



MOVING TO WORK (MTW)

ANNUAL PLAN – FY2018

Creating Affordable Housing Opportunities



Lexington Housing Authority

Amdended Document Submitted March 23, 2018

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INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (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. In April 2016, HUD extended the agreements of all 39 MTW agencies until 2028.

MTW is a demonstration program that allows public housing authorities to design and test ways to achieve three statutory goals. The activities and policies designed by the Authority must further at least one of these goals:

- 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.

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. LHA presently manages 1,097 public housing units and 2,943 Housing Choice Vouchers (HCV) throughout the Lexington community as well as 201 units that fall outside of Section 8 (HCV) and 9 (public housing) authority.

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

Public Housing Occupancy

In recent years, the LHA's public housing occupancy has dipped below the 97% occupancy rate the agency reported in the FY2012-13 annual report. At the time of printing of this report public housing occupancy was 94.8%. The LHA continues to develop strategies to address occupancy issues that will include monitoring the waiting list to determine when purging or opening/closing is necessary. The LHA's 1,097 units of public housing stock are divided among three management teams. Each team is challenged with issues of maintaining units with less and less funds for deferred maintenance each year as well as address the needs of a shifting population of older households facing a multitude of issues related to aging. The agency continues to seek solutions to those issues when developing and maintaining housing stock.

Solutions

During FY2017 the LHA applied for and received funding for a Resident Opportunities and Self-Sufficiency Service Coordinator for public housing. The position will provide outreach to households at the LHA's public housing family sites to assess their needs and coordinate available resources in the community to meet those needs.

The primary purpose of this position is to promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources, for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency. LHA staff plans to have the position staffed prior to the start of FY2018.

The LHA is working to secure funding to develop a parcel of land owned by the agency for eleven units that will likely be funded using our single fund fungibility to provide housing for veterans and extremely-low income families. The Housing Authority is in the early stages of seeking financing for the project. Through approval of this plan, the LHA will transfer excess cash reserves from Low Rent Public Housing (LRPH) Section 9 funding, as of FY2016 year end, per our audited report to be utilized for this development.

The LHA will seek to sell or develop a vacant parcel of land that has gone undeveloped for a number of years that is adjacent to our last HOPE VI development located in the east end of Lexington. The Housing Authority must maintain the lot with mowing and upkeep, an expense that the agency does not wish to maintain indefinitely. The realization of developing this property is feasible should the agency be able to utilize the excess cash reserves from LRPH.

Addressing Homelessness

The LHA remains committed to working with local government and community groups to address the needs of families in need of permanent housing. During 2017 LHA staff joined other community groups in the annual Community Stand Down serving Lexington residents experiencing

or at risk of homelessness. The LHA offers rental assistance to the homeless population through its HCV special partner vouchers. The agency joins the conversation on the issue of homelessness through its relationship with the Lexington-Fayette Urban County Office of Homeless Prevention and Intervention and a number of community outreach groups.

The Housing Authority owned a vacant and dilapidated house located at 325 Wilgus that was rehabbed with assistance from the LFUCG, the Lexington Homebuilders Association and the Lexington Community Action Council to provide a three-bedroom house to a homeless family. This public-private partnership made the difference in this project.

Update: Family Self-Sufficiency Retooling

LHA staff began discussing the task of retooling and combining the FSS Action Plans that govern the program offered to both the public housing and HCV participants. The Family Self-Sufficiency (FSS) Program is a voluntary, five-year program. The program offers case management and supportive services to help a family gain financial self-sufficiency. Each participant's needs are customized and may include job training, career planning and financial literacy education, such as budgeting, saving, establishing good credit and income tax preparation.

Going forward, both programs are guided by one action plan and its most significant addition, an assessment tool that will be required prior to the applicant being added to the FSS wait list. This step is intended to enhance successful completion of the program for potential participants. Applicants on the FSS waitlist will be expected to take steps toward their identified goals, and FSS Coordinators will check in with applicants monthly to ensure progress is being made. Applicants will be asked to attend a face-to-face follow-up interview after 6 months on the waitlist.

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 22 MTW activities since entering the program in 2011. Below is a chart summarizing the LHA's MTW activities. Through the submission of the FY2018 Plan, the Authority seeks approval of two new 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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
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	Not Implemented until necessary	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
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	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	Discontinued in FY2016	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Ongoing	1
18	Streamlined HQS Inspection of LHA-Owned/Controlled Property	FY2017	Ongoing	1
19	Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	FY2017	Ongoing	3
20	Assign Project-Based Vouchers To LHA Owned and Controlled Units Without Bid Process	FY2017	Ongoing	3
21	Triennial Certifications For HCV Homeownership Participants (Rent Reform)	FY2017	Ongoing	1
22	HCV Time Limit Pilot Program (Rent Reform)	FY2018	Proposed	1, 2 & 3
23	Rent Reasonableness Determinations to be Made by LHA Staff on LHA Owned/Controlled Properties	FY2018	Proposed	1

SECTION II – OPERATING INFORMATION

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

(II) General Housing Authority Operating Information

Annual MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	Type Noted *	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	Type Noted *	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	Type Noted *	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	Type Noted *	0	0

Total Public Housing Units to be Added

0

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

If Other, please describe:

N/A

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
4-6 / AMP 4 Connie Griffith	1	LHA has received HUD approval to take one unit out of occupancy for major repairs. LHA will continue to receive subsidy for this unit.
4-6/AMP 4 Connie Griffith	182	The LHA plans to apply for Voluntary Conversion for this development if the application is approved all 183 units at this building will be removed.
PIC Dev. # /AMP PIC Dev. Name	0	N/A

Total Number of
Units to be
Removed

183

New Housing Choice Vouchers to be Project-Based During the Fiscal Year			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project	
Glenn Arvin	11	The LHA will develop 11 PBV units on LHA-owned property; the units will be designated for extremely low-income.	
N/A	N/A	N/A	
N/A	N/A	N/A	
N/A	N/A	N/A	
Anticipated Total New Vouchers to be Project-Based	11	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	217
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	217
<p>*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.</p>			
Other Changes to the Housing Stock Anticipated During the Fiscal Year			
<p>The Lexington Housing Authority would like to take advantage of the MTW Single Fund Fungibility feature by transferring excess cash reserves from Low Rent Public Housing (LRPH) Section 9 funding as of 6/30/16 per our audited report to be utilized for possibly development and deferred maintenance.</p> <p>LHA would plan to transfer the money from the LRPH section to a Business Activity area until the development of a (11) apartment site is underway and ready to be funded. The deferred maintenance would be used for possibly the replacement of windows in a senior high rise. At the present time, LHA has been testing windows before committing to the major expenditure of the entire window replacement.</p>			
N/A			
N/A			
<p>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.</p>			

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

1408-Management Improvements-PHA Wide Software Update \$111,474
 1410-Administration-Capital Fund Fee \$111,474
 1430-Fees and Costs-PHA Wide A & E Fees \$167,215
 KY004000001-Bainbrdge-PineVly-Const: Replace/repair sidewalks & driveways, replace exterior doors & storm doors, and replace handrails & back decks \$154,560
 KY004000002-Unnamed: Window replacement \$166,907
 KY004000003-Unnamed: Replace exterior entrance doors, sliding patio doors, replace kitchen living room, & bathroom flooring, replace kitchen & bathroom cabinets, countertops, and bathroom tub surrounds \$81,408
 KY004000007-Homownership: Replace interior & exterior lighting, paint interior hallways \$16,950
 KY004000010-Bluegrass Apartments: Parking lot repair, replace kitchen cabinets and bathroom tubs \$19,380
 KY004000011-Bluegrass Phase II: Replace kitchen countertops & cabinets, bathroom shower stall doors \$8700
 KY004000013-Bluegrass Phase III: Sidewalk repair/replacement, dumpster replacement, and paint MF interior hallways \$14,000
 KY004000015-Bridlewood Apartments: Paint MF interior hallways \$19,000
 KY004000033-Grand Oaks Apartments: Paint MF interior hallways \$20,730

SINGLE-FUND FUNGIBILITY

As reported previously in the operating information, the LHA requests approval to use single-fund fungibility by transferring excess cash reserves from Low Rent Public Housing (LRPH) (Section 9 funding) as of 6/30/2016 per our audited report to be utilized for a number of projects.

Those projects would include but not limited to: development of 11 units designated for extremely low-income families on LHA-owned property at Glen Arvin Avenue; deferred maintenance – window replacement at Connie Griffith Towers; deferred maintenance at Ballard Towers a LHA-owned PBV multifamily site that fall outside of Section 8 and 9; voluntary conversion of Connie Griffith Manor, the agencies elderly-designated high rise building; programs to offer incentives to residents moving toward self-sufficiency; and fees associated with MTW Program evaluation.

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	1042	12504
Federal MTW Voucher (HCV) Units to be Utilized	2062	24744
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	388	4656
Total Households Projected to be Served	3492	41904

* Calculated by dividing the planned 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 to be served, the PHA should estimate the number of households to be served.

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

LHA is currently in compliance with statutory requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	Public Housing occupancy is down due to waiting list being depleted of eligible applicants for self-sufficiency sites that have a work requirement. The LHA has implemented steps to address the issue in the short term goals of the FY2018 MTW Annual Plan.
N/A	N/A
N/A	N/A

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Public Housing	Regional/Site-Based	764	Partially Open	Yes
Housing Choice Voucher	Community-Wide	496	Closed	Yes
Non-Traditional Housing Assistance	Program Specific	141	Open	Yes

Rows for additional waiting lists may 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.

***Public Housing - waiting list is open for the general public and Connie Griffith Towers (Elderly Only).

N/A

N/A

If Local, Non-Traditional Housing 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) Greenhouse17 - for victims of domestic violence
7) HOPE Center - Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment;
8) Serenity House Place - Parents with children: who have recently been released from jail, are homeless and who are substance abuse treatment program graduates 9) Greenhouse17 - serves victims of domestic violence.

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.

Pre-applications are taken to compile four Public Housing waiting lists. There is one regional waiting list for each of the LHA's three regional management teams plus one site-based waiting list for Connie Griffith Manor. Applicants may select from one of three regional waiting lists or the site-based waiting list for Connie Griffith Manor that have an open waiting list for which they meet the occupancy criteria. The regional waiting lists are organized by bedroom size. Public housing communities with occupancy restrictions are identified on the LHA website.

