, Implemented, Amended

Approved for 2010 Plan
Implemented 2010

ii. Description / Update
Adopt alternative recertification schedule to conduct biennial recertification for all elderly and disabled public housing and Section 8 households on fixed incomes, to reduce the total number of annual recertifications processed to reduce cost and achieve greater administrative efficiencies.
Hardship Policy: Participants may request a hardship and be recertified in the year identified to skip if their annual medical expenses have increased by 10% in the previous 12 months.
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 09-5

Homeownership matching grant

i. Plan Year Approved, Implemented, Amended
Approved for 2017 Plan Implemented 2017
ii. Description / Update
Revised original MTW Homeownership Program to create equity between Public Housing and Section 8 to provide up to \$3000 matching grant for MTW households that purchase a home.
<u>Update:</u> As of the end of January 2020, 100 households have received a homeownership matching grant since 2002.
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes

No changes or modifications are planned.

Activity 09-6

Revise definition of countable income

i. Plan Year Approved, Implemented, Amended

**Approved for 2009 Plan
Implemented 2009**

ii. Description / Update

Excluded earned income of young adult children between the ages of 18 and 21 not enrolled full-time in school, and excluded earned income of young adult children between 18-24 if enrolled full-time as a student, while retaining the work requirement for these groups. This Activity is authorized by the MTW flexibility to establish alternate definitions of income, and to encourage work.

This Activity was designed to not penalize the entire household for the fluctuations in employment of young adult children. Additionally it reduces administrative cost by eliminating the need for frequent rent recalculations and encourages work through program enforcement for this population.

Update:

The LDCHA had 87 participants who were required to participate in the Resident Services Office employment program and all participants came into compliance with the work requirement.

iii. Planned Non-Significant Changes

No changes or modifications are planned.

iv. Planned changes to Metrics/Data Collection

No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

Activity 09-6.1

Revise Definition of Countable Income: Count income under previously disallowed 12:12:48 Regulation
<i>i. Plan Year Approved, Implemented, Amended</i>
Approved for 2009 Plan Implemented 2009
<i>ii. Description / Update</i>
<p>This Activity is designed to achieve greater administrative efficiency by eliminating the 12:12:48 month Earned Income Disallowance rule, and including those amounts as income, as permitted by the MTW flexibility that allows LDCHA to establish alternate definitions of income.</p> <p><u>Update:</u> This Activity is fully implemented.</p>
<i>iii. Planned Non-Significant Changes</i>
No changes or modifications are planned.
<i>iv. Planned changes to Metrics/Data Collection</i>
No changes or modifications are planned.
<i>v. Planned Significant Changes</i>
No changes or modifications are planned.

Activity 09-8 Create a jail re-entry housing program
<i>i. Plan Year Approved, Implemented, Amended</i>
Approved for 2009 Plan Implemented 2010
<i>ii. Description / Update</i>
<p>Create 5 units of transitional re-entry vouchers in partnership with Douglas County Sheriff's Office for inmates participating in a re-entry program. The Sheriff's Office provides the services for this program. To be eligible for referral to the LDCHA the inmate being released from Douglas County jail must meet performance criteria established by the Jail Re-entry Program. To qualify for assistance, the inmate must be a Douglas County resident and must not be excluded under the federal housing mandatory prohibition rules.</p> <p><u>Update:</u> This program utilized 3 vouchers in 2020, and 2 households completed this program and transitioned to the regular HCV program.</p>

iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 99-1
Combined Public Housing and Section 8 HCV programs and operations
i. Plan Year Approved, Implemented, Amended
Approved for 2017 Plan Implemented 2017
ii. Description / Update
<p>This Activity uses MTW flexibility to establish a locally designed waiting list and tenant selection criteria by combining the public housing family housing units and Section 8 HCV into one program called General Housing with one waiting list and single organizational program structure. The objective of this Activity was to decrease the vacancy rate by using the same suitability criteria for both programs and offering the next available unit to the applicant at the top of the waiting list. Additionally it decreases administrative burden by reducing voluntary unit turnover cost.</p> <p><u>Update:</u> This Activity is one of the key innovations in the LDCHA MTW program. It has resulted in an average 98% occupancy rate for the LDCHA public housing program. Additionally the utilization rate for the HCV program is 99%.</p>
iii. Planned Non-Significant Changes
No changes or modifications are planned.
iv. Planned changes to Metrics/Data Collection
No changes or modifications are planned.
v. Planned Significant Changes
No changes or modifications are planned.

Activity 99-2

Alternative rent structure

i. Plan Year Approved, Implemented, Amended

Approved for 1999 Plan
Implemented 1999

ii. Description / Update

Developed alternative MTW rent structure with minimum and maximum annual rents that are adjusted periodically and applied to all non-disabled/non-elderly households in the General Housing program. The rent structure requires all non-elderly, non-disabled adults to pay a significant minimum amount of rent regardless of their income. To reward work, the agency set a maximum rent for each size unit.

