

FY2018 MOVING TO WORK ANNUAL REPORT

Lexington-Fayette Urban County Housing Authority



Submitted December 21, 2018

Lexington, Kentucky

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SECTION I.

INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (LHA) is pleased to present this annual report that marks the completion of seven (7) years as a Moving to Work (MTW) agency. During FY2108 the LHA provided housing to approximately 4,500 households through our housing programs. The LHA is pleased to provide affordable housing opportunities in Lexington with the flexibility the Demonstration provides.

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

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

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

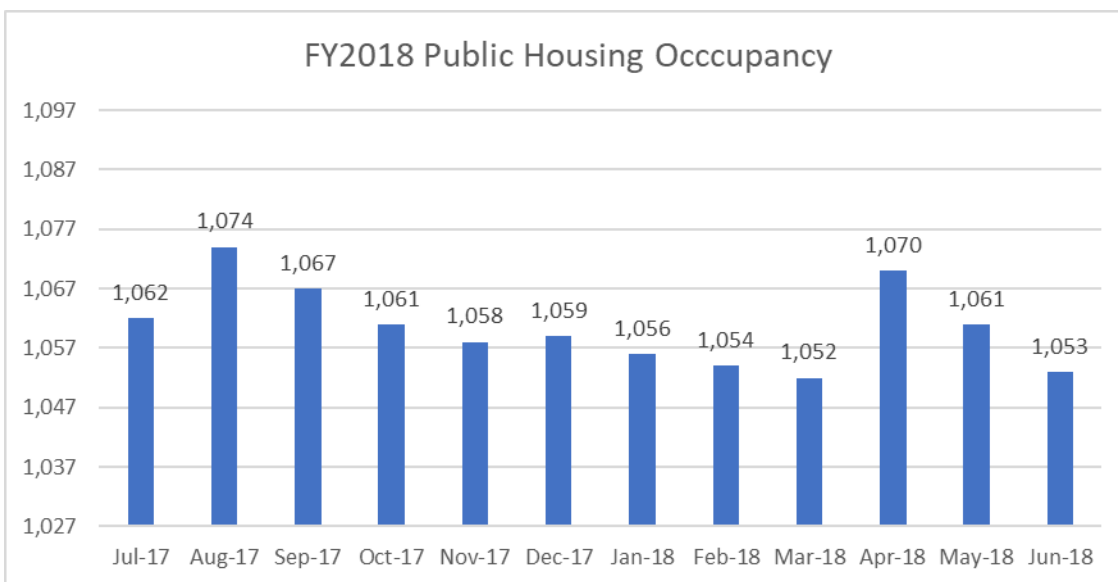
*Serve as a prudent financial steward of federal, state and local resources,
endeavoring to more effectively provide safe and desirable affordable housing,
while furthering the self-sufficiency of families within Lexington-Fayette County.*

SHORT TERM GOALS

Public Housing Occupancy

Public Housing Occupancy did not fall below 96% during FY2018. At the close of FY2017 public housing occupancy was 98% (1,064 occupied units). Occupancy continues to be a priority concern and LHA staff has made significant improvements in occupancy from an 89% occupancy rate in November of 2016 (972 occupied units). From that low point in November 2016, occupancy numbers have steadily climbed. The chart below demonstrates the LHA's occupancy rates over a 12-month period.

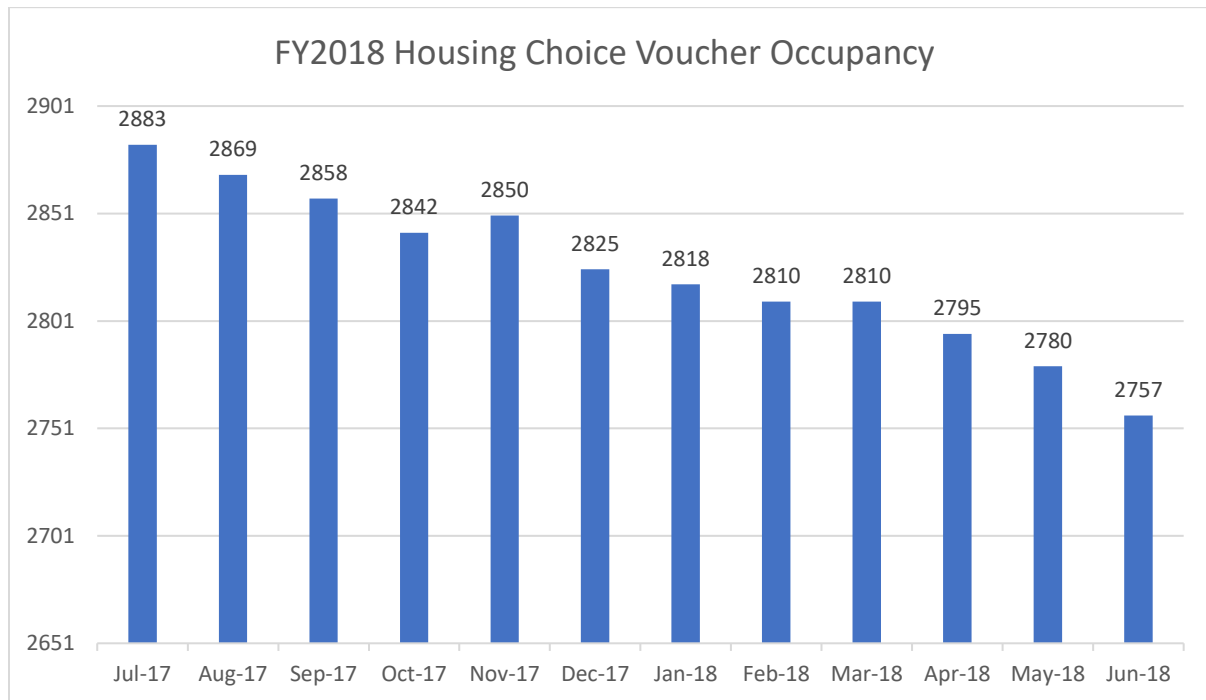
The LHA continues to develop strategies to address occupancy issues that will include monitoring the waiting list to determine when purging or opening/closing is necessary. The LHA's 1,097 units of public housing stock are divided among three management teams. Each team is challenged with issues of maintaining 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.



Data from HUD Portfolio Risk Management Tool

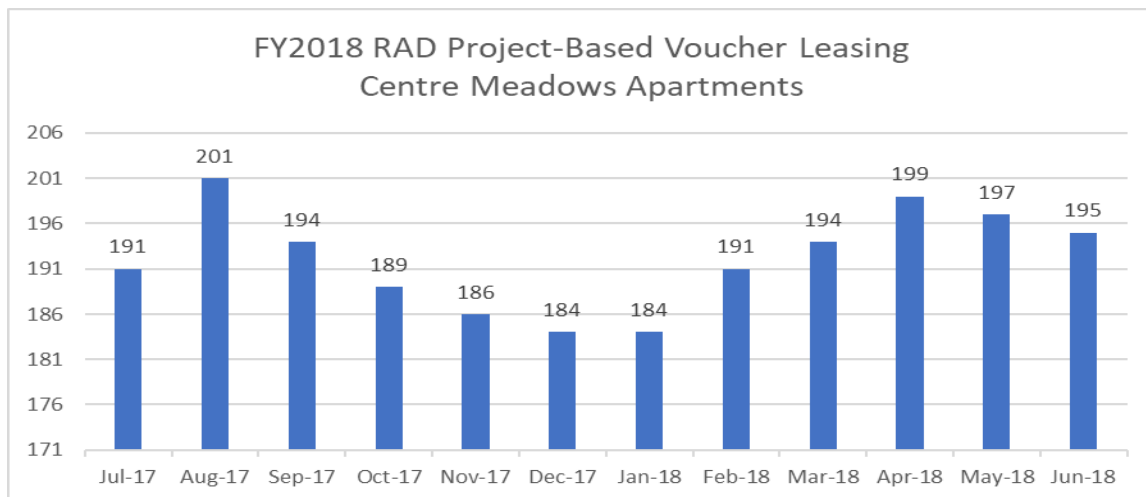
Housing Choice Voucher Leasing

The popular rental assistance program had a 104% lease up rate of 2,757 on June 30, 2017 compared to the baseline of 2,651. Throughout the year the HCV program maintained a lease up rate above 100% or better. In early 2018 the HCV waiting list had fallen to less than one-hundred. The HCV waiting list was open for five days in March 2018 and approximately 3,500 applications were received. During the fiscal year the HCV program averaged \$1,557,168 per month for Housing Assistance Payments (HAP). See the leasing results for FY2018 in the following chart.



Rental Assistance Demonstration (RAD) Centre Meadows Occupancy – HCV Project-Based Vouchers (PBV)

The LHA's only RAD PBV site, Centre Meadows (formerly Pimlico) was converted from public housing to PBV in 2014 with a total renovation of the site. Lease-up of the renovated site began in late 2015. Occupancy at the site near the end of FY2018 was at 95%. As shown on the table below, occupancy at Centre Meadows dipped below 90% in December 2017 and January 2018. As with other LHA housing programs, staff continues to monitor and open/close the waiting list as necessary throughout the year.



Voluntary Conversion for Connie Griffith Tower

During FY2018 the LHA has made application for HUD's Voluntary Conversion of Connie Griffith Tower, the LHA's elderly (for ages 62 and over) high-rise, that needs complete rehabilitation. Conversion in this context means the removal of developments from public housing Annual Contributions Contracts, and the provision of tenant-based or project-based assistance, and/or relocation to comparable housing, for residents.

Voluntary conversion may be undertaken only where it would be beneficial to the residents of the development being removed from public housing and temporarily relocated to the surrounding area, and where it would not have an adverse impact on the availability of affordable housing in the area. Further, conversions are permitted only if they are cost-effective. The Voluntary Conversion requires a cost methodology that PHAs must use to compare the cost of continuing to operate developments as public housing to the cost of providing tenant-based assistance.

Redevelopment of Ballard Tower

The Lexington-Fayette Urban County Housing Authority (LHA) will be undertaking the redevelopment of Ballard Apartments using a 2018, 9% Low-Income Housing Tax Credit (LIHTC) award. LHA was awarded an allocation of \$1,000,000.00 of 2018 9% LIHTC's by the Kentucky Housing Corporation (KHC) for Ballard Apartments. Ballard Tower is a non-MTW site.

Ballard Tower is an 8-story, 134 1-bedroom apartment unit affordable housing development serving seniors 62 years and older located in downtown Lexington, Kentucky that will be undergoing a \$10 million redevelopment. The redevelopment of Ballard apartments is scheduled to begin by January of 2019 and will be completed in 3 – 4 phases consisting of 2 or 3 vacant floors at a time. Each redevelopment phase should be completed in less than 6 months, with the overall Ballard redevelopment scheduled to be completed by June of 2020.

A collaborative process involving input from LHA staff, Ballard residents and architects will take place prior to redevelopment of Ballard. The renovated common areas and apartments will have aesthetically pleasing and functional features and finishes that will complement one another. Installation of energy efficient low-e glass windows, energy efficient HVAC systems, energy star appliances will result in utility savings. Another key sustainable effort will be the replacement of hundreds of inefficient incandescent and fluorescent light fixtures with highly efficient and long-lasting LED light fixtures throughout the common areas.

The adjacent Connie Griffith Tower will be the primary site where current Ballard residents will be relocated while their apartments in Ballard are undergoing renovations. The LHA will coordinate and pay for all expenses associated with moving the Ballard residents, including contracting with professional movers to pack and unpack resident's belongings prior to and after relocation.

Glen Arvin Townhomes Redevelopment

The LHA's non-profit entity Lexington Home Ownership Commission (LHOC) began the development of the Glen Arvin Townhomes project located at 366 and 370 Glen Arvin Avenue in September of 2017 and is scheduled for completion in October of 2018. This development of eleven (11) units of affordable housing is composed of seven one-bedroom and four two-bedroom units and off-street parking that will be maintained within the LHOC's portfolio for utilization by eligible clients of the LHOC and the Lexington Housing Authority (LHA). Provision for affordable housing continues to be an important goal of LHOC, LHA and the community at large. This medium-density land use development strikes a balance of offering a number of affordable housing units without negatively impacting the site or neighborhood that can result from some high-density developments. This strategically planned infill redevelopment will expand affordable and accessible housing choices within the community to meet the needs of all citizens, including those who are older and/or disadvantaged.

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; since entering the program in 2011, the LHA has sought and received HUD approval to implement 21 MTW activities of which 16 are underway or on hold until needed. Below is a chart summarizing the LHA's MTW activities. The numbers in the statutory objective column of the table on the next page correspond with the numbered descriptions.

Statutory Objectives

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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Implemented agency-wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Ongoing	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 Significantly Modified	Implemented FY2015 w/ Emphasys Elite Software	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013	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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
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	Ongoing	1, 2 & 3
23	Activity 23: Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/Controlled Properties	FY2018	Ongoing	1

SECTION II.

GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
N/A	0	0	N/A	No	N/A
	0	0	Planned/Actual Total Vouchers Newly Project-Based		

* Figures in the "Planned" column should match the corresponding Annual MTW Plan.

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

Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:
Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

N/A

ii. Actual Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Centre Meadows	206	206	Leased/Issued	Yes	Family site of one, two and three-bedroom units
	#	#	Planned/Actual Total Existing Project-Based Vouchers		

* Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

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

Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:

N/A

iii. **Actual Other Changes to MTW Housing Stock in the Plan Year**

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR
The LHA has applied for voluntary conversion of Connie Griffith Tower. The 183-unit elderly high-rise is in need of complete rehabilitation. In addition, a non-MTW site, Ballard Towers, that is situated adjacent to Connie Griffith Tower will undergo rehab during FY2019 and units are being held at Connie Griffith Towers to accommodate relocated Ballard residents.

iv. **General Description of All Actual Capital Expenditures During the Plan Year**

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

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR
KY004 PHA-Wide Management Improvements \$101,808 KY004000001 Sidewalk Water Leak Repair \$17,807 KY004000002 Fencing Repair \$4657 KY004000003 Fencing Repair/Replacement \$16,878 KY004000004 Call System, Cameras, Window & Unit Water Remediation, Fencing Repair \$114,443 KY004000010 Parking Lot Repair, Fencing Replacement \$55,447 KY004000011 Parking Lot Repair, Fencing Replacement \$42,673 KY004000012 Parking Lot Repair \$6203

B. LEASING INFORMATION

i. **Actual Number of Households Served**

Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	1042	1053	12504	12636
MTW Housing Choice Vouchers (HCV) Utilized	2062	2757	24744	33084
Local, Non-Traditional: Tenant-Based	388	582	4656	6984
Local, Non-Traditional: Property-Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
Planned/Actual Totals	3492	4392	41904	52704

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

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

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

Please describe any differences between the planned and actual households served:

The LHA leased units at 103% of baseline during FY2018. The HCV program units occupied rate was 133% of planned.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned^^	Actual	Planned^^	Actual
Tenant-Based	Local, Non-Traditional Uses of MTW Funds for Special Partners/Activity 12	388	582	4656	6984
Property-Based	Name/#	0	0	0	0
Homeownership	Name/#	0	0	0	0
		388	582	4656	6984

Planned/Actual Totals

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

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	0	0

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	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.
MTW Housing Choice Voucher	The LHA's HCV program continued to serve households above baseline during FY2018.
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Public Housing	Regional/Site-Based	2115	Open	Yes
Housing Choice Voucher	Community-Wide	3557	Closed	Yes
Project-Base Vouchers	Site-Based	607	Open	Yes

Please describe any duplication of applicants across waiting lists:

There is duplication across the public housing, HCV and PBV waiting lists.

ii. Actual Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Public Housing	Waiting List open May 14, 2018
Housing Choice Voucher	Waiting List open March 26 – 30, 2018
Project-Based Voucher (Centre Meadows)	Waiting List for 2-Bedrooms opened May 14, 2018 Waiting List for 2-Bedrooms closed July 31, 2017

D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. 75% of Families Assisted Are Very Low Income

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based"; "Local, Non-Traditional: Property-Based"; and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	582
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households Admitted	582

ii. Maintain Comparable Mix

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)					
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	421	818	0	1253	34%
2 Person	310	529	0	848	23%
3 Person	298	505	0	811	22%
4 Person	135	313	0	443	12%
5 Person	49	168	0	221	6%
6+ Person	24	72	0	111	3%
TOTAL	1237	2405	0	3687	100%

* "Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.

Please describe the justification for any "Non-MTW Adjustments" given above:

The baseline for public housing was adjusted 1, 036 and the baseline for the HCV program was adjusted to 2,651.

MIX OF FAMILY SIZES SERVED (in Plan Year)				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	34%	1126	29%	-5%
2 Person	23%	1010	26%	3%
3 Person	22%	815	21%	-1%
4 Person	12%	544	14%	2%
5 Person	6%	233	6%	0%
6+ Person	3%	155	4%	1%
TOTAL	100%	3883	100%	0%

** The "Baseline Mix Percentage" figures given in the "Mix of Family Sizes Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)" table.

^ The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.

^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

N/A

iii. **Number of Households Transitioned to Self-Sufficiency in the Plan Year**

Number of households, across MTW activities, that were transitioned to the MTW PHA's local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
Local Non-Traditional Uses of MTW Funds for Special Partners /#12	38	LHA defines self-sufficiency as any household with annual earned income of at least \$15,080 = \$7.25 (minimum wage) x 40 hours x 52 weeks
Increase Minimum Rent to \$150 Across All Housing Programs/#1	953	LHA defines self-sufficiency as any household with annual earned income of at least \$15,080 = \$7.25 (minimum wage) x 40 hours x 52 weeks
Local Self-Sufficiency Admissions and Occupancy Requirements /#13	465	LHA defines self-sufficiency as any household with annual earned income of at least \$15,080 = \$7.25 (minimum wage) x 40 hours x 52 weeks
	465	<i>(Households Duplicated Across MTW Activities)</i>
	991	Total Households Transitioned to Self-Sufficiency

* Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.

SECTION III.

PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

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

SECTION IV.

APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

A. IMPLEMENTED ACTIVITIES

Activity 1 – Increase Minimum Rent to \$150 Across All Housing Programs (Rent Reform)

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Impact/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.

Earned income among public housing households affected by the increased \$150 minimum rent showed steady minimal increases early on but more significant increases are demonstrated since 2016 with earned income averages rising above 50% of the 2013 baseline. The fact remains that the FY2018 average earned income of \$18,626 is equal to about \$8.96 per hour working full-time which is only \$1.71 more than the federal minimum wage of \$7.25 per hour.

Statistics on poverty from the U.S. Department of Health and Human Services (HHS) are sobering. HHS poverty guidelines for 2018 are shown below.