SECTION III - PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

Activity 22: Rent Reform: Housing Choice Voucher Time Limit Pilot Program

Description

The uncertainty of federal funding dictates that the LHA look for alternative ways to provide affordable housing and demands that the Housing Authority require accountability and commitment from work-able program participants. The Lexington Housing Authority proposes to test time-limited housing assistance for work-able new admissions to the HCV Program for five (5) years with a potential two (2) year extension. Elderly households are exempt from this activity.

Work-able new admission participants will be subject to:

- Total Tenant Payment (TTP) calculated based on 28% for work-able households
- A triennial recertification schedule
- Mandatory participation in LHA-provided case management
- Elimination of all deductions except childcare (elderly/disabled deduction, dependent deduction, medical expenses)
- Increases in income are excluded until the next certification
- Adult head of household, co-head or spouse must be employed at least 20 hours per week earning no less than local or federal minimum wage (whichever is higher); at least 25 hours per week employment beginning with their third year of program participation and at least 37.5 hours per week employment for the fourth and any subsequent years program participation.
- Should the participant not reach \$0 HAP at the end of five (5) years; the LHA will continue to provide rental assistance capped as follows:
 - 1 BR – \$200 maximum subsidy
 - 2 BR – \$300 max subsidy
 - 3 BR and over – \$400 max subsidy
- Minimum rent of \$150

The LHA defines self-sufficiency as a participant that is able to supply for their own needs with a reduced need for subsidy with an earned income of local or federal minimum wage (whichever is higher); at 37.5 hours per week; for 52 weeks.

Meets Statutory Objective

- Achieve greater cost effectiveness in federal expenditures
- To give incentives to families with children where the head of household is working
- Increase housing choice

Anticipated Impact of Activity on Statutory Objectives

This activity will improve housing choice and move families toward self-sufficiency. In addition, LHA and participant families will experience time savings related to the reduced recertifications. Participant families on the triennial schedule may also see income savings as a result of LHA not recalculating rent portions during the in between years or because of the new income calculation.

Schedule for Achieving Objective

Upon approval of the FY2018 Plan the LHA plans to advertise and hire case management specialist with plans to begin enrolling HCV new admission participants into the time limit pilot program no later than October 2017. LHA staff will communicate the details of program requirements in client briefings and through case management consults. Currently there are no plans to offer this incentive beyond 25 vouchers.

Authorizations

Attachment C, Section D. Authorizations Related to Housing Choice Vouchers Only, Paragraph 2(a) and 2(d). Rent Policies and Term Limits. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R 982.508, 982.503 and 982.518 A as necessary to implement the Agency's Annual MTW Plan.

Explain why the cited authorization from Attachment C or D is needed to engage in this activity;

- Authorization is needed to assign local preferences, admissions and continued occupancy policy and procedures.
- Authorized is required to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act.

Impact Analysis

The impact analysis is provided at the end of this activity.

Hardship Case Criteria

Families who lose income through no fault of their own may submit a hardship request. Through an approved hardship request a tenant's earned income will be changed to true income, no less than the LHA's minimum rent, for up to ninety days while the tenant seeks employment. Only one hardship request may be submitted for a total of 90 days (whether consecutive or not) in any 12-month period. All households will be subject to LHA's MTW Rent Reform Hardship Policy (see Appendix A).

Annual Re-Evaluation of Rent Reform Activity

The LHA will review and/or re-evaluate this activity annually based on feedback from tenants and quarterly reports from the case manager. Should the LHA determine that the activity be modified, the LHA will make the request through the annual Plan or an amendment. Should interest in this program exceed 25 new admission participants, the LHA will establish a waiting list for consideration should the agency choose to continue the program beyond the 25 voucher limit.

Transition Period

Upon approval of this plan new admissions would be offered voluntary participation in this program not to exceed 25 participants.

HUD STANDARD METRICS

CE #1: Agency Cost Savings			
Unit of Measure: Total Cost of Annual Certification in dollars			
Baseline	Benchmark	Outcome	Benchmark Achieved
Cost of certifications 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.
Cost per Annual Certification \$26.97 X 25 maximum participants	Cost per Annual Certification \$26.97 X 25 maximum participants divided by 3 (years)	To Be Determined	To Be Determined
\$674	\$225		
Data Source: Emphasys Software and staff feedback.			

CE #2: Staff Time Savings			
Unit of Measure: Total time to complete the task in staff hours (decrease)			
Baseline	Benchmark	Outcome	Benchmark Achieved
Total staff time dedicated to the task prior to implementation of the activity.	Expected total staff time dedicated to the task after implementation of the activity.	Actual total staff time dedicated to the task after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
1 hour X 25 Annual Certifications = 25 hours annually	1 hour X 8 Annual Certifications = 8 hours annually	To Be Determined	To Be Determined
Data Source: Staff interviews.			

CE #5: Increase in Agency Rental Revenue			
Unit of Measure: Rental revenue in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
*Rental revenue prior to implementation of the activity (in dollars).	Expected 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.
0	\$180,000 Expected HAP Payments after implementation of activity (in dollars).	To Be Determined	To Be Determined
*There is no rental revenue as the LHA is not the landlord HAP payments to the landlord can be tracked. A decrease in HAP would indicate activity success.			
Data Source: Emphasys Software and staff feedback.			

SS #1: Increase in Household Income			
Unit of Measure: Average earned income of households affected by this policy in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved
Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy after implementation of the activity (in dollars).	Actual average earned income of households affected by this policy after implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$10,667 (avg. earned income of non-elderly/non-disabled households during FY2017)	\$14,138 (37.5 hours per week X (minimum wage) X 52 weeks)	To Be Determined	To Be Determined
Data Source: Emphasys Software			

SS #3: Increase in Positive Outcomes in Employment			
Unit of Measure: Number of employed head of household, co-head or spouse affected by this policy.			
Baseline	Benchmark	Outcome	Benchmark Achieved
Head(s) of households, co-heads or spouses employed prior to implementation of the activity. This number may be zero.	Expected head(s) of households, co-heads or spouses employed after implementation of the activity.	Actual head(s) of households, co-heads or spouses employed after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
0	25	To Be Determined	To Be Determined
Data Source: Emphasys Software and staff feedback.			

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)			
Unit of Measure: Number of households receiving TANF assistance (decrease) affected by this policy.			
Baseline	Benchmark	Outcome	Benchmark Achieved
Households receiving TANF assistance prior to implementation of the activity. This number may be zero.	Expected number of households receiving TANF assistance after implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
0	12	To Be Determined	To Be Determined
Data Source: Emphasys Software			

SS #8: Households Transitioned to Self-Sufficiency			
The LHA defines self-sufficiency as a participant that is able to supply for their own needs with a reduced need for subsidy with an earned income of state or federal minimum wage (whichever is higher); at 37.5 hours per week; for 52 weeks.			
Unit of Measure: Number of households transitioned to self-sufficiency (increase) affected by this policy. 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	Benchmark Achieved
Households receiving TANF assistance prior to implementation of the activity. This number may be zero.	Expected number of households receiving TANF assistance prior to implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
0	12	To Be Determined	To Be Determined
Data Source: Emphasys Software			

DISPARATE IMPACT ANALYSIS

HCV Population	Heads of Household FY2017	Average Gross Annual Earned Income	Avg. Total Annual Adjusted Income	Avg. Gross Rent Payment
All Households	2435	\$8,269	\$11,235	\$296
Gender				
Female	1,961	\$8,809	\$11,483	\$304
Male	474	\$6,034	\$10,208	\$263
Race				
Black	1,740	\$9,193	\$11,698	\$308
White	678	\$5,891	\$10,053	\$266
American Indian/ Native Alaskan	6	\$10,707	\$10,800	\$309
Asian/Pacific Islander	10	\$6,989	\$11,116	\$279
Other	-	-	-	-
Ethnicity				
Non-Hispanic	2,395	\$8,253	\$11,271	\$297
Hispanic	40	\$9,200	\$9,088	\$265
Age of Head of Household				
18-31	722	\$9,683	\$10,233	\$277
32-46	984	\$9,973	\$12,304	\$323
47-61	729	\$4,532	\$10,537	\$273
Excluded Households				
Elderly	327	N/A	N/A	\$277

Activity 23: Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/Controlled Properties

Description

Housing Authority staff will perform all rent reasonableness determinations on all Housing Choice Voucher (HCV) tenant and project-based units that are owned or managed by the LHA.

LHA HCV staff currently perform rent reasonableness determinations on HCV tenant-based voucher units and rental comparisons are currently in our computer system therefore requiring no significant changes for additional units. In addition, the scheduling time required to secure the third-party entity requires 5 to 7 days lead time as opposed to LHA staff being able to respond in less than 24 hours. LHA will secure a third-party provider for rent reasonableness determinations when LHA HCV staff is overburdened. An example would be in cases where new units are added to the LHA's portfolio and scheduling/manpower will not allow for internal rent reasonableness determinations. Eliminating the third-party provider will improve administrative efficiencies, eliminate confusion for the voucher participant, and improves the response time for performing inspections.

Meets Statutory Objective

To achieve greater cost effectiveness in federal expenditures.

Anticipated Impact of Activity on Statutory Objectives

The LHA anticipates significant cost savings using LHA staff to make rent reasonableness determinations rather than a third-party contractor that may or may not be familiar with Lexington's rental housing market.

Schedule for Achieving Objective

Upon approval of the amended FY2018 MTW Annual Plan the LHA will immediately determine rent reasonableness on all LHA owned-controlled HCV and PBV units.

Authorizations

This MTW activity is authorized in Attachment C, Section D.1.f Operational Policies and Procedures; Section D.2.c Rent Policies and Term Limits; and Section D.5 Ability to Certify Housing Quality Standards. Under Section D.1.f, the housing authority is authorized to determine property eligibility criteria. Under Section D.2.c, the housing authority is authorized to develop a local process that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. Under Section D.5, the housing authority is authorized to certify that housing assisted under MTW will meet housing quality standards established or provide by HUD. These authorizations waive certain provisions of Section 8(p), Section 8(o)(10) and Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982.507, 24 C.F.R. Subpart H, and 24 C.F.R. Subpart I.

Cited Authorization from Attachment C or D is needed to engage in this activity because 24 CFR 983.59 states that an independent entity will need to perform rent-setting inspection functions set out in 24 CFR 983.59

HUD STANDARD METRICS

CE1 Agency Cost Savings

CE1 Agency Cost Savings			
Unit of Measure: Total cost of rent reasonableness determinations in dollars (decrease).			
Baseline	Benchmark (FY2018)	Outcome (FY2019)	Benchmark Achieved
Cost of rent reasonableness determinations prior to implementation of the activity (in dollars).	Expected cost of rent reasonableness determinations after implementation of the activity (in dollars).	Actual cost of rent reasonableness determinations after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$750.00 per unit Cost per rent reasonableness determination performed by third-party vendor	\$48.00 per unit Cost per rent reasonableness determination performed by LHA HCV staff	TBD	TBD

*This is the current salary per hour for LHA HCV inspectors.

