

# LEXINGTON HOUSING AUTHORITY



**FY2016**

## **MOVING TO WORK ANNUAL REPORT**

*Submitted October 9, 2018*



**Lexington Housing Authority**

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## SECTION I

### INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (LHA) entered its fifth year as a Moving to Work (MTW) agency with the submission of the FY2016 Annual Plan. In April 2016, HUD extended the agreements of all 39 MTW agencies until 2028. The LHA is pleased to continue to shape the direction of affordable housing in Lexington with the flexibility the Demonstration provides.

The LHA submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011 with the execution of an MTW Agreement between HUD and LHA.

The LHA was established in 1934 to provide safe and desirable affordable housing to low and moderate-income individuals and families while partnering with community agencies to promote increased self-sufficiency and a higher quality of life for its residents. The agency provides housing assistance to nearly 4,000 low-income households in Lexington-Fayette County through the public housing and Housing Choice Voucher (HCV) programs. The Authority is governed by a Board of Commissioners, a group of dedicated citizens and local officials appointed in accordance with state housing law, who establish and monitor agency policies and are responsible for preserving and expanding the Authority's resources and ensuring the Authority's ongoing success.

The mission of the Lexington-Fayette Urban County Housing Authority (LHA) MTW Program is to:

*Serve as a prudent financial steward of federal, state and local resources, endeavoring to more effectively provide safe and desirable affordable housing, while furthering the self-sufficiency of families within Lexington-Fayette County.*

## **SHORT TERM GOALS**

### **Improve Public Housing Occupancy**

Traditionally the LHA has maintained public housing occupancy at or above 95%. However, in recent years occupancy rates have dipped at public housing sites to 89% (976 occupied/of 1097 units). Staff has cited various reasons for the decrease in occupancy: Housing Choice Vouchers being made available in jurisdictions in close proximity to Lexington with low-income families applying for and receiving vouchers in counties close to Lexington, and; the LHA's requirements for self-sufficiency units which make up 77% of the LHA's public housing stock were restrictive, dictating that the head/co-head/spouse have 6 months of consecutive employment history and currently be employed at application.

An amendment to the FY2016 Annual Plan in early 2016 relaxed the occupancy/admissions requirement from 6 months of consecutive employment history to 3 months of consecutive employment history. In addition, 12 months of landlord history was eliminated and now landlord history can be determined to be satisfactory by housing management without time constraints. These two adjustments were made in early 2016 therefore staff expects to see improvement throughout FY 2017 in the number of applicants who meet admissions requirement for Self-Sufficiency I & II units.

### **Lease-Up Centre Meadows**

In June 2016 the LHA's public housing management Team I completed lease-up of the 206 renovated units at Centre Meadows. The Centre Meadows site (formerly Pimlico) was converted to project-base vouchers (PBV) through the Rental Assistance Demonstration (RAD) and underwent major renovation that closed the site in March of 2013. Staff begin leasing units at Centre Meadows in December 2015.

### **Waiting List**

On June 30, 2016 there were 3,352 applicants on the waiting list for both public housing and the Housing Choice Voucher programs. The agency's HCV waiting list was opened temporarily August 31, 2015 – September 4, 2015. The LHA selected 1,500 randomly selected applicants to complete the eligibility process. Staff anticipates seeing all of those applicants over a 24-month period. The LHA will open the waiting list for all housing programs as necessary during FY2017 to address vacancy issues. The waiting list for two and three-bedroom self-sufficiency units in public housing was opened in January and March of 2016.

### **Initiatives to House Veterans**

The LHA is committed to serving veterans in need of affordable housing. The LHA currently provides 282 Housing Choice Vouchers for the Veterans Affairs Supportive Housing (VASH) Program. Through VASH, participating veterans receive a voucher and case management services provided by the local VA Hospital. Going forward in FY2017, the LHA will accept Veterans with dishonorable discharge and the LHA's HCV Administrative Plan has been updated to reflect this.

During FY2016, the LHA made an additional 75 vouchers available for families that include an adult household member who is a veteran. In addition to veterans receiving a preference on the HCV and public housing waiting list, the LHA has created and filled two housing navigator positions who devote their time to assisting veterans in securing permanent housing. Both positions are licensed clinical social workers with specialized skills needed to work with homeless veterans. The navigators assist veterans through the leasing process as well as working with landlords and performing inspections to expedite leasing. In March of 2016 the navigators coordinated a landlord recruitment luncheon to provide information about HCV and housing veterans. Through these efforts, the LHA plays an integral part in ending homelessness for veterans in Lexington.

### **Family Self-Sufficiency Program**

Currently the LHA is revising and combining the Action Plans for both the HCV and public housing Family Self-Sufficiency (FSS) Programs. So many requirements for the HCV and public housing programs are identical, it makes sense to combine the two separate plans into one document. Instances where there are differing requirements have been clearly indicated. The FSS Program seeks to assist participants in achieving self-sufficiency. The LHA defines self-sufficiency as a participant that is able to supply for their own needs with reduced need for subsidy. To assist the client in achieving self-sufficiency the Housing Authority will provide client-centered policies and practices to optimize the FSS participant's living condition. The LHA plans to use single- and flexibility to offer incentives for goal achievement and homeownership.

## **LONG TERM GOALS**

To ensure LHA's participation in the MTW demonstration program meets the specific needs of the Lexington-Fayette community, the agency will continue to craft local initiatives to address long term needs and meet the following MTW objectives:

1. Increase the number and quality of affordable housing choices throughout the Lexington-Fayette community;
2. Increase the number of families moving toward self-sufficiency;
3. Increase and strengthen the number of community partnerships benefitting residents with special needs, especially those not adequately served elsewhere in the community and those requiring a "service-enriched" housing environment; and
4. Reduce the agency's administrative costs while limiting the administrative burdens placed on staff and residents.

To further both the federal and local MTW objectives listed above; the LHA has sought and received HUD approval to implement 16 MTW activities since entering the program in 2011. Through the submission of and approval of the FY2016 Plan, the Authority has implemented

Activity 17. Below is a chart summarizing the LHA's MTW activities. The numbers in the statutory objectives column of the table corresponds with the numbered descriptions below.

### Statutory Objectives

1. To reduce costs and achieve greater cost effectiveness in federal expenditures;
2. To give incentives to families with children where the head of household is working; is seeking work; or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. To increase housing choices for low-income families.

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Implemented agency-wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly -Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Ongoing	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 Significantly Modified	Implemented FY2015 w/ Emphasys Elite Software	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013		3
8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013 -FY2014 Significantly Modified	Modified in FY2014 - Pimlico Converted to PBV w/ RAD/Not Implemented	3
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Implemented Resources used for RAD revitalization of Pimlico	3
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014 Significantly Modified	Ongoing	3

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Implemented until/ necessary for emergency capital repairs	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014	Ongoing	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing Implemented April 1, 2014	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Closed Out	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Proposed	1

## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION

Annual MTW Report					
II.4.Report.HousingStock					
A. MTW Report: Housing Stock Information					
New Housing Choice Vouchers that were Project-Based During the Fiscal Year					
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Actual Number of New Vouchers that were Project-Based	Description of Project		
N/A	0	0	N/A		
N/A	0	0	N/A		
N/A	0	0	N/A		
N/A	0	0	N/A		
Anticipated Total Number of New Vouchers to be Project-Based *		Actual Total Number of New Vouchers that were Project-Based	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 *	
0		0	0	0	
			Actual Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	Actual Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	
			206	202	
* From the Plan					
Other Changes to the Housing Stock that Occurred During the Fiscal Year					
Description of other changes to the housing stock during the fiscal year					
Description of other changes to the housing stock during the fiscal year					
Description of other changes to the housing stock during the fiscal year					
Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.					



General Description of Actual Capital Fund Expenditures During the Plan Year		
KY004 PHA-Wide Operations: \$521,586 KY004 PHA-Wide Management Improvements: \$120,530 KY004 PHA-Wide Administration: \$107,042 KY004 PHA-Wide Fees and Costs: \$180,859 KY004000001 Bainbridge-PineVly-Const: Parking lot repavement, office & bathroom renovation & repair; unit repairs, and unit storage repair/replacement \$373,000 KY004000004 Connie Griffith: Heat pump replacements \$33,568 KY004000013 BG Phase III: Sewer repair \$592		
Overview of Other Housing Owned and/or Managed by the PHA at Fiscal Year End		
Housing Program *	Total Units	Overview of the Program
Tax Credit	181	Ballard - a 134 unit elderly high rise; LHOC II - 13 single-family units and Faith Community Housing 34 single family rental units
Market Rate	5	Jefferson Street 5 units are market-rate.
Non-MTW HUD Funded	337	These vouchers are committed to Veterans Affairs Supportive Housing (VASH) - 282 vouchers, Shelter Plus Care - 30 vouchers and Mainstream - 25 vouchers.
<b>Total Other Housing Owned and/or Managed</b>	<b>523</b>	
<b>* Select Housing Program from:</b> Tax-Credit, State Funded, Locally Funded, Market-Rate, Non-MTW HUD Funded, Managing Developments for other non-MTW Public Housing Authorities, or Other.		
If Other, please describe:		N/A

II.5.Report.Leasing		
B. MTW Report: Leasing Information		
Actual Number of Households Served at the End of the Fiscal Year		
Housing Program:	Number of Households Served*	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs **	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs **	358	627
Port-In Vouchers (not absorbed)	0	0
<b>Total Projected and Actual Households Served</b>	<b>358</b>	<b>627</b>
* Calculated by dividing the planned/actual number of unit months occupied/leased by 12.		
** In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of Households served.		
Housing Program:	Unit Months Occupied/Leased****	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs ***	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs ***	4296	7524
Port-In Vouchers (not absorbed)	0	0
<b>Total Projected and Annual Unit Months Occupied/Leased</b>	<b>4296</b>	<b>7524</b>
<p>The Authority currently provides a monthly rental subsidy to seven (7) special partners who have agreed to house and provide wraparound social services to a minimum of 358 families with special needs. The special parnter agency handles the administrative duties for leasing the unit which lessens the LHA's administrative duties and allows for direct access to the client from the housing provider. A monthly rental subsidy was agreed upon with each of the agencies.</p>		
*** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of households served.		
**** Unit Months Occupied/Leased is the total number of months the housing PHA has occupied/leased units, according to unit category during the year.		
	Average Number of Households Served Per Month	Total Number of Households Served During the Year
Households Served through Local Non-Traditional Services Only	0	0

**Reporting Compliance with Statutory MTW Requirements: 75% of Families Assisted are Very Low-Income**

HUD will verify compliance with the statutory objective of “assuring that at least 75 percent of the families assisted by the Agency are very low-income families” is being achieved by examining public housing and Housing Choice Voucher family characteristics as submitted into the PIC or its successor system utilizing current resident data at the end of the agency's fiscal year. The PHA will provide information on local, non-traditional families provided with housing assistance at the end of the PHA fiscal year, not reported in PIC or its successor system, in the following format:

<b>Fiscal Year:</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Total Number of Local, Non-Traditional MTW Households Assisted	0	0	0	0	612	627	0	0
Number of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	0	0	0	0	612	627	0	0
Percentage of Local, Non-Traditional MTW Households with Incomes Below 50% of Area Median Income	0	0	0	0	100%	100%	0	0

Reporting Compliance with Statutory MTW Requirements: Maintain Comparable Mix							
<p>In order to demonstrate that the statutory objective of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the PHA will provide information in the following formats:</p>							
Baseline for the Mix of Family Sizes Served							
Family Size:	Occupied Number of Public Housing units by Household Size when PHA Entered MTW	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW	Non-MTW Adjustments to the Distribution of Household Sizes *	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained		
1 Person	421	818	0	1239	34%		
2 Person	310	529	0	839	23%		
3 Person	298	505	0	803	22%		
4 Person	135	313	0	448	12%		
5 Person	49	168	0	217	6%		
6+ Person	24	72	0	96	3%		
Totals	1237	2405	0	3642	100%		
Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized	N/A						
Mix of Family Sizes Served							
	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained **	34%	23%	22%	12%	6%	3%	100%
Number of Households Served by Family Size this Fiscal Year ***	1529	990	929	550	276	158	4432
Percentages of Households Served by Household Size this Fiscal Year ****	34%	22%	21%	12%	6%	4%	0.99
Percentage Change	0%	-4%	-5%	-0.88	-0.94	-0.96	-0.01
Justification and Explanation for Family Size Variations of Over 5% from the Baseline Percentages	N/A						
<p>* “Non-MTW adjustments to the distribution of family sizes” are defined as factors that are outside the control of the PHA. Acceptable “non-MTW adjustments” include, but are not limited to, demographic changes in the community’s population. If the PHA includes non-MTW adjustments, HUD expects the explanations of the factors to be thorough and to include information substantiating the numbers used.</p> <p>** The numbers in this row will be the same numbers in the chart above listed under the column “Baseline percentages of family sizes to be maintained.”</p> <p>*** The methodology used to obtain these figures will be the same methodology used to determine the “Occupied number of Public Housing units by family size when PHA entered MTW” and “Utilized number of Section 8 Vouchers by family size when PHA entered MTW” in the table immediately above.</p> <p>**** The “Percentages of families served by family size this fiscal year” will reflect adjustments to the mix of families served that are directly due to decisions the PHA has made. HUD expects that in the course of the demonstration, PHAs will make decisions that may alter the number of families served.</p>							

Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End		
Housing Program	Description of Leasing Issues and Solutions	
Project-Base Vouchers	206 units at the Pimlico public housing development were converted to project-based vouchers under HUD’s Rental Assistance Demonstration (RAD) program. The site has been vacant for construction since FY2014. The Housing Authority began re-occupying these units in December 2015. The site was completely occupied in June 2016.	
Public Housing	Public Housing occupancy was down during FY2016 due to the waiting list being depleted of eligible applicants for self-sufficiency sites that have a work requirement. The LHA will continue to periodically open the waiting list to seek eligible housing applicants.	
Local, Non-Traditional Units	The LHA meets periodically with these special partners to encourage utilization of these vouchers. At present, the LHA has no leasing issues with these vouchers.	

Number of Households Transitioned To Self-Sufficiency by Fiscal Year End		
Activity Name/#	Number of Households Transitioned *	Agency Definition of Self Sufficiency
Increase Minimum Rent/ Activity 1	450	Self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.
HCV Tenant Based Special Partner Programs/Activity 10	4	Self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.
Local, Non-Traditional Use of MTW Funds for Special Partners/Activity 12	35	Self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.
Alternate Policy on the Inclusion/Exclusion of Income to Calculate Rent/Activity 13	428	Self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.
Households Duplicated Across Activities/Definitions	428	* The number provided here should match the outcome reported where metric SS #8 is used.
ANNUAL TOTAL NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	489	

## II.6.Report.Leasing

### C. MTW Report: Wait List Information

Wait List Information at Fiscal Year End				
Housing Program(s) *	Wait List Type **	Number of Households on Wait List	Wait List Open, Partially Open or Closed ***	Was the Wait List Opened During the Fiscal Year
Federal MTW Public Housing Units	Community-Wide	1979	The public housing waiting list was partially open for 2 and 3 bedroom self-sufficiency public housing sites and elderly applicants of Griffith Towers	Yes
Federal MTW Housing Choice Voucher Program	Community-Wide	1373	HCV waiting list was partially open in 2016 for general applicants.	Yes
Federal non-MTW Housing Choice Voucher Units	Program Specific	0	The waiting list remained open for VASH, Shelter Plus Care and Mainstream.	Yes
Tenant Based Local, Non-Traditional Housing Assistance Program	Program Specific	94	The 7 special partner programs manage their own waiting list that remained open during FY2015. These partners provide housing to families while they participate in special programming.	Yes

More can be added if needed.

\* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

\*\* *Select Wait List Types*: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

\*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Federal MTW Public Housing Units: Elderly population served at the Connie Griffith Manor site ONLY and 2 and 3 bedroom waiting list for self-sufficiency units is currently open.
Federal MTW Housing Choice Voucher Program: Tenant-based HCV special partner programs (Domestic Violence Bluegrass Mental Health and Volunteers of America)
Housing Program and Description of the populations for which the wait list is open

If Local, Non-Traditional Program, please describe:

1) Canaan House - Individuals who have been diagnosed with a mental illness; 2) Urban League of Lexington-Fayette County - Elderly Individuals; 3) New Beginnings - Individuals who have been diagnosed with a mental illness; 4) OASIS Rental Assistance Housing Program - Families in need of financial literacy, credit management, and homeownership resources.
5) One Parent Scholar House - Single parents who are full-time students in a post-secondary educational institution.
6) HOPE Center - Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment; 7) Serenity House Place - Parents with children: who have recently been released from jail, are homeless and who are substance abuse treatment program graduates.

If Other Wait List Type, please describe:

N/A
N/A
N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

N/A
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## SECTION III -

### REQUIRED ELEMENTS FOR PROPOSED ACTIVITIES

All proposed activities that are granted approval by HUD are reported on in Section IV as 'Approved Activities.'

## SECTION IV

### A. IMPLEMENTED ACTIVITIES

#### Activity 1: Increase Minimum Rent to \$150 Across All Housing Programs

Plan Year Proposed	Plan Year Implemented
FY 2012 – FY 2013 for Pimlico Apartments	FY 2012
Activity Expanded FY2014 to all Public Housing Units and HCV Units	FY 2014
<b>Activity Description</b>	
All non-elderly/non-disabled public housing and Housing Choice Voucher (HCV) tenants pay \$150 in minimum rent. The LHA increased the minimum rent to \$150 across all housing programs (Section 8 & 9) excluding elderly and/or disabled households and households participating in HCV special partner programs in April 2014. The initiative promotes self-sufficiency by encouraging heads-of-household to work, while raising much-needed revenue.	
<b>Status</b>	
This activity is on schedule and benchmarks and outcomes are reported in the following pages.  Even though households reporting earned income increased, the number of households reporting no income were higher during FY2015 than baseline and benchmark metrics.  The Centre Meadows site (formerly Pimlico Apartments) is now occupied since being closed for renovations from 2013 through the fall of 2015. Major renovation of the 206-unit site is the result of HUD's Rental Assistance Demonstration (RAD) program. The Centre Meadows site is now a Project-Based Voucher site, all tenants at this site are subject to the \$150 minimum rent.  LHA staff maintains that increasing the minimum rent has produced positive results for the agency with increased revenue and motivated work-able tenants to seek and secure employment.	
<b>Non-Significant Changes or Modifications</b>	
There were no non-significant changes or modifications during the FY2016 Plan year.	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>	
There were no changes or modifications to metrics, baselines or benchmarks for this activity.	
<b>Attachment C or D Authorization(s) Changes</b>	
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.	
<b>Significant Change or Modifications to the Activity Since Approval</b>	
There are no significant changes or modifications to the activity as previously proposed and approved.	



## HUD STANDARD METRICS

Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households					
CE #5: INCREASE IN AGENCY RENTAL REVENUE					
Sum total annual gross (net) revenue from non-disabled/non-elderly households					
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	\$2,576,196 (\$1,612,512) Sum total annual gross (net) rental revenue from <b>759</b> non-elderly/non-disabled households as of June 30, 2013	\$2,888,208 (\$2,017,152) Expected sum total annual gross (net) rental revenue from <b>699</b> non-elderly/non-disabled households as of June 30, 2015	\$3,490,820 (\$2,109,288) Actual sum total annual gross (net) rental revenue from <b>768</b> non-elderly/non-disabled households as of June 30, 2015	\$3,637,812 (\$2,676,180) Actual sum total annual gross (net) rental revenue from <b>728</b> non-elderly/non-disabled households as of June 30, 2016	Yes
<b>*HCV</b>	\$6,423,672 (\$3,457,392) 1,540 non-elderly/non-disabled households as of June 30, 2013	\$6,661,080 (\$3,928,428) 1,458 non-elderly/non-disabled households as of June 30, 2015	\$7,007,724 (\$4,587,564) 1,325 non-elderly/non-disabled households as of June 30, 2015	\$7,514,400 (\$4,886,424) 1,296 non-elderly/non-disabled households as of June 30, 2016	Yes
<b>**PBV UNITS</b>	\$392,399 (\$290,262) 158 non-elderly/non-disabled households as of June 30, 2016	\$672,684 (\$497,592) 165 non-elderly/non-disabled households as of June 30, 2017	N/A	**Baseline established in 2016	TBD
<b>AGENCY-WIDE</b>	\$8,999,868 (\$5,069,904) 2,299 Non-Elderly/Non-Disabled Public Housing & HCV Households as of June 30, 2013	\$9,549,288 (\$5,945,580) 2,157 Non-Elderly/Non-Disabled Public Housing & HCV Households as of June 30, 2015	\$10,498,544 (\$6,696,852) 2,093 Public Housing & HCV Households as of June 30, 2015	\$11,152,212 (\$7,562,604) 2,024 Non-Elderly/Non-Disabled Public Housing & HCV Households	Yes

\*HCV does not receive rental revenue. The data reported for HCV is the Total Tenant Payment (TTP) which includes HAP and Utility Allowance.

\*\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.

Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households					
SS #1: INCREASE IN HOUSEHOLD INCOME					
Average earned income of households affected by this policy in dollars (increase).					
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	<b>\$11,487</b> Average gross annual earned income from <b>759</b> non-elderly/non-disabled households as of June 30, 2013	<b>\$12,857</b> Expected average gross annual earned income from <b>699</b> non-elderly/non-disabled households as of June 30, 2015	<b>\$17,209</b> Actual average gross annual earned income from <b>324 (42%) of 768</b> non-disabled/ non-elderly house-holds as of June 30, 2015	<b>\$19,518</b> Actual average gross annual earned income from <b>598 (82%) of 728</b> non-elderly/non-disabled households as of June 30, 2016	<b>Yes</b>
<b>HCV</b>	<b>\$8,316</b> <b>1,540</b> non-elderly/non-disabled/non-special partner households as of June 30, 2013	<b>\$8,535</b> <b>1,458</b> non-elderly/non-disabled/non-special partner households as of June 30, 2015	<b>\$14,597</b> <b>520 (39%) of 1,325</b> non-disabled/non-elderly/non-special partner households as of June 30, 2015.	<b>\$14,555</b> <b>844 (65%) of 1,296</b> non-elderly-non-disabled/non-special partner households as of June 30, 2016	<b>Yes</b>
<b>*PBV UNITS</b>	<b>\$15,231</b> <b>130 (82%) of 158</b> non-elderly/ non-disabled/non-special partner households as of June 30 2016	<b>\$18,277</b> <b>165</b> non-elderly/non-disabled /non-special partner households as of June 30 2017	<b>N/A</b>	<b>*Baseline established in 2016</b>	<b>TBD</b>
<b>AGENCY-WIDE</b>	<b>*\$9,902</b> <b>2,299</b> public housing & HCV households as of June 30, 2013	<b>*\$10,696</b> <b>2,157</b> public housing & HCV households as of June 30, 2016	<b>\$15,903</b> <b>844 (37%) of 2,304</b> public housing & HCV households as of June 30, 2015.	<b>\$17,037</b> <b>1,442 (71%) of 2,024</b> non-elderly/non-disabled public housing & HCV households as of June 30, 2016	<b>Yes</b>

\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. The addition of Centre Meadows has changed the agency-wide totals.

Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households					
SS #3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS					
Category 5: Unemployed Heads of Household (Reporting No Earned Income)					
	Baseline	Benchmark	Outcome FY2015)	Outcome FY2016)	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	<b>255 (34%)</b> Non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2013	<b>206 (29%)</b> Expected non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2015	<b>444 (59%)</b> Actual non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2015	<b>130 (22%)</b> Actual non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2016	<b>Yes</b>
<b>HCV</b>	<b>734 (48%)</b>	<b>669 (46%)</b>	<b>805 (61%)</b>	<b>452 (35%)</b>	<b>Yes</b>
<b>*PBV UNITS</b>	<b>28 (18%)</b> Non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2016	<b>0</b> Non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2017	<b>N/A</b>	<b>*Baseline established in 2016</b>	<b>TBD</b>
<b>*AGENCY-WIDE</b>	<b>989 (43%)</b>	<b>875 (41%)</b>	<b>1,249 (60%)</b>	<b>582 (29%)</b>	<b>Yes</b>

\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. Agency-wide totals do not include Centre Meadows.

Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households					
SS #3: INCREASE IN HOUSEHOLD INCOME					
Category 6: Other (Heads of Household Reporting Earned Income)					
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	<b>504 (66%)</b> Non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2013	<b>493 (71%)</b> Expected non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2015	<b>324 (42%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2015	<b>598 (82%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>Yes</b>
<b>HCV</b>	<b>806 (52%)</b>	<b>789 (54%)</b>	<b>520 (39%)</b>	<b>844 (65%)</b>	<b>Yes</b>
<b>Centre Meadows</b>	<b>130 (82%)</b> Non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>165 (100%)</b> Non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>N/A</b>	<b>Baseline established in FY2016</b>	<b>TBD</b>
<b>* AGENCY-WIDE</b>	<b>1,310 (57%)</b>	<b>1,282 (59%)</b>	<b>844 (40%)</b>	<b>1,442 (71%)</b>	<b>Yes</b>

\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. Agency-wide totals do not include Centre Meadows.

Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households					
SS #4: NON-ELDERLY/NON-DISABLED HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)					
	Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	<b>42</b> Non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2013	<b>32</b> Expected non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>266* (35%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>95 (13%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>Yes</b>
<b>HCV</b>	<b>86</b> Non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2013	<b>91</b> Expected non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>58 (4%)</b> Actual non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>47 (4%)</b> Actual non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>Yes</b>
<b>*Centre Meadows</b>	<b>38 (24%)</b> Non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>0</b> Expected non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2017	<b>N/A</b>	<b>Baseline established in FY2016</b>	<b>TBD</b>
<b>*AGENCY-WIDE</b>	<b>128</b> Public Housing & HCV non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2013	<b>123</b> Expected Public Housing & HCV non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>324 (16%)</b> Actual Public Housing & HCV non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>142 (7%)</b> Actual Public Housing & HCV non-elderly/non-disabled/non-special partner households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>Yes</b>
Data Source: Emphasys *LHA believes the disproportionate difference in the public housing households transitioning to self-sufficiency could be due to a change in software programs. A difference in how the data was extracted could explain the major difference from the baseline numbers to the actual numbers LHA will compare FY2016 numbers to FY2015 numbers to determine if the data is plausible. *FY2016 data compared to FY2015 data for public housing households appears to be more plausible. *Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. Agency-wide totals do not include Centre Meadows.					

<b>Activity 1: Rent Reform - Increase Minimum Rent for Work-Able Households</b>					
<b>SS #8: Households Transitioned to Self-Sufficiency</b>					
For this activity, self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.					
Number of households transitioned to self-sufficiency (increase). Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.					
	Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
<b>PUBLIC HOUSING</b>	<b>50</b> Non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2013	<b>56</b> Expected non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2015	<b>220 (29%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2015	<b>385 (53%)</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2016	<b>Yes</b>
<b>HCV</b>	<b>399</b>	<b>408</b>	<b>237 (18%)</b>	<b>373 (29%)</b>	<b>Yes</b>
<b>**PBV UNITS</b>	<b>72 (46%)</b> Non-elderly/non-disabled/non-special partner households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2016	<b>88 (53%)</b> Non-elderly/non-disabled/non-special partner households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	<b>N/A</b>	<b>Baseline established in FY2016</b>	<b>TBD</b>
<b>AGENCY-WIDE</b>	<b>449</b>	<b>464</b>	<b>457 (22%)</b>	<b>757 (37%)</b>	<b>Yes</b>
Data Source: Emphasys *\$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year **Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. The addition of Centre Meadows has changed the agency-wide totals.					

## IMPACT ANALYSIS

<b>Metric</b>	<b>Program</b>	<b>FY 2013 Baseline</b>	<b>FY 2014 Benchmark</b>	<b>FY 2014 Actual*</b>	<b>FY2015 Actual</b>	<b>FY2016 Actual</b>
# (%) of families paying at least \$150 per month in gross rent / TTP	Public Housing	641 (75%)	860 (100%)	700 (99%)	768 (100%)	728 (100%)
	HCV	866 (60%)	1,454 (100%)	1,312 (92%)	1,325 (100%)	1,296 (100%)
	Centre Meadows	N/A	N/A	N/A	N/A	155 (98%)
	Agency-Wide	1,507 (65%)	2,314 (100%)	2,012 (94%)	2,093 (100%)	2,024 (100%)
Avg (Median) gross annual earned income reported by families	Public Housing	\$10,512 (\$8,190)	\$10,825 (\$8,425)	\$13,263 (\$12,480)	\$14,368 (\$14,100)	\$16,112 (\$15,611)
	HCV	\$8,632 (\$3,000)	\$8,890 (\$3,075)	\$8,626 (\$3,510)	\$8,335 (\$3,157)	\$9,479 (\$6,775)
	Centre Meadows	N/A	N/A	N/A	N/A	*\$12,532 (\$13,845)
	Agency-Wide	\$9,331 (\$6,084)	\$9,605 (\$6,225)	\$10,156 (\$7,540)	\$10,549 (\$8,105)	\$12,796 (\$7,712)
Avg (Median) total adjusted annual income reported by families	Public Housing	\$11,197 (\$8958)	\$11,530 (\$9,220)	\$14,478 (\$12,184)	\$14,845 (\$13,215)	\$16,389 (\$15,632)
	HCV	\$10,501 (\$8,136)	\$10,815 (\$8,375)	\$10,325 (\$7,736)	\$9,887 (\$7,800)	\$11,328 (\$9,477)
	Centre Meadows	N/A	N/A	N/A	N/A	\$13,964 (\$14,574)
	Agency-Wide	\$10,760 (\$8,410)	\$11,075 (\$8,650)	\$11,695 (\$9,540)	\$11,701 (\$9,848)	\$13,859 (\$11,960)
Avg (Median) monthly gross rent payment / TTP of families	Public Housing	\$281 (\$226)	\$302 (\$226)	\$352 (\$304)	\$229 (\$198)	\$416 (\$391)
	HCV	\$271 (\$203)	\$306 (\$203)	\$357 (\$269)	\$289 (\$168)	\$314 (\$228)
	Centre Meadows	N/A	N/A	N/A	N/A	\$355 (\$365)
	Agency-Wide	\$275 (\$211)	\$305 (\$211)	\$355 (\$278)	\$267 (\$196)	\$365 (\$293)
# (%) of families requesting hardship exemptions (of those whose rent is increased)	Public Housing	N/A	11 (5%)	2	0	0
	HCV	N/A	29 (5%)	0	0	4
	Centre Meadows	N/A	N/A	N/A	N/A	1
	Agency-Wide	N/A	40 (5%)	2	0	5
# (%) of families granted hardship exemptions (of those whose rent is increased)	Public Housing	N/A	7 (3%)	0	0	0
	HCV	N/A	18 (3%)	0	0	3
	Centre Meadows	N/A	N/A	N/A	N/A	0
	Agency-Wide	N/A	25 (3%)	0	0	3
# (%) of residents who leave LHA housing	Public Housing	97 (11%)	102 (12%)	245 (17%)	168 (22%)	127
	HCV	152 (10%)	160 (11%)	202 (14%)	443 (33%)	280
	Centre Meadows	N/A	N/A	N/A	N/A	10
	Agency-Wide	257 (11%)	270 (12%)	347 (15%)	611 (29%)	417

Metric	Program	FY 2013 Baseline	FY 2014 Benchmark	FY 2014 Actual*	FY 2015 Actual	FY2016 Actual
Total gross monthly rent revenue (Net monthly rent revenue)	Public Housing	\$242,040 (\$146,196)	\$259,737 (\$163,893)	\$247,812 (\$174,868)	\$290,902 (\$175,774)	\$303,151 (\$223,015)
	HCV	\$394,734 (\$145,633)	\$445,333 (\$196,232)	\$510,027 (\$283,346)	\$583,977 (\$382,297)	\$409,108 (\$282,135)
	Centre Meadows	N/A	N/A	N/A	N/A	\$56,057 (\$41,466)
	Agency-Wide	\$636,774 (\$291,829)	\$705,070 (\$360,125)	\$757,839 (\$458,214)	\$874,879 (\$558,071)	\$712,259 (\$505,150)
# of initiative-related complaints reported to staff	Public Housing	N/A	20	5	4	3
	HCV	N/A	55	6	2	4
	Centre Meadows	N/A	N/A	N/A	N/A	1
	Agency-Wide	N/A	75	11	6	8
Staff time spent handling initiative-related complaints	Public Housing	N/A	7 hours	1.25 hours	.50 hours	.75 hours
	HCV	N/A	18 hours	1.5 hours	.50 hours	1 hour
	Centre Meadows	N/A	N/A	N/A	N/A	.25 hours
	Agency-Wide	N/A	25 hours	2.75 hours	1 hour	2 hours
*The LHA's fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014, making historical data from before this time difficult to retrieve. Therefore, LHA is using data from Tenmast ending May 27, 2014.						



## Activity #1 – Disparate Impact Analysis

Activity 1: Public Housing																				
Disparate Impact Analysis - Baseline Data																				
Public Housing Population	Heads of Household				Average Gross Annual Earned Income				Average Total Annual Adjusted Income				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2014 Actual	FY2015 Actual	FY2016 Actual
All Households	860	704	768	728	\$10,512	\$13,263	\$14,367	\$16,112	\$11,197	\$14,478	\$19,388	\$16,389	\$281	\$352	\$487	\$416	\$21	\$71	\$206	\$135
Gender																				
Female	774	636	700	654	\$10,610	\$13,392	\$14,388	\$15,593	\$11,245	\$14,588	\$15,617	\$15,966	\$284	\$354	\$399	\$377	\$20	\$70	\$115	\$93
Male	86	68	68	74	\$9,623	\$12,049	\$14,156	\$20,326	\$10,764	\$13,447	\$15,680	\$20,133	\$260	\$335	\$267	\$467	\$26	\$75	\$7	\$207
Race (Multiple selections permitted)																				
Black	677	577	642	606	\$10,959	\$13,635	\$14,485	\$16,259	\$11,656	\$14,789	\$16,179	\$16,679	\$290	\$358	\$412	\$424	\$21	\$68	\$122	\$130
White	179	126	118	116	\$9,267	\$11,668	\$13,910	\$15,645	\$10,022	\$13,199	\$13,460	\$15,011	\$257	\$324	\$347	\$380	\$17	\$67	\$90	\$123
American Indian / Native Alaskan	4	3	1	1	\$9,407	\$15,847	\$13,595	\$0	\$3,333	\$10,271	\$8,731	\$12,635	\$116	\$262	\$218	\$316	\$34	\$146	\$102	\$200
Asian / Pacific Islander	5	5	5	3	\$13,170	\$12,172	\$16,777	\$18,919	\$7,930	\$10,810	\$8,820	\$8,923	\$208	\$284	\$222	\$223	\$27	\$76	\$14	\$15
Native Hawaiian / Other Pacific Islander	4	4	2	2	\$8,120	\$10,683	\$6,500	\$13,000	\$6,890	\$12,044	\$10,346	\$13,360	\$210	\$305	\$272	\$334	\$4	\$95	\$62	\$124
Other**	3	-	-	-	-	-	-	-	\$568	-	-	-	\$83	-	-	-	\$67	-	-	-
Ethnicity																				
Non-Hispanic	843	688	752	708	\$10,514	\$13,254	\$14,135	\$16,093	\$11,245	\$14,510	\$12,669	\$16,009	\$282	\$352	\$417	\$407	\$35	\$70	\$135	\$125
Hispanic	17	16	16	20	\$10,411	\$13,627	\$17,075	\$15,181	\$8,798	\$13,099	\$15,222	\$16,197	\$251	\$337	\$359	\$411	\$21	\$86	\$108	\$160
Age of Head of Household																				
18-31	421	284	310	309	\$9,284	\$12,198	\$14,939	\$15,486	\$9,320	\$12,473	\$12,571	\$15,999	\$249	\$318	\$322	\$365	\$21	\$69	\$73	\$116
32-46	292	289	327	309	\$11,734	\$13,598	\$15,247	\$16,420	\$13,162	\$15,548	\$16,844	\$14,282	\$317	\$379	\$428	\$437	\$17	\$62	\$111	\$120
47-61	147	131	131	110	\$11,600	\$14,830	\$14,981	\$18,616	\$12,667	\$16,465	\$20,511	\$19,428	\$305	\$368	\$196	\$504	\$27	\$63	\$156	\$199
Excluded Households																				
Elderly/Disabled Households	363	358	323	368	\$971	\$1,341	\$688	\$1,397	\$11,051	\$11,555	\$10,368	\$10,560	\$260	\$267	\$259	\$265	N/A	N/A	N/A	N/A

\*The LHA's fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014. Therefore, LHA is using data from Tenmast ending May 27, 2014.

Activity 1: HCV																				
Disparate Impact Analysis - Baseline Data																				
HCV Population	Heads of Household				Average Gross Annual Eined Income				Average Total Annual Adjusted Income				Average TTP				Average Increased Rent Burden			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2014 Actual	FY2015 Actual	FY2016 Actual
All Households	1,454	1,430	1,325	1,296	\$8,632	\$8,626	\$8,335	\$9,479	\$10,501	\$10,325	\$9,887	\$11,328	\$271	\$357	\$289	\$314	\$35	\$86	\$18	\$43
Gender																				
Female	1,404	1,378	1,177	1,167	\$8,697	\$8,669	\$8,701	\$9,873	\$10,547	\$10,403	\$10,231	\$11,605	\$273	\$360	\$299	\$322	\$34	\$87	\$26	\$49
Male	50	52	148	129	\$7,995	\$7,497	\$5,424	\$5,917	\$8,958	\$8,254	\$7,146	\$8,824	\$237	\$271	\$207	\$246	\$47	\$34	-\$30	-\$9
Race ( Multiple selections permitted)																				
Black	1,183	1,160	962	1,036	\$8,942	\$8,811	\$8,975	\$10,066	\$10,787	\$10,444	\$10,205	\$11,809	\$279	\$360	\$297	\$325	\$34	\$81	\$18	\$46
White	277	275	358	257	\$7,561	\$7,938	\$5,816	\$7,221	\$9,341	\$9,805	\$8,595	\$9,431	\$242	\$341	\$256	\$273	\$38	\$99	\$14	\$31
American Indian / Native Alaskan	5	4	2	2	\$6,298	\$4,940	\$5,029	\$3,329	\$7,354	\$7,557	\$12,892	\$8,279	\$189	\$221	\$323	\$224	\$34	\$32	\$189	\$35
Asian / Pacific Islander	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Native Hawaiian / Other Pacific Islander	1	2	3	1	\$0	\$0	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$0	\$436	\$178	\$166	\$0	\$436	\$178	\$166
Other**	1	-		-	\$22,260	-		-	\$0	-	-	-	\$50	-	-	-	\$100	-	-	-
Ethnicity																				
Non-Hispanic	1,438	1,410	1,262	1,274	\$8,654	\$8,605	\$5,753	\$9,481	\$10,475	\$10,294	\$8,648	\$11,316	\$271	\$356	\$240	\$314	\$35	\$85	-\$31.00	\$43.00
Hispanic	16	20	63	22	\$10,432	\$10,156	\$7,345	\$9,641	\$12,096	\$12,466	\$9,082	\$12,006	\$306	\$394	\$257	\$313	\$21	\$88	-\$49.00	\$7.00
Age of Head of Household																				
18-31	497	386	329	289	\$8,258	\$7,821	\$8,593	\$9,456	\$9,035	\$8,513	\$8,558	\$9,801	\$237	\$297	\$261	\$287	\$42	\$60	\$24	\$50
32-46	759	824	711	741	\$9,231	\$9,351	\$9,150	\$10,379	\$11,774	\$11,499	\$11,120	\$12,407	\$302	\$392	\$318	\$337	\$29	\$90	\$16	\$35
47-61	198	220	265	266	\$7,579	\$7,324	\$6,003	\$7,016	\$9,238	\$9,104	\$8,344	\$9,982	\$242	\$328	\$246	\$282	\$38	\$86	\$4	\$40
*The LHA's fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014. Therefore, LHA is using data from Tenmast ending May 27, 2014.																				
**"Other" category not available in LHA's computer systems as of May 27, 2014																				

Activity 1: Centre Meadows				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>
<b>All Households</b>	158	\$12,532	\$13,964	\$355
<b>Gender</b>				
Female	144	\$12,561	\$13,819	\$352
Male	14	\$12,239	\$15,457	\$387
<b>Race</b> ( <i>Multiple selections permitted</i> )				
Black	129	\$12,126	\$14,067	\$357
White	28	\$14,237	\$13,407	\$342
American Indian / Native Alaskan	0	\$0	\$0	\$0
Asian / Pacific Islander	1	\$17,233	\$16,273	\$407
Native Hawaiian / Other Pacific Islander	0	\$0	\$0	\$0
Other**	0	\$0	\$0	\$0
<b>Ethnicity</b>				
Non-Hispanic	156	\$12,356	\$13,819	\$351
Hispanic	2	\$26,232	\$25,272	\$632
<b>Age of Head of Household</b>				
18-31	107	\$12,438	\$13,582	\$347
32-46	37	\$12,671	\$14,402	\$363
47-61	14	\$12,883	\$16,252	\$393
<b>Excluded Households</b>				
Elderly/Disabled Households	45	\$487	\$11,679	\$292

### Activity 3) Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households

Plan Year Proposed	Plan Year Implemented
Proposed For Connie Griffith Manor households – FY2012-FY2013 Plan	FY 2012-FY2013
Activity expanded to include HCV elderly and disabled households on a fixed income – FY2014	FY 2014
<b>Activity Description</b> <p>This activity is ongoing. Through this activity the LHA is recertifying households at Connie Griffith and HCV elderly and disabled families on a fixed income once every three years instead of annually. Between triennial recertifications, whenever the federal government adjusts benefits paid through fixed-income programs like Social Security and SSI, the LHA reserves the right to adjust resident household incomes and rent payments accordingly. In reference to this activity, households on a fixed income are defined as any household with any amount of income from a fixed income source like Social Security, SSDI, or pension income.</p> <p>Additionally, the LHA created a "local version" of HUD-Form 9886 that would be signed by the tenant at the triennial recertification. Households who experience a significant loss of income, an increase in allowable medical expenses, or a change in family composition may request an interim recertification at any time. Households whose income increases \$200 or more per month must request an interim recertification.</p>	
<b>Status</b> <p>In response to a recommendation from Dr. Amanda Sokan, Moving To Work (MTW) consultant/evaluator that all LHA households be surveyed, the LHA conducted a resident satisfaction survey of Connie Griffith households during 2016. The survey was administered by two University of Kentucky interns working at the Towers during the 2016 Fall Semester under the supervision of Mark Johnson, Resident Services Coordinator. At the time the survey was conducted 168 households were occupied at CG Towers and a total of 79 (47%) residents completed the survey. Each resident who took the survey received a \$10 Walmart gift card. A total of 12 questions were asked and an additional three optional questions to track demographics were asked on the survey. The results of this survey are discussed in the Evaluation section of this report. HCV households will be surveyed later in 2016.</p>	
<b>Non-Significant Changes or Modifications</b> <p>There were no non-significant changes or modifications during the FY2016 Plan year.</p>	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b> <p>There were no changes or modifications to metrics, baselines or benchmarks for this activity.</p>	
<b>Attachment C or D Authorization(s) Changes</b> <p>There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.</p>	
<b>Significant Change or Modifications to the Activity Since Approval</b> <p>There are no significant changes or modifications to the activity as previously proposed and approved.</p>	

## HUD STANDARD METRICS

Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households					
CE #1: Agency Cost Savings					
	Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
CONNIE GRIFFITH	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars) during FY2015.	Actual cost of task after implementation of the activity (in dollars) during FY2016.	Whether the outcome meets or exceeds the benchmark.
	<b>\$8,091</b> <b>181</b> recertifications at Connie Griffith at an average cost of \$44.70 each during FY 2011	<b>\$2,754</b> Expected <b>57</b> recertifications at Connie Griffith at an average cost of \$48.31 each during FY 2015	<b>\$2,657</b> <b>55</b> actual recertifications at Connie Griffith multiplied by average cost of each during FY 2015.	<b>\$2,126</b> <b>44</b> actual recertifications at Connie Griffith multiplied by the average cost of each during FY2016.	<b>Yes</b>
HCV PROGRAM	<b>\$30,800</b> <b>700</b> recertifications for elderly and/or disabled households with at least one fixed income source at an average cost of \$44.00 each during FY 2013	<b>\$10,435</b> Expected <b>216</b> recertifications for elderly and/or disabled households with at least one fixed income source at an average cost of \$48.31 each during FY 2015	<b>\$16,329</b> <b>338</b> actual recertifications for elderly and/or disabled households with at least one fixed income source multiplied by average cost of \$48.31 each during FY 2015.	<b>\$11,015</b> <b>228</b> actual recertifications for elderly and/or disabled households with at least one fixed income source multiplied by average costs of \$48.31 each during FY2016.	<b>No</b>
	<b>\$38,891</b> <b>881</b> public housing and HCV recertifications at an average cost of \$41.14 each before implementation of the activity	<b>\$13,189</b> Expected <b>273</b> public housing and HCV recertifications at an average cost of \$48.31 each during FY2015	<b>\$18,986</b> <b>393</b> actual public housing and HCV recertifications multiplied by the average cost of each during FY2015	<b>\$13,141</b> <b>272</b> actual public housing and HCV recertifications multiplied by the average cost of each during FY2016	<b>Yes</b>
AGENCY-WIDE					
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records					

## Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households

### CE #2: Staff Time Savings

Baseline		Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
CONNIE GRIFFITH	Total amount of staff time dedicated to the task prior to implementation of the activity	Expected amount of total staff time dedicated to the task after implementation of the activity	Actual 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.
	<b>362 hours</b>  <b>181</b> recertifications at Connie Griffith at an average staff time of <b>2 hours</b> each during FY 2011	<b>114 hours</b>  Expected <b>57</b> recertifications at Connie Griffith at an average staff time of <b>2 hours</b> each during FY 2015.	<b>110 hours</b>  <b>55</b> actual recertifications at Connie Griffith multiplied by average staff time of <b>2 hours</b> each during FY 2015.	<b>88 hours</b>  <b>44</b> actual recertifications at Connie Griffith multiplied by average staff time of <b>2 hours</b> each during FY 2016.	<b>Yes</b>
HCV PROGRAM	<b>1,400 hours</b> <b>700</b> recertifications for elderly and/or disabled households with at least one fixed income source at an average staff time of <b>2 hours</b> each during FY 2013	<b>432 hours</b> Expected <b>216</b> recertifications for elderly and/or disabled households with at least one fixed income source at an average staff time of <b>2 hours</b> each during FY 2015	<b>676 hours</b> <b>338</b> actual recertifications for elderly and/or disabled households with at least one fixed income source multiplied by average staff time of <b>2 hours</b> each during FY 2015.	<b>456 hours</b> <b>228</b> actual recertifications for elderly and/or disabled households with at least one fixed income source multiplied by average staff time of <b>2 hours</b> each during FY 2016.	<b>No</b>
AGENCY-WIDE	<b>1,762</b> <b>881</b> public housing and HCV recertifications at an average staff time of <b>2 hours</b> each before implementation of the activity	<b>546 hours</b> Expected <b>273</b> public housing and HCV recertifications at an average staff time of <b>2 hours</b> each during FY2015	<b>786 hours</b> <b>393</b> actual public housing and HCV recertifications multiplied by average staff time of <b>2 hours</b> each during FY2015	<b>544 hours</b> <b>272</b> actual recertifications of public housing and HCV households multiplied by an average staff time of <b>2 hours</b> each during FY2016	<b>Yes</b>
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records					

# Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households

CE #5: Increase in Agency Rental Revenue

Baseline		Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
CONNIE GRIFFITH	Rental revenue prior to implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Expected rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Actual rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Actual rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$40,416	\$41,220	\$27,427	\$38,939	No
HCV ELDERLY/DISABLED	*\$195,345	*\$199,250	*\$246,286	\$845,208	No

Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records

\*HAP to Owner – for the HCV Program HAP to owner should decrease if this metric is successful.