Bedroom Size	Minimum	Maximum
1 Bedroom	\$ 185	\$ 435
2 Bedroom	\$ 215	\$ 500
3 Bedroom	\$ 255	\$ 575
4 Bedroom	\$ 275	\$ 665
5 Bedroom	\$ 315	\$ 690

To encourage employment advancement the agency established a system of income deductions that increase as hours of work increase.

Special income deductions for MTW households include:

- 10% earned income deduction for those working at least 35 hours/week
- \$2,000 medical deduction for those working at least 35 hours/week
- full out-of-pocket dependent care deduction necessary to allow work or school attendance
- utility allowance as an annual income deduction, not as a monthly deduction from rent
- increase in the child dependent deduction to \$840 per child capped at \$1,680 per household

Flat rents are not applied in the MTW rent structure, and MTW participants are not eligible for the flat rent option.

The LDCHA's Rent Hardship Policy permits a degree of rent relief if the household experiences a loss in income. Under the policy, a household not under termination may be recertified based on the nature and amount of the income loss.

If loss of earned income equals or is greater than 50% of total reported earned income, then the MTW Hardship Rent shall be reset to \$50 a month for the household for a three consecutive month period.

Or

If loss of earned income is at least 25% but is less than 50% of total reported earned income, the MTW Hardship Rent shall be reset \$100 a month for the household for a three consecutive month period.

Amend the policy to establish that hardships requests may be denied based upon a pattern of policy abuse per the LDCHA Fraud Policy - Resolution 539, as amended. The rent reduction is for a period not to exceed three months. A household may have a hardship rent reduction

only once every 12 months from the end of an approved hardship request. If the household's income loss is due to a condition that qualifies the individual for a disability under ADA, the household's designation is changed from MTW to income-based and they are then recertified. The alternative rent structure and hardship policies are more fully outlined in Appendix I.

Section 8 portability is restricted. MTW households may not move outside the LDCHA's jurisdiction unless the household applies for and receives an exception from this rule as a reasonable accommodation for a disability, VAWA, or other good cause, such as taking a job in a different city, education, or other household need. Households porting into the LDCHA's jurisdiction must participate in the MTW program.

An important component of the LDCHA's MTW rent structure is the feature of Annual Rent or Fixed Rent. Rent is fixed for one year and does not change, regardless of changes in household income or composition except in instances where a household permanently loses income through death, divorce, or when an income producing adult child whose income was included in the rent calculation moves out of the household.

Update:

The amount of tenant rent is expected to exceed \$1.3 million for 2020; additionally public housing occupancy is at 99%.

iii. Planned Non-Significant Changes

No changes or modifications are planned.

iv. Planned changes to Metrics/Data Collection

No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

Activity 99-3 Work Requirement

i. Plan Year Approved, Implemented, Amended

**Approved for 1999 Plan
Implemented 1999**

ii. Description / Update

This Activity establishes an MTW work requirement which applies to all households in the General Housing program with a non-elderly non-disabled adult in the household. The work requirement mandates that all able-bodied adults age 18 and older work a minimum of 15 hours a week. For a two-adult household with minor children, the work requirement can be met if one adult works 35 hours per week. Enrollment in a post-secondary education program or Work Training Program satisfies the work requirement. An adult child in the household is also subject

to the work requirement. Residents who fail to meet the work requirement must participate in the LDCHA's Family Self-Sufficiency Program 15 hours per week. Failure to meet the work requirement is a major program breach.

Following are the exemptions to the work requirement and MTW rent structure:

- Elderly/Disabled Status - All adult household members age 62 or over, or who have disability status that prevents employment.
- Temporary Medical Exemption - verified medical condition of a household member lasting longer than 3 months that limits or that prevents work activities. Must be certified to by a licensed physician or medical practitioner.
- Discretionary Exemption - households with only one adult who does not have elderly/disability status and who, due to limitations of employment experience, education or training, or other significant barriers, is unable to earn sufficient income to meet the MTW minimum rent requirement.
- Work Requirement Exemption Only - Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work" by DCF. The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement.

Exempt households may elect annually to participate in the MTW rent structure if they meet the work requirement through employment income.

Failure to meet the work requirement results in a lease violation. If not corrected, tenant rent goes to full market rate for the unit.

Update:

During 2019 and through February 2020, 86 households had a work requirement enforcement action. All households came into compliance.

iii. Planned Non-Significant Changes

No changes or modifications are planned.

iv. Planned changes to Metrics/Data Collection

No changes or modifications are planned.

v. Planned Significant Changes

No changes or modifications are planned.

B. NOT YET IMPLEMENTED ACTIVITIES

Not Implemented: *Activity 18-1* **Local Project Based Section 8 Voucher Program Targeted to Special Needs Populations**

i. Description, Why Not Implemented

Approved for 2018 Plan

Create a local Project Based Section 8 Voucher Program (PBV) with the following components:

- Allocate PBV subsidy non-competitively process to LDCHA-owned or controlled sites and transitional units,
- Prioritize assignment of PBV assistance to units designed to serve special populations with poverty rates 50% of AMI or below,
- Eliminate the 25% cap on the number of units that can be project-based on a single site for supportive or elderly housing, and for sites with fewer than 20 units,
- Waive the 20% cap on the amount of HCV budget authority that can be project-based, allowing LDCHA to determine the size of the PBV program,
- Modify eligible unit and housing types to include shared housing, cooperative housing, or transitional housing,
- Allow project partners to manage project wait lists with criteria as determined by LDCHA,
- Use LDCHA's standard HCV process for determining Rent Reasonableness for units in lieu of requiring third-party appraisals,
- Eliminating or modifying the requirement that households living in a unit subsidized through a project-based voucher be given an opportunity to receive tenant-based rental assistance ("exit voucher") if, after one year, they wish to move, however the participants will be given access to the LDCHA transfer policy, and

Assign standard HCV payment standards to PBV units.