Data is based on staff interviews and Emphasys software.

CE2 Staff Time Savings			
Unit of Measure: Total time to complete reasonableness determinations in staff hours (decrease).			
Baseline	Benchmark (FY2018)	Outcome (FY2019)	Benchmark Achieved
Total staff time dedicated to the task prior to implementation of the activity.	Expected total staff time dedicated to the task after implementation of the activity.	Actual total staff time dedicated to the task after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
7 days/168 hours to schedule and complete rent reasonableness determinations performed by third-party vendor.	1 day/24 hours to complete rent reasonableness determinations performed by LHA HCV staff.	To Be Determined	To Be Determined

SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

A. IMPLEMENTED ACTIVITIES

Activity 1: Increase Minimum Rent to \$150 Across All Housing Programs	
Plan Year Approved and Implemented	
Proposed FY 2012 – FY 2013 for Pimlico Apartments / Implemented May 1, 2012 Activity Expanded FY2014 to all Public Housing Units and HCV Units / Implemented April 1, 2014	
Description/Update	
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.	
Non-Significant Changes or Modifications During FY2018	
The LHA does not anticipate any non-significant changes or modifications during the FY2018 Plan year.	
Changes or Modifications Metrics, Baselines or Benchmarks During FY2018	
The LHA does not anticipate any changes or modifications during the FY2018 Plan year to benchmarks and/or metrics for this activity.	
Attachment C or D Authorization(s) Changes	
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.	

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

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented – FY2012-FY2013 Plan
For Connie Griffith Manor households
Activity Expansion Approved and Implemented – FY2014 Plan
Expanded to include HCV elderly and disabled households on a fixed income

Description/Update

This activity is ongoing. The Housing Authority implemented this activity for all 183 units at Connie Griffith Towers, an elderly high rise, during FY 2012 – FY 2013. Through this activity, the LHA is recertifying households at Connie Griffith once every three years instead of annually. Between triennial re-certifications, 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.

The success of that initiative prompted staff to request authority to expand the activity to HCV elderly and disabled families on a fixed income. As the vast majority of elderly and disabled households in the HCV programs rely on fixed-income sources, there is little variation in household income on an annual basis. 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.

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.

Per HUD Notice PIH 2016-05, Streamlining Administrative Regulations for Programs Administered by PHAs, triennial recertifications can be adopted at the PHAs discretion. The LHA elects to continue with this activity until it is determined if the provisions in the notice will be adopted by the LHA. The LHA requests permission to discontinue reporting metrics for this activity.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 5: Streamlined HQS Inspection Policy for Housing Choice Voucher Program

Plan Year Approved and Implemented

Plan Year Activity Approved and Implemented
 Proposed and Approved FY2012 – FY2013 Plan
 Significantly Modified FY2014 Plan
 Implemented FY2015

Description/Update

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 *Star Rating System* for HCV property owners.

The LHA performed 60% less HQS inspections during FY2017 (2,410) from the baseline numbers reported in FY2014 when this activity was first proposed (4,033). The number of participating landlords decreased from the 845 in FY2013 (baseline) to 784 during FY2017. The FY2017 star ratings compared to the FY2016 are shown below:

*5-Star Rating Category	FY2016	FY2017
1-Star (12-month interval between HQS inspections)	7	6
2-Star (24-month interval between HQS inspections)	695	706
3-Star (30-month interval between HQS inspections)	49	41
4-Star (36-month interval between HQS inspections)	31	25
5-Star (42-month interval between HQS inspections)	8	6

*The LHA was delayed in tracking the star rating in FY2014 and FY2015 due to software issues. The star ratings were tracked in FY2016.

The LHA proposes to perform inspections based on the star-rating system at the any current and future LHA-owned/controlled project-based voucher (PBV) units.

Non-Significant Changes or Modifications During FY2018

The LHA proposes to perform inspections based on the star-rating system at the LHA-owned/controlled PBV assisted cites.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

Metrics for this activity will be updated to include current PBV units.

Attachment C or D Authorization(s) Changes

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

The LHA-owned Centre Meadows will be added to the metrics for this activity.

Activity 10: Housing Choice Voucher Tenant-Based Special Partners Programs

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2012 – FY 2013

Description/Update

Through MTW Activity 10, social service agencies provide stable tenant-based voucher assistance and special services to specific populations. Currently, Bluegrass Mental Health Mental Retardation (BGMHMR) and Community Action Council are the special partner programs receiving the flexibility of this activity. BGMHMR (22 tenant-based vouchers) provides wraparound services for persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services, in order to, stabilize the household's situation to increase self-sufficiency. Community Action Council (10 tenant-based vouchers) provides case management to youth aging out of Foster Care (as described in Activity 19). The assistance for this program is capped at 10 tenant-based vouchers. The Foster Care initiative was proposed and approved in the FY2017 MTW Annual Plan.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

Since Greenhouse17 formerly reporting under this activity has been moved to Activity 12 and Community Action Council will now be reported under this activity for youth aging out of foster care (Activity 19). The benchmarks and/or metrics for this activity have been updated to include the addition of this special partner program.

Attachment C or D Authorization(s) Changes

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

Midway through FY2017, special partner program, Greenhouse 17 (formerly Bluegrass Domestic Violence) signed a Memorandum of Understanding (MOU) with the LHA to receive monthly block grant funding for 25 vouchers for a facility with fixed units. The intent to move this activity from Activity 10 to Activity 12 was reported in the FY2017 MTW Annual Plan. In addition, Community Action Council will now be reported in this activity for youth aging out of foster care (Activity 19).

Activity 12: Local, Non-Traditional Uses of MTW Funds for Special Partners

Plan Year Approved and Implemented

This activity was proposed and implemented in FY2014 and is ongoing.

Description/Update

The Housing Authority provides monthly rental subsidy of \$144,887 to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 388 families with special needs. HCV staff has signed Memoranda of Understanding (MOUs) in with each special partner program. The number of vouchers for New Beginnings Bluegrass, Inc. have increased from 24 to 29.

Special Partner Program	Description of Households Served	# of Vouchers Provide
Canaan House	Individuals who have been diagnosed with a mental illness	17
Greenhouse17	victims of domestic violence, dating violence, sexual assault, and stalking	25
Hope Center	Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment	144
New Beginnings Bluegrass, Inc.	Individuals who have been diagnosed with a mental illness	29
OASIS Rental Assistance Housing Program	Families in need of financial literacy, credit management, and homeownership resources	30
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80
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
Urban League of Lexington-Fayette County	Elderly individuals	23
Total Special Partner Units		388

Activity 12: Local, Non-Traditional Uses of MTW Funds for Special Partners (continued)

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

Since Greenhouse17 is reported under this activity since the approval of the FY2017 Annual Plan, the have benchmarks and/or metrics for this activity have been updated to include this special partner program and reported in the FY2018 Annual Report. In addition, metrics will be updated for New Beginnings whose voucher allotment has be increased from 24 to 29.

Attachment C or D Authorization(s) Changes

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

Midway through FY2017, special partner program, Greenhouse 17 (formerly Bluegrass Domestic Violence) signed a Memorandum of Understanding (MOU) with the LHA to receive monthly block grant funding for 25 vouchers for a facility with fixed units. The intent to move this activity from Activity 10 to Activity 12 was reported in the FY2017 MTW Annual Plan. In addition, New Beginnings Inc.'s vouchers were increased by four from 24 to 29. No new authorizations are needed for this modification.

SECTION III - PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

Activity 13: Local Self-Sufficiency Admissions and Occupancy Requirements
Plan Year Approved and Implemented
<p>This activity that was initially proposed and approved in FY2014.</p> <p>A technical amendment was submitted to HUD on January 14, 2016</p>
Description/Update
<p>In FY2014, the LHA created this activity with the aim of eliminating loopholes that a significant number of residents use to avoid work requirements. This policy affects non-elderly/non-disabled households at the LHA's public housing self-sufficiency units and LHA owned and managed Centre Meadows Apartments, a 206-unit project-based voucher (PBV) site converted from public housing to PBV through RAD. With MTW authority the LHA is allowed to:</p> <p>Impose a minimum earned income calculation for work able, non-elderly, non-disabled families, including full-time students, residing at self-sufficiency units or Centre Meadows regardless of employment status.</p> <ul style="list-style-type: none">a) 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 and Centre Meadows PBV units - 52 weeks x 20 hours x federal minimum wage.b) The amount of assumed annual income will be modified when the local or federal minimum wage (whichever is more) 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 elderly or disabled are exempted.c) Modify the Definition of Work Activity used to determine whether or not a family is compliant with the self-sufficiency requirements. 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">a) Unsubsidized employment;b) Subsidized private sector employment;c) Subsidized public sector employment;d) Paid on-the-job training <p>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 sites and Centre Meadows. As re-</p>

proposed, staff plans to offer relief in meeting this qualification by allowing a gap of no more than ten (10) days of a gap between changes in employment to satisfy 3 months of employment history. 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) and HCV Admin Plan.

Exceptions

In the event that there are no families requiring mobility accessible units on either the Self-Sufficiency or Centre Meadows waiting list or the general occupancy waiting list, Management may, at its discretion, allow a family on the Self-Sufficiency waiting list that does not require a mobility accessible unit, but meets all Self-Sufficiency requirements, to occupy a mobility accessible unit. However, the family must sign a waiver agreeing to move to any available Self-Sufficiency unit in order to accommodate a family requiring a mobility accessible unit. Families in self-sufficiency units must continue to meet all self-sufficiency requirements.

Meets Statutory Objectives

This activity will help to increase family self-sufficiency and housing choice.

Anticipated Impact of Activity on Statutory Objectives

Meeting the earned income calculation will move families toward self-sufficiency as well as achieve greater cost effectiveness in federal expenditures.

Schedule for Achieving Objectives

Upon Plan approval, the LHA will begin implementing the revised provisions of this activity. LHA staff anticipates to immediately see the effects of limiting the number of transfers and the rent calculation based on imputed income has proved to be successful in increasing self-sufficiency.

Activity Metrics

HUD standard Metrics can be found at the end of this activity.

Attachment C or D Authorization(s) Changes

Attachment C, Section C.2. Local Preferences and Admission and Continued Occupancy Policies and Procedures. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R. 960.206 as necessary to implement the Agency's Annual MTW Plan.