### Impact: Assessing the costs / benefits

Metric	Self-Sufficiency Group	FY 2011 Baseline	FY 2012 Actual	FY 2013 Actual	FY2015 Actual	FY2016 Actual
Total number annual recertifications	ConnieGriffith	181	47	41	55	44
	HCV	N/A	N/A	N/A	338	228
Average total staff time per unit spent processing annual (interim) recertifications	ConnieGriffith	2 hours (2 hours)	2 hours (1.5 hours)	2 hours (45 minutes)	2 hours	2 hours
	HCV	N/A	N/A	N/A	2 hour (30 minutes)	2 hours
Dollar value of staff time spent processing annual and interim recertifications	ConnieGriffith	\$8,717	\$2,570	\$2,419	\$2,657	\$2,126
	HCV	N/A	N/A	N/A	\$16,329	\$11,015
Avg (Median) gross annual earned income reported by families	ConnieGriffith	\$1,490 (\$0)	\$1,536 (\$0)	\$1,690 (\$0)	\$140 (\$122)	\$295 (\$0)
	HCV	N/A	N/A	N/A	\$9,483 (\$9,610)	\$3,100 (\$0)
Avg (Median) gross annual non-earned income reported by families	ConnieGriffith	\$9,847 (\$9,144)	\$9,060 (\$8,413)	\$9,731 (\$9,324)	\$9,155 (\$9,036)	\$8,348 (\$8,636)
	HCV	N/A	N/A	N/A	\$10,314 (\$8,977)	\$12,088 (\$10,223)
Average (Median) gross annual income reported by families	ConnieGriffith	\$11,337 (\$9,480)	\$10,596 (\$8,860)	\$11,467 (\$9,882)	\$10,326 (\$9,180)	\$9,932 (\$9,036)
	HCV	N/A	N/A	N/A	\$10,049 (\$8,892)	\$13,230 (\$11,262)
Total monthly gross rent revue	ConnieGriffith	\$40,416	\$39,824	\$39,428	\$25,255	\$26,625
	HCV	N/A	N/A	N/A	\$156,439	\$91,725
# (%) Estimated cost savings from fewer recertifications	ConnieGriffith	N/A	\$6,146	\$6,297	\$6,060	\$6,591
	HCV	N/A	N/A	N/A	N/A	\$5,314

FY2014 data was not available for Connie Griffith or HCV elderly/disabled households due to the software conversion. In addition, baseline and benchmark metrics were not established for HCV households as the activity was not expanded to HCV elderly/disabled households until FY2014. FY2015 would be the baseline year for the HCV data. I'm not sure we should include this table or should I create separate tables for Connie Griffith and HCV elderly/disabled households?



## Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2012 – FY2013 Plan Significantly Modified FY2014 Plan	FY 2015
<b>Activity Description</b>	
Until June 25, 2014, HUD regulations mandated that housing authorities inspect every HCV unit at least annually to ensure they meet Housing Quality Standards (HQS). Section 220 of the 2014 Appropriations Act now allows housing authorities to comply with the requirement to inspect assisted housing units in the HCV program by inspecting such units not less than biennially, rather than annually. While LHA intends to uphold HUD's high standards of decent, safe, and sanitary housing maintained in good repair for all HCV households, the Authority believes it can achieve this outcome more cost-effectively through the 5-Star Rating System for HCV property owners.	
<b>Status</b>	
This activity is ongoing. Interviews with HCV inspection staff found a consensus among inspectors that the drive-by inspections were not effective because a drive-by inspection is not a reliable indicator of issues with a unit. All of the inspectors indicated that the 5-Star Rating System is useful and advise that more landlord education would help landlords understand the rating system. Inspectors said many landlords wait for a list of deficiencies from HCV inspectors rather than being proactive and making repairs before a scheduled inspection.	
<b>Non-Significant Changes or Modifications</b>	
There were no non-significant changes or modifications during the FY2016 Plan year.	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>	
There were no changes or modifications to metrics, baselines or benchmarks for this activity.	
<b>Attachment C or D Authorization(s) Changes</b>	
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.	
<b>Significant Change or Modifications to the Activity Since Approval</b>	
There are no significant changes or modifications to the activity as previously proposed and approved.	

## HUD STANDARD METRICS

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher			
CE #1: Agency Cost Savings			
Unit of Measurement: Total cost of task in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>\$32,868</b> 2,739 Initial and Annual Inspections \$24.00 per hour times 30 minutes to complete an inspection.	<b>\$16,440</b> 1,370 Initial and Annual Inspections @ \$24.00 per hour times 30 minutes to complete an inspection.	<b>\$21,852</b> 1,821 Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	No
Data Source: Emphasys.			

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher			
CE #2: Staff Time Savings			
Unit of Measurement: Total time to complete the task in staff hours (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>1370 hours</b> 2,739 Inspections@ 30 minutes each	<b>685 hours</b> 1,370 Inspections @ 30 minutes each	<b>911 hours</b> 1,821 Inspections @ 30 minutes each	No
Data Source: Emphasys.			

## Activity 10) HCV Tenant-Based Special Partners Programs

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2012 – FY2013 Plan	FY 2012 – FY 2013
<b>Activity Description</b>	
<p>LHA partners with three social service agencies in the Lexington area to provide stable, tenant-based voucher housing to low-income families while they receive services provided by the partner agency. LHA partners with an additional eight social service agencies that provide designated, fixed housing to low-income families; these partners are addressed in Activity 12 of this Plan. These “special partner programs” serve some of Lexington’s most vulnerable low-income populations, those who need wraparound services in order to stabilize their family situation and begin working to increase self-sufficiency. Targeted populations include the mentally ill, the homeless, those recovering from alcohol or drug addiction, and parents who have recently been released from jail.</p> <p>Through MTW, the LHA received permission to require that participants relinquish their tenant-based voucher at the time they graduate from or otherwise leave the program offered by the special partner, so another family may benefit from the housing and programming offered by the special partner. The approval of this activity has permitted the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance.</p>	
<b>Status</b>	
<p>This activity is ongoing. With all service providers reporting for FY2016, 72 vouchers were funded and utilized by 108 households (150% utilization). Only 19 of the 108 participating households were employed during the year with an average earned income of \$9,328. Providers reported 37 (34%) households moving to a better neighborhood and four (4%) earning at least \$15,080 in annual income (LHA’s definition of self-sufficiency).</p>	
<b>Non-Significant Changes or Modifications</b>	
<p>Service provider Bluegrass Domestic Violence is now operating under a new name, Greenhouse17.</p>	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>	
<p>There were no changes or modifications to metrics, baselines or benchmarks for this activity.</p>	
<b>Attachment C or D Authorization(s) Changes</b>	
<p>There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.</p>	
<b>Significant Change or Modifications to the Activity Since Approval</b>	
<p>There are no significant changes or modifications to the activity as previously proposed and approved.</p>	

Households receive HCV tenant-based assistance through the following special partner programs.

HCV Special Partner	Description of Households Served	Families Selecting Private Market Units
Bluegrass Domestic Violence (BGDV)	Victims of domestic violence, dating violence, sexual assault, and stalking	25
Bluegrass Regional Mental Health - Mental Retardation (BGMHMR)	Persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services	22
Volunteers of America (VOA)	Homeless individuals and families	25
Total Units		72

## HUD STANDARD METRICS

Activity 10 – HCV Tenant-Based Special Partner Programs			
CE #4: Increase in Resources Leveraged			
Unit of Measurement – Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
\$274,905 VOA - \$120,538 BGDV - \$119,075 BGMHMR - \$35,292	\$274,905	\$218,894 VOA - \$74,884 BGDV - \$107,986 BGMHMR - \$36,024	No
Data Source: Special Partner Reporting and PHA financial records.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #3: Increase in Positive Outcomes in Employment Status			
Unit of Measurement – Employment Status: Category 5 Unemployed (reporting no earned income)			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
36 VOA – 17 BGDV – 10 BGMHMR – 9	29	VOA- BGDV – BGMHMR – 7	No
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #3: Decrease in Wait List Time			
Unit of Measurement – Average applicant time on wait list in months (decrease).			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
60 months	6 months	3 months	Yes
Data Source: Special Partner reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS4: Households Removed from Temporary Assistance for Needy Families (TANF)			
Unit of Measurement – Number of households affected by Activity #10 receiving TANF assistance (decrease).			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
19 VOA – 11 Greenhouse17 -8 BGMHMR – 0	17	VOA- Unknown Greenhouse17 – Unknown BGMHMR – Unknown	N/A
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS8: Households Transitioned to Self-Sufficiency			
Unit of Measurement – Number of households transitioned to self-sufficiency (increase).			
For this activity, self-sufficiency is defined as any household that has earned income of at least <sup>1</sup> \$15,080 per year.			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
10 VOA- 8 BGDV – 2 BGMHMR – 0	20	4 VOA- 4 Greenhouse17–Unknown BGMHMR – 0	No
<sup>1</sup> \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #5: Increase in Resident Mobility			
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
38	72	37	No
Data Source: Special Partner reporting.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #1: Increase in Household Income			
Unit of Measurement – Average earned income of households affected by this policy in dollars (increase).			
Baseline (FY2015)	Benchmark	Outcome	Benchmark Achieved?
\$6,022 (Average) VOA - \$3,417 Greenhouse17 –\$6,000 BGMHMR - \$8,649	\$15,080	\$9,328 VOA- \$6,534 Greenhouse17 – \$12,850 BGMHMR – \$8,600	No
Data Source: Special Partner Reporting			

## Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2014	FY 2014
<b>Activity Description</b>	
<p>HCV staff met with representatives of the seven (7) special partner programs prior to implementation and signed Memoranda of Understanding (MOUs) in December 2013, and the activity was implemented in January 2014.</p> <p>The Authority currently provides monthly rental subsidy to seven (7) special partners who have agreed to house and provide wraparound social services to a minimum of 358 families with special needs. These agencies serve individuals with mental illness and/or substance abuse issues; individuals recently released from prison or jail; families in need of financial literacy, credit management, and homeownership resources; single parents enrolled full-time in higher education; and homeless individuals and families.</p> <p>With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and</p> <p>With Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.</p> <p>With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and</p> <p>With Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.</p> <p>Although benchmarks were not met for the majority of the HUD standard metrics, the LHA realizes that populations served through this activity deal with challenges such as drug addition/recovery, homelessness, etc. and have overwhelming barriers to employment that would allow for increased earned income or homeownership. The LHA will consider re-evaluating benchmarks going forward.</p>	
<b>Status</b>	
<p>During FY2016 LHA special partner agencies served a total of 627 families which represents a 75% increase in utilization of households served. The LHA is pleased with the number of households served and continues to encourage providers to improve tracking all metrics.</p>	
<b>Non-Significant Changes or Modifications</b>	
<p>There were no non-significant changes or modifications during the FY2016 Plan year.</p>	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>	
<p>There were no changes or modifications to metrics, baselines or benchmarks for this activity.</p>	
<b>Attachment C or D Authorization(s) Changes</b>	

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

**Significant Change or Modifications to the Activity Since Approval**

There are no significant changes or modifications to the activity as previously proposed and approved.

Special Partner Program	Description of Households Served	# of Vouchers Provide	Actual Families Served in FY2016
Canaan House	Individuals who have been diagnosed with a mental illness	17	17
Hope Center	Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment	144	359
New Beginnings Bluegrass, Inc.	Individuals who have been diagnosed with a mental illness	24	31
OASIS Rental Assistance Housing Program	Families in need of financial literacy, credit management, and homeownership resources	30	36
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80	111
Serenity Place (Chrysalis House)	Parents with children: 1) who have recently been released from jail or are homeless and 2) who are substance abuse treatment program graduates	40	51
Urban League of Lexington-Fayette County	Elderly individuals	23	22
<b>Total Special Partner Units</b>		<b>358</b>	<b>627</b>

## HUD STANDARD METRICS

**Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners**

\*SS7: Increase in Agency Rental Revenue

Unit of Measure – PHA rental revenue in dollars (increase).

Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
\$58,790	\$58,790	\$58,790	Yes

Data Source: Special Partner reporting.



**Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners**

SS8: Households Transitioned to Self-Sufficiency

Unit of Measure – Number of households transitioned to self-sufficiency (increase).

For this activity, self-sufficiency is defined as any household that has earned income of at least <sup>1</sup>\$15,080 per year.

Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
95	105	35	No
<sup>1</sup> \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

**Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners**

HC #5: Increase in Resident Mobility

Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.

Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
109	120	180	Yes
Data Source: Special Partner reporting.			

**Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners**

HC #6: Increase in Homeownership Opportunities

Unit of Measurement – Number of households that purchased a home as a result of the activity (increase).

Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
0	2	0	No
Data Source: Special Partner reporting.			

**Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners**

HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement – Number of households receiving services aimed to increase housing choice (increase).

Baseline (FY2015)	Benchmark (FY2016)	Outcome	Benchmark Achieved?
679	747	627	No
Data Source: Special Partner reporting.			

## Activity 13) Local Self-Sufficiency Admissions and Occupancy Requirements

### Activity

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2014	FY 2014
<b>Activity Description</b>	
<p>LHA created this activity with the aim of eliminating loopholes that a small but significant number of residents use to avoid work requirements at its public housing self-sufficiency units. Through this activity, the LHA has the authority to:</p> <ul style="list-style-type: none"> <li>a) Impose a minimum earned income calculation for families residing at self-sufficiency units regardless of employment status – Minimum earned income for household members subject to the LHA’s self-sufficiency work requirement will be calculated based on the following: Self-Sufficiency I units - 52 weeks x 37.5 hours x federal minimum wage; and, Self-Sufficiency II units - 52 weeks x 20 hours x federal minimum wage. The amount of assumed annual income will be modified when the federal minimum wage is updated. This requirement is a condition of admissions and continued occupancy for all families who accept self-sufficiency units. Families whose head/co-head is a full-time student, are exempted.</li> <li>b) Modify the Definition of Work Activity used to determine whether or not a family is compliant with the self-sufficiency requirements. In order to ensure that the employment activities sought by residents will enable them to earn at least the minimum imputed earned income, the LHA received permission to create a local definition of "work activity," which limits compliant work activities to paid activities that are most likely to ensure families' incomes at least equal the minimum imputed earned income amount. Instead of using the requirements found at 42 USC 607(d), the LHA now defines “work activity” as follows: <ul style="list-style-type: none"> <li>a) Unsubsidized employment;</li> <li>b) Subsidized private sector employment;</li> <li>c) Subsidized public sector employment;</li> <li>d) Paid on-the-job training</li> </ul> </li> </ul> <p>In addition, the LHA received approval to require Self-Sufficiency Level II Admissions and Continued Occupancy Rules at Centre Meadows (formerly Pimlico Apartments) post-revitalization. Centre Meadows is a 206-unit site converted from public housing to project-based voucher through the Rental Assistance Demonstration (RAD) Program. Centre Meadows was reoccupied during FY2016.</p>	
<b>Status</b>	
This activity is ongoing.	
<b>Non-Significant Changes or Modifications</b>	
There were no non-significant changes or modifications during the FY2016 Plan year.	

<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>
There were no changes or modifications to metrics, baselines or benchmarks for this activity.
<b>Attachment C or D Authorization(s) Changes</b>
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.
<b>Significant Change or Modifications to the Activity Since Approval</b>
A technical amendment was submitted to HUD on January 14, 2016 to reduce the requirement for prior employment history from six months to three months for eligibility certification prior to signing a lease at a self-sufficiency site. This change will cause no adverse effect to the applicant and it is the Housing Authority's expectation that it will enhance the leasing process. The LHA's requirements for admissions and occupancy at self-sufficiency sites have been revised in the LHA's Admissions and Continued Occupancy Policy (ACOP).

## HUD STANDARD METRICS

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements					
SS #1: INCREASE IN HOUSEHOLD INCOME					
Average earned income of households affected by this policy in dollars (increase).					
	Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
SSI/SSI	<b>\$12,800</b> Average gross annual earned income from <b>648</b> non-elderly/non-disabled households as of June 30, 2013	<b>\$13,704</b> Expected average gross annual earned income from <b>639</b> non-elderly/non-disabled households as of June 30, 2015	<b>\$19,544</b> Actual average gross annual earned income from <b>490 of 628</b> non-elderly/non-disabled households as of June 30, 2015	<b>\$18,151</b> Actual average gross annual earned income from <b>542 of 646</b> non-elderly/non-disabled households as of June 30, 2016	<b>Yes</b>
* Centre Meadows	<b>\$15,231</b> Average gross annual earned income from <b>119 of 144</b> non-elderly/non-disabled households as of June 30, 2016	<b>\$18,277</b> Expected average gross annual earned income from <b>165</b> non-elderly/non-disabled households as of June 30, 2017	N/A	N/A	TBD
*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.					

**Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements**
**SS #3: INCREASE IN HOUSEHOLD INCOME**
**Category 6: Other (Heads of Household Reporting Earned Income)**

	Baseline	Benchmark	Outcome	Benchmark Achieved?
SSI/SSII	<b>303 of 628</b> Non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2015	<b>628</b> Expected non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>542</b> Actual non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>No</b>
*Centre Meadows	<b>130 of 158</b> Non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2016	<b>165</b> Expected non-elderly/non-disabled households where the head/co-head/spouse report earned income as of June 30, 2017	<b>N/A</b>	<b>TBD</b>

**Data Source: Emphasys**

The baseline and benchmark for this metric was identified in FY2015 and outcomes will be reported in the FY2016 MTW Annual Report.

**Earned income of the head, co-head or spouse only is reported here.**

\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.

**Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements**
**SS #3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS**
**Category 5: Unemployed Heads of Household (Reporting No Earned Income)**

	Baseline	Benchmark	Outcome	Benchmark Achieved?
SSI/SSII	<b>95 of 628</b> Non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2015	<b>0</b> Expected non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2016	<b>104</b> Actual non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2016	<b>No</b>
*Centre Meadows	<b>28 of 158</b> Non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2016	<b>0</b> Expected non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2017	<b>TBD</b> Actual non-elderly/non-disabled households where the head/co-head or spouse has no earned income as of June 30, 2017	<b>TBD</b>

**Data Source: Emphasys**

The baseline and benchmark for this metric was identified in FY2015 and outcomes will be reported in the FY2016 MTW Annual Report.

\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.

**Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements**
**SS #4: NON-ELDERLY/NON-DISABLED HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)**

	Baseline	Benchmark	Outcome	Outcome	Benchmark Achieved?
SSI/SSII	<b>*26</b> Non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2013	<b>*20</b> Expected non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>*187 of 628</b> Actual non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2015	<b>*81</b> Actual non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>No</b>
<b>**Centre Meadows</b>	<b>38</b> Non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2016	<b>0</b> Expected non-elderly/non-disabled households where the head/co-head/spouse receive TANF as of June 30, 2017	<b>N/A</b>	<b>TBD</b> Baseline set in FY2016	<b>TBD</b>

Data Source: Emphasys

\*LHA believes the disproportionate difference in SSI and SSII households receiving TANF benefits could be due to a change in software programs. A difference in how the data was extracted could explain the major difference from the baseline numbers to the actual numbers. LHA will compare FY2016 numbers to FY2015 to determine if the data is plausible.

\*\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Based Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.

**Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements**

SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement - Average amount of Section 8 and/or Section 9 subsidy per household affected by this policy in dollars (decrease).

	Baseline	Benchmark	Outcome	Benchmark Achieved?
SSI/SSII	<b>\$2,921 (\$243 per month per household)</b> Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2015 (decrease)	<b>\$2,191 (\$183 per month per household)</b> Expected average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2015	<b>\$3,017 (\$251 per month per household)</b> Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	No
*Centre Meadows	<b>\$399 per household</b> Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2016	<b>\$299 per household</b> Expected non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	<b>TBD</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	TBD

Data Source: Emphasys

The baseline and benchmark for this metric was identified in FY2015 and outcomes will be reported in the FY2016 MTW Annual Report.

\*\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Based Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV. The baseline for Centre Meadows is established as FY2016.

Activity 13: Rent Reform – Alternate Policy on the Inclusion / Exclusion of Income to Calculate Rent				
SS #7: Increase in Agency Rental Revenue				
Unit of Measurement - PHA rental revenue in dollars (increase).				
	Baseline	Benchmark	Outcome	Benchmark Achieved?
Self-Sufficiency I/II	<b>\$134,619</b> PHA rental revenue prior to implementation of Activity #13 as of June 30, 2015	<b>\$193,851</b> Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2016	<b>\$278,328</b> Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Yes
*Centre Meadows	<b>\$392,399</b> PHA rental revenue prior to implementation of Activity #13 as of June 30, 2016	<b>\$672,684</b> Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2017	<b>TBD</b> Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2017	TBD
Data Source: Emphasys The baseline and benchmark for this metric was identified in FY2015 and outcomes will be reported in the FY2016 MTW Annual Report. *Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Base Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.				



### Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements

SS #8: Households Transitioned to Self-Sufficiency

For this activity, self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.

Number of households transitioned to self-sufficiency (increase). Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.

	Baseline	Benchmark	Outcome	Outcome	Benchmark Achieved?
SSI/SSII	<b>*48</b> Non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2013	<b>*58</b> Expected non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2015	<b>*314</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2015	<b>*364</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2016	Yes
<b>**Centre Meadows</b>	<b>72</b> Non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2016	<b>88</b> Expected non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	<b>TBD</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	<b>TBD</b> Actual non-elderly/non-disabled households where the head/co-head/spouse is meeting the definition of self-sufficiency as of June 30, 2017	TBD

#### Data Source: Emphasys

**\*\$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year**

\*LHA believes the disproportionate difference in SSI and SSII households transitioning to self-sufficiency could be due to a change in software programs. A difference in how the data was extracted could explain the major difference from the baseline numbers to the actual numbers. LHA will compare FY2016 numbers to FY2015 to determine if the data is plausible.

\*\*Centre Meadows (formerly Pimlico) was converted from public housing units to Project-Based Voucher units and vacated for rehabilitation in March of 2014 and most of 2015. The site after conversion was reoccupied beginning in December 2015. A new baseline has been established now that the site is PBV.