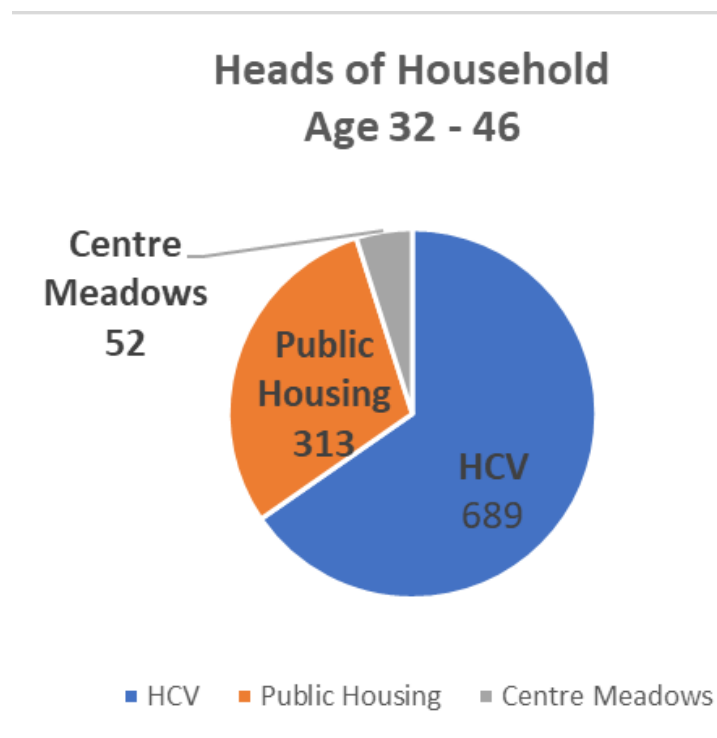
HHS Poverty Guidelines by Household Size ¹		LHA Households w/ Total Household Income Below the Poverty Line		
		Public Housing	HCV	Centre Meadows
1	\$12,140	40	300	12
2	\$16,460	99	97	61
3	\$20,780	132	241	23
4	\$24,100	96	217	15
5	\$29,420	61	85	6
6	\$33,740	12	45	3
7	\$38,060	2	11	0
8	\$42,380	3	7	0
TOTALS		445	1,003	120

¹ U.S. Dept. of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, statistics located at <https://aspe.hhs.gov/poverty-guidelines>

Across all programs affected by this policy 1,568 or 73% of households total household income falls below the poverty line². Data USA reports that Lexington-Fayette County has a median income of \$53,178. Data USA says 17.7% of the population for whom poverty status is determined in Lexington-Fayette, KY (54,232 out of 305,674 people) live below the poverty line, a number that is higher than the national average of 14%. The largest demographic living in poverty is Female 18-24, followed by Male 18-24 and then Female 25-34.³ The average LHA public housing tenant is female, 18-31 years old, Black and Non-Hispanic.

A review of 20 randomly selected households from each of LHA's affordable housing programs – public housing, HCV and PBV have been analyzed in the evaluation section of this report to show a clearer profile of households affected by the LHA's MTW activities.

In 2014 the U.S. Department of Labor Bureau of Labor Statistics offered a profile of the working poor with women being more likely than men to be among the working poor. In addition, Blacks and Hispanics continued to be more than twice as likely as Whites and Asians to be among the working poor.⁴ LHA's population trends with the national profile with 49% of households across all programs between the age of 32 – 46 earning less than \$20,000 annually.



² U.S. Dept. of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, statistics located at <https://aspe.hhs.gov/poverty-guidelines>

³ Data USA, statistics located at <https://datausa.io/profile/geo/lexington-fayette-ky/>

⁴ <https://www.bls.gov/opub/reports/working-poor/2014/home.htm>

Characteristics of the work-able households affected by the \$150 minimum rent:

Characteristics	LIPH	HCV	PBV (Centre Meadows)	Total
Households Affected	727	1,231	196	2,154
Female	660	1,138	181	1,979
Male	67	93	15	175
Black	607	1,006	163	1,776
White	118	221	32	371
American Indian/Alaska Native	0	1	0	1
Asian	1	2	1	4
Native Hawaiian/Pacific Islander	1	1	0	2
Hispanic	16	26	3	54
Non-Hispanic	711	1,205	193	2,582
Age 18-31	307	359	123	789
Age 32-46	313	689	52	1,054
Age 47- 61	107	183	21	311
Average Household Size	3	3.1	2.4	2.8

Households Leaving LHA Housing Programs

A total of 662 households moved from the public housing, housing choice voucher (HCV) and PBV programs. There are a number of reasons recorded for those who move from LHA jurisdiction, but the two most frequent reasons, regardless of housing program, are voluntary moves and eviction.

LIPH Move-Outs During FY2018

The three most frequent reasons for moveouts during FY2018 in the Public Housing program were transfer to other units, voluntary moveout and eviction writ served.

1 – No Reason/No Notice

2- Transfer

3 – Court Judgement

4 – Purchased House

5- Eviction Writ Served

6 – Voluntary Move

7 – Deceased

8 – Received Voucher

9 – To Avoid Court

10 – Non-Payment of Rent

11- Rent Increase

12 – 30 Day Notice to Move (no cure)

13 – 14/30 (Non-compliance of lease)

		Reason												
Reason	Total	1	2	3	4	5	6	7	8	9	10	11	12	13
LIPH	221	18	50	23	8	26	34	13	5	9	7	1	23	4

HCV/PBV Move-Outs During FY2018

The three most frequent reasons for moveouts in HCV were port-outs to other jurisdictions, voluntary termination and moving without LHA approval. PBV (Centre Meadows) three most frequent reasons for moveouts were non-compliance with lease/evicted, voluntary termination and moving without LHA approval.

- | | |
|--|---|
| <i>1 - EOP – Non-compliance with Lease/Evicted from Unit</i> | <i>8 - Failure to report true income</i> |
| <i>2 - Voucher Expired</i> | <i>9 - Household member engaged in criminal activity/drug/alcohol abuse</i> |
| <i>3 - Failure to Report true household composition</i> | <i>10 - Zero HAP for 6 months</i> |
| <i>4 - Failure to show for appointment</i> | <i>11 - Voluntarily Terminated</i> |
| <i>5 - Failure to Provide Information</i> | <i>12 - Moved without LHA approval</i> |
| <i>6 - Failure to Occupy Unit as Primary Residence</i> | <i>13 - Miscellaneous</i> |
| <i>7 - Failure to maintain utility service/appliances</i> | <i>14 - Failure to Allow Inspection</i> |
| | <i>15 - Deceased</i> |
| | <i>16 - Port Out</i> |

		Reason															
	TOTAL	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
HCV	411	33	31	10	14	7	9	8	1	9	32	69	58	20	5	24	81
PBV	30	14	0	0	2	2	0	0	0	0	1	8	3	0	0	0	0

FY2018 Hardship Requests

During FY2018 the LHA reports hardship requests in the following table. LHA housing managers reported the following hardship requests for FY2018:

Management Team	# of Hardship Requests	Approved	Denied
Team 1 Housing Manager	1	1	0
Team 2 Housing Manager	3	1	2
Team 3 Housing Manager	2	0	2
HCV Manager	10	8	2
TOTALS	16	10	6

Based on the total households served through the public housing and HCV programs, the number of hardships is di minimis. Public Housing and HCV hardships accounted for less than 1% of the work-able populations. Sixty-three per cent of all requests were approved. Fourteen or 88% of the 16 requests were due to loss of a job or a reduction in income. Two requests were due to medical reasons and both were approved.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

The LHA has determined that HUD Standard Metric CE #5 Rental Revenue for the HCV program has been reported previously as revenue when the LHA receives no revenue from rent payments, rent is paid to private landlords. We have determined that to show increases in revenue for HCV, the Housing Assistance Payments (HAP) should be analyzed and decreases in HAP would indicate that the LHA is paying less to the landlord for the HCV participant precipitating a savings. Therefore, going forward the metrics for HCV in CE #5 will track HAP and monthly per unit cost.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA has determined that HUD Standard Metric CE #5 Rental Revenue for the HCV program has been reported previously as revenue when the LHA receives no revenue from rent payments; rent is paid to private landlords. It has been determined that to show increases in revenue for HCV, the Housing Assistance Payments (HAP) should be analyzed and decreases in HAP would indicate that the LHA is paying less to the landlord for the HCV participant, precipitating a savings. Therefore, going forward the metrics for HCV in CE #5 will track HAP and monthly per unit cost.

HUD STANDARD METRICS

CE#5: INCREASE RENTAL REVENUE							
UNIT OF MEASURE: Average Gross Rental Revenue of non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (increase)							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	\$2,576,196 (\$1,612,512) Average Rental Revenue of 759 HHs	\$2,888,208 (\$2,017,152) Expected Rental Revenue of 699 HHs	\$3,490,820 (\$2,109,288) Actual Rental Revenue from 768 HHs	\$3,637,812 (\$2,676,180) Actual Rental Revenue of 728 HHs	\$3,671,868 (\$2,803,644) Actual Rental Revenue of 809 HHs	\$3,466,643 (\$2,769,132) Actual Rental Revenue of 727 HHs	YES
PBV (Centre Meadows)	\$392,399 (\$290,262) 158 HHs	\$672,684 (\$497,592) 165 HHs	N/A	N/A	\$615,588 (\$390,972) Actual Rental Revenue from 186 HHs	\$756,456 (\$520,772) Actual Rental Revenue from 196 HHs	YES
*HCV	\$6,423,672 HAP (\$348 MCPU) 1,540 HHs	\$6,661,080 HAP (\$381 MCPU) 1,458 HHs	\$7,007,724 HAP (\$441 MCPU) 1,325 HHs	\$7,514,400 HAP (\$483 MCPU) 1,296 HHs	\$10,034,004 HAP (\$536 MCPU) 1,561 HHs	\$7,504,176 HAP (\$508 MCPU) 1,231 HHs	NO
*LHA has re-evaluated the metric for HCV households affected by this policy and determined that a more accurate analysis can be achieved by tracking Annual Housing Assistance Payment (HAP) and monthly cost per unit (MCPU). Should this activity be a success for HCV participants the HAP/CPU paid should decrease, as HCV does not receive rental revenue. Previously gross/net and TTP were being analyzed.							

SS#1: INCREASE IN HOUSEHOLD INCOME							
UNIT OF MEASURE: Average Gross Annual Earned Income of non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (increase)							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	\$11,487 Average Earned Income of 759 HHs	\$12,857 Expected Average Earned Income of 699 HHs	\$17,209 Actual Average Earned Income of 324 (24%) of 768 HHs	\$19,518 Actual Average Earned Income of 598 (82%) of 728 HHs	\$20,634 Actual Average Earned Income of 658 (81%) of 809 HHs	\$20,807 Actual Average Earned Income of 602 (83%) of 727 HHs	YES
PBV (Centre Meadows)	\$15,231 Average Earned Income of 130 (82%) of 158 HHs (2016)	\$18,277 Average Earned Income of 165 HHs	N/A	N/A	\$14,726 Average Earned Income of 140 (75%) of 186 HHs	\$17,264 Average Earned Income of 163 (83%) of 196 HHs	NO
HCV	\$8,316 Average Earned Income of 1,540 HHs	\$8,535 Average Earned Income of 1,458 HHs	\$14,597 Average Earned Income of 520 (39%) of 1,325 HHs	\$14,555 Average Earned Income of 844 (65%) of 1,296 HHs	\$15,990 Average Earned Income of 836 (68%) of 1,231 HHs	\$17,807 Actual Average Earned Income of 836 of 1,231 HHs	YES
AGENCY-WIDE	\$9,902 2,299 LIPH & HCV HHs	\$10,696 Expected Average Earned Income of 2,157 HHs	\$15,903 Average Earned Income of 844 (71%) of 2,304 HHs	\$17,037 Average Earned Income of 1,442 (71%) of 2,024 HHs	\$17,112 Average Earned Income of 1,726 (67%) of 2,556 HHs	\$18,626 Average Earned Income of 1,634 (76%) of 2,154 HHs	YES

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS							
UNIT OF MEASURE: Category 6 – Heads of Household Reporting Earned Income - non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (increase)							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	504/759 (66%)	493/699 (71%)	324/768 (42%)	598/728 (82%)	658/809 (81%)	602/727 (83%)	YES
PBV (Centre Meadows)	130/158 (82%) (2016)	165 (100%)	N/A	N/A	140/186 (75%)	163/196 (83%)	NO
HCV	806/1,540 (52%)	789/1,458 (54%)	520/1,325 (39%)	844/1,296 (65%)	964/1,561 (62%)	836/1,231 (68%)	YES
AGENCY-WIDE			844/2,093 (40%)	1,442/2,024 (71%)	1,762/2,556 (69%)	1,601/2,154 (74%)	YES

SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS							
UNIT OF MEASURE: Category 5 – Heads of Household Reporting No Earned Income - non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (decrease)							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	255 (34%)	206 (29%)	444 (59%)	130 (22%)	151 (19%)	125 (17%)	YES
PBV (Centre Meadows)	28 (18%) (2016)	0	N/A	N/A	46 (25%)	33 (17%)	NO
HCV	734 (48%)	669 (46%)	805 (61%)	452 (35%)	597 (38%)	395 (32%)	YES
AGENCY-WIDE			1,249/2,093 (60%)	582/2,024 (29%)	794/2,556 (31%)	553/2,154 (26%)	

SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)							
UNIT OF MEASURE: Number of households receiving TANF assistance (decrease).							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	42/759 (6%)	32/699 (5%)	266/768 (35%)	95/728 (13%)	166/809 (21%)	175/727 (24%)	NO
PBV (Centre Meadows)	38/158 (24%) (2016)	0	N/A	N/A	7/186 (4%)	9/196 (5%)	NO
HCV	86 (6%)	91 (6%)	58/1,325 (4%)	47(4%)	60/1,561 (4%)	38/1,231 (3%)	YES
AGENCY-WIDE			324/2,093 (16%)	142/2,024 (7%)	233/2,556 (9%)	222/2,154 (10%)	

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY (Self-sufficiency defined as any household with annual earned income of at least \$15,080 = \$7.25 (minimum wage) x 40 hours x 52 weeks)							
UNIT OF MEASURE: Number of households with earned income of at least \$15,080 per year (increase).							
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	BENCHMARK ACHIEVED?
LIPH (Public Housing)	50	56	220 (29%)	385 (53%)	428 (53%)	399 (55%)	YES
PBV (Centre Meadows)	72	88	N/A	N/A	58 (31%)	97 (49%)	YES
HCV	329	408	237 (18%)	373 (29%)	474 (30%)	457 (37%)	YES
AGENCY-WIDE			457	758	960	953 (44%)	

ACTIVITY 1 – IMPACT ANALYSIS

Metric	Program	FY 2013 Baseline	FY 2014 Benchmark	FY 2014 Actual*	FY2015 Actual	FY2016 Actual	FY2017 Actual	FY2018 Actual
# (%) of families paying at least \$150 per month in gross rent / TTP	Public Housing	641 (75%)	860 (100%)	700 (99%)	768 (100%)	728 (100%)	809 (100%)	727 (100%)
	HCV	866 (60%)	1,454 (100%)	1,312 (92%)	1,325 (100%)	1,296 (100%)	1,561 (100%)	1,231 (100%)
	Centre Meadows	N/A	N/A	N/A	N/A	155 (98%)	186 (100%)	196 (100%)
	Agency-Wide	1,507 (65%)	2,314 (100%)	2,012 (94%)	2,093 (100%)	2,024 (100%)	2,556 (100%)	2,154(100%)
Avg (Median) gross annual earned income reported by families	Public Housing	\$10,512 (\$8,190)	\$10,825 (\$8,425)	\$13,263 (\$12,480)	\$14,368 (\$14,100)	\$16,112 (\$15,611)	\$16,782 (\$15,860)	\$17,229 (\$16,805)
	HCV	\$8,632 (\$3,000)	\$8,890 (\$3,075)	\$8,626 (\$3,510)	\$8,335 (\$3,157)	\$9,479 (\$6,775)	\$9,875 (\$7,249)	\$12,573 (\$10,916)
	Centre Meadows	N/A	N/A	N/A	N/A	\$12,532 (\$13,845)	\$11,084 (\$10,288)	\$14,357 (\$14,775)
	Agency-Wide	\$9,331 (\$6,084)	\$9,605 (\$6,225)	\$10,156 (\$7,540)	\$10,549 (\$8,105)	\$12,796 (\$7,712)	\$12,204 (\$11,069)	\$12,724 (\$11,217)
Avg (Median) total adjusted annual income reported by families	Public Housing	\$11,197 (\$8,958)	\$11,530 (\$9,220)	\$14,478 (\$12,184)	\$14,845 (\$13,215)	\$16,389 (\$15,632)	\$16,667 (\$15,406)	\$16,641 (\$15,336)
	HCV	\$10,501 (\$8,136)	\$10,815 (\$8,375)	\$10,325 (\$7,736)	\$9,887 (\$7,800)	\$11,328 (\$9,477)	\$9,948 (\$8,316)	\$11,202 (\$9,152)
	Centre Meadows	N/A	N/A	N/A	N/A	\$13,964 (\$14,574)	\$10,762 (\$8,447)	\$12,629 (\$12,265)
	Agency-Wide	\$10,760 (\$8,410)	\$11,075 (\$8,650)	\$11,695 (\$9,540)	\$11,701 (\$9,848)	\$13,859 (\$11,960)	\$12,310 (\$10,668)	\$12,382 (\$10,919)
Avg (Median) monthly gross rent payment / TTP of families	Public Housing	\$281 (\$226)	\$302 (\$226)	\$352 (\$304)	\$229 (\$198)	\$416 (\$391)	\$422 (\$385)	\$420 (\$383)
	HCV	\$271 (\$203)	\$306 (\$203)	\$357 (\$269)	\$289 (\$168)	\$314 (\$228)	\$280 (\$203)	\$305 (\$227)
	Centre Meadows	N/A	N/A	N/A	N/A	\$355 (\$365)	\$276 (\$211)	\$322 (\$307)
	Agency-Wide	\$275 (\$211)	\$305 (\$211)	\$355 (\$278)	\$267 (\$196)	\$365 (\$293)	\$322 (\$265)	\$327 (\$272)
# (%) of families requesting hardship exemptions	Public Housing	N/A	11 (5%)	2	0	0	0	6
	HCV	N/A	29 (5%)	0	0	4	17	10
	Centre Meadows	N/A	N/A	N/A	N/A	1	0	0
	Agency-Wide	N/A	40 (5%)	2	0	5	17	16