Attachment C, Section D.3.a. Authorizations Related to Section 8 Housing Choice Vouchers Only - Eligibility of Participants. The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act. This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.268, and 982.201 as necessary to implement the Agency's Annual MTW Plan.

Attachment C, Section D.7.a. Establishment of an Agency MTW Section 8 Project-Based Program, which waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983.

Explain why the cited authorization from Attachment C or D is needed to engage in this activity;

Authorization is needed to assign local preferences, admissions and continued occupancy policy and procedures.

Authorized is required to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act.

Impact Analysis

The impact analysis is provided at the end of this activity.

Hardship Case Criteria

Families who lose income through no fault of their own may submit a hardship request. Through an approved hardship request a tenant's earned income will be changed to true income for up to ninety days while the tenant seeks employment. Only one hardship request may be submitted for a total of 90 days (whether consecutive or not) in any 12-month period. All households will be subject to LHA's MTW Rent Reform Hardship Policy (see Appendix A). There is no hardship for the limit on transfers from PBV to tenant-based voucher assistance.

Transition Period

Since the activity is ongoing but significantly modified, the only necessary transition is to notify Centre Meadows (CM) PBV participant households of the limits on transfers to tenant-based vouchers. LHA staff would notify CM tenants of this policy upon HUD approval of the Plan. Any future tenants at PBV units owned/controlled by the LHA will be notified during admissions.

Activity 14: Rent Reform: Elimination of Earned Income Disallowance

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented – FY2015 Plan

Description/Update

LHA staff proposed to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV households. Currently, federal regulations mandate the exclusion of earnings for public housing households in the following cases:

- The household income increases as a result of employment of a family member who was previously unemployed for one or more years.
- Families whose income increases during the participation of a family member in any economic self-sufficiency or other job training program.
- Families who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program.

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.):

- 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.
- Families whose income increases during the participation of a disabled family member in any economic self-sufficiency or other job training program.
- Persons with disabilities who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program for at least \$500.

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.

Staff reports 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 received the EID calculation from hire date through 48 cumulative months was difficult to track because households didn't always report when employment status starts and stops. In

addition, many who received the benefit quit their jobs at the end of the two-year exclusion to avoid an increase in the household rent. Staff reports that the elimination of the EID calculation has been successful in reducing the administrative burden of monitoring household members receiving the EID and tracking employment.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications during the FY2018 Plan year.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 16: HCV Rent Reform Study

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented – FY2015

Description/Update

Lexington Housing Authority (LHA) is one of four MTW agencies participating 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. 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.

The majority of Study participants were enrolled by March 2016. A total of 1,024 HCV participants have been enrolled in the Study (509 Treatment/Study Group and 515 Control Group). June 30, 2018, the end of FY2018, will mark the end of the three-year period for Study participants’ first triennial recertification. At that time, Study participants who received increases in earned income will face increases in rent upon recertification.

The software provider, Emphasys continues to develop reports to provide metrics for the required reporting for this activity. The LHA has met with Emphasys leadership to establish a plan of action for Emphasys to provide the agreed upon reports necessary to update metrics.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications during the FY2018 Plan year.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 17: Limit Interim Re-Examinations for Public Housing Households

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2016

Description/Update

The LHA sought and received approval to limit interim re-examinations for public housing households to one for households seeking reductions in rent based on reductions in earned income. This restriction applies to all households who are not defined as elderly or disabled households. At any time between required annual re-examinations and after one interim reduction in rent, a family residing in public housing may submit a written hardship request for an exemption to the interim rent reduction policy (see Appendix B). All cases are reviewed on a case-by-case basis.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 18: Streamlined Inspection of LHA-Owned/Controlled Property

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2017

Description/Update

The LHA received approval to have the LHA's Housing Choice Voucher (HCV) inspectors perform HQS inspections of LHA-owned property or affiliates that receive HCV assistance rather than a third-party inspector. Previously, HCV inspectors from other jurisdictions performed HQS inspections on LHA-owned properties or affiliates, which slows the leasing process. In cases where the property is a tax credit entity, the property is inspected by LHA public housing management staff in addition to an HQS inspection.

The LHA has 244 units eligible for HQS inspection, excluding 15 market-rate units that may require HQS inspection should the unit be occupied by a voucher holder. HCV staff reports that the majority of LHA's units that require HQS inspections have a at least a 4-Star rating (see Activity 5) which allows an inspection schedule of once every 36 months. LHA staff reports no negative consequences of this activity.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 19: Tenant-Based Rental Assistance for Youth Aging Out of Foster Care

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2017

Description/Update

The LHA received approval offer tenant-based vouchers to Foster Care youth (ages 18- 24) aging out Kentucky's foster care program. The LHA provides a maximum ten (10) tenant-based vouchers annually for youth aging out of foster care. LHA staff has established a partnership with the local Community Action Council (CAC), who receives referrals from the state Cabinet for Health and Family Services, to implement this initiative. The LHA has entered into a Memorandum of Understanding with CAC to supply vouchers to the Cabinet referrals and CAC provides the mandatory case management to the participant. The CAC staff interview, screen and enroll families for the program.

To date, two participants are housed and an additional four vouchers have been issued and those four participants are searching for housing. The LHA has a HCV housing specialist that works directly with the CAC case manager on a regular basis. Staff is encouraged by the success of this activity.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 20: Assign Project-Based Vouchers to LHA Owned/Controlled Units Without Bid Process

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2017

Description/Update

The LHA received approval to select existing and new LHA owned/managed property for project-based voucher assistance without a competitive bid process. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project. The LHA has plans to project-base its own new construction projects in the coming year and this flexibility will have a positive impact for the agency and the clients we serve.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

Activity 21: Triennial Certifications for HCV Homeownership Participants (Rent Reform)

Plan Year Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2017

Description/Update

The LHA received approval to implement reexaminations every three (3) years for Housing Choice Voucher (HCV) Homeownership households by conducting income reexaminations every three (3) years. Triennial recertification has proved successful for HCV elderly disabled on fixed incomes. Staff sees minimal changes in income for the homeownership households in the Housing Choice Voucher program. The elimination of these annual certifications has allowed for more time for HCV specialist to devote to other programs.

Non-Significant Changes or Modifications During FY2018

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.

Changes or Modifications Metrics, Baselines or Benchmarks During FY2018

There have been no changes to benchmarks, and/or metrics for this activity.

Attachment C or D Authorization(s) Changes

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.

SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED
B. NOT YET IMPLEMENTED ACTIVITIES

Activity #7: Public Housing Acquisition Without Prior Approval		Approval Dates: FY2012-2013 Plan
Description	<p>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. This relief will apply only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.</p> <p>All acquired properties will meet HUD’s site selection requirements. Approval from the local HUD office will be sought when a pending real estate acquisition deviates from the selection requirements. Copies of all required forms and appraisals will be maintained at the Authority’s main office. After acquisition, all required documentation will also be provided to the HUD field office so HUD officials can ensure that site selection requirements were met and establish records for these new public housing properties in the agency’s data systems.</p>	
Update	The LHA did not acquire any public housing properties during where it was necessary to implement this activity.	
Timeline for Implementation: The LHA will develop a timeline for this activity during FY 2018 should the Authority decide to acquire public housing units or land for the development of public housing.		
Explanation of any non-significant changes or modifications to the activity since it was approved: The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.		

Activity #8: Conversion of Appian Hills Public Housing to Project-Based Vouchers		Approval Dates: FY2012-2013 Plan FY2014 (modified)
Description	Appian Hills needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site’s 27 four-bedroom homes. LHA continues to work diligently to secure 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.	
Update	Should HUD issue a NOFA during FY 2018 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.	
Timeline for Implementation: 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.		
Explanation of any non-significant changes or modifications to the activity since it was approved: The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.		

Activity #9: Development of Project-Based Voucher Units at 800 Edmond St.		Approval Dates: FY2012-2013 Plan
Description	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.	
Update	The LHA still plans to implement this activity once financial resources become available.	
Timeline for Implementation: The LHA will develop a timeline for this activity during FY 2018 should the Authority decide to develop the Edmond Street property.		
Explanation of any non-significant changes or modifications to the activity since it was approved: The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.		

Activity #11: Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers		Approval Dates: FY2012-2013 Plan FY2014 (modified)
Description	<p>Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Towers (non-MTW units which are attached to an LHA-owned public housing site, Connie Griffith Towers, serving low-income, elderly households) require significant emergency capital repairs. MTW funds would only be used if the LHA 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 Towers no more than \$300,000 in emergency funds in total.</p> <p>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.</p>	
Update	Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a tax-credit entity until October 20, 2015 when the property exited tax credit compliance and is now solely owned by the Ballard, LLC, a LHA controlled entity. The LHA is weighing the possibility of Voluntary Conversion for Connie Griffith Towers and continues to seek a funding mechanism for Ballard Towers.	
Timeline for Implementation: The LHA will develop a timeline for this activity during FY 2018 should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.		
Explanation of any non-significant changes or modifications to the activity since it was approved: The LHA does not anticipate any non-significant changes or modifications to this activity during FY2018.		

SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

C. ACTIVITIES ON HOLD

N/A

D. CLOSED OUT ACTIVITIES

Activity #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 (Closed out FY2014)

The implementation of this activity made no discernable impact on the percentage of Bluegrass HOPE VI public housing families meeting the self-sufficiency requirement. Staff reported that many families simply waited for the six-month restriction to expire, and then requested a rent reduction shortly thereafter. Given its negligible impact, the LHA decided to terminate this activity.

Activity #4 - HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy (Closed out FY2015)

The implementation of this activity did not reduce the percentage of families requesting a rent reduction within 6 months of their effective move-in date. In fact, the percentage of families making such a request rose from 10% to 18% during FY2012 – FY2013. For those reasons, the LHA has decided to terminate this activity.

Activity #6 - Biennial Housekeeping Inspection Policy for Public Housing Residents (Closed out FY2014)

This activity was not implemented in FY 2012-FY2013 because it was determined that tracking the housekeeping ratings would require software modifications that would be cost prohibitive.

Activity #15 - Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent (Closed out FY2016)

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.