## Activity #13 – Disparate Impact Analysis

Activity 13: Self Sufficiency I														
Disparate Impact Analysis - Baseline Data														
Self-Sufficiency I Population	Heads of Household			Average Total Annual Adjusted			Average Gross Annual Earned			Average Gross Rent Payment			Average Increased Rent Burden	
	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2015	FY2016
All Non-Elderly/Non-Disabled Households	210	230	206	\$16,431	\$19,512	\$20,595	\$16,555	\$19,270	\$21,365	\$380	\$462	\$531	\$82	\$151
Gender														
Female	201	222	194	\$16,399	\$19,512	\$20,483	\$16,525	\$19,270	\$20,782	\$378	\$462	\$518	\$84	\$140
*Male	9	8	12	\$17,154	\$17,513	\$29,783	\$17,228	\$16,659	\$30,800	\$426	\$467	\$745	\$41	\$319
Race (Multiple selections permitted)														
Black	170	193	169	\$16,581	\$20,390	\$21,254	\$16,281	\$19,365	\$21,505	\$387	\$477	\$538	\$90	\$151
White	39	34	34	\$17,164	\$15,215	\$20,580	\$18,048	\$19,494	\$21,394	\$365	\$475	\$515	\$110	\$150
American Indian / Native Alaskan	1	0	0	\$5,184	\$36,874	\$0	\$29,827	\$0	\$0	\$130	\$550	\$0	\$0	\$0
**Asian / Pacific Islander	2	0	2	\$10,090	\$19,512	\$12,084	\$20,313	\$19,259	\$19,726	\$278	\$493	\$302	\$215	\$24
Native Hawaiian / Other Pacific Islander	0	1	1	\$0	\$15,771	\$15,376	\$0	\$0	\$0	\$0	\$394	\$384	\$394	\$384
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Ethnicity														
Non-Hispanic	204		198	\$16,511	\$19,761	\$21,029	\$16,508	\$19,310	\$21,471	\$381	\$500	\$531	\$119	\$150
Hispanic	6		8	\$13,711	\$19,512	\$20,916	\$18,145	\$19,259	\$18,738	\$351	\$493	\$523	\$142	\$172
Age of Head of Household														
18-31	88	82	72	\$13,189	\$16,002	\$16,582	\$13,760	\$15,519	\$17,752	\$312	\$401	\$422	\$89	\$110
32-46	88	106	100	\$17,554	\$22,040	\$22,175	\$17,177	\$21,210	\$21,821	\$405	\$555	\$558	\$150	\$153
47-61	34	42	34	\$21,916	\$24,141	\$27,050	\$22,179	\$21,697	\$27,678	\$489	\$607	\$681	\$118	\$192
Excluded Households														
Elderly/Disabled Households	35	36	48	\$15,369	\$15,174	\$14,449	\$4,429	\$3,892	\$5,031	\$343	\$358	\$361	N/A	N/A

\*Data for males is skewed due to one income being three times that of the average.

\*\* Data for Asian/Pacific Islander households is incorrect for FY2015 as there were no households of that race for 2015.

Activity 13: Self Sufficiency II														
Disparate Impact Analysis - Baseline Data														
Self-Sufficiency II Population	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned			Average Gross Rent Payment			Average Increased Rent Burden	
	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2015	FY2016
All Non-Elderly/Non-Disabled Households	419	398	440	\$16,431	\$13,381	\$15,182	\$11,012	\$12,926	\$14,936	\$297	\$342	\$384	\$45	\$87
Gender														
Female	379	362	389	\$11,813	\$13,112	\$14,680	\$10,848	\$12,679	\$14,269	\$294	\$336	\$372	\$42	\$78
Male	40	36	51	\$15,238	\$16,092	\$19,014	\$13,450	\$15,412	\$20,023	\$340	\$402	\$475	\$62	\$135
Race (Multiple selections permitted)														
Black	351	256	376	\$12,244	\$15,160	\$15,455	\$11,051	\$17,463	\$14,870	\$300	\$385	\$391	\$85	\$91
White	71	59	63	\$11,594	\$11,881	\$13,534	\$11,363	\$10,910	\$15,291	\$289	\$305	\$341	\$16	\$52
American Indian / Native Alaskan	1	0	0	\$5,400	\$0	\$0	\$7,800	\$0	\$0	\$135	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	\$5,400	\$16,344	\$16,344	\$7,800	\$17,304	\$17,304	\$135	\$409	\$409	\$274	\$274
Native Hawaiian / Other Pacific Islander	3	1	0	\$9,186	\$4,920	\$0	\$10,826	\$13,000	\$0	\$230	\$150	\$0	-\$80	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	415	394	435	\$12,129	\$13,381	\$15,150	\$11,057	\$12,926	\$14,898	\$298	\$305	\$383	\$7	\$85
Hispanic	4	4	5	\$13,246	\$11,277	\$17,964	\$15,145	\$13,846	\$18,247	\$332	\$310	\$449	-\$22	\$117
Age of Head of Household														
18-31	223	176	207	\$10,494	\$11,935	\$13,915	\$10,459	\$12,541	\$14,390	\$268	\$306	\$355	\$38	\$87
32-46	137	173	174	\$13,416	\$14,256	\$15,479	\$11,295	\$13,491	\$15,026	\$321	\$363	\$391	\$42	\$70
47-61	59	49	59	\$15,397	\$15,489	\$18,743	\$13,044	\$12,318	\$16,585	\$360	\$397	\$469	\$37	\$109
Excluded Households														
Elderly/Disabled Households	153	154	240	\$10,372	\$10,355	\$11,075	\$597	\$513	\$936	\$260	\$259	\$277	N/A	N/A

\*FY2014 data was not available due to software conversion issues.

Activity 1: Centre Meadows				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>
<b>All Households</b>	158	\$12,532	\$13,964	\$355
<b>Gender</b>				
Female	144	\$12,561	\$13,819	\$352
Male	14	\$12,239	\$15,457	\$387
<b>Race</b> ( <i>Multiple selections permitted</i> )				
Black	129	\$12,126	\$14,067	\$357
White	28	\$14,237	\$13,407	\$342
American Indian / Native Alaskan	0	\$0	\$0	\$0
Asian / Pacific Islander	1	\$17,233	\$16,273	\$407
Native Hawaiian / Other Pacific Islander	0	\$0	\$0	\$0
Other**	0	\$0	\$0	\$0
<b>Ethnicity</b>				
Non-Hispanic	156	\$12,356	\$13,819	\$351
Hispanic	2	\$26,232	\$25,272	\$632
<b>Age of Head of Household</b>				
18-31	107	\$12,438	\$13,582	\$347
32-46	37	\$12,671	\$14,402	\$363
47-61	14	\$12,883	\$16,252	\$393
<b>Excluded Households</b>				
Elderly/Disabled Households	45	\$487	\$11,679	\$292

**Impact: Encouraging non-disabled/non-elderly adult household members to work**

<b>Metric</b>	<b>Self-Sufficiency Group</b>	<b>*FY 2013 Baseline</b>	<b>**FY 2014 Benchmark</b>	<b>***FY 2014 Actual</b>	<b>FY2015 Actual</b>	<b>FY2016 Actual</b>	<b>Data Source</b>
Imputed minimum annual earned income	Self-Sufficiency I	N/A	\$7,540	\$7,540	\$14,138****	\$14,138	U.S. Dept. of Labor, Federal Minimum Wage
	Self-Sufficiency II	N/A	\$7,540	\$7,540	\$7,540	\$7,540	
	Centre Meadows (formerly Pimlico)	N/A	Exempt	Site vacant	Site vacant	\$7,540	
Avg (Median) gross annual earned income reported by families	Self-Sufficiency I	\$16,555 (\$16,653)	\$18,457 (\$16,653)	\$18,140 (\$17,503)	\$19,270 (\$18,741)	\$20,695 (\$20,898)	WinTen2/ Emphasys
	Self-Sufficiency II	\$11,012 (\$10,460)	\$13,497 (\$10,460)	\$12,486 (\$11,700)	\$12,926 (\$12,896)	\$14,193 (\$14,040)	
	Centre Meadows (formerly Pimlico)	\$3,395 (\$0)	Exempt	Site vacant	Site vacant	*\$12,532 (\$13,845)	
# (%) of families reporting no annual earned income	Self-Sufficiency I	44 (21%)	0 (0%)	46 (22%)	43 (19%)	22	WinTen2/ Emphasys
	Self-Sufficiency II	118 (28%)	0 (0%)	93 (23%)	95(24%)	82	
	Centre Meadows (formerly Pimlico)	98 (67%)	0 (0%)	Site vacant	Site vacant	28	
# (%) of families reporting annual earned income less than minimum imputed earned income	Self-Sufficiency I	61 (29%)	0 (0%)	54 (26%)	36 (16%)	28	WinTen2/ Emphasys
	Self-Sufficiency II	159 (38%)	0 (0%)	130 (33%)	22 (6%)	41	
	Centre Meadows (formerly Pimlico)	114 (78%)	0 (0%)	Site vacant	Site vacant	31	
Avg (Median) total adjusted annual income reported by families	Self-Sufficiency I	\$16,431 (\$14,652)	\$18,333 (\$16,246)	\$18,882 (\$16,774)	\$19,512 (\$17,508)	\$21,025 (\$19,532)	WinTen2/ Emphasys
	Self-Sufficiency II	\$12,101 (\$11,184)	\$14,587 (\$13,148)	\$13,953 (\$11,708)	\$13,381 (\$12,114)	\$15,082 (\$14,456)	
	Centre Meadows (formerly Pimlico)	\$4,340 (\$2,400)	Exempt	Site vacant	Site vacant	\$13,964 (\$14,574)	
Avg (Median) monthly gross rent payment of families	Self-Sufficiency I	\$380 (\$387)	\$427 (\$407)	\$426 (\$419)	\$493 (\$438)	\$531 (\$488)	WinTen2/ Emphasys
	Self-Sufficiency II	\$297 (\$281)	\$358 (\$330)	\$345 (\$293)	\$342 (\$305)	\$384 (\$361)	
	Centre Meadows (formerly Pimlico)	\$179 (\$150)	Exempt	Site vacant	Site vacant	\$355(\$365 )	
# (%) of families requesting hardship exemption	Self-Sufficiency I	N/A	21 (10%)	0	0	0	Property Manager Log
	Self-Sufficiency II	N/A	42 (10%)	0	0	0	
	Centre Meadows (formerly Pimlico)	N/A	Exempt	Site vacant	Site vacant	0	
# (%) of families granted hardship exemption	Self-Sufficiency I	N/A	11 (5%)	0	0	0	WinTen2 / Property Manager Log
	Self-Sufficiency II	N/A	21 (5%)	0	0	0	
	Centre Meadows (formerly Pimlico)	N/A	Exempt	Site vacant	Site vacant	0	

\* All FY 2013 baseline data is based on a 12-month period ending January 31, 2013 (the most current data available as of the date the Annual Plan was posted for public comment)

\*\* FY 2014 benchmarks account for the impact of LHA's planned minimum rent increase to \$150 for all non-disabled / non-elderly public housing families

\*\*\*The LHA's fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014. Therefore, LHA is using data from Tenmast ending May 27, 2014.

\*\*\*\*FY2014 was a phase-in period for current tenants living at Self-Sufficiency I units to reduce the financial burden. During the first year all self-sufficiency households were subject to the minimum earned income based on 20 hours per week, beginning July 1, 2014 (FY2015) Self-Sufficiency I households are now subject to a minimum earned income based on 37.5 hours per week as there is a work requirement of 37.5 hours per week for these households.

## Activity 14) Rent Reform: Elimination of Earned Income Disallowance

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2015	FY 2015
<b>Activity Description</b>	
<p>The LHA eliminated the Earned Income Disallowance (EID) calculation for public housing and HCV households. Without MTW flexibility, federal regulations mandate the exclusion of earnings for public housing households in the following cases:</p> <ul style="list-style-type: none"> <li>• The household income increases as a result of employment of a family member who was previously unemployed for one or more years.</li> <li>• Families whose income increases during the participation of a family member in any economic self-sufficiency or other job training program.</li> <li>• Families who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program.</li> </ul> <p>In the Housing Choice Voucher Program, the EID calculation only applies to disabled family members in the following cases (This activity does not apply to treatment group participants in the HCV Rent Reform Study.):</p> <ul style="list-style-type: none"> <li>▪ Families whose income increases as a result of employment of a disabled family member who was previously unemployed (defined as working less than 10 hours a week at the established minimum wage) for one or more years.</li> <li>▪ Families whose income increases during the participation of a disabled family member in any economic self-sufficiency or other job training program.</li> <li>▪ Persons with disabilities who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program for at least \$500.</li> </ul> <p>An individual family member is eligible for the EID for a maximum of 24 consecutive months with an overall lifetime limit of 48-months. During the first 12 months 100% of earned income is excluded, while 50% of earned income is excluded during the second 12 months.</p> <p>Staff reported that the EID calculation was only available to a very small population because of the very specific requirements for the disallowance. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months was difficult to track because households didn't always report starts and stops in employment status. In addition, many who did receive the benefit quit their jobs at the end of the two-year exclusion to avoid an increase in the household rent. For those reasons and the administrative burden, the LHA proposed to eliminate the EID calculation.</p>	

<b>Status</b>
Staff reports that the elimination of the EID has been extremely helpful in making more efficient use of time to complete other housing management tasks.
<b>Non-Significant Changes or Modifications</b>
There were no non-significant changes or modifications during the FY2016 Plan year.
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>
There were no changes or modifications to metrics, baselines or benchmarks for this activity.
<b>Attachment C or D Authorization(s) Changes</b>
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.
<b>Significant Change or Modifications to the Activity Since Approval</b>
There have been no significant changes or modifications since approval of this activity.

## HUD STANDARD METRICS

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination				
CE #1: Agency Cost Savings				
Unit of Measurement - Total cost of task in dollars (decrease).				
Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual 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.
\$452	\$0	0	0	Yes
23 households received EID at an average cost of \$19.64 per household annually as of June 30, 2013	Expected 0 households will receive EID at an average cost of \$19.64 per household annually as of June 30, 2015	Actual households receiving EID multiplied by average cost to calculate/track annually as of June 30, 2015	Actual households receiving EID multiplied by average cost to calculate/track annually as of June 30, 2016	All households affected by this activity no longer receive the earned income disregard.
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records				

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination				
CE #2: Staff Time Savings				
Unit of Measurement – Total time to complete the task in staff hours (decrease).				
Baseline	Benchmark	Outcome (FY2015)	Outcome (FY2016)	Benchmark Achieved?
23 hours	0 hours	0	0	Yes
23 households receiving EID x 1-hour average staff time required to track/calculate EID annually as of June 30, 2013	Expected 0 households receiving EID x average staff time required to track/calculate EID annually as of June 30, 2015	Actual households receiving EID x average staff time required to track/calculate EID annually as of June 30, 2015	Actual households receiving EID x average staff time required to track/calculate EID annually as of June 30, 2016	All households affected by this activity no longer receive the earned income disregard.
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records				

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination				
CE#3: Decrease in Error Rate of Task Execution				
Unit of Measurement – Average error rate in completing a task as a percentage (decrease).				
Baseline	Benchmark	Outcome	Outcome	Benchmark Achieved
25%	0%	0%	0%	Yes
Data Source: WinTen2, staff interviews; staff logs; PHA financial records				

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination				
CE #5: Increase in Agency Rental Revenue				
Unit of Measurement - Rental revenue in dollars (increase).				
Baseline	Benchmark	Outcome	Outcome	Benchmark Achieved?
Rental revenue prior to implementation of the activity	Expected rental revenue after implementation of the activity	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$68,544 (\$35,964)	\$104,508 (\$96,474)	\$59,736 (\$26,112)	\$49,896	No
Sum total gross (net) annual rental revenue from 23 households receiving EID as of June 30, 2013	Expected sum total gross (net) annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total gross (net) annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total gross (net) annual rental revenue from 19 rental households no longer receiving EID as of June 30, 2016	Explanation to be provided



## Activity #14 – Disparate Impact Analysis

Activity 14: EID Households								
Disparate Impact Analysis - Baseline Data								
EID Households	Heads of Household			Average TTP			Change in Rent Burden	Change in Rent Burden
	FY2014	FY2015	FY2016	FY2014	FY2015	FY2016	FY2015	FY2016
All Households	23	19	19	\$248	\$287	\$287	\$39	\$0
Gender								
Female	21	18	18	\$234	\$287	\$287	\$53	\$0
Male	2	1	1	\$400	\$296	\$296	-\$104	\$0
Race (Multiple selections permitted)								
Black	16	14	14	\$226	\$302	\$302	\$72	\$0
White	5	4	4	\$298	\$240	\$240	\$58	\$0
American Indian / Native Alaskan	1	0	0	\$417	\$0	\$0	\$155	
Asian / Pacific Islander	1	1	1	\$189	\$262	\$262	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0
Age of Head of Household								
18-31	7	5	5	\$210	\$206	\$206	-\$4	\$0
32-46	7	5	5	\$243	\$263	\$263	\$20	\$0
47-61	5	5	4	\$332	\$347	\$347	\$15	\$0
62+	6	4	5	\$220	\$344	\$344	\$124	\$0

**\*Four (4) households that received the EID prior to implementation are no longer living with the LHA.**

### Impact: Assessing Costs and Benefits

Metric	FY 2014 Baseline	FY 2015 Actual	FY 2016 Actual	FY2017 Actual
*Total number EID Households	23	19	19	10
Dollar value of staff time spent processing EID	\$452	0	0	0
Avg. gross annual earned income reported by EID families	\$6,570	\$6,915	\$7,990	\$8,238
Average total gross annual income reported by families	\$11,586	\$11,982	\$14,783	\$13,517
Average gross rent (TTP)	\$248	\$287	\$287	\$312
# (%) Estimated cost savings from eliminating EID	0	\$452	\$452	\$452

\*Public Housing and HCV households no longer receive the Earned Income Disallowance (EID) but the numbers reflect those heads of household/co-head/spouse that continue to live with the LHA.

This policy prior to implementation 23 households received the EID; since the EID was eliminated income and rent for all groups has shown little to no change. Since the new policy was implemented 13 households are no longer participants of HCV or the public housing program.

## Activity 16) HCV Rent Reform Study

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2015	FY 2015
<b>Activity Description</b>	
Lexington Housing Authority (LHA) has been selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally. The centerpiece of the new policy is the substitution of triennial recertification of households’ incomes for annual recertification. During the three-year period until a household’s next recertification date, any increase in earnings it achieves will not cause the amount of rent and utilities it pays to go up.	
<b>Status</b>	
Random assignment for the study and control group was done in March 2015. LHA staff began enrolling Study participants in mid-April 2015. Enrollment of all Study participants by was complete by December 2015. A total of 1,029 are enrolled in the Study, 513 in the study/treatment group and 516 in the control group. Emphasys Software is still developing reports for the required metrics, therefore none of the metrics required for this activity have been updated.	
<b>Non-Significant Changes or Modifications</b>	
There were no non-significant changes or modifications during the FY2016 Plan year.	
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>	
There were no changes or modifications to metrics, baselines or benchmarks for this activity.	
<b>Attachment C or D Authorization(s) Changes</b>	
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.	
<b>Significant Change or Modifications to the Activity Since Approval</b>	
There have been no significant changes or modifications since approval of this activity.	

## Activity 17 – Limit Interim Re-examinations for Public Housing Households

Plan Year Proposed	Plan Year Implemented
Proposed and Approved FY2016	FY 2016
<b>Activity Description</b>	
<p>Interim reductions in the rent portion will be made, but limited to reduce administrative costs to the LHA and to provide incentives to employed families to remain employed.</p> <p>For households who are not elderly or disabled, interim adjustments will be limited as follows:</p> <ul style="list-style-type: none"> <li>• Households may only request an interim reduction once between regularly scheduled re-examination periods. However, see the Hardship Policy below for exceptions to this limitation;</li> <li>• Interim decreases will only be processed for loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits.</li> <li>• No reduction based upon loss of job will be processed until the LHA receives documentation of eligibility or ineligibility for unemployment benefits;</li> <li>• Decreases in public assistance income that are the result of a finding of fraud or a failure to comply with work/school requirements will not be processed.</li> <li>• In calculating the reduction, all household income, including previously unreported income, will be counted;</li> <li>• The household's loss of income must be expected to last longer than four (4) months;</li> <li>• All interim rent reductions will be temporary.</li> <li>• An exception to this policy allows for an interim at any time for compliance in 50058 reporting and is limited to the following: the addition of a household member, the death or removal of a household member.</li> </ul> <p>After receiving a rent decrease, a family becomes obligated to report any new income within ten business days. A follow-up interim will be conducted to include new income, and the resulting increase will be implemented after providing the family with 30-day notice of the increase.</p>	
<b>Status</b>	
<p>Residents were notified in December 2015 of this policy change and given 60 day-notice prior to implementation in February 2015. During FY 2016 Centre Meadows was reoccupied and is believed to be responsible for the increase in the number of interims.</p>	

<b>Non-Significant Changes or Modifications</b>
There were no non-significant changes or modifications during the FY2016 Plan year.
<b>Changes or Modifications Metrics, Baselines or Benchmarks</b>
There were no changes or modifications to metrics, baselines or benchmarks for this activity.
<b>Attachment C or D Authorization(s) Changes</b>
There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.
<b>Significant Change or Modifications to the Activity Since Approval</b>
There have been no significant changes or modifications since approval of this activity.

## Standard HUD Metrics

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
<i>CE #1: Agency Cost Savings</i>			
Unit of Measurement - Total cost of task in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>\$8,679</b> <b>\$26.25 X .50 = \$13.13 per interim</b> <b>X 661 Interims</b> Management Specialist hourly rate x time to do an interim	<b>\$4,333</b> <b>\$13.13 X 330 Interims</b>	TBD	TBD
Data Source: Emphasys			

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
<i>CE #2: Staff Time Savings</i>			
Unit of Measurement - Total time to complete the task in staff hours (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>661 interims</b>	<b>330 interims</b>	TBD	TBD
Data Source: Emphasys			

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
<i>CE #5: Increase in Agency Rental Revenue</i>			
Unit of Measurement - Rental revenue in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>\$3,637,812 (\$2,676,180)</b> Rental revenue prior to implementation of the activity.	<b>\$4,387,366 (\$3,227,589)</b> Expected rental revenue after implementation of the activity.	TBD	TBD

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
SS #1: Increase in Household Income			
Unit of Measurement - Average earned income of households affected by this policy in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>\$19,518</b> Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	<b>\$22,446</b> Expected average earned income of households affected by this policy prior to implementation of the activity.	<b>TBD</b>	<b>TBD</b>

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
SS #3: Increase in Positive Outcomes in Employment Status - Households reporting earned income			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>598</b> Actual head(s) of households reporting earned income prior to implementation of the activity.	<b>100%</b> Expected head(s) of households reporting earned income after implementation of the activity.	<b>TBD</b>	<b>TBD</b>

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
SS #3: Increase in Positive Outcomes in Employment Status - Households with no earned income			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>130</b> Head(s) of with no earned income prior to implementation of the activity.	<b>0</b> Expected head(s) of households with no earned income after implementation of the activity.	<b>TBD</b>	<b>TBD</b>

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
<i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i>			
Unit of Measurement - Number of households receiving TANF assistance (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>95</b> Households receiving TANF prior to implementation of the activity.	<b>0</b> Expected number of households receiving TANF after implementation of the activity (number).	<b>TBD</b>	<b>TBD</b>

Activity 17 – Limit Interim Re-examinations for Public Housing Households			
<i>SS #8: Households Transitioned to Self Sufficiency</i>			
For this activity, self-sufficiency is defined as any household that has earned income of at least \$15,080 per year.			
Baseline	Benchmark	Outcome	Benchmark Achieved?
<b>385</b> Households transitioned to self-sufficiency (Households with the head of household/co-head or spouse annually earning \$15,080 or more) prior to implementation of the activity.	<b>589</b> Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	<b>TBD</b>	<b>TBD</b>



## Activity #17 – Disparate Impact Analysis

Activity 17: Public Housing				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	FY2016	FY2016	FY2016	FY2016
<b>All Households</b>	728	\$16,112	\$16,389	\$416
<b>Gender</b>				
Female	654	\$15,593	\$15,966	\$377
Male	74	\$20,326	\$20,133	\$467
<b>Race (Multiple selections permitted)</b>				
Black	606	\$16,259	\$16,679	\$424
White	116	\$15,645	\$15,011	\$380
American Indian / Native Alaskan	1	\$0	\$12,635	\$316
Asian / Pacific Islander	3	\$18,919	\$8,923	\$223
Native Hawaiian / Other Pacific Islander	2	\$13,000	\$13,360	\$334
Other**	-	-	-	-
<b>Ethnicity</b>				
Non-Hispanic	708	\$16,093	\$16,009	\$407
Hispanic	20	\$15,181	\$16,197	\$411
<b>Age of Head of Household</b>				
18-31	309	\$15,486	\$15,999	\$365
32-46	309	\$16,420	\$14,282	\$437
47-61	110	\$18,616	\$19,428	\$504
<b>Excluded Households</b>				
Elderly/Disabled Households	368	\$1,397	\$10,560	\$265

**Impact: Encouraging non-disabled/non-elderly adult  
household members to maintain employment**

<b>Metric</b>	<b>Baseline FY 2016</b>	<b>Benchmark FY2017</b>
# of Households affected by this policy	728	878
# of Interims	661	330
Avg gross annual earned income reported by families	\$16,112	\$19,334
# (%) of families reporting no annual earned income	130	0
# (%) of families reporting annual earned income	598	878
Avg total adjusted annual income reported by families	\$16,389	\$19,667
Avg monthly gross rent payment of families	\$416	\$425
# (%) of families requesting hardship exemption	0	0
# (%) of families granted hardship exemption	0	0

## NOT YET IMPLEMENTED ACTIVITIES

### **Activity 7) Public Housing Acquisition Without Prior HUD Approval**

Activity Proposed and Approved - FY 2012-2013 Plan

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. The LHA has not acquired any public housing properties since this activity was approved, so it was not necessary to implement this activity.