ACTIVITY 1 – DISPARATE IMPACT ANALYSIS

Activity 1: Public Housing																				
Disparate Impact Analysis - Baseline Data																				
Public Housing Population	Heads of Household				Average Gross Annual Earned Income				Average Total Annual Adjusted Income				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2014 Benchmark	FY2015
																				Actual
All Households	860	704	768	728	809	727	\$10,512	\$13,363	\$14,367	\$16,112	\$16,782	\$17,229	\$11,197	\$14,478	\$19,388	\$16,309	\$16,667	\$16,691	\$21	\$216
Gender																				
Female	774	636	700	664	711	660	\$10,610	\$13,392	\$14,388	\$15,593	\$15,982	\$16,694	\$11,245	\$14,588	\$15,617	\$15,966	\$16,133	\$16,477	\$20	\$215
Male	86	68	68	74	98	67	\$9,623	\$12,049	\$14,156	\$20,326	\$22,589	\$24,777	\$10,764	\$13,447	\$15,680	\$20,133	\$20,658	\$21,690	\$26	\$207
Race (Multiple selections permitted)																				
Black	677	577	642	666	657	607	\$10,959	\$13,665	\$14,465	\$16,259	\$16,871	\$18,228	\$11,666	\$14,789	\$16,179	\$16,679	\$17,464	\$17,677	\$21	\$222
White	179	126	118	116	145	118	\$9,267	\$11,688	\$13,940	\$15,645	\$16,527	\$17,507	\$10,022	\$13,099	\$13,440	\$15,011	\$16,341	\$17,427	\$27	\$91
American Indian / Native Alaskan	4	3	1	1	1	0	\$9,407	\$15,947	\$13,595	\$0	\$0	\$0	\$3,333	\$10,271	\$8,751	\$12,655	\$14,428	\$0	\$34	\$146
Asian / Pacific Islander	5	5	5	3	3	1	\$13,170	\$12,772	\$16,777	\$18,919	\$13,151	\$17,288	\$7,930	\$10,810	\$8,820	\$18,023	\$7,524	\$7,988	\$27	\$14
Native Hawaiian / Other Pacific Islander	4	4	2	2	3	1	\$8,120	\$10,683	\$6,500	\$13,000	\$19,015	\$25,524	\$6,890	\$12,044	\$10,346	\$13,540	\$12,627	\$24,272	\$4	\$95
Other**	3	-	-	-	\$0	0	-	-	-	-	\$0	-	\$568	-	-	-	-	-	\$67	-
Ethnicity																				
Non-Hispanic	845	688	752	708	704	711	\$10,514	\$13,354	\$14,155	\$16,093	\$16,745	\$17,745	\$11,245	\$14,510	\$12,690	\$16,009	\$16,708	\$17,073	\$35	\$215
Hispanic	17	16	16	20	25	16	\$10,411	\$13,827	\$17,075	\$15,181	\$17,948	\$17,739	\$17,798	\$13,099	\$15,222	\$16,197	\$12,655	\$16,332	\$21	\$108
Age of Head of Household																				
18-31	421	284	310	309	345	307	\$9,294	\$12,098	\$14,499	\$15,466	\$14,886	\$15,804	\$9,320	\$12,473	\$12,571	\$15,599	\$14,459	\$14,862	\$21	\$69
32-46	292	289	327	309	340	313	\$11,734	\$13,398	\$15,247	\$16,420	\$17,746	\$18,073	\$13,162	\$15,548	\$16,644	\$14,202	\$16,736	\$17,519	\$17	\$82
47-61	147	131	131	110	124	107	\$11,600	\$14,480	\$14,981	\$18,616	\$20,157	\$22,020	\$12,667	\$16,665	\$20,511	\$19,428	\$21,505	\$21,701	\$27	\$63
Excluded Households																				
Elderly/Disabled Households	365	338	323	368	406	445	\$971	\$1,241	\$688	\$1,397	\$2,267	\$2,976	\$1,161	\$1,155	\$10,348	\$10,540	\$12,489	\$12,954	N/A	N/A

ACTIVITY 1 – DISPARATE IMPACT ANALYSIS

FY2018 Activity 1: HCY		Disparate Impact Analysis - Baseline Data		Average Gross Annual Funded Income		Average Total Annual Adjusted Income		Average TTP		Average Increased Rent Burden	
HCY Population	FY2013 Baseline	FY2014		FY2015		FY2016		FY2017		FY2018	
		Actual	Baseline	Actual	Baseline	Actual	Baseline	Actual	Baseline	Actual	Baseline
All Households	1,454	1,430	1,235	1,296	1,501	1,231	1,257	1,020	1,020	1,020	1,020
Gender											
Female	1,404	1,378	1,177	1,167	1,424	1,138	1,274	1,013	1,013	1,013	1,013
Male	50	52	148	129	137	93	93	93	93	93	93
Race (Multiple selections permitted)											
Black	1,183	1,160	962	1,036	1,266	1,006	1,039	1,023	1,023	1,023	1,023
White	277	275	358	257	287	221	221	221	221	221	221
American Indian / Native Alaskan	5	4	2	2	4	1	1	1	1	1	1
Asian / Pacific Islander	-	-	0	0	2	2	2	2	2	2	2
Native Hawaiian / Other Pacific Islander	1	2	3	1	2	1	1	1	1	1	1
Other**	1	-	-	-	-	-	-	-	-	-	-
Ethnicity											
Non-Hispanic	1,458	1,440	1,262	1,274	1,526	1,205	1,268	1,045	1,045	1,045	1,045
Hispanic	16	20	6	22	35	26	26	26	26	26	26
Age of Head of Household											
18-31	497	386	229	209	402	359	359	359	359	359	359
32-46	759	824	711	741	850	689	689	689	689	689	689
47-61	198	220	265	266	229	183	183	183	183	183	183
Family Households											
Elderly / Disabled	1,196	717	983	709	623	709	709	709	709	709	709

ACTIVITY 1 – DISPARATE IMPACT ANALYSIS

Activity 1: Centre - Meadows														
Disparate Impact Analysis - Baseline Data														
Public Housing Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2017	FY2018
All Households	158	174	196	\$12,532	\$12,672	\$14,357	\$13,994	\$12,001	\$12,629	\$355	\$303	\$322	-\$52	-\$33
Gender														
Female	144	154	181	\$12,561	\$12,363	\$14,268	\$13,819	\$11,990	\$12,351	\$352	\$302	\$314	-\$50	-\$38
Male	14	20	15	\$12,239	\$13,806	\$15,441	\$15,457	\$12,548	\$15,981	\$387	\$314	\$410	-\$73	\$23
Race (Multiple selections permitted)														
Black	129	143	163	\$12,126	\$12,491	\$14,513	\$14,067	\$12,318	\$12,409	\$357	\$312	\$316	-\$45	-\$41
White	28	30	32	\$14,237	\$13,539	\$13,468	\$13,407	\$10,670	\$13,620	\$342	\$267	\$346	-\$75	\$4
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	\$17,233	\$12,492	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	156	172	193	\$12,356	\$12,535	\$14,355	\$13,819	\$12,099	\$12,602	\$351	\$306	\$321	-\$45	-\$30
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,955	\$632	\$89	\$163	-\$543	-\$269
Age of Head of Household														
18-31	107	118	123	\$12,438	\$12,260	\$14,677	\$13,582	\$11,684	\$11,825	\$347	\$293	\$304	-\$54	-\$43
32-46	37	43	52	\$12,671	\$13,004	\$14,548	\$14,402	\$13,048	\$13,297	\$363	\$306	\$333	-\$37	-\$30
47-61	14	13	21	\$12,883	\$15,313	\$12,014	\$16,252	\$12,928	\$15,683	\$393	\$323	\$397	-\$70	\$4
Excluded Households														
Elderly/Disabled Households	45	42	57	\$487	\$659	\$870	\$11,679	\$10,962	\$9,806	\$292	\$274	\$246	N/A	N/A

Activity 5 - Streamlined HQS Inspection Policy for Housing Choice Voucher

i. Plan Year Approved, Implemented, Amended

Proposed and Approved FY2012 – FY2013 Plan; Significantly Modified FY2014 Plan and FY 2015

ii. Description/Impact/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 5-Star Rating System for HCV property owners.

Update

This activity is ongoing. During FY2018, 780 landlords received 2-star rating; 72 received 3-star rating; and, 4 received 1-Star rating. The rating system is as follows:

Star Rating	Inspection Interval	Evaluation Criteria
★	12-month interval between HQS inspections	<ul style="list-style-type: none">· A high percentage of units have historically failed annual HQS· 20% or more of units go into abatement annually or 20% or more of units receive complaint inspections
★★	24- month interval between HQS inspections	<ul style="list-style-type: none">· Any landlord with 3 or fewer units on the program (subject to increased rating after three years with no failed inspections)· Landlords new to the program· Fewer than 20% of units go into abatement annually· Fewer than 20% of units required complaint inspections over the previous year
★★★	36-month interval between HQS inspections	<ul style="list-style-type: none">• No complaint inspections over the previous year• No failed drive by inspections• Landlords self-certify biennially that all units meet HQS

HCV conducted a total of 2,108 initial and annual inspections during FY2018. The table below shows a breakdown of inspections for the year.

FY2018 HCV INSPECTIONS	
Inspection Type	Pass
Annual	1350
Initial	758
TOTAL	2108

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There have been no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA has not met the benchmark for this activity since tracking began. The LHA will adjust the benchmark going forward. Although elderly and disabled households on fixed incomes are on a triennial certification schedule as well as the HCV Rent Reform Study Group, inspections from moves and initials have not significantly decreased.

HUD STANDARD METRICS

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher					
CE #1: Agency Cost Savings					
Unit of Measurement: Total cost of task in dollars (decrease).					
*Baseline	*Benchmark	FY2016	FY2017	FY2018	Benchmark Achieved?
\$32,868 2,739 Initial and Annual Inspections @ \$24.00 per hour times 30 minutes to complete an inspection.	\$16,440 1,370 Initial and Annual Inspections @ \$24.00 per hour times 30 minutes to complete an inspection.	\$21,852 1,821 Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	**\$30,300 2,525 Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	\$25,296 2,108 Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	No
Data Source: Emphasys * The baseline and benchmark for this metric was identified in FY2015 and outcomes were reported starting FY2016. **FY2017 Outcome incorrectly reported – numbers have been revised in this report.					
Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher					
CE #2: Staff Time Savings					
Unit of Measurement: Total time to complete the task in staff hours (decrease).					
*Baseline	*Benchmark	FY2016	FY2017	FY2018	Benchmark Achieved?
1370 hours 2,739 Inspections @ 30 minutes each	685 hours 1,370 Inspections @ 30 minutes each	911 hours 1,821 Inspections @ 30 minutes each	**1,263 hours 2,525 Inspections @ 30 minutes each	1,054 hours 2,108 Inspections @ 30 minutes each	No
Data Source: Emphasys *The baseline and benchmark for this metric was identified in FY2015 and outcomes were reported starting FY2016. **FY2017 Outcome incorrectly reported – numbers have been revised in this report.					

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Impact/Update

Through MTW Activity 10, social service agencies provide stable tenant-based voucher assistance and special services to specific populations. Currently, Bluegrass.org (formerly Bluegrass Mental Health Mental Retardation) and Community Action Council are the special partner programs receiving the flexibility of this activity. BGMHMR (25 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 (CAC) (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.

Status Update

Of the thirty-five (35) vouchers set aside for these two special partner programs, 30 vouchers or 86% were utilized during FY2018. Bluegrass.org has been a partner with LHA for several years and provides outstanding case management to clients suffering with mental illness, substance abuse and those in recovery. CAC case managers have experienced issues with maintaining consistent contact with foster care youth participants. The HCV staff will monitor and consider other options for case management as necessary. Foster care youth aging out who have opted to extend their commitment with the Cabinet for Health and Human Services (Cabinet) have a Cabinet case manager in addition to the CAC case manager. Better communication to the participant on case management requirements may be needed.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There have been no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA will monitor the metrics for this activity to determine if benchmarks are consistently not being met, if this is the case staff will re-evaluate requirements and make adjustments where needed.

Activity 10 – HCV Tenant-Based Special Partner Programs			
CE #4: Increase in Resources Leveraged			
Baseline (FY2017)	Benchmark	Outcome	Benchmark Achieved?
\$44,892 Bluegrass.org - \$35,292 CAC - \$9,600	Bluegrass.org - \$35,292 CAC - \$48,000	Bluegrass.org – \$117,412 CAC – \$21,614	YES

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #3: Increase in Positive Outcomes in Employment Status			
Unit of Measurement –Employment Status: Category 5 Unemployed (reporting no earned income)			
Baseline (FY2017)	Benchmark	Outcome	Benchmark Achieved?
Bluegrass.org -2 CAC - 1	0	Bluegrass.org – 2 CAC – 3	NO
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS4: Households Removed from Temporary Assistance for Needy Families (TANF)			
Unit of Measurement – Number of households affected by Activity #10 receiving TANF assistance (decrease).			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
Bluegrass.org – 4 CAC - 0	17	Bluegrass.org – 5 CAC – 1	YES
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS8: Households Transitioned to Self-Sufficiency			
Unit of Measurement – Number of households transitioned to self-sufficiency (increase).			
For this activity, self-sufficiency is defined as any household that has earned income of at least ¹ \$15,080 per year.			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
Bluegrass.org – 2 CAC - 0	35	Bluegrass.org – 3 CAC – 1	NO
¹ \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #5: Increase in Resident Mobility			
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
26	35	Bluegrass.org – 25 CAC – 3	NO
Data Source: Special Partner reporting.			

Activity 10 – HCV Tenant-Based Special Partner Programs			
SS #1: Increase in Household Income			
Unit of Measurement – Average earned income of households affected by this policy in dollars (increase).			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
Bluegrass.org - \$8,600 CAC- \$3,600	\$15,080	Bluegrass.org – \$11,689 CAC – \$4,297	NO
Data Source: Special Partner Reporting			

Activity 10 – HCV Tenant-Based Special Partner Programs			
HC #3: Decrease in Wait List Time			
Unit of Measurement – Average applicant time on wait list in months (decrease).			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
3 months	3 months	Bluegrass.org – 0 CAC – 0	YES
Data Source: Special Partner reporting			

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

i. Plan Year Approved, Implemented, Amended

Activity Proposed, Approved, and Implemented in FY 2014

ii. Description/Impact/Update

The Authority currently provides monthly rental subsidy to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 388 families with special needs. These agencies serve individuals with mental illness and/or substance abuse issues; individuals recently released from prison or jail; families in need of financial literacy, credit management, and homeownership resources; single parents enrolled full-time in higher education; and homeless individuals and families.

- With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and
- With Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.

Status Update

The following social service providers served 582 families during FY2018. The LHA funded monthly funding to these social service providers totaling \$130,072. These providers are expected to serve a minimum of 388 participants. Service providers numbers were down slightly from FY2017 but continues to surpass the minimum number of participants by 50%:

Special Partner Program	Description of Households Served	# of Vouchers Provide	Actual Families Served in FY2017	Actual Families Served in FY2018
Canaan House	Individuals who have been diagnosed with a mental illness	17	17	17
Greenhouse17 (formerly Bluegrass Domestic Violence)	Victims of domestic violence, dating violence, sexual assault, and stalking	25	24	24
Hope Center	Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment	144	317	291
New Beginnings Bluegrass, Inc.	Individuals who have been diagnosed with a mental illness	29	33	30
OASIS Rental Assistance Housing Program	Families in need of financial literacy, credit management, and homeownership resources	30	36	32
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80	123	113
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	54	53
Urban League of Lexington-Fayette County	Elderly individuals	23	22	22
Total Special Partner Units		388	626	582

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There have been no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA will continue to monitor metrics for this activity to determine if benchmarks are being met. The benchmark for Metric #HC 6 Increase in Homeownership Opportunities is a challenge to meet because the majority of the participants served through these special partners are challenged with barriers such as homelessness, mental illness, substance abuse, etc. making the possibility of homeownership unlikely. The LHA adjusted the benchmark to zero for this metric. Metric #SS 7 – Increase in Agency Rental Revenue has been adjusted to track monthly per unit HAP costs because HCV does not receive rental revenue. The best way to determine a savings is to determine if HAP costs are being reduced.

HUD STANDARD METRICS

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
*SS7: Increase in Agency Rental Revenue			
Unit of Measure – Housing Assistance Payment (HAP) savings in dollars (decrease).			
*Baseline (FY2017)	*Benchmark	FY2018 Outcome	Benchmark Achieved?
\$335 monthly per unit cost	\$224 monthly per unit cost	\$223 monthly per unit cost	YES
Data Source: Special Partner reporting. *LHA adjusted the baseline and benchmark for this activity to reflect the HAP monthly per unit cost. A decrease in HAP would indicate a savings/increase in revenue.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
SS8: Households Transitioned to Self-Sufficiency			
Unit of Measure – Number of households transitioned to self-sufficiency (increase).			
For this activity, self-sufficiency is defined as any household that has earned income of at least ¹ \$15,080 per year.			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
28	40	32	NO
¹ \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year			
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #5: Increase in Resident Mobility			
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
198	238	166	NO
Data Source: Special Partner reporting.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #6: Increase in Homeownership Opportunities			
Unit of Measurement – Number of households that purchased a home as a result of the activity (increase).			
Baseline (FY2017)	*Benchmark	FY2018 Outcome	Benchmark Achieved?
0	0	0	YES
Data Source: Special Partner reporting. *LHA adjusted the benchmark for this activity.			

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners			
HC #7: Households Assisted by Services that Increase Housing Choice			
Unit of Measurement – Number of households receiving services aimed to increase housing choice (increase).			
Baseline (FY2017)	Benchmark	FY2018 Outcome	Benchmark Achieved?
626	640	582	NO
Data Source: Special Partner reporting.			

Activity 13 – Local Self-Sufficiency Admissions and Occupancy Requirements (Rent Reform)

i. Plan Year Approved, Implemented, Amended

Proposed FY 2014

Technical Amendment January 14, 2016

ii. Description/Impact/Update

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.

Program	Minimum Hours	Hourly Rate	Current Annual Imputed Income
Self-Sufficiency Level 1	37.5	Federal Minimum Wage	$\$7.25 \times 37.5 \times 52 = \$14,138$
Self-Sufficiency Level 2	20	Federal Minimum Wage	$\$7.25 \times 20 \times 52 = \$7,540$
Centre Meadows	20	Federal Minimum Wage	$\$7.25 \times 20 \times 52 = \$7,540$

Characteristics of SSI, SSII and Center Meadows Households

Households	SSI	SSII	Centre Meadows	Total
Total	211	424	196	831
Gender				
Female	196	382	181	759
Male	15	42	15	72
Race				
Black	175	365	163	703
White	35	58	32	125
Asian	0	1	1	2
Native Hawaiian/Pacific Islander	1	0	0	1
Ethnicity				
Hispanic	6	9	3	18
Non-Hispanic	205	415	193	813
AGE				
18-31	85	191	123	399
32-46	92	173	52	317
47-61	34	60	21	115

It is encouraging that 163 of 196 (83%) Centre Meadows work-able households reported earned income during FY2018. Earned income among working households averaged \$17,264, up nearly 18% over the FY2017 average earned income of CM work-able households of \$14,727. Public Housing Self-Sufficiency I and II households saw a decrease in households reporting earned income from 568 in FY2017 to 539 in FY2018. Average earned income of SSI and SSII households was down slightly, \$231, from \$21,397 (FY2017) to \$21,166 (FY2018).