V. SOURCES AND USES OF FUNDS

Annual MTW Plan		
V.1.Plan.Sources and Uses of MTW Funds		
A. MTW Plan: Sources and Uses of MTW Funds		
Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$4,559,035
70600	HUD PHA Operating Grants	\$25,421,098
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,642,123
71100+72000	Interest Income	\$8,213
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	\$37,309
70000	Total Revenue	\$31,967,778
Estimated Uses of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.		
Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,265,314
91300+91310+92000	Management Fee Expense	\$1,642,123
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,811,144
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,648,633
95000 (95100+95200+95300+95500)	Total Protective Services	\$341,471
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$512,667
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$320,212
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$18,881,224
97400	Depreciation Expense	\$1,732,265
97500+97600+97700+97800	All Other Expenses	\$357,448
90000	Total Expenses	\$39,512,501

Describe the Activities that Will Use Only MTW Single Fund Flexibility

The Lexington Housing Authority would like to take advantage of the MTW Single Fund Fungility by transferring excess cash reserves from Low Rent Public Housing (LRPH) Section 9 funding as of 6/30/16 per our audited report to be utilized for possibly development and deferred maintenance.

LHA would plan to transfer the money from the LRPH section to a Business Activity area until the development of a (11) apartment site is underway and ready to be funded. The deferred maintenance would be used for possibly the replacement of windows in a senior high rise. At the present time, LHA has been testing (2) windows before committing to the major expenditure of the entire window replacement.

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes

or

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

No

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. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

No

The LHA is not implementing a LAMP.

VI. ADMINISTRATIVE

- A. Resolution Signed by the Board of Commissioners and Certifications of Compliance
- B. The beginning and end dates of when the Plan was made available for public review, public hearing sign-in sheet and # of attendees, etc.
- C. Evaluation
- D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1)

A. Resolution Signed by the Board of Commissioners and Certifications of Compliance

RESOLUTION TO APPROVE AND SUBMIT THE AMENDED FY2018 MTW ANNUAL PLAN TO THE U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT FOR APPROVAL

WHEREAS, the Lexington Housing Authority, a public housing agency, is a Moving To Work (MTW) Agency under the November 10, 2011 MTW Agreement executed by the U.S. Department of Housing and Urban Development (HUD) and LHA; and

WHEREAS, in compliance with the MTW Agreement, the fiscal year 2018 MTW Annual Plan was approved by the LHA Board of Commissioners on April 13, 2017; and

WHEREAS, a new activity, Activity 23: Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/Controlled Properties, has been added to the MTW Plan to allow LHA staff to perform rent reasonableness determinations on all property owned or managed by the LHA rather than using an independent entity; and

WHEREAS, LHA invited comment on the Plan through notices posted on its website and advertised in the local newspaper allowing for a 30-day comment period (November 19–December 20, 2017) with a public hearing held on December 6, 2017; and

WHEREAS, this amended Plan will be submitted to HUD for review upon approval by the LHA Board of Commissioners;

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the amended FY2018 MTW Annual Plan is approved and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan to the U.S. Department of Housing and Urban Development for approval.



Daryl Smith
Chairperson, Board of Commissioners

1/18/18

Date

**RESOLUTION APPROVING THE LEXINGTON HOUSING AUTHORITY FY 2018
MOVING TO WORK ANNUAL PLAN**

WHEREAS, the Lexington-Fayette Urban County Housing Authority (LHA) executed a Moving to Work (MTW) Agreement on November 10, 2011, which provides LHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the MTW Agreement, an annual plan must be developed and submitted to HUD to formally enable the Authority to fully use the policy and budget flexibility provided to participants in the MTW Program; and

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) approved the LHA's FY 2012 MTW Annual Plan on December 29, 2011; and

WHEREAS, the LHA's FY2017 MTW Annual Plan was submitted to HUD on July 29, 2016 and approved by HUD on August 5, 2016, effective through June 30, 2017; and

WHEREAS, LHA has proposed three new activities (one re-proposed activity) in the FY 2018 MTW Annual Plan that will serve to reduce costs and achieve greater cost effectiveness in federal expenditures; encourage self-sufficiency for working families; or, increase housing choice for low-income families; and

WHEREAS, the LHA has proposed to modify certain previously approved MTW activities as necessary; and

WHEREAS, a Board Resolution approving the proposed FY 2018 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from March 10, 2017 through April 10, 2017 for the public to comment on the Plan, and has conducted a Public Hearing on March 23, 2017 to discuss the proposed Annual Plan before its submission to HUD;

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2018 MTW Annual Plan is approved, and that the Executive Director, Austlin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.



Daryl Smith
Chairperson, Board of Commissioners

April 13, 2017

Date

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 7/01/2017, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Board(s)) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Lower-Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 136.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by the Part, and with restrictions on payments to influence Federal Transactions in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

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 accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Daryl Smith
Name of Authorized Official

Board Chairperson
Title


Signature

April 13, 2017
Date

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

- B. The beginning and end dates of when the Plan was made available for public review, public hearing sign-in sheet and # of attendees, etc.

**Legals &
Public Notices**

**PUBLIC HEARING
ANNOUNCEMENT**

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) Amending the FY 2018 Moving to Work (MTW) Annual Plan to add a new activity; 2) updates to the Public Housing Admissions and Continued Occupancy Policy (ACOP) including clarification of admissions and occupancy requirements for LHA self-sufficiency sites; 3) and, updates to the Housing Choice Voucher (Section 8) Administrative Plan including modifications to Life-Threatening and Non-Life-Threatening Conditions in regard to Housing Quality Standards (HQS) Inspections.

The public hearing will be held on Wednesday, December 6, 2017 at 5:30 PM at LHA's Central Office, located at 300 W. New Circle Rd, Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be to amend the FY 2018 MTW Annual Plan with a new activity to propose that LHA staff make rent reasonableness determinations rather than a third-party provider; proposed modifications to the Public Housing ACOP including clarification of admissions and occupancy requirements for LHA self-sufficiency sites; and, proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan, including modifications to life-threatening and non-life-threatening conditions in regard to HQS Inspections.

LHA welcomes public comment regarding these changes from November 19 - December 20, 2017. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

Sunday, Lexington Herald-Leader
November 19, 2017



PUBLIC HEARING

You are welcome to attend; however, attendance is not mandatory.

WEDNESDAY, DECEMBER 6, 2017 @ 5:30 PM

LHA CENTRAL OFFICE
300 W. NEW CIRCLE RD

SUBJECTS TO BE DISCUSSED:

- 1) AMEND TO THE FY 2018 MOVING TO WORK (MTW) ANNUAL PLAN
- 2) PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY UPDATES
- 3) HOUSING CHOICE VOUCHER (SECTION 8) ADMINISTRATIVE PLAN UPDATES

Lexington-Fayette Urban County Housing Authority (LHA) Announces a Public Hearing Regarding: 1) Amend the FY 2018 Moving to Work (MTW) Annual Plan to add a new activity; 2) updates to the Public Housing Admissions and Continued Occupancy Policy (ACOP); 3) and, updates to the Housing Choice Voucher (Section 8) Administrative Plan.

There will be a public hearing on **Wednesday, December 6, 2017 at 5:30 PM at LHA's Central Office**, located at 300 W. New Circle Rd, Lexington, Kentucky, 40505. The subject of the meeting will be to amend the FY 2018 MTW Annual Plan with a new activity to propose that LHA staff make rent reasonableness determinations rather than a third-part provider; proposed modifications to the Public Housing ACOP; and, proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan.

The LHA welcomes public comment regarding these changes from November 19 –December 20, 2017. Complete copies of the affected documents (and a summary of proposed changes to each) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060.

Should you require transportation to the public hearing, please see your housing specialist or manager in advance to schedule.

Accommodations for disabled or non-English speaking residents will be made available upon advance request. Please call (859) 281-5063. Residents with hearing or speech impairments may receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

**LHA Public Hearing
Sign-In Sheet
5:30 p.m. – Wednesday, December 6, 2017**

Name	Address	Email Address/Phone #
Carol Carter	581 E Sixth St	Carol007Carter@gmail.com
RIKI WHITLOCK	LHA	whitlockr@lexha.org
BARRY HOLTS	"	Holts@lexha.org
Cathy Hall	"	hallc@lexha.org
Carolyn Fish	"	fishc@lexha.org
Lo - Smith	"	SMITHL@LEXHA.ORG
SWAN COOPER	LHA	COOPER@LEXHA.ORG
Alicia Pearson	LHA	Pearson@lexha.org
Dina Mason	LHA	masond@lexha.org
Wanda Mays	C C	
Margaret Brack	C C	
Andrew Wilson	LHA	281-5063
Austin Smith	LHA	281-5083

**PUBLIC HEARING
ANNOUNCEMENT**
Lexington-Fayette Urban
County Housing Authority
(LHA) will hold a Public
Hearing regarding: 1) the
proposed FY 2018 Moving
to Work (MTW) Annual
Plan; 2) revisions to the
Public Housing Admissions
and Continued Occupancy
Policy (ACOP); and 3) revisions to the Housing Choice
Voucher (Section 8) Administrative Plan; 4) the
proposed Ballard Towers
Admissions and Continued
Occupancy Policy; and 5) the proposed FY2017 Capital Fund Work Activities.

The public hearing will be held on **Thursday, March 23, 2017 at 5:30 p.m.** at LHA's Central Office, located at 300 W. New Circle Rd, Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2018 MTW Annual Plan that includes one new activity – a pilot program for the HCV program to test time limits; proposed modifications to the Public Housing ACOP; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan; the proposed Ballard Towers Admissions and Continued Occupancy Policy; and the proposed FY2017 Capital Fund Work Activities.

LHA welcomes public comment regarding these changes from March 10 – April 10, 2017. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lha2.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lha2.org. For additional information, call (859) 281-5040. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

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PUBLIC HEARING ANNOUNCEMENT



Lexington Housing Authority

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) the proposed FY 2018 Moving to Work (MTW) Annual Plan; 2) revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP); and 3) revisions to the Housing Choice Voucher (Section 8) Administrative Plan; 4) the proposed Ballard Towers MultiFamily Occupancy Policy, and; 5) the proposed FY2017 Capital Fund Work Activities.

The public hearing will be held on **Thursday, March 23, 2017 at 5:30 p.m.** at LHA's Central Office, located at 300 W. New Circle Rd, Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2018 MTW Annual Plan that includes two new activities: a pilot program for the HCV Program to test time limits and limits on transfers from LHA-owned project-based voucher assisted units; proposed modifications to the Public Housing ACOP; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan; the proposed Ballard Towers MultiFamily Occupancy Policy, and; the proposed FY2017 Capital Fund Work Activities.

LHA welcomes public comment regarding these changes from March 10 – April 10, 2017. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

Twenty-six people attended the public hearing.