This Activity uses MTW flexibility to:

Reduce the administrative time and development costs associated with issuing a Request for Proposal (RFP) when LDCHA has a qualifying development for PBV program.

Increase housing choices for special populations.

Because this is a PBV program it is not considered a local non-traditional program.

These are new units that will serve individuals residing outside of the LDCHA inventory. These units will be constructed in conjunction with a new Mental Health Crisis Center.

A preference will be established for individuals with serious persistent mental illness who are stabilized at the crisis center and in need of housing. There will be supportive services through a partnership with the local Bert Nash Community Mental Health Center and a new peer support program.

Update:

This Activity has not yet been implemented because the units are currently under construction. The LDCHA received approval from HUD per PIH 2011-45 for funding. Standard HUD metrics CE#1, CE#2, CE#3, HC#1, and HC#4 for this Activity will be incorporated into the FY21 MTW Report.

ii. Implementation Plan / Timeline

The environmental assessment, design and construction contract bidding were completed by October 23 of 2019. The groundbreaking occurred on November 8, and construction is to be completed by the fourth quarter of 2020. Due to accessibility issues while other nearby buildings are being constructed during October of 2020, lease up of the 10 units is not anticipated until 2021.

iii. Planned Non-Significant Changes

The LDCHA executed the Second Amendment to its Amended and Restated Moving to Work Agreement. The LDCHA will conduct HQS inspections and certify that any of the property it owns that has a PBV assigned meets HQS. Additionally the LDCHA will determine rent reasonableness for all PBV units it owns.

C. ACTIVITIES ON HOLD

No Activities are currently on hold.

D. CLOSED OUT ACTIVITIES

Closed Out: Activity 14-1

Create a Biennial Housing Quality Standards (HQS) Inspection process for existing Housing Choice Voucher (HCV) properties

i. Years Approved, Implemented, Closed Out

Approved for 2012 Plan
Never Implemented
Closed Out 2020

Revise the HQS certification to permit biennial HQS inspections for units that have a record of good property maintenance, a history of making repairs in a timely manner, and have passed HQS on the first inspection for two consecutive annual inspections.

ii. Reason Activity was Closed Out

It has been confirmed that due to limitations in Lindsey Software Systems, our housing software, the eligible properties and landlords cannot be easily tracked. Lindsey is not working to fix this limitation. The Activity was created to save time and costs for both staff and landlords but tracking it manually will take more staff time, not less.

Closed Out: Activity 12-1

Biennial recertification for Section 8 elderly and disabled households

i. Years Approved, Implemented, Closed Out

Approved for 2012 Plan
Implemented 2012
Closed Out 2015

Conduct biennial recertification for all elderly and disabled Section 8 households.

ii. Reason Activity was Closed Out

Combined with Activity 10-1, and closed out 12-1.

Closed Out: Activity 11-1

Financial Assistance for Vehicle Repair

i. Years Approved, Implemented, Closed Out

Approved for 2011 Plan

**Implemented 2011
Closed Out 2015**

Provide up to \$500 per household for vehicle repair to assist MTW households with children to obtain or retain employment, employment training, or attend post-secondary education.

ii. Reason Activity was Closed Out

This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility."

Closed Out: Activity 11-2

Partner with Full Circle Tenant Services, Inc. (FCTS) to create the Full Circle Youth Program *(Originally partnered with Douglas County Housing, Inc. [DCHI])*

i. Years Approved, Implemented, Closed Out

**Approved for 2011 Plan
Implemented 2011
Closed Out 2015**

Use FCTSI, an affiliated nonprofit, to pursue private and public foundation grant funding that is restricted to nonprofit organizations in order to expand program opportunities and activities for LDCHA youth, particularly the children of parents participating in the MTW program. The Full Circle youth program provides year-round social, educational, health and recreational opportunities for youth.

ii. Reason Activity was Closed Out

This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility."

Closed Out: Activity 11-3

Combine the Administrative Plan and the Public Housing ACOP into one policy statement

i. Years Approved, Implemented, Closed Out

**Approved for 2011 Plan
Implemented 2011**

Closed Out 2013

Combine Section 8 Housing Choice Voucher Administrative Plan and public housing Admissions and Continued Occupancy policy and Methods of Administration to create consistency and safeguard staff accuracy in the application of MTW policies under the public housing and Section 8 HCV programs.

ii. Reason Activity was Closed Out

Activity was completed, published for public comment and adopted by the Board of Commissioners on August 26, 2013.