As stated for MTW Activity #1 \$150 minimum rent increase, wages from earned income continue to be very low for this population. Only 27% (2586 of 2,154) work-able households with total household income above the poverty line.⁵

Self-Sufficiency Case Management

The primary purpose of self-sufficiency case management is to promote the development of local strategies to coordinate affordable housing assistance with public and private resources for supportive services and resident empowerment activities. These services 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.

Case management is offered to both public housing and HCV households through Family Self-Sufficiency programs. FSS allows the participating households to be credited the portion of the rent increase that occurs as a result of an increase in earned income to an escrow account. The escrow credit is based solely on increases in earned income. Upon completion of the FSS requirements/graduation the household receives the money in the escrow account. In FY2018, 4 FSS participants graduated from the program and used their escrow funds in the purchase of a house.

Small successes through the FSS program are encouraging. Success stories not only included escrow going toward home ownership, but one participant used escrow funds to pay tuition for medical certification program. Currently there are 31 HCV FSS participants and 44 public housing FSS participants. During FY2018 four FSS participants purchased homes (two public housing FSS and two HCV FSS participants). A total of 27 FSS participants graduated, voluntarily left or were terminated during FY2018. Two FSS participants left the program with escrow over \$13,000.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA will re-evaluate benchmarks for the metrics of this activity and offer updated benchmarks in the FY2020 Plan. Centre Meadows met one benchmark, SS8: Households Transitioned to Self-Sufficiency. Benchmarks appear to be unrealistic to attain and should be revised going forward.

⁵ U.S. Dept. of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, statistics located at <https://aspe.hhs.gov/poverty-guidelines>

HUD STANDARD METRICS

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements							
SS #1: INCREASE IN HOUSEHOLD INCOME							
UNIT OF MEASURE: Average earned income of households affected by this policy in dollars (increase).							
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	\$12,800 Average gross annual earned income from 648 non-elderly/non-disabled households as of June 30, 2013	Expected average gross annual earned income from 639 non-elderly/non-disabled households as of June 30, 2015	Actual average gross annual earned income from 490 of 628 non-elderly/non-disabled households as of June 30, 2015	Actual average gross annual earned income from 542 of 646 non-elderly/non-disabled households as of June 30, 2016	Actual average gross annual earned income from 568 of 683 non-elderly/non-disabled households as of June 30, 2017	Actual average gross annual earned income from 539 of 635 non-elderly/non-disabled households as of June 30, 2018	No
	\$12,800	\$13,704	\$19,544	\$18,151	\$21,397	\$21,166	
CENTRE MEADOWS (PBV)	Average annual earned income from 119 of 144 non-elderly/non-disabled households as of June 30, 2016	Expected average annual earned income from 165 non-elderly/non-disabled households as of June 30, 2017	Actual average annual earned income from non-elderly/non-disabled households as of June 30, 2015	Actual average annual earned income from non-elderly/non-disabled households as of June 30, 2016	Actual average annual earned income from 140 non-elderly/non-disabled households as of June 30, 2017	Actual average annual earned income from 163 of 196 non-elderly/non-disabled households as of June 30, 2018	No
	\$15,231	\$18,277	N/A	N/A	\$14,727	\$17,264	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements						
SS #1: INCREASE IN HOUSEHOLD INCOME						
Category 6: Other (Heads of Household Reporting Earned Income).						
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2015	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2018	Yes
	303	628	542	568	539	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2018	No
	130	165	N/A	140	163	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements							
SS #4: NON-ELDERLY/NON-DISABLED HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)							
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2013	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2018	No
	26	20	187	81	135	130	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2018	No
	38	0	N/A	N/A	7	9	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements						
SS #6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS						
Unit of Measure – Average amount of Section 8 and/or Section 9 subsidy per household affected by this policy in dollars (decrease)						
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2015	Expected average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2018	No
	\$2,921 (\$243 MPUC)	\$2,191 (\$183 MPUC)	\$3,017 (\$251 MPUC)	\$2,783 (\$233 MPUC)	\$2,696 (\$225 MPUC)	
CENTRE MEADOWS (PBV)	Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2016	Expected average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2018	No
	\$399	\$299	N/A	\$5,543 (\$462 MPUC)	\$5,361 (\$447 MPUC)	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements						
SS #7: INCREASE IN AGENCY RENTAL REVENUE PER MONTH						
Unit of Measure – PHA rental revenue in dollars (increase).						
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	PHA rental revenue prior to implementation of Activity #13 as of June 30, 2015	Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2018	Yes
	\$134,619	\$193,851	\$278,328	\$233,777	\$288,887	
CENTRE MEADOWS (PBV)	PHA rental revenue prior to implementation of Activity #13 as of June 30, 2016	Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2018	No
	\$392,700 (\$32,700 monthly)	\$672,684 (\$56,057 monthly)	N/A	\$519,803 (\$43,317 monthly)	\$520,772 (\$43,398 monthly)	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements						
SS #1: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS						
Category 5: Unemployed Heads of Household (Reporting No Earned Income)						
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2015	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2018	No
	95 of 628	0	104	115	96	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2018	No
	28 of 158	0	N/A	46	33	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements							
SS #8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY							
The LHA define self-sufficiency as any household that has earned income of at least \$15,080 per year. Number of households transitioned to self-sufficiency (increase). Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.							
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Outcome FY2017	Outcome FY2018	Benchmark Achieved?
SSI/SSI (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2013	Expected non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2018	Yes
	48	58	314	364	372	368	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Expected non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2018	Yes
	72	88	N/A	N/A	58	97	

IMPACT ANALYSIS

		*FY 2013	**FY2014	***FY2014	FY2015	FY2016	FY2017	FY2018	
Metric	Program	Baseline	Benchmark	Actual	Actual	Actual	Actual	Actual	Data Source
Imputed minimum annual earned income	SS I	N/A	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	U.S. Dept. of Labor, Federal Minimum Wage
	SSII	N/A	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	\$7,540	\$7,540	\$7,540	
Avg. (Median) gross annual earned income reported by families	SS I	\$16,555 (\$16,653)	\$18,457 (\$16,653)	\$18,140 (\$17,503)	\$19,270 (\$18,761)	\$20,695 (\$20,898)	\$21,620 (\$21,039)	21580 (\$19,864)	WinTen2/Emphasys
	SSII	\$11,012 (\$10,460)	\$13,497 (\$10,460)	\$12,486 (\$11,700)	\$12,926 (\$12,896)	\$14,193 (\$14,040)	\$15,031 (\$14,022)	\$16,168 (\$15,708)	
	Centre Meadows	\$3,395 (\$0)	Exempt	Site Vacant	Site Vacant	\$12,532 (\$13,845)	\$11,084 (\$10,288)	\$14,357 (\$14,775)	
# (%) of families reporting no annual earned income	SS I	44 (21%)	0 (0%)	46 (22%)	43 (19%)	22 (11%)	21 (10%)	22 (5%)	WinTen2/Emphasys
	SSII	118 (28%)	0 (0%)	93 (23%)	95 (24%)	82 (19%)	94 (20%)	74 (35%)	
	Centre Meadows	98 (67%)	0 (0%)	Site Vacant	Site Vacant	28 (18%)	46 (25%)	33 (17%)	
# (%) of families reporting annual earned income less than the minimum imputed earned income	SS I	61(29%)	0 (0%)	54 (26%)	36(16%)	28 (14%)	48 (24%)	50 (24%)	WinTen2/Emphasys
	SSII	159 (38%)	0 (0%)	130 (33%)	22 (6%)	41 (9%)	24 (5%)	98 (23%)	
	Centre Meadows	\$4,340 (\$2,400)	Exempt	Site Vacant	Site Vacant	31 (20%)	16 (9%)	46 (24%)	
Avg. (Median) total adjusted annual income reported by families	SS I	\$16,431 (\$14,652)	\$18,333 (\$16,246)	\$18,882 (\$16,744)	\$19,512 (\$17,508)	\$21,025 (\$19,532)	\$20,853 (\$19,331)	\$19,090 (\$18,060)	WinTen2/Emphasys
	SSII	\$12,101 (\$11,184)	\$14,587 (\$13,148)	\$13,953 (\$11,708)	\$13,381 (\$12114)	\$15,082 (\$14,456)	\$15,282 (\$14,223)	\$16,556 (\$14,813)	
	Centre Meadows	\$4,340 (\$2,400)	Exempt	Site Vacant	Site Vacant	\$13,964 (\$14,574)	\$10,762 (\$8447)	\$12,629 (\$12,265)	
Avg. (Median) monthly gross rent payment of families	SS I	\$380 (\$387)	\$427 (\$407)	\$426 (\$419)	\$493 (438)	\$531 (\$488)	\$524 (\$484)	\$479 (\$452)	WinTen2/Emphasys
	SSII	\$297 (\$281)	\$358 (\$330)	\$345 (\$293)	\$342 (\$305)	\$384 (\$361)	\$385 (\$356)	\$416 (\$371)	
	Centre Meadows	\$179 (\$150)	Exempt	Site Vacant	Site Vacant	\$355 (\$365)	\$276 (\$211)	\$322 (\$307)	
# (%) of families requesting hardship exemption	SS I	N/A	21 (10%)	0	0	0	0	4	WinTen2/Emphasys/Property Manager Log
	SSII	N/A	42 (10%)	0	0	0	0	1	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	0	0	0	
# (%) of familes granted hardship exemption	SS I	N/A	11 (5%)	0	0	0	0	2	WinTen2/Emphasys/Property Manager Log
	SSII	N/A	21 (5%)	0	0	0	0	0	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	0	0	0	
* All FY 2013 baseline data is based on a 12-month period ending January 31, 2013 (the most current data available as of the date the Annual Plan was posted for public comment)									
** FY 2014 benchmarks account for the impact of LHA’s planned minimum rent increase to \$150 for all non-disabled / non-elderly public housing families									
***The LHA’s fiscal year ended June 30, 2014, however, software conversion from Tenmast to Emphasys took place on June 1, 2014. Therefore, LHA is using data from Tenmast ending May 27, 2014.									

Activity 13: Self-Sufficiency I															
Disparate Impact Analysis - Baseline Data															
Self-Sufficiency Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income				
	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	210	220	206	204	211	\$16,431	\$19,512	\$20,595	\$20,853	\$19,090	\$16,555	\$19,270	\$21,365	\$21,620	\$21,580
Gender															
Female	201	222	194	191	196	\$16,399	\$19,512	\$20,483	\$20,334	\$18,781	\$16,525	\$19,270	\$20,782	\$21,129	\$20,942
*Male	9	8	12	13	15	\$17,154	\$17,513	\$20,783	\$28,476	\$23,124	\$17,228	\$16,689	\$30,800	\$28,837	\$29,915
Race (Multiple selections permitted)															
Black	170	193	169	170	175	\$16,381	\$20,390	\$21,254	\$21,606	\$19,296	\$16,281	\$19,365	\$21,505	\$21,795	\$21,860
White	39	34	34	32	35	\$17,164	\$15,215	\$20,580	\$16,660	\$17,855	\$18,048	\$19,494	\$21,394	\$20,586	\$20,071
American Indian / Native Alaskan	1	0	0	0	0	\$5,184	\$36,074	\$0	\$0	\$0	\$29,827	\$0	\$0	\$0	\$0
**Asian / Pacific Islander	2	0	2	1	0	\$10,090	\$19,512	\$12,084	\$12,356	\$0	\$20,313	\$19,259	\$19,726	\$21,252	\$0
Native Hawaiian / Other Pacific Islander	0	1	1	1	1	\$0	\$15,771	\$15,376	\$26,320	\$26,272	\$0	\$0	\$0	\$25,324	\$25,324
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity															
Non-Hispanic	204	220	198	197	205	\$16,511	\$19,761	\$21,029	\$20,851	\$19,109	\$16,508	\$19,310	\$21,471	\$21,647	\$21,615
Hispanic	6	10	8	7	6	\$13,711	\$19,512	\$20,916	\$20,931	\$18,450	\$18,145	\$19,259	\$18,738	\$20,862	\$20,361
Age of Head of Household															
18-31	88	82	72	83	85	\$13,189	\$16,002	\$16,582	\$14,483	\$15,135	\$13,760	\$15,519	\$17,752	\$16,872	\$17,582
32-46	88	106	100	90	92	\$17,554	\$22,040	\$22,175	\$23,456	\$19,473	\$17,177	\$21,210	\$21,821	\$23,844	\$21,814
47-61	34	42	34	31	34	\$21,916	\$24,141	\$27,080	\$30,411	\$27,940	\$22,179	\$21,697	\$27,678	\$27,877	\$30,941
Excluded Households															
Elderly/Disabled Households	35	36	48	46	75	\$15,369	\$15,174	\$14,449	\$23,140	\$18,399	\$4,429	\$3,892	\$5,031	\$6,283	\$6,768

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

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

Activity 13: Self Sufficiency II

Disparate Impact Analysis - Baseline Data

Self-Sufficiency II Population	Heads of Household				Average Total Annual Adjusted Income				Average Gross Annual Earned Income				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	419	398	440	479	424	\$16,431	\$13,381	\$15,182	\$15,282	\$16,556	\$11,012	\$12,926	\$14,936	\$15,031	\$16,168	\$297	\$342	\$384	\$385	\$416
Gender																				
Female	379	362	389	430	382	\$11,813	\$13,112	\$14,680	\$14,904	\$15,953	\$10,948	\$12,679	\$14,269	\$14,276	\$15,626	\$294	\$336	\$372	\$375	\$401
Male	40	36	51	49	42	\$15,238	\$16,092	\$19,014	\$18,602	\$22,040	\$13,450	\$15,412	\$20,023	\$21,663	\$21,100	\$340	\$402	\$475	\$465	\$551
Race (Multiple selections permitted)																				
Black	351	256	376	401	365	\$12,244	\$15,160	\$15,455	\$15,731	\$16,957	\$11,051	\$17,463	\$14,870	\$14,646	\$16,156	\$300	\$385	\$391	\$396	\$335
White	71	59	63	76	58	\$11,594	\$11,881	\$13,534	\$13,318	\$14,008	\$11,363	\$10,910	\$15,291	\$16,940	\$16,160	\$289	\$305	\$341	\$334	\$292
American Indian / Native Alaskan	1	0	0	0	0	\$5,400	\$0	\$0	\$0	\$0	\$7,800	\$0	\$0	\$0	\$0	\$135	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	1	1	\$5,400	\$16,344	\$16,344	\$0	\$17,988	\$7,800	\$17,304	\$17,304	\$18,200	\$21,288	\$135	\$409	\$409	\$0	\$362
Native Hawaiian / Other Pacific Islander	3	1	0	1	0	\$9,186	\$4,920	\$0	\$0	\$0	\$10,826	\$13,000	\$0	\$21,320	\$0	\$230	\$150	\$0	\$0	\$0
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity																				
Non-Hispanic	415	394	435	469	415	\$12,129	\$13,381	\$15,150	\$15,442	\$16,566	\$11,057	\$12,926	\$14,898	\$14,972	\$16,149	\$298	\$305	\$383	\$389	\$416
Hispanic	4	4	5	10	9	\$13,246	\$11,277	\$17,964	\$7,781	\$16,081	\$15,145	\$13,846	\$18,247	\$20,133	\$16,982	\$332	\$310	\$449	\$195	\$402
Age of Head of Household																				
18-31	223	176	207	227	191	\$10,494	\$11,935	\$13,915	\$14,139	\$15,091	\$10,459	\$12,541	\$14,330	\$13,381	\$15,186	\$268	\$306	\$355	\$357	\$380
32-46	137	173	174	191	173	\$13,416	\$14,256	\$15,479	\$15,332	\$17,143	\$11,295	\$13,491	\$15,026	\$15,781	\$16,456	\$321	\$363	\$391	\$399	\$429
47-61	59	49	59	61	60	\$15,397	\$15,489	\$18,743	\$18,756	\$19,527	\$13,044	\$12,318	\$16,585	\$18,826	\$18,466	\$360	\$397	\$469	\$469	\$493
Excluded Households																				
Elderly/Disabled Households	153	154	240	201	244	\$10,372	\$10,355	\$11,075	\$12,805	\$13,122	\$597	\$513	\$936	\$1,990	\$1,855	\$260	\$259	\$277	\$323	\$329

Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	158	186	196	\$12,532	\$11,084	\$14,357	\$13,964	\$10,762	\$12,629	\$355	\$276	\$322	-\$79	-\$33
Gender														
Female	144	171	181	\$12,561	\$11,083	\$14,268	\$13,819	\$10,719	\$12,351	\$352	\$275	\$314	-\$77	-\$38
Male	14	15	15	\$12,239	\$11,098	\$15,441	\$15,457	\$11,257	\$15,981	\$387	\$281	\$410	-\$106	\$23
Race (Multiple selections permitted)														
Black	129	157	163	\$12,126	\$10,678	\$14,513	\$14,067	\$10,847	\$12,409	\$357	\$279	\$316	-\$78	-\$41
White	28	28	32	\$14,237	\$13,324	\$13,458	\$13,407	\$10,437	\$13,620	\$342	\$264	\$346	-\$78	\$4
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	\$17,233	\$12,238	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	156	184	193	\$12,356	\$10,939	\$14,365	\$13,819	\$10,841	\$12,602	\$351	\$278	\$321	-\$73	-\$30
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,395	\$632	\$89	\$363	-\$543	-\$269
Age of Head of Household														
18-31	107	124	123	\$12,438	\$10,820	\$14,677	\$13,582	\$10,263	\$11,825	\$347	\$266	\$304	-\$81	-\$43
32-46	37	45	52	\$12,671	\$11,986	\$14,548	\$14,042	\$10,715	\$13,297	\$363	\$270	\$333	-\$93	-\$30
47-61	14	17	21	\$12,883	\$10,624	\$12,014	\$16,252	\$14,526	\$15,683	\$393	\$363	\$397	-\$30	\$4
Excluded Households														
Elderly/Disabled Households	45	42	57	\$487	\$1,617	\$870	\$11,679	\$10,207	\$9,816	N/A	N/A	N/A	N/A	N/A

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

i. Plan Year Approved, Implemented, Amended

Proposed/Implemented FY 2015

ii. Description/Impact/Update

LHA staff proposed to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV households. 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 reported that the EID calculation are only available to a very small population because of the very specific requirements for the disallowance. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months was difficult to track because households don'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. For those reasons and the administrative burden, the LHA proposed to eliminate the EID calculation.

This activity has achieved the anticipated result to eliminate the burdensome task of tracking the employment starts and stops of the 23 households that were receiving EID. Currently no

new households can receive the EID. During FY2018 ten (10) of the 23 households that formerly received EID continue to receive housing assistance; four are participants in the HCV program and six reside in public housing units.

No disparate impact analysis was done for this activity as no new households have been added. Households affected by this policy are decreasing as they leave the program.