**LHA Public Hearing
Sign-In Sheet
5:30 p.m. – Thursday, March 23, 2017**

Name	Address	Email Address/Phone #
<u>Carol Johnson</u>	<u>650 Tower Plaza #4</u>	<u>CAROLJOHNSON@gmail</u>
<u>Kathy Self</u>	<u>650 Tower Plaza #108</u>	<u>859-307-3449 kathyrues@gmail.com</u>
<u>Rose Vinson</u>	<u>650 Tower #61</u>	<u>859-687-0161</u>
<u>Alma Walker</u>	<u>650 Tower #305</u>	<u>859-317-9198</u>
<u>Danamaoan</u>	<u>LHA</u>	
<u>Rodrick Parker</u>	<u>LHA</u>	
<u>Conchita</u>	<u>LHA</u>	
<u>Angie Hutchinson</u>	<u>650 Tower Plaza #65</u>	<u>859-447-8453</u>
<u>Phasi Wolf</u>	<u>650 Tower #155</u>	<u>859-552-4977</u>
<u>Cathy Hall</u>	<u>LHA</u>	
<u>Heaven A. Lee</u>	<u>LHA</u>	
<u>Stephanie Brown</u>	<u>LHA</u>	
<u>Halvort Heston</u>	<u>LHA</u>	
<u>Rosie Evans</u>	<u>650 Tower Plaza</u>	<u>859-749-7266</u>
<u>Margaret Brook</u>	<u>650 Tower Plaza</u>	<u>954-336-5547</u>
<u>Doretha Bowles</u>	<u>650 Tower Plaza</u>	<u>859-536-3226</u>

LHA Public Hearing
Sign-In Sheet
5:30 p.m. - Thursday, March 23, 2017

Name	Address	Email Address/Phone #
Charlotte Dine	650 Tower	202-8097
Rick Whitlock	LHA	
BARRY NOLTE	LHA	
Sean Cooper	LHA	
Lillie M. McVey Jones		
Beth Towers	650 Tower Plaza	
Tom Smith	LHA	
Bill Ginn	LHA	
Andrea Wilson	LHA	
Austin Simms	LHA	



**Lexington Housing Authority Moving To Work (MTW) Stakeholders
Meeting Agenda
2:00 p.m. Tuesday, March 28, 2017
LHA Central Office Conference Room**

- Introductions
- Overview of MTW Participation
- Distribute FY2016 MTW Annual Report
- FY 2018 Proposed Activities
 - Activity 22 – HCV Time Limit Pilot Program
 - Activity 23 – Limit Transfers for Project-Based Voucher (PBV) Units
 - Activity 13 – Re-Proposed Local Self-Sufficiency Admissions and Occupancy Requirements
- Open Discussion for Questions/Comments
- Policy Review
 - Proposed Revisions to the Admissions & Continued Occupancy Policy (ACOP)
 - Proposed Revisions to the Housing Choice Voucher Administrative Plan (Admin Plan)
 - Proposed Ballard Towers MultiFamily Occupancy Policy
- Proposed Family Self-Sufficiency (FSS) Action Plan
- Implementation Schedule for FY2018 MTW Plan Submission
 - Public Comment Period (March 10th - April 10th)
 - Public Hearing (March 23rd)
 - Board Resolution (April 13th)
 - Submission to HUD (April 17th)
- Adjournment



**Moving To Work
Stakeholders Meeting
Sign-In Sheet
2:00 p.m. - Tuesday, March 28, 2017**

Name	Address	Email Address/Phone
Christy Shuttlett	225 Walton Ave #120	christy@newbeginningsky.org
Jean Cooper	Lex	cooper@LEXHA.ORG 281-5031
Janice - James	PO Box 6	james@hope.org
Coranne Hodge	498 E. Lower Street	coranne@lexingtonky.gov
CHRIS FORD	200 E. MAIN ST.	cford@lexingtonky.gov
Aldon Pleasant	LHA	
Tanya Christopher	LHA	
Donna Townsend	1156 Horseshoe Lane	312-754 dcollins@beaconproperty.com
Michelle A Lee	LHA	
Dana Mason	LHA	
Jessica White	Chapman House	jessicawhite@chapmanhouse.org
Carolyn Fish	LHA	
Arthur Crosby	Fair Housing	crosbyfhc@hotmail.com
Ron White	LHA	
Carrie Chism	LH Housing	chism.carrie@gmail.com
Ally Nelson	FCPS	ally.nelson@fcps.ky.gov
Andrea Wilson	LHA	

C. Evaluation

The LHA has partnered with Dr. Amanda Sokan, 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.

D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1)

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/2011

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KV3-P004-501-13 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 07/2013 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02-28-2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Total Estimated Cost Revised ²	Obligated	Total Actual Cost ³ Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ²	249,891		249,891	249,891
3	1408 Management Improvements	103,000		103,000	167,348.64
4	1410 Administration (may not exceed 10% of line 21)	124,945		124,945	124,946
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement	162,445		162,445	113,829.93
10	1460 Dwelling Structures	609,174		609,174	589,696.07
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

- ¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grants for operations.
⁴ RHF funds shall be included here.

Part E: Summary		FFY of Grant: 07/2013			
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number: Capital Fund Program Grant No.: 8Y36-P004-501-12 Replacement Housing Factor Grant No.: Date of CFPP:			
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03-31-2014		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
19A	Reserved Budget				
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,249,455		1,249,455	1,245,711.64
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.

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form HUD-50075.1 (4/2008)

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¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

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Part II: Supporting Pages							
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450113 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2013		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost	Total Actual Cost	Status of Work	
KY004000001				211,278			
Allante Brook	Door replacement	1460	32 units	34,208			
	Sub-Total			34,208			
Appian Hills	Parking lot repavement	1450	44 units	120,960			
	Sub-Total			120,960			
Camelot	Door replacement	1460	36 units	36,360			
	Sub-Total			36,360			
Trent	Door & window replacement	1460	9 units	19,750			
	Sub-Total			19,750			
	Total Project KY004000001			211,278			
KY004000003				171,135			
Atiya	Roof replacement	1460	18 units	124,000			
	Sub-Total			124,000			
Constitution	Parking lot light repair	1450	17 units	10,000			
	Sub-Total			10,000			
Scattered	Roof replacement	1460	1 unit	8,000			
	Sub-Total			8,000			
Old Wilson	Door and window replacement	1460	10 units	19,135			
	Sub-Total			19,135			
Catara Trace	Door replacement	1460	23 units	10,000			
	Sub-Total			10,000			
	Total Project KY004000003			171,135			

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KY004000004				318,749			
Comie Griffith	Window repair & brick sealing	1460	183 units	268,749			
	Energy management system replacement	1460	183 units	50,000			
	Sub-Total			318,749			
	Total Project KY004000004			318,739			
KY004000006				10,530			
Homeownership	Paint exterior trim	1460	17 units	10,530			
	Sub-Total			10,530			
	Total Project KY004000006			10,530			
KY004000008				12,442			
Sugar Mill	Paint exterior siding, rails, and doors	1460	46 units	12,442			
	Sub-Total			12,442			
	Total Project KY004000008			12,442			
KY004000010				37,918			
Bluegrass Apartments (The Shropshire)	Restrip & seal parking lot	1450	32 units	5,918			
	Mold remediation	1460	32 units	8,000			
	Dumpster & dumpster enclosure replacement	1450	32 units	16,000			
	Repair structural damage	1460	4 units	8,000			
	Total Project KY004000010			37,918			
KY004000011				9,567			
Bluegrass Phase II	Dumpster & dumpster enclosure replacement	1450	24 units	6,567			
	Restrip & seal parking lot	1450	24 units	3,000			
	Total Project KY004000011			9,567			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part I: Summary				Expires: 8/31/2017	
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY3AP06456(14) Replacement Housing Project Grant No: Date of CFFP:		FFY of Grant: 2014 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02/29/2017 <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Total Estimated Cost Revised*	Obligated	Total Actual Cost * Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) *		271,695	271,695	271,695
3	1408 Management Improvements		244,525	244,525	244,525
4	1410 Administration (may not exceed 10% of line 21)		135,847	135,847	135,847
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs		30,000	30,000	30,000
8	1440 Site Acquisition				
9	1450 Site Improvement		194,290		
10	1460 Dwelling Structures		482,120	482,120	314,098.96
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities *				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHE funds shall be included here.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 08/31/2011

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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 08/31/2011

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages			Grant Type and Number		Federal FFY of Grant: 2014			
PHA Name: Lexington-Fayette Urban County Housing Authority			Capital Fund Program Grant No: KY36P00450114					
			CEFP (Yes/ No):					
			Replacement Housing Factor Grant No:					
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
KY004000001								
Allante Brook	Tree trimming	1450	32 units	6757				
	Sub-Total			6757				
Appian Hills	Fence removal & replacement	1450	44 units	24,000				
	Retaining wall & landscape replacement	1450	44 units	60,000				
	Sub-Total			84,000				
Circle at Bainbridge	Tree trimming	1450	48 units	6758				
	Sub-Total			6758				
Camelot	Tree trimming	1450	36 units	6758				
	Sub-Total			6758				
Scattered Single-Family Housing	Roof & gutter replacement	1460	5 units	30,800				
	Siding & soffit replacement	1460	2 units	4320				
	Door & window replacement	1460	6 units	24,960				
	Sub-Total			60,080				
	Total Project KY004000001			164,353				
KY004000002								
Heartsbrook	Replace storm doors	1460	34 units	39,440				
	Vinyl wrap exterior doors	1460	34 units	12,240				
	Sub-Total			51,680				
Rogers Road	Back porch railing repair/replacement	1460	10 units	16,600				
	Sub-Total			16,600				
Rosemary	Replace storm doors	1460	26 units	30,160				
	Vinyl wrap exterior doors	1460	26 units	9360				
	Sub-Total			39,520				

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	Total Project KY004000002			107,800				
KY004000004								
Connie Griffith	Security Camera Upgrade	1408	183 units	108,678		28,306		
	Sub-Total			108,678				
	Total Project KY004000004			108,678				
KY004000007								
12 th Street	Door replacement: bldg. exterior & apartment entrance	1460	40 units	50,400				
	Fence repair & replacement	1450	40 units	15,822				
	Sub-Total			66,222				
	Total Project KY004000007			66,222				
KY004000009								
Russell Cave	Roof & gutter repair over doors	1460	26 units	43,160				
	Trim trees	1450	26 units	15,000				
	Fence repair/replacement	1450	26 units	10,000				
	Sub-Total			68,160				
	Total Project KY004000009			68,160				
KY004000003								
Atiya Place	Bathroom-cabinet & vanity top replacement	1460	18 units	5380				
	Kitchen-cabinet & counter top replacement	1460	18 units	5380				
	Roof & gutter replacement	1460	18 units	72,880				
	Dead trees removal	1450	18 units	2000				
	Perimeter fencing replacement	1450	18 units	8105				
	Sub-Total			93,745				
Catera Trace	Retention Basin Gates-gate, poles & railing repair/replacement	1450	23 units	900				
	Unit fencing-gate, poles, & rail replacement	1450	23 units	900				
	Privacy fence repair/replacement	1450	23 units	1200				
	Sub-Total			3000				