#### **Activity Update**

The LHA will develop a timeline for this activity should the Authority decide to acquire public housing units or land for the development of public housing.

### **Activity 8) Conversion of Appian Hills Public Housing to Project-Based Vouchers**

Activity Proposed and Approved - FY 2012-2013 Plan

Activity Significantly Modified in FY2014

The aging Appian Hills general public housing site needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. The LHA continues to seek adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority. Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.

#### **Activity Update**

Should HUD issue a NOFA during FY 2017 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds. The LHA does not know when funding resources will be available for implementation of this activity.

### **Activity 9) Development of Project-Based Voucher Units at 800 Edmond Street**

Activity Proposed and Approved – LHA's FY2012-FY2013

LHA plans to develop between five and eight projected-based 3-bedroom townhomes on a vacant lot owned by the agency on Edmond Street. The property is adjacent to an existing 3-unit public housing site and close to the Authority's Pine Valley Management Office. LHA is considering several options to finance the new construction at 800 Edmond Street. The Authority may allocate dollars from its program income fund, which in turn was funded through property sales and the collection of development fees associated with the implementation of its previous HOPE VI grants. Alternatively, LHA may seek outside funds from a non-federal source.

The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed

on project-based voucher developments. The activity has been put on hold so that available financial resources could be focused on the rehabilitation of Pimlico/Centre Meadows.

#### **Activity Update**

The LHA still plans to implement this activity once financial resources become available.

#### **Activity 11) Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers**

Activity Proposed in FY2012-2013 Plan

Approved with FY2012 – FY2013 Plan Approval

Revised with FY2014 Plan Approval

Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Tower (which is attached to an LHA-owned public housing site, Connie Griffith Manor; serves low-income, elderly households; and is managed, but at the time this activity was proposed was not owned, by the LHA) require significant emergency capital repairs. MTW funds would only be used if the tax credit investor can demonstrate to the Authority's satisfaction that it does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Place no more than \$300,000 in emergency funds in total.

When this activity was proposed the LHA did not have a confirmed funding source for sorely needed capital improvements at Ballard. After the activity was approved, the site's tax credit investors informed the LHA that they would indeed have sufficient funds to complete the needed work. Having spent a significant portion of their reserves to fund these improvements the Housing Authority was concerned about their ability to cover any additional emergency capital repairs, which prompted creation of this activity.

#### **Activity Update**

This activity has not yet been implemented, but will be implemented if there is an emergency capital expense necessitating the use of these funds at Ballard Place.

### **CLOSED OUT ACTIVITIES**

#### **15) Limit HCV Landlord Rent Increases to the least of 2%, HUD Fair Market Rent (FMR), or the comparable rent**

##### **Plan Year Activity Approved and Implemented**

This activity was proposed and implemented during FY2015. The activity was closed out at the end of FY2015 (June 30, 2015).

##### **Description**

LHA staff proposes to limit annual contract rent increases for participating landlords to the least of a 1) 2% increase in current contract rent, 2) HUD's FMR or 3) the comparable rent.

HCV staff has noticed that landlords are willing to lower the rent to comply with the 40% cap of a participant's monthly adjusted income at initial move in but at subsequent renewals will request a rent increase at a percentage which places a financial hardship on the family. In some cases, families are faced with the dilemma of possible eviction from the unit or have to uproot the family to move to a less expensive unit.

This activity will reduce cost and achieve greater cost effectiveness in federal expenditures by reducing the time HCV staff spends processing moves, which includes an interim examination and inspection of a new unit.

This activity will limit the number of families that need to move because their rent becomes unaffordable, thereby reducing the administrative cost burden associated with processing moves.

#### Reason for Close-Out

HCV staff decided to close out this activity because the number of landlords requesting rent increases beyond above comparable rents or HUD's FMR was not as significant as initially anticipated. In many cases when a landlord's rent increase was denied the landlord withdrew the request as to not cause the tenant to have to move.

Activity 15 – Limit HCV Landlord Rent Increases to the Least of 2%, HUD Fair Market Rent (FMR) or the comparable rent				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	<b>\$18,720</b>	<b>\$13,104</b>	<b>\$16,200</b>	<b>No</b>
	<b>260</b> families moved with continued assistance at an average of <b>\$72</b> to process each move during FY2014	Expected <b>182</b> families will move with continued assistance at an average cost of <b>\$72</b> to process each move during FY2015	<b>225</b> actual families moved with continued assistance multiplied by average cost to process each move during FY2015	
Data Source: WinTen2, Emphasys, staff interviews, staff logs, PHA financial records				

**Activity 15 – Limit HCV Landlord Rent Increases to the Least of 2%, HUD Fair Market Rent (FMR) or the comparable rent**

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	Expected amount of total staff time dedicated to the task after implementation of the activity	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.
	<b>650 hours</b>	<b>455 hours</b>	<b>563</b>	<b>No</b>
	<b>260</b> families moved with continued assistance multiplied by an average <b>2.5</b> hours of staff time required to process each move during FY2014	<b>182</b> Expected <b>families</b> will move with continued assistance multiplied by the average <b>2.5</b> hours of staff time required to process each move during FY2015	<b>225</b> Actual families moving with continued assistance multiplied by average hours of staff time required to process each move during FY2015	
Data Source: WinTen2, Emphasys, staff interviews, staff logs, PHA financial records				

**Activity 15 – Limit HCV Landlord Rent Increases to the Least of 2%, HUD Fair Market Rent (FMR) or the comparable rent**

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	<b>0</b> <b>Unavailable</b>	<b>0</b>	<b>0</b> <b>Unavailable</b>	<b>N/A</b>
	HCV households losing assistance/moving prior to implementation of the activity (number).	Expected HCV households losing assistance/moving after implementation of the activity (number).	Actual HCV households losing assistance/moving after implementation of the activity (number).	The LHA does not track this data.

## SECTION V: SOURCES & USES OF FUNDS

<b>Annual MTW Report</b>			
<b>V.3.Report.Sources and Uses of MTW Funds</b>			
<b>A. MTW Report: Sources and Uses of MTW Funds</b>			
<b>Actual Sources and Uses of MTW Funding for the Fiscal Year</b>			
<b>PHAs shall submit their unaudited and audited information in the prescribed FDS format through the Financial Assessment System - PHA (FASPHA), or its successor system</b>			
<b>Describe the Activities that Used Only MTW Single Fund Flexibility</b>			
<p>LHA used approximately \$663,666 of Section 8 funds that had been accumulated during the construction period to partially repay an investment of LHA unrestricted funds that was made in the form of a subordinated loan for development costs of the Centre Meadows (CM) Rental Assistance Demonstration (RAD) substantial rehabilitation. CM is 100% assisted by S8 project-based vouchers (PBV). As such, an investment in the cost of rehabilitation of the units to which PBV will be attached in an expenditure for which MTW funds may be used. Centre Meadows construction has been completed and is under normal operational activity.</p>			
<b>V.4.Report.Local Asset Management Plan</b>			
<b>B. MTW Report: Local Asset Management Plan</b>			
Has the PHA allocated costs within statute during the plan year?	Yes	No	
Has the PHA implemented a local asset management plan (LAMP)?	Yes	No	
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>			
Has the PHA provided a LAMP in the appendix?	Yes	No	
<p>There are no changes in the LAMP since LHA is not implementing a LAMP.</p>			
<b>V.5.Report.Unspent MTW Funds</b>			
<b>C. MTW Report: Commitment of Unspent Funds</b>			
<p>In the table below, provide planned commitments or obligations of unspent MTW funds at the end of the PHA's fiscal year.</p>			
Account	Planned Expenditure	Obligated Funds	Committed Funds
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
N/A	N/A	0	0
<b>Total Obligated or Committed Funds:</b>		<b>0</b>	<b>0</b>
N/A			
<p><b>Note :</b> Written notice of a definition of MTW reserves will be forthcoming. Until HUD issues a methodology for defining reserves, including a definition of obligations and commitments, MTW agencies are not required to complete this section.</p>			

## SECTION VI: ADMINISTRATIVE

A. General description of any HUD reviews, audits or physical inspection issues that require the agency to take action to address the issue;

The Lexington Housing Authority is in compliance with HUD reviews, audits and physical inspections. The LHA's FY2016 audit has been completed and no findings are anticipated pending the final audit report. In cases where there were findings in HUD reviews and physical inspections, the LHA responded and no further action was required.



B. Results of latest PHA-directed evaluations of the demonstration, as applicable;

# LHA MTW DEMONSTRATION PROJECT



12/16/16

YEAR END REPORT – FY2016 (SELECTED ACTIVITIES)

*This report provides a general review of LHA MTW Demonstration project for the following activities: #1, #3, #13, #14, #16 and #17, in terms of the stated program goals, and includes an impact analysis on the extent to which these activities impact disparate populations of tenants.*

**Amanda E. Soka, MHA PhD**

Upon entering the Demonstration, the LHA partnered with Kentucky State University to evaluate our rent reform MTW activities. During FY2015 KSU underwent a major overhaul of administrative staff that included a new president. Many of the core staff who were present when the LHA entered the agreement with KSU are no longer with the university. The LHA has elected to secure a new evaluator, but one who worked with KSU at the start of our partnership with KSU, Dr. Amanda Sokan. Dr. Sokan is an independent consultant, who is currently Director, Executive Master of Science, Clinical and Translational Science Program, University of Arizona for Health Sciences (UAHS). Dr. Sokan served as lead evaluator of the LHA's MTW program when the LHA entered the Demonstration in 2011. At that time, she was employed by KSU but has since left the university. Dr. Sokan will lead oversight of the MTW program evaluation process, with an overall mandate to assess, monitor and report on the effects of the LHA's MTW initiatives.

The central goal of the rent reform evaluation is to measure the overall effectiveness of the rent reform in accomplishing HUD's stated goals of: increasing the number and quality of affordable housing choices throughout the Lexington-Fayette community, increasing the number of families moving toward self-sufficiency, strengthening the number of community partnerships benefitting residents with special needs, and reducing administrative costs while limiting administrative burdens placed on staff and residents. In addition, the evaluation will consider potential disparate impacts on protected classes of residents as determined by sex, race, ethnicity, age and disability.

# LHA MTW DEMONSTRATION PROJECT

## YEAR END REPORT – FY2016 (SELECTED ACTIVITIES)

### INTRODUCTION

The LHA participates in the HUD MTW demonstration with a view to the pursuit of the following goals:

1. Reduce costs (increase revenues)
2. Increase self-sufficiency of tenants
3. Increase housing choices for tenants

Through the MTW Demonstration program, LHA proposed and received approval to embark upon activities designed to achieve stated goals. Currently there are a total of **seventeen activities**, in different stages of application. This report reviews the following:

- a. Activity One – Increase Minimum Rent to \$150 Across All Housing Programs
- b. Activity Three – Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households
- c. Activity Thirteen – Local Self-Sufficiency Admissions and Occupancy Requirements
- d. Activity Fourteen – Rent Reform: Elimination of Earned Income Disallowance
- e. Activity Sixteen – Housing Choice Voucher Rent Reform Study
- f. Activity Seventeen – Limit Interim Re-examinations for Public Housing Households

Each activity will be reviewed in terms of how well the stated goals above were achieved for the year in question. In compliance with HUD policy regarding rent reform initiatives, this report will also present the results of an impact analysis conducted to determine the effect of each activity and its driving policies on disparate tenant populations within LHA.

### REVIEW CONSIDERATIONS

- How well did activity meet stated MTW Demonstration Project goals?
- Did implementation create a disparate effect on tenant populations?

## ACTIVITY ONE

### **Increase Minimum Rent to \$150 across all Housing Programs.**

Excluding elderly and disabled households.

Date of implementation April 1, 2014

#### Reduce costs (increase revenues)

To measure this goal, the following metric was used – *increase in agency rental revenue* - from both public housing (PH) and Housing Choice Voucher (HCV) units.

#### **NOTES:**

i) Pimlico units, now rehabilitated as Centre Meadows, were converted from Public Housing (PH) to Project-Base Voucher (PBV) units, with occupation beginning in December 2015. These units are excluded from this analysis, but will be included in future analyses, as a new category (PBV), with 2016 data as baseline/benchmark.

ii) As there have been no changes/modifications to metrics, baselines or benchmarks, values used in FY 2015 remain relevant.

**Agency-wide benchmark** – annual net rental revenue: \$5,945,580 /\$2756 average per household (a/phh)

2015 - Actual net rental revenue: \$6,696,852/\$3,200 a/phh

Agency-wide, the LHA received a total of \$7,562,604 in net rental revenue for FY 2016, based on a total of 2,024 households (non-elderly/non-disabled). Although the number of eligible/affected households decreased by 69 from the previous year, net rental revenue increased by \$865,752. Average actual net rental income per household was \$3,736. As a result, net rental revenue for 2016 exceeded 2015 benchmark by an average of approximately \$536 per household.

**Public Housing (PH) benchmark** – annual net rental revenue: \$2,017,152/\$2,886 a/phh.  
2015 - \$2,109,288/\$2,746 a/phh

**For PH**, net rental revenue is calculated minus utilities. In FY 2016, the actual rental revenue collected was \$2,676,180 from a total of 728 eligible households - an average of \$3,676 per household. Thus LHA met its revenue goal for PH, exceeding benchmark by \$659,028.

**HCV benchmark** – annual rent revenue: \$3,928,428 /\$2,694 a/phh

Annual net rental revenue collected was \$4,886,424, from a total of 1,296 eligible households (29 households less than in 2015; 162 less than benchmark). Despite this, LHA saw an increase in net rental revenue of \$298,860 more than in 2015, and \$957,996

higher than the benchmark respectively. This amounts to an average rent revenue of \$3,770 per household.

Disaggregating agency wide data into PH and HCV, helps paint a clearer picture. Unlike 2015 where the increase in revenue appeared to be driven primarily by the HCV sector, 2016 reflects significant contributions from PH sector as well. That said, the fact that rent revenue increased in HCV sector, in spite of the lower number of participating households compared to previous years is noteworthy. Also, as noted above these figures do not take into account rental revenue from Centre Meadows (PBV), which would have registered an even higher increase compared to established agency-wide baseline.

#### *Increase self-sufficiency of tenants*

In addition to raising much needed revenue, this initiative is designed to promote self-sufficiency by encouraging heads-of-household to work, measured by increase in household income. LHA defines head of household to include tenants who are the head or co-head of household, and spouses. Relevant metrics included here include the following:

- a. Increase in average earned income of head of household
- b. Increase in positive outcomes in employment status
- c. Removal from Temporary Assistance for Needy Families (TANF)
- d. Households transitioned to self-sufficiency

#### *Increase in head of household's average earned income*

**PH benchmark:** expected average household income = \$12,857

Number, potentially employable heads of households = 699

Per 2016 data, of a total of 728 units with potentially employable heads of households, 598 reported earned income (82%). This is almost double the amount reported in 2015 (324/768 or 42%). Heads of households who were employed reported an average income \$19,518, an increase of \$2,309 on FY 2015, and in excess of \$6,600 over benchmark

**HCV benchmark:** expected average household income = \$8,535

Number, potentially employable heads of households = 1,458

In 2016, more heads of households (844/1296 or 65%), reported employment compared to 2015 (520/1325, or 39%). This resulted in an average annual income of \$14,555 compared to benchmark (\$8,535) and FY 2015(\$14, 597). Average income in FY 2016 is about \$42 less than in 2015, however there is an almost 60% increase in the number of employed heads of households.

**Agency-wide benchmark:** expected average household income = \$10,696

Number, potentially employable heads of households = 2,157

In FY 2016, 1442 (of a total of 2,024 employable heads of households), reported employment. Thus agency-wide, LHA appears to have increased both the number of actual heads of households who were employed, as well the average annual income earned. For instance, 71% of employable heads of households (compared to 37% in 2015) earned an average income of \$17,037 compared to \$15,903 in 2015, and benchmark of \$10,696.

As this represents an increase of over \$6,000 compared to benchmark, and \$1,134 compared to 2015, LHA appears to have met this goal.

### ***Increase in positive outcomes in employment status***

Following from the previous section, it is always useful to consider the ratio of employed heads of households to unemployed, as one of the program goals is to encourage self-sufficiency. In 2016 both PH and HCV sectors reflect significant declines in the number of households in which the head or co-head did *not* have earned income.

In PH, this number was 22%, compared to 59% in 2015, and lower even than benchmark (29%). The same pattern is seen with regard to HCV, resulting in agency-wide decline of 29% compared to 60% in 2015, and benchmark (41%). The implication is therefore that in 2016, LHA not only achieved the goal of increasing average household income, the increase appears to correlate to improved employment status for heads of households. This is arguably a more critical measure of success.

### ***Increase in Household Income – Heads of Household Reporting Income***

Another way to look at positive outcomes in employment status is to review the employment status/earned income reported by heads/co-heads of households and/or spouses.

PH: In 2016, 82% reported earned income, an increase of 11% compared to benchmark (71%). In HCV, that percentage grew from 54% (benchmark), to 65% in 2016. Overall therefore, LHA saw a 12% increase in the number of heads/co-heads of households and/or spouse reporting earned income. It must be noted that this is a better performance than seen in 2015, where that number was low (40%), and failed to meet benchmark of 59%.

### **Removal from Temporary Assistance for Needy Families (TANF)**

This metric provides another measure for self-sufficiency by tracking numbers of heads of households who receive TANF, as a cessation of reliance on TANF can be seen as a move towards self-sufficiency.

In 2015, a review of data raised concerns about plausibility due to the disproportionate differences between actual figures and baseline, which may have resulted from a change in software programs. According to that data, there was a 150% increase in households on TANF agency-wide, driven primarily by PH sector where data showed an increase from 32 (benchmark) to 266 (FY2015). As a result, for the purpose of this report comparison is made between FY 2016 and FY 2015 data only.

According to 2016 data presented (142), overall LHA saw almost 60% agency-wide decrease in the numbers of heads of households who received TANF compared to 2015 (324), and almost 40% when compared to benchmark (123). The major decrease occurred in PH, which went from 266 households in 2015 down to 95 in 2016. In contrast, the overall percentage of HCV households on TANF remained constant at 4%. Overall therefore, due to the positive outcome for this metric agency-wide LHA achieved its benchmark. It would also appear to confirm the possibility of a discrepancy/glitch in the PH data reported in 2015.

Self-sufficiency = Household with annual earned income of at least \$15,080\*  
\*\$7.25/hour (Federal minimum wage) x 40-hour week x 52 (work weeks per year)



### **Households transitioned to self-sufficiency**

This final metric measures the number of households that transition to self-sufficiency, which for the purpose of the MTW Demonstration Project is defined as any household that has earned income of at least \$15,080 per year.

Agency-wide, the 2016 number (757) exceeds LHA's benchmark of 464 by 293 points (households), an overall increase of about 63%. Both PH and HCV sectors contribute to this increase; with PH households (385) showing a 587% increase on benchmark (56), and 75% increase on 2015 values (220). HCV shows a similar - pattern, although of lesser magnitude. These numbers are consistent with the results from the metrics considered in earlier sections. Similar to the previous section, concerns about data plausibility in 2015 led to a recommendation to monitor future data (2016), for comparison to 2013 baseline, benchmark and 2015. HCV results for 2016 (373) are lower than recorded for baseline (399). However, these results show an upward trend agency-wide (PH and HCV), without the concerns about software issues from last year.

### **Increase housing choices for tenants**

Data unavailable at this time.

### **Impact Analysis – Activity One**

A critical question for LHA, MTW and other stakeholders, is the impact of increasing minimum rent to \$150 across all housing programs on LHA tenants and families. To answer this question an impact analysis was conducted to measure impact in terms of the following:

- a. Effectiveness – how many families met the minimum payment required?
- b. Annual earned income – how many families reported increases?
- c. Effect on tenants – includes: how many requested hardship exemptions, left LHA housing, number of initiative related complaints, and residents' demographics and
- d. Administration – staff time handling complaints related to this initiative

#### **a) Effectiveness – how many families met the minimum payment required?**

This initiative was also effective in increasing revenues as the data documents progressive increase in net monthly revenue collected by LHA agency-wide, from \$291,829 (2013, baseline), and \$458,214 in 2014, which exceeded the benchmark of \$360,125, to \$558,071 in 2015.

On average, the monthly rent paid in 2016 was \$365 agency-wide, which is higher than both the minimum (\$150), as well as the 2015 average of \$267, and in excess of the FY 2014 benchmark (\$305).

Continuing a trend seen in 2015, this program has been effective in establishing and maintaining a monthly minimum rent of \$150 for residents. For the second year in a row,

in both PH and HCV units, 100% of all residents have met the \$150 minimum monthly rent payment. This is compared to 75% (PH) and 60 (HCV) at baseline in 2013.

The positive impact of this trend is reflected in the increases in rent revenues agency-wide. In 2016, net monthly revenue was \$505,150. It must be noted that although this sum was significantly higher than benchmark (\$360,125), it was over \$50,000 less than in the previous year 2015. It will be important to watch whether this decline continues, and reasons why.

***b) Annual earned income – how many families reported increases?***

Average gross annual earned income reported by families generally indicate a somewhat gradual but increasing trend overall. As found in 2015, the data as provided still does not permit discrimination between sources of earned income (i.e. how much was earned by head of household, versus other members of the household). Thus, it is not possible to make an inference regarding impact of the initiative as a motivator on heads of household to increase potential earnings. Again, it is recommended that this be rectified for the future.

***c) Effect on tenants – includes: how many requested hardship exemptions, left LHA housing, number of initiative related complaints, and residents' demographics***

Tracking the number of requests for exemption or deferral of the minimum rent payment is a useful way to measure effect of the initiative on tenants/residents. 2016 saw a total of 5 requests for hardship exemptions agency-wide, unlike the zero reported for 2015. Of the 5, four were in HCV units. Although this is significantly less than the benchmark (29) established in 2014, it is important to investigate cause, and monitor this negative trend. There were no hardships requests in PH, and the 5<sup>th</sup> request came from Centre Meadows (PBV), a category not considered in 2016, but which will be included in future analyses as stated in the beginning of this section.

Data also indicates increases in initiative-related complaints agency-wide. Of the eight (8) reported, PH saw 3 complaints, one less than in 2015, while HCV complaints doubled from 2 (2015) to 4, which appears in line with/reflects the number of hardship requests. One (1) complaint came from PBV – Centre Meadows, which is currently excluded from analysis this year's as previously stated. Again as with hardship requests, it is important to monitor and evaluate any potential drivers of this negative trend - in order to manage or avoid upward growth trends as, and if appropriate.