Impact: Assessing Costs and Benefits

Metric	FY 2014 Baseline	FY 2015 Actual	FY 2016 Actual	FY2017 Actual	FY2018 Actual
*Total number EID Households (continue to receive assistance)	23	19	19	10	10
Dollar value of staff time spent processing EID	\$452	0	0	0	0
Avg. gross annual earned income reported by EID families	\$6,570	\$6,915	\$7,990	\$8,238	\$10,564
Average total gross annual income reported by families	\$11,586	\$11,982	\$14,783	\$13,517	\$11,177
Average gross rent (TTP)	\$248	\$287	\$287	\$312	\$383
# (%) Estimated cost savings from eliminating EID	0	\$452	\$452 \$373	\$452 \$197	\$452

The LHA determined that the 'Estimated cost savings from eliminating EID' remained the same across subsequent years. The table has been updated to reflect this.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA has elected to report metric CE #5 Increase in Agency Rental Revenue in separate categories - rent revenue from LIPH and HAP from HCV participants. As HCV does not receive rental revenue, going forward the LHA will track HAP paid on behalf of the former EID participants, if HAP decreases this would mean a savings to the LHA.

HUD STANDARD METRICS

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination						
CE#3: Decrease in Error Rate of Task Execution						
Unit of Measurement – Average error rate in completing a task as a percentage (decrease).						
Baseline	Benchmark	FY2015	FY2016	FY2017	FY2018	Benchmark Achieved
25%	0%	0%	0%	0%	0%	Yes
Data Source: WinTen2, staff interviews; staff logs; PHA financial records						

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination						
CE #5: Increase in Agency Rental Revenue						
Unit of Measurement - Rental revenue in dollars (increase).						
Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Outcome FY2017	Outcome 2018	Benchmark Achieved?
Rental revenue prior to implementation of the activity	Expected rental revenue after implementation of the activity	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$68,544 (\$35,964)	\$96,474	\$26,112	\$49,896	\$8,820	*\$8,196 **\$49,812	NO
Sum total gross (net) annual rental revenue from 23 households receiving EID as of June 30, 2013	Expected sum total net annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total net annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total net annual rental revenue from 19 rental households no longer receiving EID as of June 30, 2016	Actual sum total net annual rental revenue from 10 rental households no longer receiving EID as of June 30, 2017	Actual sum total net annual rental revenue from 4 rental households no longer receiving EID as of June 30, 2018	

*There is no rental revenue to the LHA from HCV participants therefore the average shown includes public housing former EID recipients.

**Going forward LHA will track HAP paid by those former EID recipients to determine if there is an increase or decrease in HAP. A decrease in HAP would indicate a savings for the LHA.

Activity 16 HCV Rent Reform Study

i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2015

ii. Description/Impact/Update

Lexington Housing Authority (LHA) was selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally. The centerpiece of the new policy is the substitution of triennial recertification of households’ incomes for annual recertification. During the three-year period until a household’s next recertification date, any increase in earnings it achieves will not cause the amount of rent and utilities it pays to go up.

The alternative rent policy is intended to be roughly cost-neutral from the perspective of housing agencies and HUD. This means that the combination of HAP and administrative expenditures should remain about the same as the total expenditures for assisting the same number of voucher holders under the traditional rent policy. Ideally, those expenditures would fall, creating an opportunity to provide housing assistance to more families for the same amount of money.

Interpreting the Potential Impacts

Potential Impact 1: The results show that estimated HAP expenditures are slightly lower under the new policy relative to the current policy in Years 1 (0.1 percent), but they are somewhat higher in years 2 and 3 (by 4.6 percent, and 4.7 percent, respectively). This is largely because voucher holders who would increase their earnings under the current policy and normally have their housing subsidies reduced would not have their subsidies reduced during this period under the alternative policy’s TTP freeze.

Potential Impact 2: However, in Year 4, even assuming that the alternative rent policy did not have an impact on tenants’ employment and earnings, estimated HAP expenditures are nearly the same under the new policy.

This reflects the fact that, on average, TTPs recalculated in Year 4 would be based on higher average earnings, because of normal increases in work and earnings over time (i.e., increases that would have occurred even in the absence of the new policy). It is at the point of the triennial recertification that housing agencies begin to recoup the foregone HAP reductions in the prior years when TTPs were held constant.

Potential Impact 3: HAP expenditures will fall even more in Year 4 (by \$107,122) if the new policy does have a modest positive impact on household earnings. This impact would push up the income base for setting new TTPs to a higher level than what it

would reach under current rules. A higher income base means that households will pay a larger share of their rent and utilities, thus requiring a lower subsidy.

Potential Impact 4: The cumulative HAP expenditures for Years 1-4 show that in the absence of an employment impact, those expenditures may be higher under the new rent policy compared with the current policy by 2.4 percent. However, if the alternative policy has a modest employment impact of the assumed size, LHA is projected to incur a slight cumulative increase in HAP expenditures (1.7 percent).

MDRC submitted an early impact report of the HCV Rent Reform Demonstration findings for HUD. Results of that report will be reviewed by MDRC and the four participating PHAs in November 2018.

No annual certifications of the Study Group were conducted during FY2018 (July 1, 2017 through June 30, 2018). Annual certifications for Study Group participants began July 1, 2018 (FY2019) and results will be reported in the FY2019 Report. HCV Rent Reform Study participants breakdown as follows:

RENT REFORM STUDY PARTICIPANTS			
<i>Year</i>	<i>Study Group</i>	<i>Control Group</i>	<i>Total</i>
Enrollment 7/2015 -12/31/2015	513	516	1,029
FY2018	361	359	720

The LHA continues to work with Emphasys (the software vendor) to extract data needed to adequately report on this activity. Emphasys has not provided all the necessary reports to conduct a full analysis of the data, i.e., gender is not included in demographics breakdown. At the end of FY2018 the Study participants demographics breakdown as follows:

FY2018 Study Participants	STUDY	CONTROL
RACE		
American Indian/Native Alaskan	1	0
Black	302	296
White	58	62
Native Hawaiian/Pacific Islander	0	1
GENDER		
Female	Not Available	Not Available
Male	Not Available	Not Available
Ethnicity		
Hispanic	5	7
Non-Hispanic	356	352
Age		
18-31	47	43
31-46	244	234
47-Up	70	82
Average Annual Income	\$13,793	\$13,397
Average Adjusted Annual Income	\$13,789	\$12,287

Hardship Requests

Rent Reform Study Hardship Requests			
YEAR	REQUESTS	APPROVED	DENIED
FY2016	12	10	2
FY2017	15	14	1
FY2018	10	8	2
TOTALS	37	32	5

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

LHA cannot address challenges achieving benchmarks as adequate reports are not available to fully analyze the outcomes. The HUD standard metrics only provide data for the Study Group; data for the Control Group was not available at the submission of this report. LHA will continue to seek the proper reports from Emphasys Software to address data for the Control Group. LHA continues to work with MDRC as the Study continues.

ACTIVITY 16 HUD STANDARD METRICS

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Annual Certification	YEAR 1: \$18,879 YEAR 2: \$18,879 YEAR 3: \$18,879 TOTAL: \$56,637	YEAR 1: \$18,879 YEAR 2: \$0 YEAR 3: \$0 SAVINGS: \$37,758	FY2016: 510/\$13,754.70 FY2017: 3/\$80.91 FY2018: 0/\$0 TOTAL: \$13,835.61	YEAR 1: YES YEAR 2: NO YEAR 3: YES TOTAL SAVINGS: \$42,801.39
	<ul style="list-style-type: none"> • Cost per Annual Certification - \$26.97 • 700 - Study Group Participants • Hard cost (mail and reproduction costs) - .72 • Staff Cost per hour - \$26.25 • 1 hour - Average time spent per annual certification 	<ul style="list-style-type: none"> • Cost per annual recertification after implementation of activity - \$26.97 • 700 - Study Group Participants 	Actual cost of Annual Certification YEAR 1: 510 x \$26.97 = \$13,754.70 YEAR 2: 3 x \$26.97 = \$80.91 YEAR 3: 0 x \$26.97 = \$0	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Interim Certification	YEAR 1: \$15,624.70 YEAR 2: \$15,624.70 YEAR 3: \$15,624.70 TOTAL: \$46,874.10	YEAR 1: \$11,488.75 YEAR 2: \$0 YEAR 3: \$0 TOTAL: \$11,488.75	FY2016: \$3,755.44 FY2017: \$3,243.37 FY2018: \$1,945.87 TOTAL: \$8,944.68	YES
	<ul style="list-style-type: none"> • Cost per Interim Certification = \$13.13 • 1.7 average number of interims per household (HH) per year • <i>times 700</i> Study Group participants <p>Cost per Interim Certification - \$13.13 is equal to:</p> <ul style="list-style-type: none"> • <i>Average time to perform an interim - .50 hours</i> • <i>times the average cost per staff hour - \$26.25 per hour</i> 	<ul style="list-style-type: none"> • Cost per Interim Certification - \$13.13 • 1.25 average number of interims per HH per year 700 Study Group participants <p>Cost per Interim Certification - \$13.13 is equal to:</p> <ul style="list-style-type: none"> • Average time to perform an interim - .50 hours • <i>times the average cost per staff hour - \$26.25 per hour</i> 	<p>Actual cost of Interim Certification</p> <p>FY2016: 284 interims - .63 average number of interims per HH</p> <p>FY2017: 247 interims - .69 average number of interims per HH</p> <p>FY2018: 148 interims -.52 average number of interims per HH</p> <ul style="list-style-type: none"> • Times cost per interim certification = \$13.13 	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Streamlined Interim Certification	YEAR 1: \$6,433.70 YEAR 2: \$6,433.70 YEAR 3: \$6,433.70 TOTAL: \$19,301.10	YEAR 1: \$3,214.40 YEAR 2: \$3,214.40 YEAR 3: \$3,214.40 SAVINGS: \$9,643.20	YEAR 1: \$4,995.56 YEAR 2: \$4,344.73 YEAR 3: \$2,603.32 TOTAL: \$11,943.61	NO SAVINGS: \$7,357.49
	<ul style="list-style-type: none"> • Cost per Interim - \$13.13 • average number of interims per household per year .7/500 per year • 700 the number of Study Group participants <p>Cost per Interim is equal to:</p> <ul style="list-style-type: none"> • Average time to perform an interim - .50 hours • <i>times</i> the average cost per staff hour - \$26.25 	<ul style="list-style-type: none"> • Cost per Streamlined Interim - \$6.56 • average number of interims per household per year .7/500 per year • 700 the number of Study Group participants <p>Cost per Streamlined Interim is equal to:</p> <ul style="list-style-type: none"> • \$6.56 • Average time to perform an interim - .25 • <i>times</i> average cost per staff hour - \$26.25 	<p>Actual cost of Streamlined Interim Certification</p> <p>FY2016: 284 interims FY2017: 247 interims FY2018: 148 interims</p> <ul style="list-style-type: none"> • Cost per Streamlined Interim - \$17.59 • average number of interims per household per year • Number of Study Group participants • Cost per Streamlined Interim is equal to: \$17.59 • Average time to perform an interim - .67 hours (40 minutes) • <i>times</i> average cost per staff hour - \$17.59 	Explanation to be provided

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost of Rent Calculation	YEAR 1: \$13,781 YEAR 2: \$13,781 YEAR 3 \$13,781 TOTAL: \$41,343	YEAR 1: \$9,187.50 YEAR 2: \$0 YEAR 3: \$0 TOTAL: \$9,187.50 SAVINGS: \$32,155.50	FY2016: \$13,387.50 FY2017: \$78.75 FY2018: \$0 TOTAL: \$13,466.25	YEAR 1: NO YEAR 2: NO YEAR 3: YES SAVINGS: \$27,876.75
	Baseline is equal to: <ul style="list-style-type: none"> • Current time to perform rent calculation .75 hours • <i>times</i> the average cost per staff hour \$26.25 • <i>times</i> the number of Study Groups 700 = <p style="text-align: center;">\$13,781.25</p> Cost of Rent Calculation is equal to: <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources .50 • <i>plus</i> the "Cost to Determine Adjusted Income - .25 hours 	Benchmark is equal to: <ul style="list-style-type: none"> • Current time to perform rent calculation .50 hours • <i>times</i> the average cost per staff hour \$26.25 • <i>times</i> the number of Study Groups 700 = <p style="text-align: center;">\$9,187.50</p> Cost of Rent Calculation is equal to: <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources .50 • <i>plus</i> the "Cost to Determine Adjusted Income - 0 hours 	Actual cost of Rent Calculation <ul style="list-style-type: none"> • Current time to perform rent calculation 1 hour • <i>times</i> the average cost per staff hour \$26.25 • <i>times the number of Study Group</i> FY2016: 510 rent calculations FY2017: 3 rent calculations FY2018: 0 rent calculations <p style="text-align: center;">\$13,466.25</p> Cost of Rent Calculation is equal to: <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources 1 hour • <i>plus</i> the "Cost to Determine Adjusted Income - 0 hours 	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total cost of task prior to implementation of the activity.	Expected cost of task after implementation of the activity.	Actual cost of the task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost to Determine Income from Assets	YEAR 1: \$4.59 YEAR 2: \$4.59 YEAR 2: \$4.59 TOTAL: \$13.77	YEAR 1: \$0 YEAR 2: \$0 YEAR 2: \$0 TOTAL SAVINGS: \$13.77	YEAR 1: \$0 YEAR 2: \$0 YEAR 2: \$0 TOTAL SAVINGS: \$13.77	YEAR 1: YES YEAR 2: YES YEAR 2: YES TOTAL: \$13.77
	Cost to determine income from assets equals: <ul style="list-style-type: none"> • Average time to verify asset, calculate income, perform quality control - .25 hours • times the cost per staff hour - \$26.25 • Times the percent of households with income from assets valued at \$5,000 - 0.001% • <i>times</i> the number of study participants – 700 	Cost to determine income from assets equals: <ul style="list-style-type: none"> • Average time to verify asset, calculate income, perform quality control - .25 hours • times the cost per staff hour - \$26.25 • Times the percent of households with income from assets valued at \$25,000 - 0% • <i>times</i> the number of study participants – 700 	Actual cost to determine income from assets	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost to Determine Utility Allowance	YEAR 1: \$4,593.75	YEAR 1: \$4,593.75	FY2016: \$3,345.60	YES
	YEAR 2: \$4,593.75	YEAR 2: \$0	FY2017: \$19.68	NO
	YEAR 3: \$4,593.75	YEAR 3: \$0	FY 2018: \$0	YES
	TOTAL: \$13,781.25	TOTAL: \$4,593.75 SAVINGS: \$9,187.50	TOTAL COST: \$3,365.28	TOTAL SAVINGS: \$10,415.97
	Cost per utility allowance equals: <ul style="list-style-type: none"> Time to Determine Utility Allowance - .25 Times the average cost per staff hour - \$26.25 <i>times</i> the number of study participants 700 Time to Determine Utility Allowance is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - .25	Cost per utility allowance equals: <ul style="list-style-type: none"> Time to Determine Utility Allowance - .25 Times the average cost per staff hour - \$26.25 <i>times</i> the number of study participants 700 Time to Determine Utility Allowance is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - .25	YEAR 1: 510 Study Group Participants YEAR 2: 3 Study Group Participants YEAR 3: 0 Study Group Participants	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time to Determine Utility Allowance	YEAR 1: 175 YEAR 2: 175 YEAR 3: 175 TOTAL: 525 hours	YEAR 1: 175 YEAR 2: 0 YEAR 3: 0 TOTAL: 175 hours SAVINGS: 350	YEAR 1: 127.50 YEAR 2: .75 YEAR 3: 0 TOTAL: 128.25 hours	YEAR 1: YES YEAR 2: NO YEAR 3: YES TOTAL SAVINGS: 396.75 hours
	Baseline is equal to: <ul style="list-style-type: none"> • Time to Determine Utility Allowance - .25 • <i>times</i> the number of Study Group 700 Time to Determine Utility Allowance is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - .25	Benchmark is equal to: <ul style="list-style-type: none"> • Time to Determine Utility Allowance - .25 • <i>times</i> the number of Study Group 700 Time to Determine Utility Allowance is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - .25	Actual Time to Determine Utility Allowance Year 1 - 510 Year 2 - 3 Year 3 - 0	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time To Complete Annual Certification	YEAR 1: 700 hours YEAR 2: 700 hours YEAR 2: 700 hours TOTAL: 2,100 hours	YEAR 1: 700 hours YEAR 2: 0 hours YEAR 3: 0 hours SAVINGS: 1,400 hours	YEAR 1: 637.5 hours YEAR 2: 3.75 hours YEAR 3: 0 hours TOTAL: 641.25 hours	YEAR 1: NO YEAR 2: NO YEAR 3: YES TOTAL SAVINGS: 1,458.75 hours
	Time to Complete Annual Certification – 1 hour <ul style="list-style-type: none"> <i>times</i> the number of the Study Group – 700 Time to Complete Annual Certification is equal to: <ul style="list-style-type: none"> Average time spent to schedule, interview and verify - .75 hours <i>plus</i> the average time spent to conduct quality control of the annual certification - .25 hours 	Time to Complete Annual Certification – 1 hour <ul style="list-style-type: none"> <i>times</i> the number of the Study Group – 700 Time to Complete Annual Certification is equal to: <ul style="list-style-type: none"> Average time spent to schedule, interview and verify - .75 hours <i>plus</i> the average time spent to conduct quality control of the annual certification - .25 hours	Actual Time to Complete Annual Certification is equal to: <ul style="list-style-type: none"> Average time spent to schedule, interview and verify - 1 hour <i>times</i> the number of the Study Group – Year 1 – 510 Year 2 – 3 Year 3 – 0 <i>plus</i> the average time spent to conduct quality control of the annual certification - .25 hours	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time To Determine Tenant Rent	YEAR 1: 525 hours YEAR 2: 525 hours YEAR 3: 525 hours TOTAL: 1,575 hours	YEAR 1: 350 hours YEAR 2: 0 YEAR 3: 0 SAVINGS: 1,225 hours	YEAR 1: 765 hours YEAR 2: 4.5 hours YEAR 3: 0 SAVINGS: 805.50 hours	NO
	<p>The Baseline is equal to:</p> <ul style="list-style-type: none"> • Time to Determine Tenant Rent .75 times the number of Study Group – 700 = 525 hours <p>Time to Determine Tenant Rent is equal to:</p> <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources .50 hours • <i>plus</i> Time to Determine Adjusted Income .25 hours = .75 hours 	<p>Benchmark is equal to:</p> <ul style="list-style-type: none"> • Time to Determine Tenant Rent . 50 times the number of Study Group – 700 = 350 hours <p>New Time to Determine Tenant Rent is equal to:</p> <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources .50 hours • <i>plus</i> Time to Determine Adjusted Income 0 hours = .50 hours 	<p>Actual time to complete Determine Tenant Rent</p> <ul style="list-style-type: none"> • Time to Determine Tenant Rent 1 HOUR times the number of Study Group = <p>Year 1 - 510 hours Year 2 = 3 hours Year 3 = 0 hours</p> <p>New Time to Determine Tenant Rent is equal to:</p> <ul style="list-style-type: none"> • Average time for documenting, recording, calculating, verifying and quality control for all income sources .50 hours • <i>plus</i> Time to Determine Adjusted Income = .50 hours 	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time to Determine Income from Assets	YEAR 1: 0.175 hours YEAR 2: 0.175 YEAR 3: 0.175 TOTAL: 0.5 hours	YEAR 1: 0 YEAR 2: 0 YEAR 3: 0 TOTAL: 0 SAVINGS: 0.5 hours	YEAR 1: 0 YEAR 2: 0 YEAR 3: 0 TOTAL: 0 SAVINGS: 0.5 hours	YEAR 1: YES YEAR 1: YES YEAR 3: YES TOTAL: 0
	Baseline is equal to: <ul style="list-style-type: none"> Time to Determine Income from Assets over \$5,000 - .25 hours times percent of households with income from assets over \$5,000 = .001% times the number of Study Group 700 	Benchmark is equal to: <ul style="list-style-type: none"> Time to Determine Income from Assets over \$25,000 - .25 hours times percent of households with income from assets over \$25,000 = 0% times the number of Study Group 700 	Actual Time to Determine Income from Assets	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average Error Rate in Determining TTP	0 (UNAVAILABLE)	0 (UNAVAILABLE)	0 (UNAVAILABLE)	N/A
	Baseline is equal to: Average error rate In Determining the TTP is (currently not tracked)	Benchmark is equal to: percent Average error rate In Determining the TTP	Actual average error rate in determining TTP	
Average Error Rate in Determining Utility Allowance	0 (UNAVAILABLE)	0 (UNAVAILABLE)	0 (UNAVAILABLE)	N/A
	Baseline is equal to: Not Currently Tracked	Benchmark is equal to: % Average error rate In Determining the Utility Allowance	Actual average error rate in determining Utility Allowance	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	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 prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average Earned Income of Non-Elderly Non-disabled Households	\$16,140	\$16,463	\$14,209	NO
	Baseline is equal to: Average Earned Income of Non-elderly Non-disabled Households of Study Group	Benchmark is equal to: Annual increase of 2% in the Average Earned Income of Non-Elderly Non-disabled Households of Study Group	Average Earned Income of Non-Elderly Non-disabled Households of Study Group	Explanation to be provided

*The LHA does not have a report that would pull average earned income of the Study Group. The income used here is average earned income of all HCV work-able households with earned income.