Closed Out: Activity 10-2 Expand employment related services to MTW households.

i. Years Approved, Implemented, Closed Out

Approved for 2009 Plan
Implemented 2009
Closed Out 2015

Provide funding for technical training, education, certifications, employment counseling and childcare services to permit heads of household to seek, obtain and retain employment. This Activity is designed to reduce the barriers to employment and underemployment, to maximize a household's potential for securing long-term employment.

ii. Reason Activity was Closed Out

This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility."

Closed Out: Activity 10-3 Energy Conservation Improvements

i. Years Approved, Implemented, Closed Out

Provided \$1.5 million from the single fund MTW budget to finance comprehensive energy improvements under HUD Energy Performance Contracting, resulting in guaranteed annual cost savings sufficient to provide funding for the 20 year investment.

ii. Reason Activity was Closed Out

The Energy Performance Contract was completed in 2011, and yearly reporting is provided to HUD Field Office to verify utility savings.

Closed Out: Activity 09-1
Single fund budget with full flexibility

i. Years Approved, Implemented, Closed Out

Approved for 2009 Plan
Implemented 2009
Closed Out 2015

Combined its public housing operating and Capital fund subsidies and HCV assistance into a single funding source.

ii. Reason Activity was Closed Out

This Activity only requires the MTW Single Fund Authorization.

Closed Out: Activity 09-2
Mandatory Orientation

i. Years Approved, Implemented, Closed Out

Approved for 2010 Plan
Implemented 2010
Closed Out 2015

Required mandatory orientation program for all new residents on the services and programs offered by the LDCHA Resident Services Office. This Activity educates residents about available services to access in times of crisis that could lead to termination of their housing assistance, or as a resource for households motivated toward upward mobility, economic self-sufficiency and homeownership.

<i>ii. Reason Activity was Closed Out</i>
This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility."

Closed Out: Activity 09-3 Expand case management services to MTW households
<i>i. Years Approved, Implemented, Closed Out</i>
Approved for 2009 Plan Implemented 2009 Closed Out 2013
Provide case management for households below 40% AMI to reduce barriers to employment and underemployment to maximize household's potential for securing long-term employment.
<i>ii. Reason Activity was Closed Out</i>
Activity 09-3 will be absorbed into Activity 10-2 to encompass a broader scope of employment support. Previous benchmark of Activity 09-3, AMI increase, will report as income per SS #1.

Closed Out: Activity 09-4 Biennial recertifications for MTW households.
<i>i. Years Approved, Implemented, Closed Out</i>
Approved for 2009 Plan Implemented 2009 Closed Out 2015
Conduct biennial recertifications for public housing and Section 8 participants in the MTW rent structure who are at maximum rent or 50% AMI.

ii. Reason Activity was Closed Out

This Activity has never had the anticipated impact and it resulted in increasing complexity rather than reducing staff time and achieving greater cost efficiency. This initiative is a voluntary election and is subject to fluctuating tenant income resulting in too many mid-year recertifications. In 2012 there were 102 eligible to participate and only 24 elected to skip recertification. In 2013 there were only 70 eligible households and 38 elected to skip. In 2014 it is projected there will be 111 eligible for MTW biennial recertification and only 37 will skip. This Initiative is difficult to track and creates additional administrative complexity to our program without resulting in a significant benefit to participants.

Closed Out: Activity 09-7 Homeless to Housed

i. Years Approved, Implemented, Closed Out

**Approved for 2009 Plan
Implemented 2009
Closed Out 2015**

Provide housing stabilization case management for recently homeless individuals who are housed in the LDCHA's Transitional Housing (TH) program and the Jail Re-Entry (JRE) program.

ii. Reason Activity was Closed Out

This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility."

(V) SOURCES AND USES OF MTW FUNDS**ANNUAL MTW PLAN****A. ESTIMATED SOURCES AND USES OF MTW FUNDS****i. Estimated Sources of MTW Funds**

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	1,408,202
70600	HUD PHA Operating Grants	6,608,804
70610	Capital Grants	464,670
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	37,645
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	58,472
70000	Total Revenue	8,577,793

ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	1,395,579
91300+91310+92000	Management Fee Expense	0
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	140,117
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	329,438
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	712,768
95000 (95100+95200+95300+95500)	Total Protective Services	59,448
96100 (96110+96120+96130+96140)	Total Insurance Premiums	159,919
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	171,732
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	0
97300+97350	HAP + HAP Portability-In	4,627,439
97400	Depreciation Expense	632,159
97500+97600+97700+97800	All Other Expense	0
90000	Total Expenses	8,228,599

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

The variance will be placed in reserves to be used to complete the Capital projects identified in Section II A vi.

iii. Description of Planned Use of MTW Single Fund Flexibility

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

2021 Sources and Uses of Funds Details

Lawrence-Douglas County Housing Authority has set aside MTW reserves to implement the following activities using the single fund flexibility:

Activity: Fiber Internet for Edgewood Homes

Program Affected: Public Housing

Year Identified: 2018

Effective Date: January, 2019

Funding Allocated: \$ 50,000

Use the MTW Single Fund reserves to fund the installation of a fiber broadband infrastructure at Edgewood Homes. LDCHA has been approved for the second cohort of ConnectHomeUSA, a movement to bridge the digital divide for HUD-assisted housing residents in the United States under the leadership of national nonprofit EveryoneOn. By helping residents in participating communities to get connected at home and providing access to digital literacy and educational content, Connect-HomeUSA aims to make public housing a platform for change. LDCHA is striving to be at the forefront of digital inclusion by having gigabit speeds available to residents for free.