A potentially related issue to hardship requests and initiative –related complaints is the number of residents who leave LHA housing, in particular if the exodus can be linked to either of these issues. In 2016, LHA reports that a total of 407 residents left agency-wide (after discounting the ten (10) from PBV – Centre Meadows, which is excluded from this year's analysis) – 127 (PH), and 280 (HCV). Although this number is lower than in 2015

(611), it is still pertinent to consider the reasons why residents leave, and whether or not this is linked to the initiative. As in 2015, there continues to be a discrepancy between numbers indicating discontent with the initiative and exodus numbers – it would be helpful to understand what, if any connection exists. For instance, are residents leaving without making complaints, and/or engaging the hardship exemption request system, if so why? Are managers reminding tenants who make complaints about the existence of the hardship exemption request system? As stated in the 2015 report, without data on the reasons why residents leave LHA housing, it is not possible to exclude the initiative as a contributory factor. Again, it is recommended that this gap in data collection be amended in future years to allow for more meaningful analyses. One example of a useful metric would be, the number of tenants who leave, who also made any complaints in the year preceding exodus from LHA, and the nature of the complaint made.

***d) Administration – staff time handling complaints related to this initiative***

The effect of the initiative on staff productivity is useful because it relates to the goal of cost reduction, and revenue increase. It can also help shed light on the how well the initiative is working, and /or accepted by residents. In 2016, a total of 1.75 hours (less .25 hours for Centre Meadows, excluded from 2016 analysis), was reported as time spent handling initiative-related complaints, compared to 1 hour in 2015. Other than a slight increase for PH, considering number of complaints to time spent, the increase over 2015 figures reflects the increase reported in residents' complaints; overall this is still significantly less than benchmark (25 hours). Thus overall, across LHA less staff time was spent on complaints than anticipated in the FY 2014 benchmark of 25 hours agency – wide maintaining the trend toward a positive outcome both for staff morale and overall productivity.

## Disparate Impact Analysis - Demographics

The purpose of the disparate impact analysis is to ensure that this rent reform initiative does not unintentionally result in and/or create through its implementation a disparate impact on the rent burden faced by protected classes of households by race, color, national origin, disability, age, or gender. The tables below provide snapshots of income (earned/adjusted), and rents paid by households by race/ethnicity, age and gender across four years (2013 – 2016), and the increased rent burden incurred.

### A) Public Housing

**TABLE 1: PUBLIC HOUSING - AVERAGE INCOME (EARNED/ADJUSTED)**

Public Housing Population	Heads of Household				Average Gross Annual Earned Income				Average Total Annual Adjusted Income			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016
<b>All Households</b>	860	704	768	728	\$10,512	\$13,263	\$14,367	\$16,112	\$11,197	\$14,478	\$19,388	\$16,389
<b>Gender</b>												
Female	774	636	700	654	\$10,610	\$13,392	\$14,388	\$15,593	\$11,245	\$14,588	\$15,617	\$15,966
Male	86	68	68	74	\$9,623	\$12,049	\$14,156	\$20,326	\$10,764	\$13,447	\$15,680	\$20,133
<b>Race (Multiple selections permitted)</b>												
Black	677	577	642	606	\$10,959	\$13,635	\$14,485	\$16,259	\$11,656	\$14,789	\$16,179	\$16,679
White	179	126	118	116	\$9,267	\$11,668	\$13,910	\$15,645	\$10,022	\$13,199	\$13,460	\$15,011
American Indian / Native Alaskan	4	3	1	1	\$9,407	\$15,847	\$13,595	\$0	\$3,333	\$10,271	\$8,731	\$12,635
Asian / Pacific Islander	5	5	5	3	\$13,170	\$12,172	\$16,777	\$18,919	\$7,930	\$10,810	\$8,820	\$8,923
Native Hawaiian / Other Pacific Islander	4	4	2	2	\$8,120	\$10,683	\$6,500	\$13,000	\$6,890	\$12,044	\$10,346	\$13,360
Other**	3	-	-	-	-	-	-	-	\$568	-	-	-
<b>Ethnicity</b>												
Non-Hispanic	843	688	752	708	\$10,514	\$13,254	\$14,135	\$16,093	\$11,245	\$14,510	\$12,669	\$16,009
Hispanic	17	16	16	20	\$10,411	\$13,627	\$17,075	\$15,181	\$8,798	\$13,099	\$15,222	\$16,197
<b>Age of Head of Household</b>												
18-31	421	284	310	309	\$9,284	\$12,198	\$14,939	\$15,486	\$9,320	\$12,473	\$12,571	\$15,999
32-46	292	289	327	309	\$11,734	\$13,598	\$15,247	\$16,420	\$13,162	\$15,548	\$16,844	\$14,282
47-61	147	131	131	110	\$11,600	\$14,830	\$14,981	\$18,616	\$12,667	\$16,465	\$20,511	\$19,428
<b>Excluded Households</b>												
Elderly/Disabled Households	363	358	323	368	\$971	\$1,341	\$688	\$1,397	\$11,051	\$11,555	\$10,368	\$10,560

Table 1 shows the demographic breakdown of households, and income earned between 2013 and 2016. Two types of income are reported – gross average annual earned income and average total annual adjusted income.

Based on this table, the profile of the average PH head of household is: Female, Black/Non-Hispanic, and aged between 18 and 46.

**TABLE 2: INCREASED RENT BURDEN BY GENDER OF HEAD OF HOUSEHOLD**

Public Hou	Heads of Household				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2014 Actual	FY2015 Actual	FY2016 Actual
All Househ	860	704	768	728	\$281	\$352	\$487	\$416	\$21	\$71	\$206	<b>\$135</b>
Gender												
Female	774	636	700	654	\$284	\$354	\$399	\$377	\$20	\$70	\$115	<b>\$93</b>
Male	86	68	68	74	\$260	\$335	\$267	\$467	\$26	\$75	\$7	<b>\$207</b>

The above table shows the average gross rent paid by head of households by gender, between 2013 and 2016, and the average increased rent burden for each year. From the table, we can see that prior to 2015 the difference in increased rent burden was marginal between female and male heads of households (\$70 vs. \$75). However, a great difference by gender (\$115 vs. \$7), skewed to suggest that this initiative may have a disparate effect on households with female heads, than on those with male heads, found in 2015, appears reversed in 2016. The average rent burden for females fell by \$22, while increasing for men by about \$200. This may be attributable to a number of factors, and raise questions such as the following:

- What is the effect of the larger number of households with female heads?
- What is the effect of the wider age span of heads of households (18 – 46, compared to 18 – 31, in the previous year?)
- What is the impact of the difference in gross annual earned/adjusted income by gender? For instance, a review of 2015 and 2016 data indicates that in 2016, the average total adjusted annual income for male heads of households was significantly more than for females.

Thus, further data collection and analysis may be useful to help determine whether the effect seen is due to a combination of the lower income earned by female heads of households and the larger numbers of female heads of households, or other cause.

**TABLE 3: INCREASED RENT BURDEN BY RACE AND ETHNICITY OF HEAD OF HOUSEHOLD**

**Activity 1: Public Housing**

**Disparate Impact Analysis - Baseline Data**

Public Housing Population	Heads of Household (By Fiscal Year)				Average Gross Rent Payment (By Fiscal Year)				Average Increased Rent Burden (By Fiscal Year)			
	2013	2014	2015	2016	2013	2014	2015	2016	2014 Benchmark	2014 Actual	2015 Actual	2016 Actual
<b>All Households</b>	860	704	768	728	\$281	\$352	\$487	\$416	\$21	\$71	<b>\$206</b>	<b>\$135</b>
<b>Race (Multiple selections permitted)</b>												
Black	677	577	642	606	\$290	\$358	\$412	\$424	\$21	\$68	<b>\$122</b>	<b>\$130</b>
White	179	126	118	116	\$257	\$324	\$347	\$380	\$17	\$67	<b>\$90</b>	<b>\$123</b>
American Indian / Native Alaskan	4	3	1	1	\$116	\$262	\$218	\$316	\$34	\$146	<b>\$102</b>	<b>\$200</b>
Asian / Pacific Islander	5	5	5	3	\$208	\$284	\$222	\$223	\$27	\$76	<b>\$14</b>	<b>\$15</b>
Native Hawaiian / Other Pacific Islander	4	4	2	2	\$210	\$305	\$272	\$334	\$4	\$95	<b>\$62</b>	<b>\$124</b>
Other**	3	-	-	-	\$83	-	-	-	\$67	-	-	-
<b>Ethnicity</b>												
Non-Hispanic	843	688	752	708	\$282	\$352	\$417	\$407	\$35	\$70	<b>\$135</b>	<b>\$125</b>
Hispanic	17	16	16	20	\$251	\$337	\$359	\$411	\$21	\$86	<b>\$108</b>	<b>\$160</b>

Table 3 shows the average gross rent paid by head of households by race/ethnicity, between 2013 and 2016, and the average increased rent burden for each year. From the table, we can see both a continuation of the 2015 trend, with a FY 2016 rent burden that far exceeds 2014 benchmarks for every race/ethnic group with the exception of Asian/Pacific Islander.

Although overall, the rent burden appears to have dropped in 2016, (\$135) compared to 2015 (\$206), the actual rent burden in 2016 increased for every racial group, with the highest increase recorded for the sole American Indian/Native Alaskan resident. Also, the rent burden decreased for Non-Hispanics, but increased for Hispanics. It will be important to monitor this, in particular if there is an increase in number of Hispanic residents/tenants

Generally, all households experienced a significant increased rent burden in 2016. For the second year in a row, the racial groups with the greatest rent burden in 2016 include American Indians/Native Alaskan (\$200), Blacks (\$130) and Native Hawaiian/Other Pacific Islander (\$124). In considering impact, the very small numbers of residents who are American Indians/Native Alaskan and Native Hawaiian/Other

Pacific Islander must be taken into account. Also the fact that the data indicates that the initiative is more likely to have a disparate effect on Hispanics compared to Non-Hispanic groups should be monitored and explored because of the relatively small numbers of Non-Hispanics in resident population.

**TABLE 4: INCREASED RENT BURDEN BY AGE OF HEAD OF HOUSEHOLD**

Public Housing Population	Heads of Household				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2014 Actual	FY2015 Actual	FY2016 Actual
All Households	860	704	768	728	\$281	\$352	\$487	\$416	\$21	\$71	<b>\$206</b>	<b>\$135</b>
Age of Head of Household												
18-31	421	284	310	309	\$249	\$318	\$322	\$365	\$21	\$69	<b>\$73</b>	<b>\$116</b>
32-46	292	289	327	309	\$317	\$379	\$428	\$437	\$17	\$62	<b>\$111</b>	<b>\$120</b>
47-61	147	131	131	110	\$305	\$368	\$196	\$504	\$27	\$63	<b>\$156</b>	<b>\$199</b>

Table 4 shows the average gross rent paid by head of households by age, between 2013 and 2016, and the average increased rent burden for each year. As before, despite an overall decrease in average rent burden for all households, the increased rent burden in 2016 exceeds both actual rent burden in 2015, as well as the 2014 benchmark in every age group, by a growing margin.

Of the three age groups/range represented on the table, those aged 47-61 bore the highest rent burden (\$199), followed by those aged 32 -46 (\$120), and 18 to 31 (\$116) respectively. The higher rent burden for the 47 -61 group, in 2016 is perhaps attributable to the higher income recorded as earned by the group in 2016.

#### B) HCV

Based on this table, the profile of the average HCV head of household is: Female, Black/Non-Hispanic, and aged between 32 and 46. This is consistent with 2015, and other annual data previously reported.

**TABLE 5: HCV - DISPARATE IMPACT, BASELINE DATA**

Activity 1: HCV																				
Disparate Impact Analysis - Baseline Data																				
HCV Population	Heads of Household				Average Gross Annual Eaned Income				Average Total Annual Adjusted Income				Average TTP				Average Increased Rent Burden			
	FY2013	FY2014*	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2013	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2014 Actual	FY2015 Actual	FY2016 Actual
All Households	1,454	1,430	1,325	1,296	\$8,632	\$8,626	\$8,335	\$9,479	\$10,501	\$10,325	\$9,887	\$11,328	\$271	\$357	\$289	\$314	\$35	\$86	\$18	\$43
Gender																				
Female	1,404	1,378	1,177	1,167	\$8,697	\$8,669	\$8,701	\$9,873	\$10,547	\$10,403	\$10,231	\$11,605	\$273	\$360	\$299	\$322	\$34	\$87	\$26	\$49
Male	50	52	148	129	\$7,995	\$7,497	\$5,424	\$5,917	\$8,958	\$8,254	\$7,146	\$8,824	\$237	\$271	\$207	\$246	\$47	\$34	-\$30	-\$9
Race (Multiple selections permitted)																				
Black	1,183	1,160	962	1,036	\$8,942	\$8,811	\$8,975	\$10,066	\$10,787	\$10,444	\$10,205	\$11,809	\$279	\$360	\$297	\$325	\$34	\$81	\$18	\$46
White	277	275	358	257	\$7,561	\$7,938	\$5,816	\$7,221	\$9,341	\$9,805	\$8,595	\$9,431	\$242	\$341	\$256	\$273	\$38	\$99	\$14	\$31
American Indian / Native Alaskan	5	4	2	2	\$6,298	\$4,940	\$5,029	\$3,329	\$7,354	\$7,557	\$12,892	\$8,279	\$189	\$221	\$323	\$224	\$34	\$32	\$189	\$35
Asian / Pacific Islander	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Native Hawaiian / Other Pacific Islander	1	2	3	1	\$0	\$0	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$0	\$436	\$178	\$166	\$0	\$436	\$178	\$166
Other**	1	-		-	\$22,260	-		-	\$0	-	-	-	\$50	-	-	-	\$100	-	-	-
Ethnicity																				
Non-Hispanic	1,438	1,410	1,262	1,274	\$8,654	\$8,605	\$5,753	\$9,481	\$10,475	\$10,294	\$8,648	\$11,316	\$271	\$356	\$240	\$314	\$35	\$85	-\$31.00	\$43.00
Hispanic	16	20	63	22	\$10,432	\$10,156	\$7,345	\$9,641	\$12,096	\$12,466	\$9,082	\$12,006	\$306	\$394	\$257	\$313	\$21	\$88	-\$49.00	\$7.00
Age of Head of Household																				
18-31	497	386	329	289	\$8,258	\$7,821	\$8,593	\$9,456	\$9,035	\$8,513	\$8,558	\$9,801	\$237	\$297	\$261	\$287	\$42	\$60	\$24	\$50
32-46	759	824	711	741	\$9,231	\$9,351	\$9,150	\$10,379	\$11,774	\$11,499	\$11,120	\$12,407	\$302	\$392	\$318	\$337	\$29	\$90	\$16	\$35
47-61	198	220	285	266	\$7,579	\$7,324	\$6,003	\$7,016	\$9,238	\$9,104	\$8,344	\$9,982	\$242	\$328	\$246	\$282	\$38	\$86	\$4	\$40
*The LHA's fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014. Therefore, LHA is using data from Tenmast ending May 27, 2014.																				
***Other** category not available in LHA's computer systems as of May 27, 2014																				



**TABLE 6: HCV - AVERAGE INCREASED RENT BURDEN BY GENDER**

HCV Population	Heads of Household by Fiscal Year			Average Gross Annual Earned Income by Fiscal Year			Average Total Annual Adjusted Income by Fiscal Year			Average Total Annual Adjusted Income by Fiscal Year			Average Increased Rent Burden by Fiscal Year			
	FY 2014*	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014 Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual
All Households	1,430	1,325	1,296	\$8,626	\$8,335	\$9,479	\$10,325	\$9,887	\$11,328	\$357	\$289	\$314	\$35	\$86	\$18	\$43
Gender																
Female	1,378	1,177	1,167	\$8,669	\$8,701	\$9,873	\$10,403	\$10,231	\$11,605	\$360	\$299	\$322	\$34	\$87	\$26	\$49
Male	52	148	129	\$7,497	\$5,424	\$5,917	\$8,254	\$7,146	\$8,824	\$271	\$207	\$246	\$47	\$34	-\$30	-\$9

\*14\* = benchmark

Similar to PH, females bear a more disparate increased rent burden compared to males, and all households generally. However, it is noteworthy that the decreasing trend in 2015 has not continued into 2016, and there is now emerging a wider gap in rent burden between males and female heads of household.

**TABLE 7: HCV - INCREASED RENT BURDEN BY RACE/ETHNICITY**

HCV Population	Heads of Household by Fiscal Year			Average Gross Annual Earned Income by Fiscal Year			Average Total Annual Adjusted Income by Fiscal Year			Average TTP by Fiscal Year			Average Increased Rent Burden by Fiscal Year		
	FY 2014*	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014	FY 2015	FY 2016	FY 2014 Benchmark	FY 2015 Actual	FY 2016 Actual
All Households	1,430	1,325	1,296	\$8,626	\$8,335	\$9,479	\$10,325	\$9,887	\$11,328	\$357	\$289	\$314	\$35	\$18	\$43
Gender															
Female	1,378	1,177	1,167	\$8,669	\$8,701	\$9,873	\$10,403	\$10,231	\$11,605	\$360	\$299	\$322	\$34	\$26	\$49
Male	52	148	129	\$7,497	\$5,424	\$5,917	\$8,254	\$7,146	\$8,824	\$271	\$207	\$246	\$47	-\$30	-\$9
Race (Multiple selections permitted)															
Black	1,160	962	1,036	\$8,811	\$8,975	\$10,066	\$10,444	\$10,205	\$11,809	\$360	\$297	\$325	\$34	\$18	\$46
White	275	358	257	\$7,938	\$5,816	\$7,221	\$9,805	\$8,595	\$9,431	\$341	\$256	\$273	\$38	\$14	\$31
American Indian / Nat	4	2	2	\$4,940	\$5,029	\$3,329	\$7,557	\$12,892	\$8,279	\$221	\$323	\$224	\$34	\$189	\$35
Asian / Pacific Islander	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-
Native Hawaiian / Oth	2	3	1	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$436	\$178	\$166	\$0	\$178	\$166
Other**	-	-	-	-	-	-	-	-	-	-	-	-	\$100	-	-
Ethnicity															
Non-Hispanic	1,410	1,262	1,274	\$8,605	\$5,753	\$9,481	\$10,294	\$8,648	\$11,316	\$356	\$240	\$314	\$35	-\$31.00	\$43.00
Hispanic	20	63	22	\$10,156	\$7,345	\$9,641	\$12,466	\$9,082	\$12,006	\$394	\$257	\$313	\$21	-\$49.00	\$7.00

Table 7 shows the average rent increase burden incurred by head of households by race/ethnicity, between 2014 (benchmark) and 2016. The average increased rent burden for all households was \$43 compared to \$18 in 2015, an increase of almost 140%. This increase in FY 2016 rent burden is reflected for all groups except American Indian/Native Alaskan (\$35 vs. \$189), and Native Hawaiian/Other Pacific Islander (\$166 vs. \$178), continuing a trend begun in 2015.

That said, Native Hawaiian/Other Pacific Islander group, does have the highest increased rent burden, even though it constitutes a very negligible portion of the population. It is important to consider whether this state of affairs may be driven by lack of earned income (\$0) recorded for this group.

**TABLE 8: INCREASED RENT BURDEN BY AGE**

HCV Population	Heads of Household by Fiscal Year			Average Gross Annual Earned Income by Fiscal Year			Average Total Annual Adjusted Income by Fiscal Year			Average TTP by Fiscal Year			Average Increased Rent Burden by Fiscal Year		
	FY2014*	FY2015	FY2016	FY2014	FY2015	FY2016	FY2014	FY2015	FY2016	FY2014	FY2015	FY2016	FY2014 Benchmark	FY2015 Actual	FY2016 Actual
All Households	1,430	1,325	1,296	\$8,626	\$8,335	\$9,479	\$10,325	\$9,887	\$11,328	\$357	\$289	\$314	\$35	\$18	\$43
<b>Age of Head of Household</b>															
18-31	386	329	289	\$7,821	\$8,593	\$9,456	\$8,513	\$8,558	\$9,801	\$297	\$261	\$287	\$42	\$24	\$50
32-46	824	711	741	\$9,351	\$9,150	\$10,379	\$11,499	\$11,120	\$12,407	\$392	\$318	\$337	\$29	\$16	\$35
47-61	220	285	266	\$7,324	\$6,003	\$7,016	\$9,104	\$8,344	\$9,982	\$328	\$246	\$282	\$38	\$4	\$40

2014\* =

BENCHMARK

Table 8 shows the average gross annual earned income by age of head of households, between 2014 and 2016, and the average increased rent burden for given years. The average increased rent burden for all households is much higher in 2016 compared to 2015. A similar pattern is seen in the average per age group, with rent burden steeply increasing by 108% (18 -31), 119% (32 -46), and 900% (47 -61), respectively. Possible factors driving these increases are worth investigating – for all groups.

Of the three age groups/range represented on the table, those aged 47 – 61 bore the highest degree of increase in rent burden (\$4 to \$40), followed by those aged 32 to 46 (\$16 to \$35)), with the youngest group having the highest rent burden (\$50), albeit with the lowest degree of increase (\$24 to \$50).

### C) Project Based Vouchers (PBV) - Centre Meadows

This year, the addition of Centre Meadows, formerly Pimlico has created a third category qualifying for disparate impact analysis. Although Centre Meadows has not been included in the 2016 report per se, with analysis of data beginning next year, preliminary data collected is provided both as a snapshot and for information. Also, this snapshot will serve as baseline values against which comparisons may be made in the future. No disparate analysis is conducted at this time.

**TABLE 9: CENTRE MEADOWS - DISPARATE ANALYSIS, BASELINE DATA**

Activity 1: Centre Meadows				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>
<b>All Households</b>	158	\$12,532	\$13,964	\$355
<b>Gender</b>				
Female	144	\$12,561	\$13,819	\$352
Male	14	\$12,239	\$15,457	\$387
<b>Race (Multiple selections permitted)</b>				
Black	129	\$12,126	\$14,067	\$357
White	28	\$14,237	\$13,407	\$342
American Indian / Native Alaskan	0	\$0	\$0	\$0
Asian / Pacific Islander	1	\$17,233	\$16,273	\$407
Native Hawaiian / Other Pacific Islander	0	\$0	\$0	\$0
Other**	0	\$0	\$0	\$0
<b>Ethnicity</b>				
Non-Hispanic	156	\$12,356	\$13,819	\$351
Hispanic	2	\$26,232	\$25,272	\$632
<b>Age of Head of Household</b>				
18-31	107	\$12,438	\$13,582	\$347
32-46	37	\$12,671	\$14,402	\$363
47-61	14	\$12,883	\$16,252	\$393
<b>Excluded Households</b>				
Elderly/Disabled Households	45	\$487	\$11,679	\$292

### Conclusion and recommendations

Activity 1 is critical for LHA because of the scope of its impact and implications for LHA and tenants alike. Results for this initiative reflect a mixture of both positive and a few potentially negative outcomes in 2016.

**A number of goals have been met** – for instance LHA has successfully established and maintained the minimum \$150 rent agency-wide, as indicated by the 100% participation for the second year in a row.

Rental revenues increased agency-wide (in both PH and HCV), even with the exclusion of PBV – Centre Meadows. 2016 data indicates success in increasing average earned income of heads of households, in both PH and HCV, fewer number of families on TANF, a reduction in the number of heads of households without earned income, and an upward trend in the number of employed heads of households. Taken together, the implication is that this initiative has had a positive impact on the goal of increasing average income, and improved employment status for heads of households. Another

positive outcome relates to the lack of increase in time spent by staff members in handling initiative related complaints.