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Scattered Single-family housing	Roof & gutter replacement	1460	13 units	57,080				
	Doors & windows replacement	1460	8 units	54,980				
	Bathroom-cabinet & vanity top replacement	1460	13 units	9580				
	Kitchen-cabinet & counter top replacement	1460	13 units	9580				
	Tree & shrubbery replacement	1450	8 units	6300				
	Sub-Total			137,520				
	Total Project KY004000003			234,265				
KY004000010								
Bluegrass Apartments (The Shropshire)	Perimeter Fencing Replacement	1450	32 units	8105				
	Total Project KY004000010			8105				
KY004000015								
Bridlewood Apartments	Perimeter Fencing Replacement	1450	88 units	8105				
	Paver repair & restriping	1450	88 units	11,225				
	Dumpster pad repair	1450	88 units	3775				
	Total Project KY004000015			23,105				
KY004000033								
Grand Oaks	Perimeter Fencing Replacement	1450	88 units	800				
	Large Tree removal	1450	88 units	3600				
	Total Project KY004000033			4400				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 08/31/2011

Part III: Implementation Schedule for Capital Fund Financing Program					Federal FFY of Grant: 2014
PHA Name: Lexington-Fayette Urban County Housing Authority					
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406 LHA Wide - Operations	06/2016	06/2016	06/2018	06/2016	
1408 Mgmt Improvements	06/2016	06/2016	06/2018	06/2016	
1410 Administration	06/2016	06/2015	06/2018	06/2015	
1430 Fees & Costs	06/2016	06/2016	06/2018		
1450 Site Improvements	06/2016	06/2016	06/2018		
1460 Dwelling Structures	06/2016	06/2016	06/2018		

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450115 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2015 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02/28/17 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Total Estimated Cost Revised ¹	Obligated	Total Actual Cost ² Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration		1,070,421	250,775.28	229,674.10
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

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⁴ RHF funds shall be included here.

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450115 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2015 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02/28/17 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Total Estimated Cost Revised ¹	Obligated	Total Actual Cost ² Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)		1,070,421	250,775.28	229,674.10
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date	Signature of Public Housing Director		Date

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KY004000002								
Pine Valley	Fencing Replacement	1450	32 units	15,000				
	Storm Door Replacement	1460	32 units	48,000				
	Sub-Total			63,000				
Rogers Manor	Retaining wall repair	1450	10 units	2,500				
	Sub-Total			2,500				
McCullough Drive	Retaining wall repair	1450	14 units	2,500				
	Sub-Total			2,500				
Rosemary	Window replacement	1460	26 units	53,910				
	Sub-Total			53,910				
Scattered Single-Family Housing	Driveway replacement	1450	1 unit	10,000				
	Kitchen cabinet replacement	1460	2 units	10,000				
	Sub-Total			20,000				
	Total Project KY004000002			141,910				
KY004000003								
Scattered Single-Family Housing	Driveway/apron/sidewalk repair/replacement	1450	14 units	14,800				
	Porch replacement; exterior painting; interior flooring replacement	1460	14 units	57,725				
	Total Project KY004000003			72,525				
KY004000004								
Connie Griffith	Energy Management System Replacement	1460	183 units	15,000				
	Total Project KY004000004			15,000				

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KY004000010								
Bluegrass Apartments	Hot water tank replacement	1460	32 units	19,231				
	Total Project KY004000010			19,231				
KY004000013								
Bluegrass Phase III	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	24 units	12,500				
	Total Project KY004000013			12,500				
KY004000015								
Brdlewood Apts.	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	56 units	32,500				
	Total Project KY004000015			32,500				
KY004000033								
Grand Oaks Apts.	Multifamily Buildings exterior entrance doors, door locks, & security software repair/replacement/upgrade	1460	60 units	50,000				
	Total Project KY004000033			50,000				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No.: KY36/P00450116 Replacement Housing Factor Grant No.: Date of CFFP:		FFY of Grant: 2016 FFY of Grant Approval:	

Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02/28/17		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
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Line	Summary by Development Account	Original	Total Estimated Cost	Revised ²	Obligated	Total Actual Cost ³	Expended
1	Total non-CFF Funds						
2	1406 Operations (may not exceed 20% of line 21) *						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration		1,114,747				
16	1495.1 Relocation Costs						
17	1499 Development Activities *						

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part I: Summary					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No.: KY36P00450116 Replacement Housing Factor Grant No.: Date of CFFP:		FFY of Grant: 2016 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 02/28/17 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁴	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 5% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,114,747			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grants for operations.
⁴ RHP funds shall be included here.

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form HUD-50075.1 (07/2014)

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part II: Supporting Pages					
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No.: KY36P00450116 CFFP (Yes/No): Replacement Housing Factor Grant No.:		Federal FFY of Grant: 2016	
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost	Total Actual Cost
				Original	Revised ¹
				Funds Obligated²	Funds Expended²
PHA-Wide	Operations	1406		222,949	
PHA-Wide	Management Improvements	1408		156,064	
PHA-Wide	Administration CF Program Fee	1410		111,474	
PHA-Wide	Fees and Costs A & E Fees	1430		111,474	
PHA-Wide	Site Improvement	1450		60,219	
PHA-Wide	Dwelling Structures	1460		435,432	
PHA-Wide	Non-dwelling Equipment	1475		17,135	

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

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Part II: Supporting Pages								
PHA Name: Lexington-Fayette Urban County Housing Authority		Grant Type and Number Capital Fund Program Grant No: KY36P00450116 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2016			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
KY004000001								
Allante Brook	Doors, storm doors, & window replacement	1460	32 units	42,070				
	Sub-Total			42,070				
Camelot	Doors, storm doors, & window replacement	1460	36 units	42,070				
	Sub-Total			42,070				
	Total Project KY004000001			84,140				
KY004000002								
Pine Valley	Fencing Replacement	1450	32 units	15,000				
	Storm Door Replacement	1460	32 units	32,000				
	Tub enclosure replacement	1460	32 units	38,400				
	Sub-Total			85,400				
Heartsbrook	Storm Door Replacement	1460	36 units	28,800				
	Sub-Total			28,800				
Rogers Manor	Steps tread replacement & seal wooden steps	1460	10 units	4,000				
	Sub-Total			4,000				
McCullough Drive	Steps tread replacement & seal wooden steps	1460	14 units	4,500				
	Sub-Total			4,500				
Rosemary	Storm door replacement	1460	26 units	22,400				
	Sub-Total			22,400				
	Total Project KY004000002			145,100				

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KY004000003								
Atiya	Tubs, surround, vanity replacement and plumbing upgrades	1460	18 units	7,264				
Constitution	Tubs, surround, vanity replacement and plumbing upgrades	1460	17 units	6,862				
Old Wilson	Window repair/replacement/upgrade	1460	10 units	9,091				
	Tubs, surround, vanity replacement and plumbing upgrades	1460	10 units	4,036				
Catera Trace	Window repair/replacement/upgrade	1460	34 units	30,909				
Single Family	Tubs, surround, vanity replacement and plumbing upgrades	1460	14 units	5,653				
	Total Project KY004000003			63,815				
KY004000004								
Connie Griffith	Energy Management Control System Replacement	1460	183 units	25,517				
	Total Project KY004000004			25,517				
KY004000007								
Homownership	Building exterior painting	1460	40 units	18,698				
	Repair/replace concrete steps & porches; exterior entrance doors, door locks, hardware repair/replace/upgrade; metal stairway repair/replace	1460	40 units	8,000				
	Total Project KY004000007			26,698				
KY004000008								
Sugar Mill Apts.	Building exterior painting	1460	46 units	21,502				
	Total Project KY004000008			21,502				
KY004000010								
Bluegrass Apartments	Brick dumpster enclosures	1450	32 units	8,000				
	Building exterior painting	1460	32 units	8,000				
	Deck/balcony repair/replacement	1460	4 units	6,958				
	Power Lift	1475	32 units	1,878				
	Total Project KY004000010			24,836				
KY004000011								
Bluegrass Phase II	Exterior perimeter fencing	1450	24 units	11,219				
	Power Lift	1475	24 units	1,408				
	Total Project KY004000011			12,627				

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APPENDIX A – HARDSHIP POLICY

This policy is applicable to LHA housing programs excluding the HCV Rent Reform Study and MTW Activity 17.

A Hardship Review Committee will be created to review individual cases of significant rent burdens or rent increases for families. Residents can request a Hardship Waiver Request form from their housing management office. The Hardship Review Committee will review hardship requests on a case-by-case basis.

The hardship committee will consist of at least two people one of which must be a senior LHA public housing or housing choice voucher management staff member.

In order to qualify for a hardship exemption, the household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:

- The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
- A death has occurred in the family which eliminates a prior source of income; or
- Other circumstances determined to warrant an exemption by the LHA.

The qualifying financial hardship must be long-term (a minimum of 4 months) and will set the household's Total Tenant Payment (TTP) at 30 percent of current income, but no lower than the minimum rent for up to six (6) months.

Until the request for a hardship exemption is reviewed and approved by the LHA Hardship Review Committee, the participating household is expected to continue to pay its portion of the rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination/eviction.

The Hardship Review Committee will send decisions to the housing manager within five (5) business days of receiving verification of all necessary information, such as income, social security benefits, etc., associated with the hardship request.

If the resident disagrees with the Hardship Review Committee's decision they can request a grievance hearing. The LHA will take no action to change a resident's rent in cases where a grievance hearing has been requested until such time as the grievance process has concluded.

If the resident is approved for a hardship and the hardship expires, the resident can re-apply as needed. There is no limit on the number of hardship requests that can be made.

The Hardship Review Committee will consist of at least two people. One of whom will be a member of LHA's senior staff. Public Housing management teams or HCV management will not review hardship requests submitted for tenants that report to their management team or HCV office.

APPENDIX B – HARDSHIP POLICY (ACTIVITY 17)

Hardship Policy for Interim Re-examinations

The LHA will adopt a policy that may limit the ability of a participating family to request an interim re-examination between normally scheduled annual re-examinations. This restriction applies to all households who are not defined as elderly or disabled households. However, a household will be exempted from the limit of one rent decrease each year if it qualifies for a hardship exemption. To be considered for a hardship exemption the participant household must demonstrate that it is experiencing a financial hardship due to an unexpected or unprecedented economic burden on the family.