There is a well-researched and documented significant gap (or digital divide) between low- and higher income households in access to technology and the internet. This disproportionately affects low-income children and reduces their achievement in school by making it harder to get homework done, connect socially, and stay on par with their peers. We have two computer labs at Edgewood Homes, one for adults for employment and education and one for children for homework, games, and social media. Many of our children at Edgewood Homes only have access to technology and the internet at their school and at our computer lab. There is Lifeline internet service available to Edgewood tenants currently for \$10 per month through a local provider, but tenants must choose between an internet Lifeline benefit or a cell phone Lifeline benefit. We believe it is important to have access to both services.

Activity: Internet for Edgewood Homes

Program Affected: Public Housing

Year Identified: 2020

Effective Date: January, 2021

Funding Allocated: \$ 25,000

Use up to \$20,000 per year of MTW Funds to provide universal internet access for all households with children at Edgewood Homes for access to educational supports provided by local school district. This supports the 2019 Activity previously approved for Fiber Internet for Edgewood Homes and the ConnectHomeUSA project at the LDCHA.

Activity: Internet Upgrade for Edgewood Homes Main Office

Program Affected: Public Housing, Multifamily

Year Identified: 2020

Effective Date: January, 2021

Funding Allocated: \$ 25,000

Use up to \$25,000 of public housing reserve funds to upgrade internet at the Edgewood Homes main office in conjunction with the Fiber Internet project at Edgewood Homes. This will provide a faster and more reliable connection with the agency's "remote" sites (Hup-pee Community Facility at Edgewood Homes, Babcock Place, and Clinton Place) improving their access to the housing software on the LDCHA servers, and higher VOIP phone quality. The expenditure was approved by the LDCHA Board of Directors under Resolution 2020-13, as it is most cost effective to perform in conjunction with the fiber internet upgrade at Edgewood Homes.

Activity: Funds for Acquiring Birth Certificates

Program Affected: Public Housing & Section 8

Year Identified: 2018

Effective Date: January, 2019

Funding Allocated: \$ 5,000

Use up to \$5,000 of MTW Funds to pay for applicants to get a birth certificate. Several partners, including Family Promise and the Lawrence Community Shelter provide some funding for this but sometimes those funds are unavailable. It is very common that LDCHA receives applications that are incomplete due to the household not having a birth certificate for all family members. This activity would remove a barrier to housing.

Activity: Public Housing Capital Improvements

Program Affected: Public Housing

Year Identified: 2016

Effective Date: Ongoing

Funding Allocated: 2021 - \$

Description of Activity:

The majority of the LDCHA's public housing units are over 40 years old and the major systems including roofs, boilers, HVAC and plumbing systems have reached or exceed their useful life. The agency has evaluated these capital needs and will use MTW / Public Housing reserve funds to fund these projects when the Capital Fund Grant is insufficient for the completion of these projects.

Activity: Provide Financial Assistance for Vehicle Repair

Program Affected: Public Housing, Housing Choice Voucher, VASH

Year Identified: 2010

Effective Date: January 1, 2011

Funding Allocated: \$20,000 (estimated)

Description of Activity:

Provide up to \$500 per household for vehicle repair to assist MTW households to obtain or retain employment, employment training, or attend postsecondary education.

Activity: Partner with Full Circle Tenant Services, Inc. to create the Full Circle Youth Program. (Previously partnered with Douglas County Housing, Inc. [DCHI])

Program Affected: Public Housing, Housing Choice Voucher, VASH

Year Identified: 2010

Effective Date: January 1, 2011

Funding Allocated: \$50,000 (estimated)

Description of Activity:

Use Full Circle Tenant Services, Inc., an affiliated 501(c)3, to pursue private and public foundation grant funding that is restricted to nonprofit organizations in order to expand program opportunities and activities for LDCHA youth, particularly the children of parents participating in the MTW program. The Full Circle Youth Program provides year-round social, educational, health and recreational opportunities for youth.

Activity: Expand employment related services to MTW households.

Program Affected: Public Housing, Housing Choice Voucher, VASH

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$175,000 (estimated)

Description of Activity:

Provide funding for technical training, education, certifications, employment counseling and childcare services to permit heads of household to seek, obtain and retain employment. This Activity is designed to reduce the barriers to employment and underemployment, to maximize a household's potential for securing long-term employment.

Activity: Homeless to Housed.

Program Affected: Public Housing and Housing Choice Voucher

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$40,000 (estimated)

Description of Activity:

Provide housing stabilization case management for recently homeless individuals who are housed in the LDCHA's Transitional Housing (TH) program and the Jail Re-Entry (JRE) program.