**There are some issues deserving of monitoring or evaluation.**

For instance, although as stated earlier LHA met its goal of increasing revenue, it must be noted that revenues declined by \$50,000 compared to the previous year. It is important to track whether this decline continues, and if so why. Also, data indicates a gradual increasing trend in the annual earned income of households (defined as heads of households, co-heads, spouses). Although this is of itself a positive outcome, it is not immediately clear who is responsible for what increase, a fact that might be useful in designing assistive interventions or programs.

In order to enhance policy and practice, it is valuable to be able to discriminate between the sources (whom) of earned income reported. The number of both hardship requests and initiative related complaints increased in 2016. Although 2016 numbers reported are still far less than benchmark, the growth in numbers can serve as an early warning system, which should be tracked overtime. It will be important to track not just the number of complaints, but also the nature of same, as well as resolution if any. This may facilitate the monitoring and evaluation of potential drivers of complaints and/or requests for hardship, in order to inform processes and/or policies as appropriate to avoid continued upward growth.

As stated in the 2015 report, understanding reasons why tenants leave LHA is informative. It is particularly important to track both numbers and reason in order to identify or eliminate any link to this initiative, if a full picture is to be achieved. Again, the use of exit interviews/surveys, etc. is recommended.

The data limitations in 2015 report, attributed to a mid-course change in software program used for data collection, maintenance and analysis, and which may have affected the metrics/measures, etc. appear to have been resolved.

Continued attention to impact on protected categories is useful, as longitudinal data has the potential to help understanding, as well as inform and improve LHA processes regarding the workings of this initiative.

**Based on this year's report some areas to watch and monitor include the following:**

*a. Disparate impact and gender?*

Data shows a growing gender gap to the detriment of female heads of households in terms of increased rent burden. Again, this might be due to reasons such as the preponderance of females to male, but bears further investigation.

*b. Disparate impact and age?*

Note the changing impact on the 47-61 age group. For instance, rent burden decreased overall, and for all age other age groups (e.g. PH). What are the drivers for this increased rent burden?

*c. Disparate impact and ethnicity?*

Data indicates greater rent burden for Hispanics, indicating a likelihood of /potential for disparity.

*d. General issues?*

FY2016 reported an increase in rent burden for all. Although this is not a disparate impact issue, it is useful to understand if drivers are positive or negative.

Also, although rent burden was reported as decreased for all age groups agency-wide, actual values had in fact increased in all age groups. Some clarification of data is needed to reconcile this difference in trajectory.

*e. Other recommendations?*

Consider obtaining resident feedback on this initiative, either via a resident survey or by conducting focus group sessions.

Overall, LHA appears to be realizing its stated goals for Activity One.

## ACTIVITY THREE

### **Triennial recertification of Connie Griffith Towers and HCV elderly/disabled households**

Expanded to include elderly and disabled households on a fixed income, due to success of initial implementation in Connie Griffith households in FY 2012 – 2013.

Date of implementation - FY 2014

#### **Reduce costs (increase revenues)**

A primary focus of this initiative is to reduce agency costs, increase revenues and boost staff productivity. To measure this overarching goal the following metrics were considered: *decrease of staff time for processing recertifications, number of recertifications and cost of task, and increase in agency rental revenue* - from both Connie Griffith (CG) and Housing Choice Voucher (HCV) program.

#### **Agency cost savings**

Cost of recertifications: Baseline data indicates that prior to the implementation of this initiative, the agency conducted 881 recertifications per year (CG =181, HCV = 700). At an average cost of \$44.41 each, these recertifications cost the agency \$38,891.

Changing the schedule of recertifications to a triennial basis was expected to reduce the annual number of recertifications processed by agency staff, and thus achieving cost savings for the agency.

The data post-implementation indicates the following:

CG: In 2016, a total of 44 recertifications was completed, an almost 23% decrease compared to benchmark (57), with a total cost to LHA of \$2126. As a result, LHA realized a cost savings of \$628 compared to benchmark (2,754), and \$531 compared to 2015(2,657). This continues a positive trend of reduced cost, especially when compared to baseline (\$8,091), and achieves benchmark.

HCV: In 2016, a total of 228 re-certifications were completed at a total cost of \$11,015 compared to the benchmark estimates (216; \$10,435). Although the agency did not meet its benchmark for this period, it must be noted that the resulting 2016 cost is almost 33% less than in FY2015 (\$16, 329), and 64% less than at baseline (\$30,800). This is a positive trend in cost savings to the agency.

Consequently, taken together (agency-wide), LHA achieved its cost savings benchmark when CG and HCV are considered together. Thus the data supports the continued success of this initiative in achieving savings for LHA. This is evidenced by the cost savings realized at the end of FY 2016 - amounting to \$5,845 (compared to 2015) and \$25,750 (compared to baseline

### **Staff time savings**

As might be expected from the foregoing, a similar pattern and effect is indicated. In CG, staff spent less time (88 hours) on recertification tasks in 2016, compared to 110 (2015), the benchmark estimate of 114 hours, and baseline (362 hours), indicating a decreasing trend. However, HCV program failed to meet benchmark as the increase in time spent – a total of 456 hours logged by staff, was almost 6% higher than benchmark (432 hours). That said, it must be noted that compared to 2015 (676 hours), staff hours logged decreased by 33%.

Ultimately, the contributions of this activity to cost reduction must be acknowledged.

### **Increase in agency rental revenues**

Data provided indicates that the agency was unsuccessful in meeting stated benchmarks for this goal. For a second year, actual rental revenue for CG went down, this time by about 5% compared to benchmark. Although it increased by 42% when compared to 2015, this was not enough to achieve benchmark. Housing Assistance Payments to Owner (HAP), increased for HCV elderly/disabled households by over 300% compared to benchmark (\$845,208 vs. \$199,250), and over 200% compared to 2015 (\$845,208 vs. \$246,286). As success for this metric requires that HAP payments decrease, LHA not only failed to achieve benchmark, but with a magnitude of difference that necessitates further investigation.

As stated in the previous report (2015), LHA has yet to show how the implementation of this initiative can impact actual rental revenue, or how the recertification process influences rental income. This is a pertinent question especially as the affected population (elderly/disabled), mostly have fixed incomes (see is agency description – Activity 3).

Also with the HCV program, increase in revenues would necessitate a decrease in HAP payment, which in turn occurs when the resident/tenant is able to afford to pay more towards rent. Data showing increase in HAP payments for 2016 negates this basic premise for increasing rental revenues.

However, it bears noting that in 2016 unlike the previous year, HAP payments to HCV elderly/disabled households did decrease by almost \$50,000.

### **Disparate Impact Analysis – Demographics**

UPDATE – No impact analysis is required for this activity, as it has been thoroughly tested by MTW agencies. At the time of report preparation, a HUD notice allowing all PHAs to streamline certifications for elderly/disabled households on fixed incomes is pending.

•

## **Resident Satisfaction Survey – Connie Griffith**

Assisted by two student interns from the University of Kentucky, a resident satisfaction survey was conducted in 2016. Of the 168 households who received the survey, 79 completed the survey for a response rate of 47%. The survey results and analysis are provided below:

*Profile of “typical” respondent:* – Black (61%), aged 62 to 69 (43%), female (47%) and High School graduate/GED level education (27%).

### *Demographic information:*

Respondents were more likely to be Black (61%) or White (25), aged between 62 and 79 (61%), have no college degree (82%), not previously lived at other LHA properties (82%), but have lived at CG for at least 3 years (65.5%).

62% of respondents report being satisfied or extremely satisfied with their apartments.

### *Pertinent issues and survey results/findings:*

Two pertinent issues addressed in the survey are (a) residents' satisfaction with the recertification process, and (b) satisfaction with LHA administration of the initiative and property management, because they speak to the initiative, and performance of LHA as perceived by residents.

With regard to the recertification process, 87% of respondents report being satisfied, indicating that the triennial recertification initiative is well received. Over 50% report being in favor of the current status quo, while less than a third think that recertification should be either less often (20%) or more often (12%).

An ancillary issue here is residents' perception of the amount paid as rent, as this can be influenced by the recertification perception. Results indicate that overall, 71% of respondents are satisfied with rent paid, with 35 responses for “satisfied” and 21 for “extremely satisfied (56/79). There does not appear to be any significant disparity by age, gender, or race.

With regard to residents' perception of LHA administration of the initiative and property management, 76% say that they are given adequate notice in writing about recertification appointments, and over half (51%), indicate that LHA housing management staff address concerns about rent or income changes in a timely manner. That said, it is important not to overlook the 19% who responded in the negative, in particular when another 26% indicated they did not know. It is unclear whether the reason for the latter is because they did not have any concerns and so did not have to engage the staff.

From the standpoint of more general administration and property management, survey results indicate that just over a third (35%) of respondents believed that LHA office management was very responsive to their needs, with 65% having a less positive



appraisal, considering staff to be either “somewhat responsive” (51%) or “not responsive” (14%). In response to the question about staff friendliness and courtesy (Question 9), 75% answered in the affirmative. However, although 54% indicated staff promptness in responding to general questions and concerns (Question 8), about one-third responded in the negative. These unfavorable responses indicate that there is some room/opportunity for improvement in resident /staff interactions.

### Conclusion and recommendations

In spite of the lack of success in achieving some of the stated benchmarks, it is obvious that this is a successful initiative, and well received by residents as survey results show. Continuation of the initiative is recommended. So too is annual measurement of staff and residents' satisfaction with the implementation and outcomes of this initiative to continue to track and monitor challenges or unexpected consequences.

LHA's effort to conduct a residents' survey is commended. Suggestions for the future include reviewing and reframing questions to reduce the number of non-committal responses. For instance, using a step-wise or step-down format may be helpful (see Appendix for illustration). Also provision for means to explain reasons for answers given, is useful. For instance, using Question 2 as illustration, where respondents indicate being “somewhat satisfied” with rent paid, it would be helpful to understand “why” this is so – to inform future policy and practice as appropriate.

The recommendation that staff response to the change and feedback on process and impact can be used to review and inform quality improvement in the recertification process is carried forward.

As stated above although survey indicates a higher degree of positivity in residents' perceptions of/satisfaction with LHA staff interaction, the one-third indicating otherwise, signal that there is some room for improvement.

Finally, with regard to the issues discussed above relating to the goal of increasing agency revenue, the recommendation from 2015 is reiterated in the excerpt provided from the 2015 report, as follows:

“...it is strongly recommended that the ‘increase in agency rental revenue’ metric be discontinued, and the agency focus on cost saving strategies, which work well within the scope and intent of this initiative. For instance, such strategies could target reducing recertification backlog, conducting a process flow analysis of the recertification process for possibility of reducing task time below the current two-hour duration.

## ACTIVITY THIRTEEN

Local self-sufficiency admissions and occupancy requirements activity

Excludes households whose head/co-head is elderly/disabled or a full-time student.

Date of implementation FY2014

This activity was created as a response to the identified need to eliminate loopholes that hitherto enabled residents of LHA Self-sufficiency units to avoid compliance with applicable “work requirements” protocols. To that end, LHA:

- a. Imposed a minimum earned income requirement for residents, regardless of employment status
- b. Modified the definition of “work activity” upon which compliance with self-sufficiency is based, and
- c. Obtained approval to implement Self-Sufficiency Level II Admissions and Continued Occupancy Rules at Centre Meadows (206- unit, formerly Pimlico apartments)

**LHA definition of “work activity” includes:**

- ✓ Unsubsidized employment;
- ✓ Subsidized public sector employment;
- ✓ Subsidized private sector employment;
- ✓ Paid on-the-job training

Additional notes/updates:

a) New amendment - In January 2016, the eligibility criteria requiring a six-month prior employment history was reduced to three months.

b) 2016, introduces data for Centre Meadows (formerly Pimlico) which was vacant in 2015. Going forward this will serve as baseline. Centre Meadows is now a Project-Based Voucher site (PBV).

With the exception of Centre Meadows (as stated above), all baselines and metrics for this activity were established in FY 2015, so one year of historical data now exists.

This initiative covers a total of 1052 LHA units consisting of units in Self-sufficiency I, Self-Sufficiency II, and Centre Meadows.

Self-Sufficiency Units (SS I/II): LHA has a total count of 846 Self-Sufficiency units (Self-Sufficiency I Units = 256; Self-Sufficiency II = 590).

Of this number, 646 households (occupied, non-elderly/non-disabled), are affected by this initiative and rent reform activity. (230 - SSI & 398 – SSII – 2015 and 2016 – SSI – 206 and SSII – 440)

Centre Meadows Units (CM): Consists of 206 units, of which 158 households (occupied units, non-elderly/non-disabled) are affected by this initiative and rent reform activity.

Thus Activity 13 affects a total of 804 households (646 – SS I/II units; 158 CM units).

Increase self-sufficiency of residents/tenants

To measure this goal, the following metrics were used –increase in household income; increase positive outcomes in employment status; number of households requesting hardship exemption, decrease in number of households on TANF, and number of households transitioned to self-sufficiency.

Increase in household income

Based on the earned income of the head of household (includes co-head, or spouse), this measure considers the average gross earned income of household subject to the policy initiative in Self-Sufficiency Units I and II (SS I/II), and Centre Meadows (CM).

SS I/II: According to data presented, prior to policy implementation the average gross earned income from 648 SS I/II units in 2013 was \$12,800, which is now set as baseline. The agency set as its benchmark for FY 2015, an expected average gross earned annual income of \$13,704 (based on 639 households). In 2016, 542 of the 646 qualifying households reported an actual average gross annual earned income of \$18,151, an increase of \$4,447 over benchmark and \$5,351 over baseline. It should be noted that the average income is lower than in 2015, but the number of participating households is

higher in 2016 (84%), compared to 78% in 2015. Ultimately, the increases recorded signify a positive outcome for this metric.

CM: As of June 2016, there were 158 eligible households, of which 130 reported an average gross annual earned income of \$15,231 establishing the baseline for CM. Going forward, LHA has calculated a benchmark of \$18,277 for CM on the basis of 165 eligible households (assuming full occupancy). As this is the first year of occupancy since the site reopened as PBV in Dec 2015, measurement of whether benchmark was achieved is to be determined (2017).

Increase positive outcomes in employment status

This metric is addressed by reviewing the increase in number of heads of household reporting earned income in 2016:

SS I/II: In 2016, the first year for which data is available 542 of 646 reported earned income. This shows an upward trend compared to baseline (303 of 628), but remains lower than the benchmark established in 2015(628/639). As such, LHA failed to achieve benchmark on this metric.

Another way to compute this metric is by the number of heads of households who reported no earned income during the year under review. Because 104 heads of households did not report earned income, compared to benchmark of zero, and 2015 baseline (of 95/628), LHA failed to meet benchmark in this instance. Overall therefore, results are mixed – the upward trend seen is positive, and has room to grow as/if the unemployment among heads of household increases or is addressed.

CM: There is currently no data for this metric as baseline (130 of 158) and benchmark (165/206) were established in FY 2016. Benchmark reflects full occupancy (206) less 20% set aside to represent elderly/disabled households = 165. As such outcomes will be evaluated in FY 2017.

Number of households requesting hardship exemption

LHA tracks the number of hardship requests made by affected households.

SS I/II: For the third year in row, data shows zero requests for hardship exemption, as none was reported for 2016. It is recommended that this metric continued to be tracked and monitored, for review in FY 2017.

CM: There is currently no data for this metric, and as this site was vacant in 2014 and 2015 there is no historical data. It is recommended that this metric continued to be tracked and monitored, for review in FY 2017.

Decrease in number of households on Temporary assistance for Needy Families (TANF)

SS I/II: LHA estimates for FY 2016 indicated an expected decrease in numbers of households receiving TANF in line with benchmark (20). Compared to benchmark, the number of households receiving TANF was 81, which although still higher than benchmark, was significantly less than actual outcome of 187 reported in 2015. This result lends some support to the concern raised about the plausibility of TANF data in the 2015 report, because of the impact of software change on data collection/management.

Benchmark was not achieved on this measure. In order to enhance reliability, it is recommended that the comparison of FY 2015 and FY 2016 outcomes be extended outward to future years, as a means to verify the numbers. Such a trend/comparative analysis is useful in helping to reconcile the data.

CM: There is currently no data for this metric as baseline (38) and benchmark (0) were established in FY 2016, as such outcomes will be evaluated in FY 2017.

**Self-sufficiency**

**= Household with annual earned income of at least \$15,080\***

*Calculation:*

*\*\$7.24/hour (Federal minimum wage) x 40-hour week x 52 (work weeks per year)*

**Number of households transitioned to self-sufficiency**

SS I/II: LHA reports that there were 364 of the 809 households subject to this policy initiative, in which the head of household (head/co-head/spouse) met the definition of self-sufficiency in FY 2016. As detailed above, self-sufficiency is defined as an earned income of at least \$15,080 per year. According to baseline established in 2013, 48 households met this definition. Expected value of 58 households was set as the benchmark for 2015. In 2015 however, actual numbers indicated that a full 50% of affected households met this definition of self-sufficiency. When compared to all three previous outcomes, it is clear that LHA achieved success regarding this benchmark. It must be noted that the fact that 2016 outcomes exceed actual 2015 figures (LHA expressed concerns about plausibility) indicate a huge success for the agency on this metric, and increases plausibility of the 2015 results.

As stated in the 2015 report, it still remains a notable concern that it is not clear from the data whether the increased earned income is attributed to the head of household or other members as well. Again, it is important that this be clarified, in order to better understand the drivers of outcomes realized, and to inform future strategies.

Reduce costs (increase revenues)

To measure this goal, the following metrics were used – reduce per unit subsidy costs for participating households, increase agency rental revenues, as well as a cost-benefits assessment of this activity for LHA.

***Reduce per unit subsidy costs for participating households - New***

In 2015, LHA established the baseline and benchmark for this metric, which looks at the average amount of subsidy per eligible household. Eligible households are non-elderly/non-disabled, with head/co-head/spouse meeting the definition of self-sufficiency. Goal is reduction of/decrease in subsidy.

SS I/II: Baseline = \$2,921, being the average subsidy paid per household in 2015.  
Benchmark = \$2191, being the expected subsidy to be paid as calculated in 2015. As of June 30, 2016 data indicates that the average subsidy was \$3017, which exceeds both benchmark (by \$826) and baseline (by \$96). As amount increased, LHA failed to achieve benchmark.

CM: There is currently no data for this metric as baseline (\$399) and benchmark (\$299) are yet to be determined. As such outcomes will be evaluated in FY 2017.

Recommend continue to track and monitor data for review in FY 2017.

***Increase agency rental revenues - New***

In 2015, LHA established the baseline and benchmark for this metric, which looks at increase in PHA rental revenue. Goal is increase in agency rental revenues. This review was placed on hold in 2015, as outcome data had yet to be determined for FY 2015.

SS I/II: Baseline = \$134,619, being the rental revenue received by PHA prior to the implementation of Activity #13, and as of June 30, 2015.  
Benchmark = \$193,851, being the rental revenue expected to be received by PHA post implementation. In fact, actual rental revenue reported in 2016 was \$278,328, an almost 44% increase on benchmark, and over 100% more than baseline. As amount increased, LHA achieved its stated benchmark.

CM: Baseline = \$392,399, being the rental revenue received by PHA prior to the implementation of Activity #13, and as of June 30, 2016.  
Benchmark = \$672,684, being the rental revenue expected to be received by PHA post implementation, and by June 30, 2017. As such outcomes will be evaluated in FY 2017.

Recommend continue to track and monitor data for review in FY 2017.

### **Cost-benefits assessment**

Two measures are considered – a) total rent revenue (gross/net), as well as dollar value of staff time spent processing hardship requests. Data provided indicates an increase in rent revenue (in SSI/II only, CM data is TBD), in FY 2016 that was in excess of both benchmark and baseline, as discussed above. Clearly this is a positive outcome/benefit for the agency.

Also, as noted earlier there were no hardship requests to process, hence no associated staff processing costs for this year.

It is recommended that this metric continue to be tracked and reported.

### **Disparate Impact Analysis – Demographics**

The purpose of the disparate impact analysis is to ensure that this rent reform initiative does not unintentionally result in/create through its implementation, a disparate impact on the rent burden faced by protected classes of households by race, color, national origin, disability, age, or gender. The tables below provide snapshots of average annual income (earned/adjusted), and average gross rent (monthly) paid by households by race/ethnicity, and gender from FY2013, FY2015, and FY2016, and any increased rent burden incurred.



## A) Self-Sufficiency I Units

TABLE 10: SELF-SUFFICIENCY I - DISPARATE IMPACT ANALYSIS, BASELINE DATA

### Profile, Heads of households:

Generally – Household heads are: Female, Black, Non-Hispanic, age 32 to 46.

**Gender** – Residents (head of household), are predominantly female. Data indicates an average rent burden for male heads of households (\$302), that is over six (6) times more than for females (\$47). This reverses the pattern found in 2015, where females had twice the rent burden experienced by male counterparts. LHA asserts that the figure for males in 2016 reflects the fact that one of the male heads reported income three times more than the average, which may have skewed the data. Thus the apparent increased rent burden for males may reflect the magnitude of difference in income reported, rather than disparate effect or hardship.

Activity 13: Self Sufficiency I														
Disparate Impact Analysis - Baseline Data														
Self-Sufficiency I Population	Heads of Household			Average Total Annual Adjusted			Average Gross Annual Earned			Average Gross Rent Payment			Average Increased Rent Burden	
	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2015	FY2016
All Non-Elderly/Non-Disabled Households	210	230	206	\$16,431	\$19,512	\$20,595	\$16,555	\$19,270	\$21,365	\$380	\$462	\$531	\$82	\$151
<b>Gender</b>														
Female	201	222	194	\$16,399	\$19,512	\$20,483	\$16,525	\$19,270	\$20,782	\$378	\$462	\$518	\$84	\$140
*Male	9	8	12	\$17,154	\$17,513	\$29,783	\$17,228	\$16,659	\$30,800	\$426	\$467	\$745	\$41	\$319
<b>Race (Multiple selections permitted)</b>														
Black	170	193	169	\$16,581	\$20,390	\$21,254	\$16,281	\$19,365	\$21,505	\$387	\$477	\$538	\$90	\$151
White	39	34	34	\$17,164	\$15,215	\$20,580	\$18,048	\$19,494	\$21,394	\$365	\$475	\$515	\$110	\$150
American Indian / Native Alaskan	1	0	0	\$5,184	\$36,874	\$0	\$29,827	\$0	\$0	\$130	\$550	\$0	\$0	\$0
**Asian / Pacific Islander	2	0	2	\$10,090	\$19,512	\$12,084	\$20,313	\$19,259	\$19,726	\$278	\$493	\$302	\$215	\$24
Native Hawaiian / Other Pacific Islander	0	1	1	\$0	\$15,771	\$15,376	\$0	\$0	\$0	\$0	\$394	\$384	\$394	\$384
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<b>Ethnicity</b>														
Non-Hispanic	204		198	\$16,511	\$19,761	\$21,029	\$16,508	\$19,310	\$21,471	\$381	\$500	\$531	\$119	\$150
Hispanic	6		8	\$13,711	\$19,512	\$20,916	\$18,145	\$19,259	\$18,738	\$351	\$493	\$523	\$142	\$172
<b>Age of Head of Household</b>														
18-31	88	82	72	\$13,189	\$16,002	\$16,582	\$13,760	\$15,519	\$17,752	\$312	\$401	\$422	\$89	\$110
32-46	88	106	100	\$17,554	\$22,040	\$22,175	\$17,177	\$21,210	\$21,821	\$405	\$555	\$558	\$150	\$153
47-61	34	42	34	\$21,916	\$24,141	\$27,050	\$22,179	\$21,697	\$27,678	\$489	\$607	\$681	\$118	\$192
<b>Excluded Households</b>														
Elderly/Disabled Households	35	36	48	\$15,369	\$15,174	\$14,449	\$4,429	\$3,892	\$5,031	\$343	\$358	\$361	N/A	N/A

\*Data for males is skewed due to one income being three times that of the average.