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed	41%/287	43%/301	*262	YES
(5) Unemployed	55%/385	53%/371	*93	YES
*The LHA does not have a report that would pull employment status of the Study Group. The data used here is from an Emphasys report that did not accurately account for all current Study Group participants.				

Activity 17 – Limit Interim Re-examinations for Public Housing Households (Rent Reform)

i. Plan Year Approved, Implemented, Amended

Proposed/Implemented FY 2016

ii. Description/Impact/Update

Interim reductions in the rent portion are limited to one per household between regularly scheduled re-examination periods.

For households who are not elderly or disabled, interim adjustments will be limited as follows:

- Households may only request an interim reduction once between regularly scheduled re-examination periods.
- Interim decreases will only be processed for loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits.
- In calculating the reduction, all household income, including previously unreported income, will be counted;
- The household's loss of income must be expected to last longer than four (4) months;
- All interim rent reductions will be temporary.
- An exception to this policy allows for an interim at any time for compliance in 50058 reporting and is limited to the following: the addition of a household member, the death or removal of a household member.

This activity is ongoing. The LHA surpassed the benchmark of 330 interims during FY2018 reporting 282 interims. During the year four households received three interims that involved income increases or reductions and/or changes in household composition. Earned income of work-able households was up slightly over the previous year \$20,634 (FY2017 to \$20,807 (FY2018).

The reduction in interims and increase in earned income indicates that the intended outcome of this activity for households to pay rent and not request rent reductions when an employed household member voluntarily leaves employment is successful.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. **Challenges in Achieving Benchmarks and Possible Strategies**

The LHA will revise benchmarks for this activity in the next Annual Plan. The only metrics met were CE#1 – Cost of Task (decrease) and CE #2 – Staff Time Savings (decrease). FY2018 is the second year of results for this activity. The LHA will monitor the FY2019 outcomes to determine if metrics should be re-evaluated/revise.

HUD STANDARD METRICS

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement Total cost of task in dollars (decrease).				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
\$8,679 $\$26.25 \times .50 = \13.13 per interim X 661 Interims Management Specialist hourly rate x time to do an interim	\$4,333 $\$13.13 \times 330$ Interims	\$4,491 $\$13.13 \times 342$ Interims	\$3,703 $\$13.13 \times 282$ Interims	YES
Data Source: Emphasys				

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement Total time to complete the task in staff hours (decrease).				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
330.5 hours 661 interims x 30 minutes	165 hours 330 interims	171 hours 342 interims	141 hours 282 interims	YES
Data Source: Emphasys				

<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement Rental revenue in dollars (increase).				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
\$3,637,812 (\$2,676,180) Rental revenue prior to implementation of the activity.	\$4,387,366 (\$3,227,589) Expected rental revenue after implementation of the activity.	\$3,671,868 (\$2,803,644) Actual rental revenue after implementation	\$3,466,643 (\$2,769,132) Actual rental revenue after implementation	NO

SS #1: Increase in Household Income				
Unit of Measurement Average earned income of households affected by this policy in dollars (increase).				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
\$19,518 Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	\$22,446 Expected average earned income of households affected by this policy prior to implementation of the activity.	\$20,634 Actual Average Earned Income of 658 of 809 HHs	\$20,807 Actual Average Earned Income of 602 of 727 HHs	NO

SS #3: Increase in Positive Outcomes in Employment Status					
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>					
Unit of Measurement Report the following information separately for each category:	Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
(6a) Other – Households reporting earned income	598 Actual head(s) of households reporting earned income prior to implementation of the activity.	878 Expected head(s) of households reporting earned income after implementation of the activity.	658 Actual HHs reporting earned income as of June 30, 2017	602 Actual HHs reporting earned income as of June 30, 2018	NO
(6b) Other – Households with no earned income	130 Head(s) of with no earned income prior to implementation of the activity.	0 Expected head(s) of households with no earned income after implementation of the activity.	151 Actual HHs reporting no earned income as of June 30, 2017	125 Actual HHs reporting no earned income as of June 30, 2018	NO

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement Number of households receiving TANF assistance (decrease).				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved?
95 Households receiving TANF prior to implementation of the activity.	0 Expected number of households receiving TANF after implementation of the activity (number).	166	175	NO

SS #8: Households Transitioned to Self Sufficiency**Unit of Measurement**

Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. 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	FY2017	FY2018	Benchmark Achieved?
385 Households transitioned to self-sufficiency (Households with the head of household/co-head or spouse annually earning \$15,080 or more) prior to implementation of the activity.	589 Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	428	399	NO

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

Metric	Baseline FY 2016	Benchmark FY2017	FY2017	FY2018
# of Households affected by this policy	728	809	809	727
# of Interims	661	330	342	282
Avg gross annual earned income reported by families	\$16,112	\$19,334	\$16,782	\$17,229
# (%) of families reporting no annual earned income	130	0	151	125
# (%) of families reporting annual earned income	598	493	658	602
Avg total adjusted annual income reported by families	\$19,518	\$20,634	\$16,667	\$16,641
Avg monthly gross rent payment of families	\$416	\$422	\$422	\$420
# (%) of families requesting hardship exemption	0	0	0	6
# (%) of families granted hardship exemption	0	0	0	2

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

Metric	Baseline FY 2016	Benchmark FY2017	FY2017	FY2018
# of Households affected by this policy	728	809	809	727
# of Interims	661	330	342	282
Avg gross annual earned income reported by families	\$16,112	\$19,334	\$16,782	\$17,229
# (%) of families reporting no annual earned income	130	0	151	125
# (%) of families reporting annual earned income	598	493	658	602
Avg total adjusted annual income reported by families	\$19,518	\$20,634	\$16,667	\$16,641
Avg monthly gross rent payment of families	\$416	\$422	\$422	\$420
# (%) of families requesting hardship exemption	0	0	0	6
# (%) of families granted hardship exemption	0	0	0	2

ACTIVITY 17 IMPACT ANALYSIS

Disparate Impact Analysis - Baseline Data																								
Activity 1: Public Housing																								
Public Housing Population	Heads of Household				Average Gross Annual Earned Income				Average Total Annual Adjusted Income				Average Gross Rent/Payment				Average Increased Rent Burden							
	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2013 Baseline	FY2014	FY2015	FY2016	FY2017	FY2018	FY2014 Benchmark	FY2015	FY2016	FY2017	FY2018	
All Households	80	704	768	728	809	727	\$10,512	\$13,265	\$14,367	\$16,112	\$16,782	\$17,229	\$11,197	\$14,478	\$19,388	\$16,389	\$16,667	\$16,661	\$20	\$352	\$407	\$416	\$422	\$420
Gender																								
Female	774	656	700	654	711	660	\$10,610	\$13,392	\$14,388	\$15,593	\$15,982	\$16,864	\$12,245	\$14,988	\$15,617	\$15,966	\$16,133	\$16,477	\$204	\$354	\$399	\$377	\$408	\$416
Male	86	68	68	74	98	67	\$9,623	\$12,049	\$14,156	\$13,126	\$22,589	\$24,277	\$10,764	\$13,447	\$15,680	\$20,133	\$20,538	\$21,650	\$20	\$335	\$267	\$467	\$320	\$342
Race (Multiple selections permitted)																								
Black	677	577	642	606	667	607	\$10,959	\$13,635	\$14,485	\$16,259	\$16,671	\$18,228	\$12,656	\$14,769	\$16,679	\$16,679	\$17,464	\$17,677	\$209	\$358	\$412	\$429	\$441	\$446
White	179	126	118	116	145	118	\$9,267	\$13,668	\$13,910	\$15,645	\$16,527	\$18,287	\$10,022	\$13,199	\$13,460	\$15,011	\$16,341	\$14,127	\$257	\$324	\$347	\$380	\$341	\$359
American Indian / Native Alaskan	4	3	1	1	1	0	\$9,407	\$13,547	\$13,395	\$0	\$0	\$0	\$3,333	\$10,271	\$8,731	\$12,655	\$14,328	\$0	\$116	\$262	\$218	\$316	\$338	\$0
Asian / Pacific Islander	5	5	5	3	3	1	\$13,170	\$12,172	\$16,777	\$18,919	\$13,151	\$21,288	\$7,930	\$18,810	\$8,920	\$8,923	\$7,524	\$19,988	\$208	\$204	\$222	\$223	\$188	\$490
Native Hawaiian / Other Pacific Islander	4	4	2	2	3	1	\$8,120	\$10,683	\$6,500	\$13,000	\$19,015	\$25,324	\$6,890	\$12,044	\$10,346	\$13,560	\$17,627	\$26,272	\$210	\$385	\$272	\$334	\$316	\$67
Other**	3	-	-	-	\$0	0	-	-	-	-	\$0	-	\$568	-	-	-	-	-	\$83	-	-	-	-	-
Ethnicity																								
Non-Hispanic	845	688	752	708	784	711	\$10,514	\$13,254	\$14,135	\$16,095	\$16,745	\$17,745	\$12,245	\$14,510	\$12,669	\$16,009	\$16,788	\$17,073	\$202	\$352	\$417	\$407	\$425	\$431
Hispanic	17	16	16	20	25	16	\$10,411	\$13,627	\$17,075	\$15,181	\$17,948	\$17,379	\$8,798	\$13,099	\$15,222	\$16,197	\$12,855	\$16,332	\$251	\$337	\$359	\$411	\$321	\$408
Age of Head of Household																								
18-31	421	284	310	309	345	307	\$9,284	\$12,198	\$14,459	\$15,486	\$14,886	\$15,804	\$9,320	\$12,473	\$15,571	\$15,999	\$14,859	\$14,862	\$249	\$318	\$322	\$366	\$377	\$377
32-46	292	289	327	309	340	313	\$11,734	\$13,598	\$15,247	\$16,420	\$17,476	\$18,073	\$13,102	\$15,548	\$16,844	\$14,282	\$16,736	\$17,519	\$18,177	\$379	\$408	\$437	\$425	\$441
47-61	147	131	131	110	124	107	\$11,600	\$14,830	\$14,981	\$18,616	\$20,157	\$22,020	\$12,667	\$16,465	\$20,511	\$19,428	\$21,505	\$21,701	\$18,105	\$388	\$196	\$594	\$456	\$455
Excluded Households																								
Elderly/Disabled Households	360	338	322	388	406	445	\$971	\$1,341	\$888	\$1,397	\$2,287	\$2,976	\$1,051	\$1,555	\$1,388	\$1,050	\$1,689	\$1,294	\$360	\$267	\$299	\$266	\$319	\$325

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

i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2017

ii. Description/Impact/Update

LHA staff implemented this activity to reduce the administrative burden of annual certifications for Homeownership households by conducting income reexaminations every three (3) years. Historically, staff saw minimal changes in income for the 32 homeownership households in the Housing Choice Voucher program. The elimination of these annual certifications will allow for more time for HCV specialist to devote to other administrative tasks.

Status Update

During FY2018 twenty-eight (28) households participated in the HCV Homeownership Program with three leaving during the year, leaving twenty-five active participants. In FY2018, eleven (11) homeowner participants had no earned income and twelve participants were disabled or elderly. See a summary of active household characteristics:

Year	Participants	Average Annual Earned Income	Average Adjusted Income	Annual Certifications	Interim Certifications
FY2016	31	\$16,050	\$19,927		
FY2017	30	\$18,808	\$19,478		
FY2018	28	\$14,904	\$14,808	12	22

Although triennial recertification was anticipated to be useful due to the minimal changes in income, homeownership participants requested 22 interim certifications during FY2018. The high number of interims indicate a need to consider limiting interims or closing out this activity. LHA staff will continue to monitor new and existing participants for issues and encourage financial literacy resources for households who may have a need for it.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. **Challenges in Achieving Benchmarks and Possible Strategies**

The 'cost per annual certification' (CE#1 Agency Cost Savings) benchmark for this activity of zero is not possible because participants will enter and exit the program as would be expected and that was not considered in establishing the benchmark. An example, program participation decreased from 31 in FY2016 to 28 in FY2018. The LHA will revise CE#1-Agency Cost savings benchmark in the FY2020 MTW Annual Plan.

Metric table CE#1 Staff Time Savings should be reconsidered because even though annual certifications have been reduced, nearly every household had at least one interim certification between annual certifications. A total of 22 interims were done for 28 households during FY2018.

Activity 21 HUD Standard Metrics

CE 2: Staff Time Savings				
Unit of Measure: Cost Per Annual Certification				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved
Total Time to Complete the Task in Staff Time (decrease) 31 hours <ul style="list-style-type: none"> 1 hour staff time to complete annual certification 31 Annual Certifications 	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). Year 1: 31 hours Year 2: 0 Year 3 - 0	Actual Cost of task after implementation of the activity (in dollars). Year 1: 30 hours Year 2: TBD Year 3: TBD Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Actual Cost of task after implementation of the activity (in dollars). Year 1: 30 hours Year 2: 12 hours Year 3: TBD Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark. Year 1: YES Year 2: NO Year 3: TBD Explanation to be provided.

CE 1: Agency Cost Savings				
Unit of Measure: Cost Per Annual Certification				
Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved
Total Cost of Task in Dollars <ul style="list-style-type: none"> Cost Per Annual Certification = \$28.53 X 31 Annual Certifications = \$884.43 1 hour – Average time to complete Annual Certification Staff Hourly Costs - \$27.78 Hard Costs Per Certification – .75¢ (mail, paper, copies, etc.) 	Total Cost of task prior to implementation of the activity. Year 1: \$884.43 Year 2: \$0 Year 3 - \$0 <ul style="list-style-type: none"> Cost per annual certification after implementation of the activity \$28.53 31 Annual Certifications 	Actual Cost of task after implementation of the activity (in dollars). Year 1: \$ 28.53 X 30 = \$855.90 Year 2: TBD Year 3: TBD Actual Cost of Annual Certification \$886	Actual Cost of task after implementation of the activity (in dollars). Year 1: \$ 28.53 X 30 = \$855.90 Year 2: \$ 28.53 X 12 = \$342.36 Year 3: TBD Actual Cost of Annual Certification \$342	Whether the outcome meets or exceeds the benchmark. Year 1: YES Year 2: NO Year 3: TBD Explanation to be provided.

CE 5: Increase Agency Rental Revenue

Unit of Measure: Housing Assistance Payment savings (decrease).

Baseline	Benchmark	FY2017	FY2018	Benchmark Achieved
Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue prior to implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$154,860*	\$154,860	\$147,588	\$152,352	YES

*If HAP paid for the homeowner households decreases, that would indicate a reduction in dollars spent for HCV homeownership participants. The LHA does not receive rental revenue for HCV participants.

DISPARATE IMPACT ANALYSIS

HCV Homeownership Households	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned Income			Average Gross Rent Payment		
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018
				Baseline			Baseline			Baseline		
Total Households	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$956	\$908	\$1,098
Gender												
Female	29	27	26	\$20,414	\$19,772	\$15,198	\$17,157	\$19,479	\$15,186	\$966	\$919	\$1,004
Male	2	1	2	\$12,865	\$11,238	\$9,744	\$0	\$0	\$11,237	\$817	\$626	\$783
Race (Multiple selections permitted)												
Black	24	24	23	\$20,351	\$20,399	\$14,949	\$17,795	\$20,454	\$16,787	\$963	\$916	\$1,019
White	7	4	5	\$18,476	\$15,055	\$14,160	\$10,069	\$10,905	\$7,800	\$932	\$873	\$816
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity												
Non-Hispanic	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$498	\$895	\$1,098
Hispanic	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Age of Head of Household												
18-31	1	0	2	\$57,580	\$0		\$63,340	\$0		\$1,019	\$0	\$1,363
32-46	16	18	12	\$22,782	\$23,116		\$21,348	\$24,821		\$1,020	\$925	\$1,101
47-61	10	7	10	\$15,259	\$14,021		\$8,240	\$9,010		\$895	\$896	\$848
62 and Over	4	3	4	\$10,764	\$9,168		\$2,688	\$3,584		\$838	\$840	\$848

Activity 22: Housing Choice Voucher Time Limit Pilot Program

i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2019

ii. Description/Impact/Update

The Lexington Housing Authority began enrolling participants in April 2018 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 year's 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.

A Self-Sufficiency Coordinator was hired November 2017 to enroll participants as well as serve as case manager. The HCV waiting list was down to less than 400 applicants in early 2018 and the HCV waiting list was open for one week in March 2018, more than 3,800 applicants were received by the time the waiting list closed.

Enrollment for this activity has proven to be a lengthy process. The Self-Sufficiency Coordinator along with an in-house panel interviewed 22 potential participants between April 2018 and the end of the 2018 fiscal year (June 30, 2018). One voucher was issued but not leased up at the close of FY2018.