Activity: Mandatory Orientation

Program Affected: Public Housing and Housing Choice Voucher

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$300 (estimated)

Description of Activity:

Required mandatory orientation program for all new residents outlining the services and programs offered by the LDCHA Resident Services Office. This Activity educates residents about available services to access in times of crisis that could lead to termination of their housing assistance, or as a resource for households motivated toward upward mobility, economic self-sufficiency and homeownership.

General Statement on Sources of Funds

Since the 2021 allocation for HUD funded programs cannot be known at this time, the amounts listed for Public Housing Operating Subsidy and Section 8 HCV Budget Authority Renewal are based on 2020 funding allocations. For Capital Funds the allocation is based on the 2020 grant funding award, excluding special COVID-19 funding.

General Statement on Uses of Funds

The uses of funds shows the aggregate expenses for all MTW programs the agency will operate by account and not program. However each individual program operated by the LDCHA contains a program specific budget.

The LDCHA plans to use funds in 2020 for intended purposes of the specific federal and resident services programs even though it will operate its Public Housing, Section 8 assistance and Capital Fund as a single fund budget with full flexibility. The agency will not reduce the number of public housing and Section 8 assisted units it has in 2020. Any development will be paid for through MTW reserves or leveraged funds. Public Housing, Section 8 and Capital Funds, as a single fund will be used to pay for the administrative, operational, maintenance costs and capital fund improvements of the respective program which includes previously approved MTW Activities.

Since all of the agency's public housing and Section 8 HCV units/households are in the MTW program, even though not all households participate in the alternative rent structure and work requirement, these programs are listed as MTW activities in the sources and uses.

Any surplus funds remaining at the end of 2020 will be used for MTW purposes outlined in the 2020 Plan and subsequent years.

B. LOCAL ASSET MANAGEMENT PLAN

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

YES

- ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

NO

- iii. Has the MTW PHA provide a LAMP in the appendix?

NO

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

The LDCHA has 369 public housing units and opted out of the asset management requirement under the various appropriations acts for 2008-2020. The agency will continue to elect to opt out of asset management for 2021. The LDCHA uses a cost allocation system to prorate expenses among the different programs it administers.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

- i. Description of RAD Participation

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

N/A

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

N/A

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

N/A

Section VI: Administrative

A. Board Resolution

Resolution 2020-21 was approved by the Board of Commissioners adopting the 2021 Annual MTW Plan on October 26, 2020. It and the Certification of Compliance are included in Appendix II.

B. Public Participation / Comment on the 2020 MTW Plan

Resident Advisory Committee

The LDCHA Resident Advisory Committee participated in the development of this plan and recommended this Plan for approval on August 13, 2020. Due to COVID-19 restrictions, the meeting was conducted via Zoom audio rather than in person.

Notice of Public Hearing and Comment Period

PUBLIC NOTICE

Additionally, the LDCHA's Draft MTW Annual Plan for 2021 was available to the public for review and comment during a 30-day period beginning August 31 and ending at 4:00 pm October 1, 2020.

During the public comment periods the Draft MTW Annual Plan for 2021 and updates to the Combined Administrative Plan / Admission & Continued Occupancy Policies (Admin/ACOP) were available on the LDCHA website, and printed copies of the documents were available at City and County Offices and all the agency's administrative and management offices. The location of copies and the public hearing were advertised in public notices published in the Lawrence-Journal World newspaper and the LDCHA website on August 31, 2020.

The public was invited to comment in writing, delivered or mailed to Lawrence-Douglas County Housing Authority, 1600 Haskell Avenue, faxed to 785-842-9596, or emailed to housing@ldcha.org. Comments were received up to 4:00 p.m. October 1, 2020.

The public hearing was held October 1, 2020 via Zoom video conferencing.

No comments were received during the comment period. No members of the public attended the hearing and participated in discussion, and no objections were presented.

C. Agency Directed Evaluation of the Demonstration

None at this time.

D. Statement of Significant Amendment or Modification

LDCHA considers a "significant amendment or modification" as a discretionary change in a plan or policy of the agency that fundamentally alters the plan or policy, and which will require the formal approval of the Board of Commissioners. Specifically the following will be considered to constitute a significant amendment:

- A material change in the policies regarding the manner which tenant rent is calculated,
- A material change in the admissions policy, or
- Any change with regard to demolition or disposition, homeownership, Capital Fund financing, conventional or mixed financing development are considered significant amendments to the Capital Fund 5-Year Action Plan.

Changes that result from HUD regulatory requirements will not be considered a significant amendment or modification to either the 5-Year Capital Fund Action or MTW Annual plans.

Significant changes to the LDCHA MTW Program as defined by HUD Form 50900 will be made through a MTW Plan amendment as approved by HUD.

E. Declaration of Trusts

The LDCHA filed Declaration of Trusts with the Douglas County Register of Deeds on all its public housing and agency owned housing on different dates over the years at the time the deeds were first filed with the registrar. The LDCHA has nine separate housing developments. Each deed was filed with a Declaration of Trust.