At any time between required annual re-examinations and after one interim reduction in rent, a family residing in public housing may submit a written request for an exemption to the interim rent reduction policy. A household must meet the following requirements in order to receive a hardship exemption; all cases will be reviewed on a case-by-case basis:

1. The participant household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:
 - The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
 - A death has occurred in the family which eliminates a prior source of income; or
 - Other circumstances determined to warrant an exemption by the LHA.
2. The qualifying financial hardship must be long-term (a minimum of 4 months).
3. Allowing an additional interim re-examination beyond the normal one-per-year option could lower the household's rent (but only as low as the \$150 minimum rent) for up to 6 months.
4. Setting the household's rent at the minimum level for up to 6 months.
5. Setting the household's TTP at 30 percent of current income (but no lower than the \$150 minimum rent), for up to 6 months.

Until the request for a hardship exemption is reviewed and approved by the LHA the participating household is expected to continue to pay its portion of rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination.

APPENDIX C – LHA GRIEVANCE PROCEDURE

1. RIGHT TO A HEARING

- a. The Lexington Housing Authority Grievance Procedure shall be applicable (except as provided in Section (b), (c) and (d) of this section) to all individual grievances as defined in Section 2 between the Leaseholder/Resident and the Lexington Housing Authority including grievances regarding accessibility and reasonable accommodation unless otherwise excluded herein.
- b. The Department of Housing and Urban Development has issued a due process determination for Lexington. This excludes from the LHA administrative grievance procedure under this subpart any grievance concerning a termination of tenancy or eviction that involves: (a) any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the LHA, or (b) any drug-related criminal activity on or off such premises.
- c. Since HUD has issued a due process determination, the LHA will evict the occupants of the dwelling unit through the judicial eviction procedures which are the subject of the determination and the LHA is not required to provide the opportunity for a hearing under the LHA's administrative grievance procedure.
- d. The LHA grievance procedure shall not be applicable to disputes between tenants not involving the LHA or to class grievances. The grievance procedure is not intended as a forum for initiating or negotiating policy changes between a group or groups of tenants and the LHA's board of Commissioners.

2. DEFINITIONS

The following definitions are applicable:

- a. *Grievance* shall mean any dispute which a tenant may have with respect to LHA action or failure to act in accordance with the individual Leaseholder's lease or LHA regulations which adversely affect the individual Leaseholder/Resident's rights, duties, welfare or status.
- b. *Complainant* shall mean any Leaseholder whose grievance is presented to the LHA or at the management office in accordance with Sections 3 and 4.
- c. *Elements of due process* shall mean an eviction action or a termination of tenancy in a State or local court in which the following procedural safeguards are required:

1. Adequate notice to the Leaseholder of the grounds for terminating the tenancy and for eviction;
 2. Right of the Leaseholder to be represented by counsel;
 3. Opportunity for the Leaseholder to refute the evidence presented by the LHA including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the Leaseholder may have;
 4. A decision on the merits.
- d. *Hearing officer* shall mean a person selected in accordance with Section 4(b) to hear grievances and render a decision with respect thereto.
- e. *Hearing panel* shall mean a panel selected in accordance with Section 4(b) to hear grievances and render a decision with respect thereto.
- f. *Leaseholder* shall mean the adult person (or persons) (other than a live-in aid or co-Leaseholder residing in the unit under the “stable family” definition):
1. Who resides in the unit, and who executed the lease with the LHA as lessee of the dwelling unit, or, if no such person now resides in the unit;
 2. Who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit.
- g. *Resident organization* includes a resident management corporation.

3. INFORMAL SETTLEMENT OF GRIEVANCE

Any grievance shall be personally presented, either orally or in writing, to the LHA office or to the management office of the community in which the complainant resides so that the grievance may be discussed informally and settled without a hearing. A summary of such discussion shall be prepared within a reasonable time and one copy shall be given to the Leaseholder and one retained in the LHA’s resident file. This summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons thereof, and shall specify the procedures by which a hearing under Section 4 may be obtained if the complainant is not satisfied.

4. PROCEDURE TO OBTAIN A HEARING

- a. **Request for hearing.** The complainant shall submit a written request for a hearing to the LHA or to the management office within ten (10) days after receipt of the summary of discussions pursuant to Paragraph 3. The written request shall specify:
 1. The reasons for the grievance; and
 2. The action or relief sought
- b. **Selection of Hearing Officer or Hearing Panel.** In cases where Leaseholders request a formal hearing under the Grievance Procedure for any reason, the selection of the hearing officer will be made by the Executive Director. The Executive Director may choose one person or a panel of up to 3 persons. The Executive Director is not prohibited from selecting himself as the hearing officer provided that he was not the person who made or approved the public housing authority action.
- c. **Failure to Request a Hearing.** If the complainant does not request a hearing in accordance with this paragraph, then the LHA's disposition of the grievance under Section 3 shall become final: *Provided*, that failure to request a hearing shall not constitute a waiver by the complainant of his right, thereafter to contest the LHA's action in disposing of the complaint in an appropriate judicial proceeding.
- d. **Hearing Prerequisite.** All grievances shall be personally presented either orally or in writing pursuant to the informal procedure prescribed in Paragraph 3 as a condition precedent to a hearing under this section: *Provided*, that if the complainant shall show good cause why he failed to proceed in accordance with Paragraph 3 to the hearing officer or hearing panel, the provisions of this subsection may be waived by the hearing officer or hearing panel.
- e. **Escrow Deposit.** Before a hearing is scheduled in any grievance involving the amount of rent the LHA claims is due, the complainant shall pay the LHA an amount equal to the amount of the rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The complainant shall thereafter deposit the same amount of the monthly rent in an escrow account monthly until the complaint is resolved by decision of the hearing officer or hearing panel. These requirements may be waived by the LHA in extenuating circumstances. Unless so waived, the failure to make such payments shall result in a termination of the grievance procedure: *Provided*, that failure to make payment shall not constitute a waiver of any right the complainant may have to contest the LHA's disposition of his grievance in any appropriate judicial proceeding.

- f. **Scheduling of Hearings.** Upon complainant's compliance with paragraphs (a), (d) and (e) of this section, a hearing shall be scheduled by the hearing officer or hearing panel promptly for a time and place reasonably convenient to both the complainant and the LHA. A written notification specifying the time, place and the procedures governing the hearing shall be delivered to the complainant and the appropriate LHA official.

5. PROCEDURES GOVERNING THE HEARING

- a. The hearing shall be held before a hearing officer or hearing panel as appropriate.
- b. The complainant shall be afforded a fair hearing, which shall include:
1. The opportunity to examine before the grievance hearing any LHA documents including records and regulations, that are directly relevant to the hearing. The Leaseholder shall be allowed to copy any such document at the Leaseholder's expense. If the LHA does not make the document available for examination upon request by the complainant, the LHA may not rely on such document at the grievance hearing.
 2. The right to be represented by the counsel or other person chosen as the Leaseholder's representative, and to have such person make statements on the Leaseholder's behalf.
 3. The right to a private hearing unless the complainant requests a public hearing.
 4. The right to present evidence and arguments in support of the Leaseholder's complaint, to controvert evidence relied on by the LHA management, and to confront and cross-examine all witnesses upon whose testimony or information the LHA management relies; and
 5. A decision based solely and exclusively upon the facts presented at the hearing.
- c. The hearing officer or hearing panel may render a decision without proceeding with the hearing if the hearing officer or hearing panel determines that the issue has been previously decided in another proceeding.
- d. If the complainant or the LHA fails to appear at a scheduled hearing, the hearing officer or hearing panel may make a determination to postpone the hearing for not to exceed five business days or make a determination that the party has waived his right to a hearing. Both the complainant and the LHA shall be notified of the determination by the hearing officer or hearing panel: *Provided*, that a determination that the complainant has waived his right to a hearing shall not

constitute a waiver or any right the complainant may have to contest the LHA's disposition of the grievance in an appropriate judicial proceeding.

- e. At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the LHA must sustain the burden of justifying the LHA action or failure to act against which the complaint is directed.
- f. The hearing shall be conducted informally by the hearing officer or hearing panel and oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings. The hearing officer or hearing panel shall require the LHA, the complainant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer or hearing panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.
- g. The complainant or the LHA may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.
- h. Accommodation of persons with disabilities.
 - 1. The LHA must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.
 - 2. If the tenant is visually impaired, any notice to the tenant which is required under this subpart must be in an accessible format.

6. **DECISION OF THE HEARING OFFICER OR HEARING PANEL**

- a. The hearing officer or hearing panel shall prepare a written decision, together with the reasons thereof, within a reasonable time after the hearing. A copy of the decision shall be sent to the complainant and the LHA. The LHA shall retain a copy of the decision in the Leaseholder's folder. A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by the LHA and made available for inspection by a prospective complainant, his representative, or the hearing panel.
- b. The decision of the hearing officer or hearing panel shall be binding on the LHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the LHA Board of Commissioners

determines within a reasonable time, and promptly notifies the complainant of its determination, that

1. The grievance does not concern LHA action or failure to act in accordance with or involving the complainant's lease or LHA regulations, which adversely affect the complainant's rights, duties, welfare or status;
 2. The decision of the hearing officer or hearing panel is contrary to applicable Federal, State or local law, HUD regulations or requirements of the annual contributions contract between HUD and the LHA.
- c. A decision by the hearing officer, hearing panel, or Board of Commissioners in favor of the LHA or which denies the relief requested by the complainant in whole or in part shall not constitute a waiver of, nor affect in any manner whatever, any rights the complainant may have to trial *de nova* or judicial proceedings, which may thereafter be brought in the matter.

7. LHA EVICTION ACTIONS

If a tenant has requested a hearing in accordance with Paragraph 4 on a complaint involving a LHA Notice of Termination of Tenancy and, the hearing officer or hearing panel upholds the LHA's action to terminate the tenancy, the LHA shall not commence an eviction action in a State or local court until it has served a notice to vacate on the tenant, and in no event shall the notice to vacate be issued prior to the decision of the hearing officer or the hearing panel having been mailed or delivered to the complainant. Such notice to vacate must be in writing and specify that if the tenant fails to quit the premises within the applicable statutory period, or on the termination date stated in the notice of termination, whichever is later, appropriate action will be brought against him or her and he or she may be required to pay court costs and attorney fees.