The LHA's enrollment process pulls HCV applicants from the waiting list and calls those applicants in for an interview to determine their suitability for the program. Once an applicant is deemed suitable for the program the verification of eligibility begins. Seventy-five percent of applicants interviewed and selected for the eligibility process were terminated or withdrew prior to enrollment. Reasons applicants were not accepted to the program include, negative/unacceptable background checks, over-income and no shows for eligibility appointment.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

Metrics cannot be tracked until enrollment/lease-up is complete. The LHA will report results of this activity when participants are enrolled and housed in the FY2019 Report.

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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
\$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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
*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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
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	Enrollment not complete during FY2018 – no participants leased up; no results until FY2019
Data Source: Emphasys Software			

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

i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2018 Amended Plan (March 28, 2018)

ii. Description/Impact/Update

The LHA received HUD approval to perform all rent reasonableness determinations on all Housing Choice Voucher (HCV) tenant and project-based units that are owned or managed by the LHA. The scheduling time required to secure a third-party entity required 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.

The LHA received approval from HUD for this activity through the FY2018 Amended MTW Annual Plan submitted January 19, 2018 and approved March 28, 2018. A total of nine (9) rent reasonableness determinations were performed for LHA properties.

It is important to note that following an HCV audit from the Office of the Inspector General (OIG), the OIG determined that HUD did not comply with third-party provisions to conduct inspections and rent reasonableness determinations of LHA properties. The LHA has proceeded with this activity based on HUD approval.

iii. Actual Non-Significant Changes

There are no non-significant changes or modifications to this activity during the Plan year.

iv. Actual Changes to Metrics/Data Collection

There were no changes to metrics/data collection during the Plan year.

v. Actual Significant Changes

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

vi. Challenges in Achieving Benchmarks and Possible Strategies

The LHA has experienced no challenges in achieving benchmarks for this activity.

ACTIVITY 23 - HUD STANDARD METRICS

CE1 Agency Cost Savings			
Unit of Measure: Total cost of rent reasonableness determinations in dollars (decrease).			
Baseline	Benchmark	Outcome (FY2018)	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	\$48.00 per unit	\$48 per unit	YES
Cost per rent reasonableness determination performed by third-party vendor	Cost per rent reasonableness determination performed by LHA HCV staff	Cost per rent reasonableness determination performed by LHA HCV staff	

CE2 Staff Time Savings			
Unit of Measure: Total time to complete reasonableness determinations in staff hours (decrease).			
Baseline	Benchmark	Outcome (FY2018)	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.	1 day/24 hours to complete rent reasonableness determinations performed by LHA HCV staff.	YES

B. NOT YET IMPLEMENTED ACTIVITIES

Provide a brief description of the approved MTW activity that was proposed in an Annual MTW Plan, approved by HUD, and not yet implemented. Specify the Plan Year in which the MTW activity was first approved.

Discuss any actions taken towards the implementation plan for the MTW activity in the Plan Year. Relate these actions to the implementation plan and timeline the MTW PHA provided in the Annual MTW Plan.

Activity 7 – Public Housing Acquisition Without Prior HUD Approval

Activity Proposed and Approved - FY 2012-2013 Plan

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. 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.

Update

The LHA did not acquire properties during FY2018 where it was necessary to implement this activity. The LHA will develop a timeline for this activity should the Authority decide to acquire public housing units or land for the development of public housing.

Activity 8 – Conversion of Appian Hills Public Housing to Project-Based Vouchers

Activity Proposed and Approved - FY 2012-2013 Plan

Activity Significantly Modified in FY2014

LHA continues 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. 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.

Update

The LHA did not seek funding for this activity during FY2018. The LHA does not know when funding resources will be available for implementation of this activity.

Activity 9 – Development of Project-Based Voucher Units at 800 Edmond Street

Activity Proposed and Approved – LHA’s FY2012-FY2013

LHA plans to develop between five and eight project-based 3-bedroom townhomes on a vacant lot owned by the agency on Edmond Street. The property is adjacent to an existing 3-unit public housing site and close to the Authority’s Pine Valley Management Office.

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. Current project-based voucher rules limit percentage of project-based units to 25% of the units in the development. The LHA plans to project-base 100% of the units at this site.

Update

The activity has been not been implemented. The LHA intends to implement this activity once financial resources become available. The LHA will develop a timeline for this activity during FY 2017 should the Authority decide to develop the Edmond Street property.

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

Activity Proposed/Approved in FY2012-2013 Plan

Activity Revised in FY2014 Plan/Revision Approved in FY2014

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

Update

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.

This activity has not yet been implemented and unlikely to be implemented in the near future because the LHA will undertake the redevelopment of Ballard Apartments during FY2019 using a 2018 9% Low-Income Housing Tax Credit (LIHTC) award. LHA was awarded an allocation of \$1,000,000.00 of 2018 9% LIHTC’s by the Kentucky Housing Corporation (KHC) for Ballard Apartments.

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

Activity Proposed and Approved FY2017

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.

Update

This activity has not yet been implemented but will be implemented should the opportunity to do so become available. The LHA will develop a timeline for this activity should it be implemented.

C. ACTIVITIES ON HOLD

N/A

D. ACTIVITIES CLOSED OUT

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 (Approved/Implemented – FY2012-2013; 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 2:

Impact 1: Encouraging non-disabled / non-elderly adult household members to work							
Metric	Study Group	FY 2011 Baseline	FY 2012 Actual ¹	FY 2013 Actual	FY 2013 Benchmark	Variance FY 2013 Actual to Benchmark	Data Source
Number (Percent) of families meeting the self-sufficiency work / education requirement	Control:	47 (90%)	46 (96%)	46 (85%)	47 (90%)	-2%	Management Team Records
	Treatment:	171 (88%)	131 (70%)	156 (88%)	184 (95%)	-18%	
Average (Median) amount of gross earned income reported by families per year	Control:	\$7,566 (\$6,022)	\$9,808 (\$9,807)	\$10,183 (\$10,400)	\$7,566	35%	WinTen2
	Treatment:	\$11,381 (\$11,222)	\$11,661 (\$11,775)	\$11,276 (\$10,696)	\$11,950	-6%	
Number (Percent) of families reporting \$0 gross earned income per year	Control:	20 (38%)	14 (29%)	18 (33%)	20 (38%)	-11%	WinTen2
	Treatment:	49 (25%)	33 (18%)	54 (30%)	25 (13%)	116%	
Average (Median) amount reported by families who report any gross earned income per year	Control:	\$12,691 (\$10,730)	\$13,847 (\$11,938)	\$15,275 (\$14,765)	\$12,691	20%	WinTen2
	Treatment:	\$15,226 (\$14,040)	\$14,160 (\$13,898)	\$16,187 (\$15,059)	\$15,987	1%	
Average (Median) total gross income reported by families per year	Control:	\$11,241 (\$10,324)	\$14,928 (\$12,936)	\$14,988 (\$14,765)	\$11,241	33%	WinTen2
	Treatment:	\$15,263 (\$14,868)	\$16,321 (\$15,184)	\$15,820 (\$14,803)	\$15,832	0%	
Average (Median) monthly gross rent of families	Control:	\$210 (\$197)	\$229 (\$189)	\$257 (\$197)	\$210	22%	WinTen2
	Treatment:	\$300 (\$286)	\$316 (\$298)	\$309 (\$267)	\$315	-2%	
Number (Percent) of families requesting rent reductions (control group) or hardship exemptions (treatment group) within 6 months of move in	Control:	2 (67%)	0 (0%)	2 (17%)	2 (67%)	0%	Property Manager and MTW Coordinator Logs
	Treatment:	47 (44%)	1 (6%)	1 (2%)	15 (15%)	-93%	
Number (Percent) of families granted rent reductions (control group) or hardship exemptions (treatment group) within 6 months of move in	Control:	2 (67%)	0 (0%)	2 (17%)	2 (67%)	0%	WinTen2 and MTW Coordinator Log
	Treatment:	47 (44%)	1 (6%)	1 (2%)	10 (10%)	-90%	
¹ Activity implemented May 1, 2012							
Impact 2: Assessing the cost / savings of this activity for LHA							
Metric	Study Group	FY 2011 Baseline	FY 2012 Actual ¹	FY 2013 Actual	FY 2013 Benchmark	Variance FY 2013 Actual to Benchmark	Data Source
Total monthly gross rent revenue from non-elderly / non-disabled households	Control:	\$10,918	\$11,222	\$13,866	\$10,918	27%	WinTen2
	Treatment:	\$58,131	\$49,566	\$55,030	\$61,038	-10%	
Dollar value of staff time spent processing rent reduction requests (control group) or hardship exemptions (treatment group) within 6 months of move in	Control:	\$45	\$23	\$35	\$45	-23%	Payroll System, Staff Interviews
	Treatment:	\$1,050	\$11	\$17	\$535	-97%	
¹ Activity implemented May 1, 2012							

Activity #3 Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households (Approved/Implemented – FY2012-2013; Closed out FY2017)

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 recertifications, whenever the federal government adjusts benefits paid through fixed-income programs like Social Security and SSI, the LHA reserves the right to adjust resident household incomes and rent payments accordingly.

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 elected to discontinue this activity going forward.

Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households						
CE #1: Agency Cost Savings						
Baseline		Benchmark	Outcome (FY2015)	Outcome (FY2016)	Outcome (FY2017)	Benchmark Achieved?
	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars) during FY2015.	Actual cost of task after implementation of the activity (in dollars) during FY2016.	Actual cost of task after implementation of the activity (in dollars) during FY2017.	Whether the outcome meets or exceeds the benchmark.
AGENCY-WIDE	\$38,891 881 public housing and HCV recertifications at an average cost of \$41.14 each before implementation of the activity	\$13,189 Expected 273 public housing and HCV recertifications at an average cost of \$48.31 each during FY2015	\$18,986 393 actual public housing and HCV recertifications multiplied by the average cost of each during FY2015	\$13,141 272 actual public housing and HCV recertifications multiplied by the average cost of each during FY2016	\$14,208 322 actual public housing and HCV recertifications multiplied by the average cost of each during FY2017.	No
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records						
Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households						
CE #2: Staff Time Savings						
Baseline		Benchmark	Outcome (FY2015)	Outcome (FY2016)	Outcome (FY2017)	Benchmark Achieved?
AGENCY-WIDE	1,762 881 public housing and HCV recertifications at an average staff time of 2 hours each before implementation of the activity	546 hours Expected 273 public housing and HCV recertifications at an average staff time of 2 hours each during FY2015	786 hours 393 actual public housing and HCV recertifications multiplied by average staff time of 2 hours each during FY2015	544 hours 272 actual recertifications of public housing and HCV households multiplied by an average staff time of 2 hours each during FY2016	644 hours 322 actual recertifications of public housing and HCV households multiplied by an average staff time of 2 hours each during FY2017	No
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records						

Rent Reform – Activity #3/Alternative Recertification Schedule for Elderly/Disabled Households						
CE #5: Increase in Agency Rental Revenue						
Baseline		Benchmark	Outcome (FY2015)	Outcome (FY2016)	Outcome (FY2017)	Benchmark Achieved?
CONNIE GRIFFITH	Rental revenue prior to implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Expected rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Actual rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Actual rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Actual rental revenue after implementation of triennial recertifications at Connie Griffith households and HCV elderly/disabled households (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$40,416	\$41,220	\$27,427	\$38,939	\$25,467	No
HCV ELDERLY/DISABLED	*\$195,345	*\$199,250	*\$246,286	\$845,208	\$246,326	No
Data Source: WinTen2, Emphasys; staff interviews; staff logs; PHA financial records						
*HAP to Owner – for the HCV Program HAP to owner should decrease if this metric is successful.						

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.

Metric	Study Group	FY2011*	FY2013	FY2014
Avg annual earned income reported by families at initial occupancy ¹	Control:	Not Available	\$6,222	\$3,313
	Treatment:		\$6,222	\$6,369
Avg monthly TTP at initial occupancy ¹	Control:	Not Available	\$239	\$233
	Treatment:		\$239	\$225
Avg gross annual earned income reported by families	Control:	\$4,645	\$8,633	\$3,913
	Treatment:		\$8,633	\$5,891
Avg total adjusted annual income reported by families	Control:	\$12,602	Unavailable	\$8,836
	Treatment:		\$10,501	\$10,011
Avg TTP of families	Control:		\$279	
	Treatment:	\$141 (Net)	\$271 (Gross)	\$285
# (%) of families requesting a) rent reduction (control) b) hardship exemption (treatment) within 6 months of move-in	Control:	81 (10%)	7 (10%)	7 (10%)
	Treatment:		1 (2%)	5(8%)
Total monthly HAP	Control:	\$1,320,599	\$660,300	\$213,480
	Treatment:			\$159,000
Dollar value of staff time spent processing of a) rent reduction requests (control group) b) hardship exemptions (treatment group) within 6 months of move-in	Control:	\$1,358	\$670	\$453
	Treatment:		\$134	0
Resident satisfaction with activity (Likert scale – 5=Low; 10=Medium; 15=High)	Control:	Not Available	Medium (10)	**Not Available
	Treatment:		Low (5)	**Not Available
Employee satisfaction with activity (Likert scale – 5=Low; 10=Medium; 15=High)	Control:	Not Available	Medium	**Not Available
	Treatment:			

Activity #6 - Biennial Housekeeping Inspection Policy for Public Housing Residents

(Proposed FY2012-2013; 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 Least of 2%, HUD Fair Market Rent (FMR), or the Comparable Rent - Plan Year Activity Approved and Implemented FY2015

(Approved/Implemented FY2015; Closed out FY2016)

The LHA proposed to limit annual contract rent increases for participating landlords to the least of a 2% increase in current contract rent, HUD's FMR or the comparable rent. This activity was closed out because LHA staff found that this activity placed a burden on the landlord and is negatively affecting landlords and hindering new landlords from making their units available to the HCV program.

ACTIVITY 15) LIMIT HCV LANDLORD RENT INCREASES TO THE LEAST OF 2%, HUD FAIR MARKET RENT (FMR), OR THE COMPARABLE RENT			
CE #1: Agency Cost Savings			
Unit of Measurement - Total cost of task in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
\$18,720	\$13,104	\$15,264	No
260 families moved with continued assistance at an average of \$72 to process each move during FY2014	Expected 182 families will move with continued assistance at an average cost of \$72 to process each move during FY2015	212 actual families moved with continued assistance multiplied by average cost to process each move during FY2015	
Data Source: WinTen2, Emphasys, staff interviews, staff logs, PHA financial records			

ACTIVITY 15) LIMIT HCV LANDLORD RENT INCREASES TO THE LEAST OF 2%, HUD FAIR MARKET RENT (FMR), OR THE COMPARABLE RENT			
CE #2: Staff Time Savings			
Unit of Measurement – Total time to complete the task in staff hours (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
650 hours	455 hours	530 hours	No
260 families moved with continued assistance multiplied by an average 2.5 hours of staff time required to process each move during FY2014	182 Expected families will move with continued assistance multiplied by the average 2.5 hours of staff time required to process each move during FY2015	212 actual families moved with continued assistance multiplied by average 2.5 hours of staff time required to process each move during FY2015	
Data Source: WinTen2, Emphasys, staff interviews, staff logs, PHA financial records			

ACTIVITY 15) LIMIT HCV LANDLORD RENT INCREASES TO THE LEAST OF 2%, HUD FAIR MARKET RENT (FMR), OR THE COMPARABLE RENT			
HC #4: Displacement Prevention			
Unit of Measurement – Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.			
Baseline	Benchmark	Outcome	Benchmark Achieved?
0	0	0	N/A
HCV households losing assistance/moving prior to implementation of the activity (number). Currently Not Tracked	Expected HCV households losing assistance/moving after implementation of the activity (number).	Actual HCV households losing assistance/moving after implementation of the activity (number).	Explanation to be provided

The LHA has no way of tracking this metric.

(V) SOURCES AND USES OF MTW FUNDS

ANNUAL MTW REPORT

A. ACTUAL SOURCES AND USES OF MTW FUNDS

i. **Actual Sources of MTW Funds in the Plan Year**

The MTW PHA shall submit unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system.

ii. **Actual Uses of MTW Funds in the Plan Year**

The MTW PHA shall submit unaudited and audited information in the prescribed FDS format through the FASPHA, or its successor system.

iii. **Describe Actual Use of MTW Single Fund Flexibility**

No activities involved the use of single funds flexibility during the reporting year.

ACTUAL USE OF MTW SINGLE FUND FLEXIBILITY

N/A

B. LOCAL ASSET MANAGEMENT PLAN

i. Did the MTW PHA allocate costs within statute in the Plan Year?

No

ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

iii. Did the MTW PHA provide a LAMP in the appendix?

No

iv. If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

LHA did not make any changes because we did not implement a LAMP.

VI. ADMINISTRATIVE

A. REVIEWS, AUDITS AND INSPECTIONS

The MTW PHA shall provide a general description of any HUD reviews, audits and/or physical inspection issues that require the MTW PHA to take action in order to address the issue.

The Office of the Inspector General (OIG) conducted a survey of the Rental Assistance Demonstration (RAD) conversion of Centre Meadows and an audit of the HCV program beginning August of 2017. The OIG issued findings and the LHA has disputed certain findings and await a final decision from HUD .

The LHA completed and submitted the annual financial audit to the REAC system through the financial data schedule by 3/31/2018. Mountjoy, Chilton, Medley, CPA firm, conducted the audit with no findings.

B. EVALUATION RESULTS

See the evaluation of the LHA's rent reform policies in Appendix A.

C. MTW STATUTORY REQUIREMENT CERTIFICATION

CERTIFICATION OF COMPLIANCE WITH REGULATIONS MOVING TO WORK ANNUAL REPORT

Acting on behalf of the Public Housing Agency (PHA) listed below, as its authorized PHA official, I approve the submission of the Annual Moving to Work Report for the PHA fiscal year July 1, 2017 through June 30, 2018.