F. Resident Commissioner

The LDCHA is in compliance with the requirement that the agency have a commissioner who is a resident of one of the agency's housing programs. Maria Duran, who is a public housing participant, is the resident commissioner. Ms. Duran was appointed to the Board by the Mayor of Lawrence for a four-year term in July 2016 and re-appointed for a second four-year term in May 2020.

Additional Appendix Items

- | | |
|---------------------|--|
| Appendix I | LDCHA's MTW Demonstration Program |
| Appendix II | Certifications and Declarations, and Forms |
| Appendix III | Capital Fund Performance and Evaluation Reports |

Appendix I:

LDCHA's MTW DEMONSTRATION PROGRAM

The LDCHA submits Appendix I to provide a comprehensive outline of its Moving to Work (MTW) program elements that have been developed during its participation in the MTW Demonstration through various MTW Plans submitted to HUD. Additionally, significant data of its MTW Program, maintained since the inception in 1999, will continue to be collected and presented with its annual reports.

The LDCHA merged the Public Housing and Section 8 Housing Assistance programs into one housing program called General Housing Assistance with one waiting list and two forms of assistance. A household whose name comes to the top of the waiting list is offered the first form of assistance available. An applicant is allowed to pass but will be assessed a pass penalty and moved down the waiting list to the date of the offer. Once an applicant has received an offer of all forms of housing and passes they are dropped from the waiting list.

All applicants for General Housing Assistance must meet suitability criteria as well as income eligibility criteria. Applicants with no prior rental experience can qualify by completing the Renter Education Program, the goal of which is to teach applicants various duties, responsibilities and rights as a leaseholder.

The agency developed an MTW rent structure that requires all non-elderly, non-disabled adults to pay a significant minimum rent regardless of their income. The LDCHA's rent structure goal was intended to move participants to work by making them responsible for paying a meaningful rent, high enough to require work but low enough to be affordable. To reward work, the agency set a maximum, or ceiling, rent for each unit by bedroom size. To encourage employment advancement the agency established a system of income deductions that increase as hours of work increase. The LDCHA's MTW rent structure requires a significant minimum payment regardless of income and caps rent as income rises to encourage upward economic mobility. The minimum and maximum MTW rents are adjusted periodically by Board resolution.

Minimum and maximum MTW rents are:

Bedroom Size	Minimum	Maximum
1 Bedroom	\$ 185	\$ 435
2 Bedroom	\$ 215	\$ 500
3 Bedroom	\$ 255	\$ 575
4 Bedroom	\$ 275	\$ 665
5 Bedroom	\$ 315	\$ 690

Actual MTW monthly rent is determined by:

- annualizing total household income
- subtracting allowable deductions
- multiplying the sum by 30%
- dividing the amount by 12

Income deductions for MTW households include:

- 10% earned income deduction for those working at least 35 hours/week
- \$2,000 medical deduction for those working at least 35 hours/week
- full out-of-pocket dependent care deduction necessary to allow work or school attendance
- utility allowance as an annual income deduction, not as a monthly deduction from rent
- increase in the child dependent deduction to \$840 per child capped at \$1,680 per household

If the final amount is less than the minimum rent for the bedroom size occupied by the household, the annual rent is increased to the minimum. If it is higher than the maximum rent, it is lowered to the maximum. If it falls between the minimum and maximum, it is set where it falls. Section 8 households may pay a rent higher than the maximum if they select a unit with a contract rent that exceeds the payment standard.

Application of MTW Rent Structure

The alternative MTW rent policy and work requirement apply to all households in the General Housing program with a non-disabled adult age 62 or younger in the household. Exempt households may elect to participate in the MTW rent structure if they meet the work requirement through employment income. There are limited exemptions permitted, as follows:

- Elderly/Disabled Status - All adult household members age 62 or over, or who have disability status that prevents employment.
- Temporary Medical Exemption - verified medical condition of a household member lasting longer than 3 months that limits or that prevents work activities. Must be certified to by a licensed physician or medical practitioner.
- Discretionary Exemption - households with only one adult who does not have elderly/disability status and who, due to limitations of employment experience, education or training, or other significant barriers, is unable to earn sufficient income to meet the MTW minimum rent requirement.
- Work Requirement Exemption Only - Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work" by DCF.

The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement.

Annual Rent

An important component of the LDCHA's MTW rent structure is the feature of Annual Rent or Fixed Rent. Rent is fixed for one year and does not change, regardless of changes in household income or composition except in instances where a household permanently loses income through death, divorce, or when an income producing adult child whose income was included in the rent calculation moves out of the household.

Work Requirement

The work requirement mandates that all able-bodied adults age 18 and older work a minimum of 15 hours a week. For a two-adult household with minor children, the work requirement can be met if one adult works 35 hours per week. Enrollment in a post-secondary education program or Work Training Program satisfies the work requirement. An adult child in the household is also subject to the work requirement. Residents who fail to meet the work requirement must participate in the LDCHA's Family Self-Sufficiency Program 15 hours per week. Failure to meet the work requirement is a major program breach.