\*\* Data for Asian/Pacific Islander households is incorrect for FY2015 as there were no households of that race for 2015.

**Race/ethnicity** – Generally rent burden decreased for all races and ethnicities in 2016. Compared to 2015, when the highest increases in rent burden affected the Native Hawaiian/Other Pacific Islander category (\$394), and Asian/Pacific Islander (arguably because previously no rent was paid), these two groups saw the biggest decrease in rent burden in 2016.

That said in 2016, Blacks are shown to have the highest rent burden (\$50). The data also shows that the rent burden is higher in FY2016 for Hispanics (\$40) compared to non-Hispanics (\$19). It must be noted that in both instances, rent burden decreased, and is still significant less than in prior years.

Age - Heads of households age 47 – 61, are shown to have the highest rent burden in 2016 of all age groups. Similar to the foregoing, it must be noted that compared to previous years, the rent burden actually decreased for all age groups, and by 64% for 47 – 61 year olds. The higher rent burden likely reflects the higher average gross annual earned income reported by this group.

Overall, not only is rent decreasing for all groups, it does not appear that this policy initiative unduly creates a disparate effect on any of the protected classes.

## B) Self-Sufficiency II Units

**TABLE 11: SELF-SUFFICIENCY UNITS II -DISPARATE ANALYSIS, BASELINE DATA**

Activity 13: Self-Sufficiency II																
Disparate Impact Analysis - Baseline Data																
Self-Sufficiency II Population	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned			Average Gross Rent Payment			Average Increased Rent Burden			
	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2013	FY2015	FY2016	FY2015	FY2016		
All Non-Elderly/Non-Disabled Households	419	398	440	\$16,431	\$13,381	\$15,182	\$11,012	\$12,926	\$14,936	\$297	\$342	\$384	\$45	\$87		
Gender																
Female	379	362	389	\$11,813	\$13,112	\$14,680	\$10,848	\$12,679	\$14,269	\$294	\$336	\$372	\$42	\$78		
Male	40	36	51	\$15,238	\$16,092	\$19,014	\$13,450	\$15,412	\$20,023	\$340	\$402	\$475	\$62	\$135		
Race (Multiple selections permitted)																
Black	351	256	376	\$12,244	\$15,160	\$15,455	\$11,051	\$17,463	\$14,870	\$300	\$385	\$391	\$85	\$91		
White	71	59	63	\$11,594	\$11,881	\$13,534	\$11,363	\$10,910	\$15,291	\$289	\$305	\$341	\$16	\$52		
American Indian / Native Alaskan	1	0	0	\$5,400	\$0	\$0	\$7,800	\$0	\$0	\$135	\$0	\$0	\$0	\$0		
Asian / Pacific Islander	1	1	1	\$5,400	\$16,344	\$16,344	\$7,800	\$17,304	\$17,304	\$135	\$409	\$409	\$274	\$274		
Native Hawaiian / Other Pacific Islander	3	1	0	\$9,186	\$4,920	\$0	\$10,826	\$13,000	\$0	\$230	\$150	\$0	-\$80	\$0		
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Ethnicity																
Non-Hispanic	415	394	435	\$12,129	\$13,381	\$15,150	\$11,057	\$12,926	\$14,898	\$298	\$305	\$383	\$7	\$85		
Hispanic	4	4	5	\$13,246	\$11,277	\$17,964	\$15,145	\$13,846	\$18,247	\$332	\$310	\$449	-\$22	\$117		
Age of Head of Household																
18-31	223	176	207	\$10,494	\$11,935	\$13,915	\$10,459	\$12,541	\$14,390	\$268	\$306	\$355	\$38	\$87		
32-46	137	173	174	\$13,416	\$14,256	\$15,479	\$11,295	\$13,491	\$15,026	\$321	\$363	\$391	\$42	\$70		
47-61	59	49	59	\$15,397	\$15,489	\$18,743	\$13,044	\$12,318	\$16,585	\$360	\$397	\$469	\$37	\$109		
Excluded Households																
Elderly/Disabled Households	153	154	240	\$10,372	\$10,355	\$11,075	\$597	\$513	\$936	\$260	\$259	\$277	N/A	N/A		

\*FY2014 data was not available due to software conversion issues.

Profile – Similar to SSI – Household heads are predominantly female, Black, non-Hispanic, but aged between 18 and 31.

Gender – As before women far exceed men as head of households. In fact, compared to 2015, the number of females increased by 45% (362 to 526), while the number of males grew from 36 to 65. Although rent decreased for both gender, males report a higher average increased rent burden, which may reflect higher rent paid (males = \$17,783 vs. females = \$13,748), rather than gender bias.

Race/ethnicity –

Where race is considered, a similar pattern is found, in that rent burden decreased in FY 2016 for all races, with the highest decrease for Asian/Pacific Islander (from \$274 in 2015 to -\$2). Whites currently have the highest rent burden at \$11. There appears to be a

clear difference based on ethnicity, with Hispanics showing a significantly greater rent burden than non-Hispanics. Monitoring is recommended, as this might flag a possible case of disparate impact for review.

Age – Average rent burden increased for all age groups except the 32 -46 range, which fell by almost half, despite earning more and paying higher rent than the 18 to 31 group. The highest rent burden is experienced by the 47 to 61, and possibly reflects both higher income and rent paid.

## C) Centre Meadows

TABLE 12: CENTRE MEADOWS - BASELINE DATA

**CM – Data provided for information only, no rent burden for analysis. Tabled till 2017.**

Activity 1: Centre Meadows				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>	<i>FY 2016</i>
<b>All Households</b>	158	\$12,532	\$13,964	\$355
<b>Gender</b>				
Female	144	\$12,561	\$13,819	\$352
Male	14	\$12,239	\$15,457	\$387
<b>Race (Multiple selections permitted)</b>				
Black	129	\$12,126	\$14,067	\$357
White	28	\$14,237	\$13,407	\$342
American Indian / Native Alaskan	0	\$0	\$0	\$0
Asian / Pacific Islander	1	\$17,233	\$16,273	\$407
Native Hawaiian / Other Pacific Islander	0	\$0	\$0	\$0
Other**	0	\$0	\$0	\$0
<b>Ethnicity</b>				
Non-Hispanic	156	\$12,356	\$13,819	\$351
Hispanic	2	\$26,232	\$25,272	\$632
<b>Age of Head of Household</b>				
18-31	107	\$12,438	\$13,582	\$347
32-46	37	\$12,671	\$14,402	\$363
47-61	14	\$12,883	\$16,252	\$393
<b>Excluded Households</b>				
Elderly/Disabled Households	45	\$487	\$11,679	\$292

### Conclusion and recommendations

This is an important policy initiative with the potential to help LHA achieve its preferred goals for this population. Generally, with a few exceptions noted above, rent burden decreased in 2016, and so this initiative does not appear to have unduly burdened groups represented. As LHA continues to build historical data, it will facilitate comparisons, and assist future analyses of patterns or trends.

Also, it must be noted that Centre Meadows site was not included in this analysis, but put on hold till 2017 pending availability of data.

It is recommended that continued priority be given to data collection and reconciliation, tracking and monitoring for all affected sites during the coming year as implementation continues. This will allow for more robust evaluation in FY 2017.

## ACTIVITY FOURTEEN

### **Rent reform – Elimination of Earned Income Disallowance (EID).**

Date of implementation FY 2015

The stated goal of this policy initiative/activity is to reduce costs, and enhance better stewardship of and effectiveness in federal expenditures, by streamlining processes and eliminating non-value creating administrative practices that impede staff productivity. Through this activity, LHA seeks to eliminate an administrative practice, with minimal return on investment of staff time and agency resources.

Originally, this initiative applied to a small segment agency-wide, as only 23 households met eligibility criteria to receive the EID. Since its implementation, four of the original 23 households have since left LHA housing. Thus the number of households has decreased, and is currently at 19.

#### *Reduce costs (increase revenues)*

To measure this goal, the following metrics were used – *agency cost savings, staff time savings, decrease in error rate of task execution, increase in agency rental revenue* - from both public housing (PH) and Housing Choice Voucher (HCV) households.

#### **Agency cost savings**

In 2016, implementation of this initiative allowed LHA eliminate task costs of \$452 (2013 baseline) for a second year in a row, as all affected households did not receive EID. Benchmark achieved.

#### **Staff time savings and Decrease in error rate of task execution**

Per affected household, LHA staff previously spent one hour on average on EID related tasks. Based on this computation, implementation of this initiative allowed LHA eliminate the 19 hours of staff time, which would have been necessary to complete EID related tasks in 2016. Benchmark achieved.

Also, as seen in 2015, the estimated 25% error rate (baseline, 2013), encountered when tracking residents' employment status was eliminated. Both outcomes have the potential to enhance staff productivity by freeing them up to accomplish other tasks.

### Increase in agency rental revenue

Compared to 2015, LHA data show an increase in agency rental revenue in from affected units in 2016. The FY 2016 outcome data indicates that LHA received net rental revenue from the 19 households in the amount of \$49,896, which although an increase on 2015 (\$26,112) and baseline (\$35,964), was still significantly less than benchmark (\$96,474). Benchmark consequently not achieved. It is recommended that LHA review for possible explanations of this outcome.

### Disparate Impact Analysis – Demographics

For practical purposes, there is no benefit to conducting a disparate analysis for Activity #14 as LHA indicates that there are no longer any households receiving EID at this time, and there are relatively little (or no), changes to income. Hence, in FY2016, LHA reports a decrease in rent burden values for FY 2015 to \$0 (zero dollar) rent burden for all households, regardless of race, gender, age, and race/ethnicity. As such, the following table is provided for information and documentation purposes only.

**TABLE 13: DISPARATE IMPACT ANALYSIS - EID HOUSEHOLDS, BASELINE DATA**

Activity 14: EID Households								
Disparate Impact Analysis - Baseline Data								
EID Households	Heads of Household			Average TTP			Change in Rent Burden	Change in Rent Burden
	FY2014	FY2015	FY2016	FY2014	FY2015	FY2016	FY2015	FY2016
All Households	23	19	19	\$248	\$287	\$287	\$39	\$0
Gender								
Female	21	18	18	\$234	\$287	\$287	\$53	\$0
Male	2	1	1	\$400	\$296	\$296	-\$104	\$0
Race (Multiple selections permitted)								
Black	16	14	14	\$226	\$302	\$302	\$72	\$0
White	5	4	4	\$298	\$240	\$240	\$58	\$0
American Indian / Native Alaskan	1	0	0	\$417	\$0	\$0	\$155	
Asian / Pacific Islander	1	1	1	\$189	\$262	\$262	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0
Age of Head of Household								
18-31	7	5	5	\$210	\$206	\$206	-\$4	\$0
32-46	7	5	5	\$243	\$263	\$263	\$20	\$0
47-61	5	5	4	\$332	\$347	\$347	\$15	\$0
62+	6	4	5	\$220	\$344	\$344	\$124	\$0

## Conclusion and recommendations

This initiative presents mixed results for LHA. In terms of cost savings, and reducing administrative burden on staff, it appears to be a successful initiative, as evidenced by data, which indicate cost savings to the agency from elimination of staff time spent in processing EID (rent calculations, tracking resident employment status etc.)

However, LHA appears to be having difficulty in relation to increasing agency rental revenue, having failed to achieve benchmark for two consecutive years. A review of the process and initiative to provide explanation will be useful.

The following actions are recommended:

- a. That tracking of this initiative be continued.
- b. Tracking of demographic data, and disparate analysis be continued, despite current \$0 burden reported
- c. Review the goal of the increasing agency rental revenue, its mechanics, and in particular the feasibility of the benchmark established.

## ACTIVITY SIXTEEN

### **Housing Choice Voucher Rent Reform Study**

Excluding elderly and disabled households.

Date of implementation FY 2015

At time of writing of this report, enrollment of 1029 study participants into study/treatment (513) and control (516) groups had been completed. However, per LHA, the agency's data collection and maintenance provider – *Emphasys Software* – is currently in the process of developing reports for the identified metrics. Review and evaluation is therefore on hold until said reports are available.

## ACTIVITY SEVENTEEN

### **Limit Interim Re-examination for Public Housing Households - NEW**

Excluding elderly and disabled households.

Date of proposal/approval FY 2016

Date of implementation FY 2016

The stated goals of this initiative/activity are two-fold, to:

- a. Reduce administrative costs associated with the process of interim re-examinations, and increase agency revenues
- b. Provide incentives to employed families to remain in employment

Through this activity, LHA seeks to limit the number/frequency of re-examinations for the purpose of rent reduction, made between regularly scheduled re-examination periods. Limited criteria for interim adjustments have been delineated, and a Hardship Policy is in effect to help facilitate exceptions to policy.

**Reduce costs (increase revenues)**

To measure this goal, the following metrics were used – *agency cost savings, staff time savings, increase in agency rental revenue* - for public housing (PH)

**Provide incentives to remain in employment (Increase/move to self-sufficiency)**

To measure this goal, the following metrics were used – *Increase in household income, increase in positive outcomes of employment status, removal from TANF, and households transitioned to self-sufficiency cost savings, staff time savings, increase in agency rental revenue* - for public housing (PH).

Activity #17 now includes Centre Meadows, which was reoccupied in FY 2016.



**Agency cost savings**

This metric is determined by considering the time taken to complete an interim re-examination (.50) multiplied by the hourly rate of the management specialist completing the task (\$26.25). LHA calculated baseline on the basis of 661 interims:  $\$13.13 \times 661 = \$8679$ . Through this initiative, LHA sought to reduce the number of interims from 661 to 330, resulting in a lower cost of \$4,333, which became the benchmark for this activity.

For FY 2016, LHA's performance against benchmark is yet to be determined as outcome data is unavailable.

Recommendation: Continue to track data, and plan for review in FY 2017

**Staff time savings (Decrease costs)**

The metric of interest here is the total time taken to complete the task of interim re-examination in staff hours, with a goal to decrease it. LHA has provided data on the number of total interims (baseline and benchmark). As with the preceding section, outcome data is unavailable so conclusions about performance against benchmark cannot be made at this time.

Recommendation: Continue to track data, and plan for review in FY 2017. Also, it is suggested that the appropriate focus here is not just the number of re-examinations; rather it is key to compute as an associated metric, the actual time spent completing each task of re-examination in the year under review.

**Increase in agency rental revenue**

Before implementation of this activity, LHA assessed that rental revenue for the fiscal year amounted to \$3,637,812 – now set as baseline. Benchmark was set as the expected rental revenue post- activity implementation, at a value of \$4,387,366. Again, analysis is not possible as outcome is yet to be determined.

Recommendation: Continue to track data, and plan for review in FY 2017. Also, identify or explicate the source of the values set for both baseline and benchmark.

**Increase in household income**

Metric of interest here is the average earned income of affected households. In order to achieve benchmark, LHA must show that actual average earned income exceeded \$19,518 (expected average = benchmark). Since LHA records state that outcome data is yet to be determined, no conclusions can be made about whether or not benchmark was achieved.

It is recommended that LHA continue to track this metric, with a view to reporting on outcome data in FY2017.

### ***Increase in positive outcomes in employment status***

This metric is computed by separately considering:

- a) Households reporting earned income, versus
- b) Households with no earned income.

*Households reporting earned income:* Baseline = 598 (Actual heads of households that reported earned income, before activity implementation. Benchmark = 100% of heads of households, reporting earned income in the fiscal year under review.

*Households with no earned income:* Baseline = 130 (Actual heads of households that reported **no** earned income, before activity implementation. Benchmark = 0 (Expected number of heads of households reporting **no** earned income post implementation).

As outcome data for all aspects of this metric is unavailable, no conclusions can be drawn about LHA's performance against benchmark at this time.

Recommendation: Continue to track data, and plan for review in FY 2017. Also, verify the feasibility or revisit the benchmark value of zero for households reporting no earned income, at the end of the reporting period.

### ***Decrease in number of households on Temporary assistance for Needy Families (TANF)***

Similar to the measure in Activity #13 of same name, LHA seeks as an outcome of this initiative, a decrease in the number of households receiving TANF.

Baseline = number of TANF receiving households before implementation – which was 95. Benchmark = expected number of households receiving TANF, post-implementation – set at 0 (zero).

As outcome data for this metric is unavailable, no conclusions can be drawn about LHA's performance against benchmark at this time.

Recommendation: Continue to track data, and plan for review in FY 2017.

### ***Number of households transitioned to self-sufficiency***

LHA also seeks as an outcome of this initiative, an increase in the number of households transitioned to self-sufficiency. Per definition provided earlier, a household is considered as transitioned to self-sufficiency if the head/co-head or spouse, earns \$15,080 or more per year.

Baseline = number of households where head earns more than \$15,080 annually, before implementation of Activity#17 – verified to be 385

Benchmark = expected number of households where head earns more than \$15,080 annually, post-implementation of Activity#17 – determined to be 589.

As outcome data for this metric is unavailable, no conclusions can be drawn about LHA's performance against benchmark at this time.

Recommendation: Continue to track data, and plan for review in FY 2017. As discussed in other sections of this report (e.g. Activity #13), consider distinguishing who earns what, for this calculation. Such information may potentially be useful in further developing policy initiatives or practice interventions.

## Disparate Impact Analysis – Demographics

**TABLE 13: PUBLIC HOUSING - ACTIVITY 17, LIMIT INTERIMS - BASELINE DATA**

Activity 17: Public Housing				
Disparate Impact Analysis - Baseline Data				
Public Housing Population	Heads of Household	Average Gross Annual Earned Income	Average Total Annual Adjusted Income	Average Gross Rent Payment
	FY2016	FY2016	FY2016	FY2016
<b>All Households</b>	728	\$16,112	\$16,389	\$416
<b>Gender</b>				
Female	654	\$15,593	\$15,966	\$377
Male	74	\$20,326	\$20,133	\$467
<b>Race (Multiple selections permitted)</b>				
Black	606	\$16,259	\$16,679	\$424
White	116	\$15,645	\$15,011	\$380
American Indian / Native Alaskan	1	\$0	\$12,635	\$316
Asian / Pacific Islander	3	\$18,919	\$8,923	\$223
Native Hawaiian / Other Pacific Islander	2	\$13,000	\$13,360	\$334
Other**	-	-	-	-
<b>Ethnicity</b>				
Non-Hispanic	708	\$16,093	\$16,009	\$407
Hispanic	20	\$15,181	\$16,197	\$411
<b>Age of Head of Household</b>				
18-31	309	\$15,486	\$15,999	\$365
32-46	309	\$16,420	\$14,282	\$437
47-61	110	\$18,616	\$19,428	\$504
<b>Excluded Households</b>				
Elderly/Disabled Households	368	\$1,397	\$10,560	\$265

**Profile** – Household heads affected by Activity #17, are predominantly female, Black, non-Hispanic, and aged between 18 and 46.

**Gender** – Per data provided and as seen before, women far exceed men as head of households (654 vs. 74). Male heads of households however earn on average higher incomes (\$20,326 vs. \$15,593 for females), and have a higher gross rent payment (\$467 vs. \$377 for females).

Thus income appears to be the driver for higher rent paid by males, rather than gender bias.

**Race/ethnicity** – Blacks pay the highest average gross rent (\$424) compared to other groups, and also earn the highest average total annual adjusted income. With regard to ethnicity, a consideration of both rent paid, and average total annual adjusted income earned by Non-Hispanics and Hispanics respectively, does not display any significant disparity. In fact, values are comparable for both groups (income = \$16,009 vs. \$16,197; rent = \$407 vs. \$411)).

**Age** – Average gross rent is highest for those aged 47 to 61. Again, because this group also earns the highest income (both annual gross and adjusted), the higher rent paid is attributable to this fact, rather than an age-related bias driving disparate impact.

Based on data provided, it does not appear that this activity has disparate impact on any of the protected groups. That said it is important to note that this is the first year post-implementation, and so there is no comparative data.

It is recommended that relevant metrics continue to be tracked, for this and future years. Consistent and continued tracking will allow for appropriate review and attention to the issue of disparate impact.

### Closing Comments

This report has provided a review of selected activities involving rent reform as part of the LHA MTW Demonstration project, many of which were reviewed in 2015. Activity #17 is new.

It is clear that the LHA and its staff have expended a lot of work and effort in the choice of and implementation of these initiatives. Generally, these initiatives/activities appear to be moving and/or capable of moving the agency towards its stated goals for participation in the MTW program. Emphasis must continue to be placed on the collection, tracking and monitoring of data upon which evaluation must rest. For those activities and metrics with incomplete data, or for which further verification or clarification is suggested, it is hoped that data collected by end of FY 2017 will help address some of the challenges identified in this report.

With regard to the impact of these rent reform initiatives on the protected groups, no critical issues or red flags were found at this time. However, continuous and rigorous attention to execution of initiatives and data collection will be important and necessary to ensure that disparate impacts are avoided, or identified and addressed.

Finally, even in the absence of possible disparate impact, issues that negatively affect all are worthy of consideration. For instance, as seen in Table 7 above, the average increased rent burden for all households is much higher in 2016 compared to 2015. A similar pattern is seen in the average per age group, with rent burden steeply increasing

by 108% (18 -31), 119% (32 -46), and 900% (47 -61), respectively. Possible factors driving these increases are worth investigating – for all groups.

Such actions will underscore LHA's commitment to improving efficiencies, outcomes and wellbeing for itself as well as its residents.

C. Certification that the PHA has met the three statutory requirements of: 1) assuring that at least 75 percent of the families assisted by the Agency are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

**CERTIFICATION OF COMPLIANCE WITH REGULATIONS  
MOVING TO WORK ANNUAL REPORT**

Acting on behalf of the Public Housing Agency (PHA) listed below, as its authorized PHA official, I approve the submission of the Annual Moving to Work Report for the PHA fiscal year July 1, 2015 through June 30, 2016.

The Agency has met the three statutory requirements of: 1) ensure that at least 75 percent of the families assisted by the Agency are very low-income families, as defined in section 3(b)(2) of the 1937 Act; 2) assist substantially the same total number of eligible low-income families under MTW, as would have been served absent the demonstration, and 3) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under the demonstration.

Lexington-Fayette Urban County Housing Authority  
PHA Name

KY004  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the Report, is true and accurate.

Austin J. Simms  
Name of Authorized Official

Executive Director  
Title

  
Signature

December 16, 2016  
Date

## ADDENDUM

### RESPONSE TO COMMENTS FROM THE FY2014 & FY2015 MTW ANNUAL REPORTS

This addendum is in response to the August 5, 2016 letter from Marianne Nazzaro, Program Director with the HUD Moving to Work (MTW) Office approving the FY2014 and FY2015 LHA MTW Annual Reports. The letter requests that the LHA respond to Section V4 – Sources and Uses of Funds – Local Asset Management Plan and Section VI – Administrative for FY 2014 and FY2015.

#### Section V4 – Sources and Uses of Funds

Has the PHA allocated costs within statute during the plan year?

**Yes**

Has the PHA implemented a local asset management plan (LAMP)?

**No**

Has the PHA provided a LAMP in the appendix?

**No**

**There are no changes in the LAMP since LHA is not implementing a LAMP.**

#### Section VI – Administrative

To provide a general description of any HUD reviews, audits or physical inspection issues that require the agency to take action to address the issue;

**The Lexington Housing Authority is in compliance with HUD reviews, audits and physical inspections. The LHA's FY2014 and FY2015 audits were completed with no findings. In cases where there were findings in HUD reviews and physical inspections, the LHA responded and no further action was required.**