Other Approved Rent Reform Elements of the Rent Structure

Section 8 portability is restricted. MTW households may not move outside the LDCHA's jurisdiction unless the household applies for and receives an exception from this rule as a reasonable accommodation for a disability or other good cause, such as taking a job in a different city, education, or other household need. Households porting into the LDCHA's jurisdiction must participate in the MTW program, unless exempt.

Households that have both elderly/disabled members and non-disabled adult members are considered mixed eligibility households and are placed in the MTW rent structure.

Flat rents are not applied in the MTW rent structure, and MTW participants are not eligible for the flat rent option.

Rent Hardship Policy

The LDCHA's Rent Hardship Policy permits a degree of rent relief if the household experiences a loss in employment income or medical illness. Under the policy, a household may be re-certified to a \$50 or \$100 monthly rent based on the nature and amount of the income loss. The rent reduction is for a period not to exceed three months. A household may have a hardship rent reduction only once every 12 months, measured from the completion of any prior hardship .

If the household's income loss is due to a condition that then qualifies the individual for a disability under ADA, the household's designation is changed from MTW to income-based and they are then recertified.

Homeownership

Households that have an annual gross income which exceeds 50% of the Area Median Income (AMI) are offered an opportunity to join the homeownership program.

The LDCHA will provide a \$3,000 matching grant for down payment or closing costs for households that complete the Homeownership Program and purchase a house. Households participating in the Homeownership Program that have income between 80%-99% of AMI are allowed to pay the MTW maximum rent for three to five years or until they purchase a home. Households who do not join the homeownership program may remain in their public housing unit until their gross annual income reaches 80% AMI at which time they become responsible for paying the full market rent without subsidy. The LDCHA encourages households to leave the housing assistance program when a household's gross annual income reaches 100% AMI, so that higher income households not interested in purchasing a house will move into the private rental market, thereby opening up units of affordable housing for households at or below 80% of AMI.

Households participating in Section 8 voucher must leave the program when their rent obligation equals the full contract rent for their unit for six consecutive months. This is a provision of the Section 8 Housing Assistance Payment contract which serves as a term limit for higher income households.

Public housing households that reach 100% of AMI at the annual recertification will be given a 6 month notice to vacate. If the household has not provided the LDCHA with notice of a pending home purchase, the household will not be eligible for the homeownership down payment match. This will result in Section 8 HCV and public housing households being treated the same.

Alternate Rent Historic Outcomes

Avg Gross In- come / Partici- pants / Home- ownership	MTW YEAR	AVG GROSS INCOME	AVG TENANT RENT	AVG HAP TO OWNER	AVG CON- TRACT RENT	AVG FAMILY SIZE	MTW RENT PARTICI- PANTS	HOME- OWNER- SHIP
BASELINE	2000 - 2001 YR 2	16,434	296	213	622	3	391	
Year 2	2001 - 2002 YR 3	16,660	303	223	653	3	401	1
	2002 - 2003 YR 4	17,967	288	375	676	3	517	5
BENCHMARK	2003 - 2004 YR 5	19,564	329	378	731	3	492	5
Increase met- rics over time	2004 - 2005 YR 6	19,901	332	403	737	3	479	5
	2005 - 2006 YR 7	19,274	324	436	768	3	450	2
	2006 - 2007 YR 8	20,372	349	422	786	3	456	9
	2007 - 2008 YR 9	21,625	368	439	814	3	440	5
	2008 - 2009 YR 10	20,446	367	499	874	3	426	7
	2010 YR 11	19,776	358	510	872	3	411	7
	2011 YR 12	19,793	355	513	870	3	411	3
	2012 YR 13	21,060	376	551	929	3	477	8
	2013 YR 14	22,558	388	539	937	3	478	7
	2014 YR 15	23,937	411	521	950	3	472	5
	2015 YR 16	27,429	424	526	961	3	485	10
	2016 YR 17	24,345	417	536	977	3	479	2
	2017 YR 18	24,736	419	561	981	3	475	4
	2018 YR 19	23,997	410	573	996	3	508	8
OUTCOME	2019 YR 20	25,176	390	628	1030	3	434	6
	OVERALL AVERAGE	21,318	363	466	851	3	457	Total 99

Appendix II

Certifications and Declarations

- Board Resolution 2020-21 Adopting 2021 Annual MTW Plan
- Certification of Meeting MTW Statutory Requirements and Public Notices
- Certification of a Drug-Free Workplace
- Disclosure of Lobbying Activities
- Certification of Payments
- Affidavit of Publication for Public Notice Ad
- Landlord On-Site Verification and Re-Inspection Form
- Certification of Payments HUD Form 50071

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Vice Chair 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 January 1, 2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 30 days before the public hearing, published a notice that a hearing would be held and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment 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 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.
4. The PHA will affirmatively further fair housing by examining their 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.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. 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.
7. 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.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. 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.
10. 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. 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.

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

15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. 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.).

17. 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.

18. 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.

Lawrence-Douglas County Housing Authority

PHA Name

KS053

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)

Joshua Powers

Name of Authorized Official

Chair, LDCHA Board of Commissioners

Title

Joshua C. Powers
Signature

November 18, 2020

Date