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

Lexington-Fayette Urban County Housing Authority
PHA Name

KY004
PHA Number/HA Code

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

Austin J. Simms
Name of Authorized Official

Executive Director
Title


Signature

December 21, 2018
Date

D. MTW ENERGY PERFORMANCE CONTRACT (EPC) FLEXIBILITY DATA
N/A

APPENDIX A

FY2018 MTW ANNUAL REPORT EVALUATION

LHA MTW DEMONSTRATION PROJECT

Year End Evaluation Report (selected activities)

Submitted by

Dr. Amanda Soka, Consultant/Lead Evaluator

INTRODUCTION

2018 is the seventh year since the onset of LHA's participation in the HUD MTW demonstration. Participation was premised on the recognition of the benefits to be derived by LHA, the constituency it serves as well as its stakeholders, from the pursuit of the following goals:

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

To date as part of that MTW Demonstration program, LHA has proposed and received approval to embark upon a total of 22 activities. In 2018, LHA had a total of 13 ongoing activities, and 5 activities awaiting implementation. As with previous years, implemented activities are designed to target one or more of the goals identified above. Of that number, this report reviews the following:

- a. Activity One – Increase Minimum Rent to \$150 Across All Housing Programs
- b. Activity Thirteen – Local Self-Sufficiency Admissions and Occupancy Requirements
- c. Activity Fourteen – Rent Reform: Elimination of Earned Income Disallowance
- d. Activity Seventeen – Limit Interim Re-examinations for Public Housing Households
- e. Activity Twenty-one – Triennial Re-certifications for Home Choice Voucher (HCV) Homeownership Participants
- f. Activity Twenty-two – Housing Choice Voucher Time Limit Pilot Program - *NEW*

Each activity will be reviewed in terms of how well the stated goals above were achieved in FY 2018. In compliance with HUD policy regarding rent reform initiatives, this report will also present the results of an impact analysis conducted to determine the effect of each activity and its driving policies on disparate tenant populations within LHA. Where data is available, resident perception and/or satisfaction with the activity and/or its impact will be reviewed.

REVIEW CONSIDERATIONS

- How well did activity meet stated MTW Demonstration Project goals?
- Did implementation create a disparate effect on tenant populations?
- What is resident perception of the activity and or its impact?

ACTIVITY ONE

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

Exclusions: Elderly and disabled households.

Implementation Date: April 1, 2014

Changes and Modifications/ Activity: No changes (non-significant; significant), during Plan year

Changes and Modifications/Metrics: No changes to baseline, or benchmarks during Plan year

One metric -related change during Plan year – CE #5 Rental Revenue, HCV Only.

Important note: This year LHA instituted an important change to one of the metrics for this activity. Previously, the metric *increase in agency rental revenue* included a calculation of rental income/revenues received from HCV units. However, rents from these units go to the private landlords of said units and not LHA, and so have no effect on agency revenues. A better measure is the Housing Assistance Payments (HAP), which LHA may pay for participants in these units. An increase in these payments reduces LHA revenues, while a decrease increases revenues. Thus, it is more expedient and correct to track and analyze annual HAP and monthly cost per HCV unit (MCPU). Beginning this year 2018, for HCV only, CE# 5 metric will be *decrease in HAP /monthly per unit cost*

Reduce costs (increase revenues)

Relevant metric used: *increase in agency rental revenue*. Applied to both public housing (PH) and Project Based Voucher units (PBV) through a review of rental revenues received. For Housing Choice Voucher (HCV) units, the review is of HAP/monthly per unit cost incurred by LHA.

NOTES:

- i.) *For HCV only - per above change in metrics, this is the first year for which data is collected and included for review regarding HAP by LHA for HCV units. Thus for this new measure included in this analysis, measures for baseline/benchmark are derived from 2018 data.*
- ii.) *Where there have been no changes/modifications to metrics, baselines or benchmarks, previous values used remain relevant.*

Agency-wide rental revenues (Recalculated – as PH and PBV only)

Benchmark (established 2015) – annual net rental revenue: \$2,514,744 /\$2,911 average per household (a/phh) (from 864 h/holds)

2018 - Actual net rental revenue: \$3,289,904/\$3,564 a/phh (923 h/holds)

Previous year - Actual net rental revenue: \$3,194,616/\$3,211 a/phh (995 h/holds)

Agency-wide (reflects PH and PBV only as they alone contribute to rental revenues), the LHA received a total of \$3,289,904 in net rental revenue for FY 2018, based on a total of 923 households (non-elderly/non-disabled). The total number of eligible/affected households increased in 2018 compared to 2017, LHA saw rental revenues higher than both the previous year, as well as higher average rents paid per household, with both measures in excess of benchmark. Thus, benchmark achieved.

Public Housing (PH)

Benchmark – annual net rental revenue: \$2,017,152/\$2,886 a/phh. (from 699 h/holds)

Previous - FY 2017 = \$2,803,644/\$3,465 a/phh

FY 2018 – actual rental revenue = \$2,769,132/\$3,809 a/phh (from 727 h/holds)

Net rental revenue is calculated minus utilities. PH contributed \$2,769,132 to LHA rental revenues, with an average of \$3,809 per household thus exceeding benchmark. Compared to FY 2017, when a total of 809 eligible yielded actual rental revenue of \$2,803,644, annual rent revenue was down by \$34,512 in 2018 which reported a 10.14% decrease in number of participating households. Notwithstanding, LHA succeeded in achieving benchmark on this metric.

Project Based Voucher (PBV)

Baseline – annual rent revenue: \$290,262 /\$1,837 a/phh (from 158 h/holds)

Benchmark - annual net rental revenue: \$497,592/\$3,016 a/phh (from 165 h/holds)

Previous - FY 2017 = \$390,972/\$2,102 a/phh

FY 2018 - actual rental revenue: \$520,772 / \$2,657 a/phh (from 196 h/holds)

2018 is the second year of reporting on the PBV units of Centre Meadows, formerly Pimlico. A 5% change (increase) in households from 2017 resulted in an over 33% increase in rental revenue for LHA, even though the average rent per household was \$359 lower in 2018. LHA achieved benchmark on this measure as actual rental revenue exceeded benchmark of \$497,592.

2018 was a good year for LHA in terms of rental revenue – seeing an overall increase in both actual annual rent revenue as well as average rent revenue per household. Seeing what trend develop will be important going forward, now that HCV is excluded from this section/metric.

Housing Choice Voucher (HCV)

New metric – Reduce costs: Decrease in Annual Housing Assistance Payment (HAP) and monthly cost per unit (MCPU)

Baseline - Annual Housing Assistance Payment (HAP)/MCPU: \$6,423,672/\$348 a/phh (based on 1,540 h/holds) established FY 2013

Benchmark – Annual Housing Assistance Payment (HAP)/MCPU: \$6,661,080/\$381 a/phh (based on 1,458 h/holds) established FY 2015

FY 2018 - actual HAP/MCPU expense = \$7,504,176/\$508 a/phh (1,231 h/holds)

Previous FY: 2017 - \$10,034,004/\$536 a/phh

The values presented above were obtained from historical data held by LHA. The goal is to decrease the HAP payments, as these count as expenses that reduce overall revenues. Since MCPU was one-third higher compared to benchmark value, and LHA HAP payments in 2018 exceeded benchmark by about 13%, it failed to meet this metric. That said, overall LHA paid significantly less in HAP than in the previous year.

2018 was a good year for LHA in terms of rental revenue – seeing an overall increase in both actual annual rent revenue as well as average rent revenue per household. Seeing what trend develops will be important going forward, now that HCV is excluded from this section/metric.

In the same vein, the correction that allows tracking of HAP/MCPU is valuable in its potential to help provide a clearer and more appropriate picture of LHA rental revenues and rental-related expenses. Clearly. A reduction in these payments will reduce costs for LHA – monitoring is recommended.

Increase Self-Sufficiency of Tenants

Another key element of this initiative is promoting or enhancing a move to self-sufficiency for heads of eligible households, defined as tenants who are the head or co-head of household, and spouses. To this end, the initiative seeks to encourage work/employment status, which is measured by a review (increase) of household income. In reviewing tenant self-sufficiency, metrics considered include the following:

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

Increase in head of household's average earned income

PH benchmark: expected average household income = \$12,857
potentially employable heads of households = 699

2018: # potentially employable heads of households = 602 (83% of 727)

Of the 727 eligible PH households, 83% had potentially employable heads of households. Thus, the percentage of employable heads increased by 2% compared to 2017.

According to the data presented for FY 2018, households with potentially employable heads, reported an average gross annual earned income of \$20,807, compared to \$20,634 in 2017. Although not a substantial increase, it does continue the upward trend begun in 2013. LHA achieved its benchmark for this metric, as employed heads of households reported an average an increase of \$7,950 (62%) in excess of benchmark.

HCV benchmark: expected average earned household income = \$8,535
potentially employable heads of households = 1,458

Previous year: actual average earned household income = \$15,990
employed heads of households = 964/1561 (62%)

2018: # actual/potentially employable heads of households = 836/1231 (68%)

The actual average earned annual income in 2018 was \$17,807 resulting in 11% increase over 2017 values on average per household, and a whopping 109% increase over benchmark. Also, 2018 saw a 6% increase in the number of employable households, which increased from 62% in 2017 to 68%. The last three years have seen this percentage stay in the mid to high 60s, compared for instance to 39% in 2015 (520/1325). Taken together these outcomes ensured that LHA achieved benchmark on this metric.

PBV benchmark (2016): expected average household income = \$18,277
potentially employable heads of households = 165

2018: # potentially employable heads of households = 163 (83% of 196)

In 2018, the average earned income was \$17,264, with 83% of households reporting earned income. Although an increase in both measures (number reporting earned income; average annual earned income), compared to 2017, because 2018 average earned income is still less than 2016 values, LHA failed to meet benchmark on this metric for PBV.

Agency-wide benchmark: expected average household income = \$10,696
potentially employable household heads = 2,157

2018: # potentially employable heads of households = 1,634 (76% of 2,154)

A total of 1,634 of 2,154 employable heads of households, reported employment in 2018 – the highest percentage since data collection began. Thus, relative to number of units, LHA increased the percentage of actual heads of households who were employed. Also, compared to FY2017, there is a larger increase in average earned income (from \$75 in 2017 to \$1,514 in 2018). This is more in line with the change seen between 2015 and 2016 (\$1,134).

Similar to 2017 (albeit to a lesser degree), PBV was the only sector that failed to meet benchmark. The depressed effect on agency-wide numbers attributed to the addition of CM appears reduced in 2018. Ultimately, because the earned income reported in 2018 reflects a 74% increase over benchmark, LHA met its goal for this metric.

Increase in positive outcomes in employment status

One of LHA's program goals is to encourage self-sufficiency. It is thus useful to consider the ratio of employed heads of households to unemployed, as a follow up to the previous section.

One sector – PBV failed to meet established benchmark of 100% employment for household heads on this metric. However, it fared better in 2018 (83%), compared to the previous year (75%).

When agency-wide performance is considered, LHA saw a 5% increase over 2017 in the heads of households reporting earned income (1,601 out of 2154 eligible households). So, 2018 recorded the highest percentage in the last four years. On the other hand, 26% of eligible household heads reported earning no income in 2018. This number – lowest

too in the last four years is to be expected and dovetails the numbers of those who earned income. Thus, on both measures LHA achieved benchmark.

In PH units, the number of affected household heads who reported no income again fell in 2018 by 2 percentage points, resulting in a 12% decrease on benchmark. Unlike last year, HCV too saw a decrease of 6 points compared to 2017, with the 32% of households reporting no earned income being the lowest value reported for all years for which data is available. As with PH, the decrease above is reflected in the higher percentage of household heads reporting earned income.

Again, PBV failed to achieve benchmark, although the percentage of household heads reporting no earned income in 2018 was lower than in 2017, it still was higher than the benchmark goal of 0%.

LHA is maintaining the positive trend in employment status for heads of households and household income in PH and HCV sectors. Even PBV units which failed to meet benchmark, still show an increase in employment as well as average household income – all of which augur well for movement toward success in LHA's goal of increasing self-sufficiency.

Continued tracking, especially in the newer PBV sector is important to understand/inform future analysis. Also, HCV sector should continue to be followed to see what if any trends develop regarding households where heads report not earning income.

Increase in Household Income – Heads of Household Reporting Income

As before, this report reviews the employment status/earned income reported by heads/co-heads of households and/or spouses, as another means to consider positive outcomes in employment status.

In 2018, 83% of PH household heads reported earned income, a 12% increase over benchmark (71%). In HCV, that percentage changed by 14 points to 68% (54% = benchmark). Although not achieving benchmark in the PBV sector, 83% of those household heads did report earned income in 2017. Overall therefore, it is important not to lose sight of the gains made in relation to the stated goal, and in particular the larger increases to average earned income generally (~\$1,600 per head of household, when compared to \$75 in the previous year).

Removal from Temporary Assistance for Needy Families (TANF)

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

10% of non-elderly, non-disabled families received Temporary Assistance for Needy Families (TANF) in 2018 (222/2154). For the 3rd year in a row, we see a gradual increase in households on TANF. Per 2017 data 9% (233/2556) of non-elderly, non-disabled families received Temporary Assistance for Needy Families (TANF).

As indicated last year, it is informative to look at the actual numbers of households still on TANF, versus the percentage of the underlying population in each of the sectors that it represents. The pattern seen in 2017 continues to hold in 2018:

PH: 24% of households (175/727) received TANF, compared to 21% (166/809) in 2017, 13% (95/728) in 2016, and established 5% benchmark (32/699) – thus continuing an upward trend in TANF recipients both in terms of actual numbers and percentage of underlying population.

HCV: This is the only sector in this category in which LHA achieved benchmark in 2018. TANF recipients fell to 3%, of eligible households compared to 6% at benchmark.

CM: Failed again to meet benchmark, as the 5% of TANF receiving households was higher than LHA's desired 0% benchmark.

Overall therefore, although LHA only achieved benchmark for HCV, failure to do same in PH and CM negatively impacted a positive outcome for this metric agency-wide, with the 10% reported agency-wide higher than the desired benchmark of 6%. It will be important to continue to monitor this metric in all sectors.

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

Households Transitioned to Self-Sufficiency

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

Further to a recommendation to monitor future data (2016 onward), for comparison to benchmark, as well as 2013 baseline and 2015 - these values are presented below. This is the second year for which data is presented for PBV units.

In 2018, across all sectors LHA reported that 953 or 44% of households transitioned to self-sufficiency. By comparison, 2018 values exceeded those reported in 2017 (36%), 2015 (22%), as well as benchmark (22%) respectively. Thus agency-wide, LHA met its

goal by exceeding benchmark of 22% (464/2157). Each sector saw an increase with the highest shown in the PBV sector. Future outcomes should continue to be monitored.

Increase Housing Choices for Tenants

Data not presented for 2018, and so is unavailable at this time.

Impact Analysis – Activity One

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

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

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

For the fourth year in a row, LHA reports 100% of households paid at least the minimum rent of \$150 per month in gross rent/TTP, agency-wide – i.e. PH, HCV and PBV units eligible for this activity.

Agency-wide, the average monthly gross rent paid in 2018 was \$327 – a \$5 increase on the previous year and higher than both the minimum payment (\$150), as well as the benchmark (\$305), established in FY 2014.

It would appear from the data that this initiative has also been effective in increasing annual revenues for LHA. This can be looked at in two ways, through: a) increase in rental revenues, and b) reduction in LHA expenditure on HAP. Thus, in terms of effect on revenues, 2018 followed prior trends and saw a 31% increase compared to benchmark (see revised benchmark values, post HCV/HAP correction). The same effect has not been documented for reduction in expenditure – via lower HAP/MCPU. For instance, to date LHA has not succeeded in achieving benchmark of keeping MCPU to \$381 or lower or reducing HAP to \$6,661,080. That said, at least for 2018 LHA was able to reduce expenditure on HAP by 25% on the previous year (2017).

Given the new metric/correction to previous calculations it will be important to monitor trends, if any going forward.

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

Looking at agency-wide aggregate the trend has been an increase in average gross annual earned income reported by families overtime. This was true also in 2018. That said, the magnitude of increase was greater in 2018(\$1,514 on average per household), compared to the \$75 increase on the previous year recorded in 2017. 2018 also recorded the highest percentage of eligible households reporting earned income (76%). Last year questions were raised on the impact if any of the addition of PBV units which reported decreases in average earned income per household, as the numbers appeared to have depressed overall values agency-wide. In 2018, PBV units reported a higher percentage (83 vs 75 in 2017) of households with earned income – the highest percentage change in all sectors.

Continued data monitoring is recommended, to help inform our understanding of the effect of this initiative on PBV households, and in turn the degree/nature of its contribution to the overall outcome of this metric agency-wide.

We still lack the ability to evaluate how this activity impacts or affects heads of household.

As long as we are unable ascertain the sources of earned income (i.e. how much was earned by head of household, versus other members of the household), it continues to be difficult to analyze or develop any conclusions about whether, and to what extent the implementation of Activity 1 motivates heads of household to increase potential earnings. The recommendation that this be rectified for the future, is again restated.

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

We measure any effect of the initiative on tenants/residents, by tracking the number of requests for exemption or deferral of the minimum rent payment.

In 2018 there were 16 requests for hardship exemptions, one less than in 2017 and still low compared to desired benchmark. Unlike in 2017 where all requests came from HCV units, this year six came from PH – the first time in 4 years. This change(reduction) is a positive for HCV, but a matter to watch for PH. The majority of requests 63% of which were approved were precipitated by job losses or reduction in come, with the rest due to medical reasons which were approved.

It is useful to continue to monitor these hardship requests, the sectors affected, as well as the whether or not they were granted. In particular, it would be helpful to know the rationale/reasons for refusal of these requests, as well as what recourse was taken by those refused. Currently, that data is not provided.

Another way to measure effect of Activity One on tenants is by looking at the incidence of initiative-related complaints agency-wide. However, that data is not available for 2018.

Similar to hardship requests, as a means to understand tenant perception/impact, it is important to monitor and evaluate any potential drivers of dis/satisfaction with this activity – to inform decision-making and optimize management as necessary.

The number of tenants who moved/left LHA housing may provide useful information. It is useful to consider the reasons why residents leave, and whether or not this is linked to the initiative. In response to feedback given last report, LHA has made available comprehensive data about households that left LHA housing programs in FY 2018. A total of 662 households were affected:

TABLE 1: MOVEOUTS AND TOP REASONS - 2018

	PH	HCV	PBV	AGENCY-WIDE
No of Move- outs	221	411	30	662
Top 3 Reasons - 1	Voluntary move (34)	Port out (81)	Non-compliance w/lease, Eviction (14)	Voluntary moves
- 2	Eviction – writ served (26)	Voluntarily terminated (69)	Voluntarily terminated (8)	Evictions
- 3	Court judgment (23) or 30-day notice to move (23)	Moved w/o LHA approval (58)	Moved w/o LHA approval (58)	
Transfer w/in LHA	50	Unknown	Unknown	50

The data provided above is a good first step, but a key shortcoming is that the information is not provided for the exact reason for eviction/behind the court judgement. Also, were any of the moves in HCV/PBV to PH? Such information is necessary to support any reasonable deductions. It is also helpful to explore if any, links between exodus, initiative – related hardship requests, and/or tenant complaints. Regarding complaints, the 2017 report suggested a new and useful metric would be tracking the number of tenants who leave, who also made any complaints in the year preceding exodus from LHA, and the nature of the complaint(s) made.

Data/information on the suggested metric above is unavailable at this time.

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

The effect of the initiative on staff productivity is useful because it relates to the goal of cost reduction, and revenue increase. It can also help shed light on the effectiveness of the initiative and/or acceptance by residents. 2018 data on this metric is unavailable. So, it is not known if there were complaints, or if these just failed to be recorded.

Staff should be reminded about the importance reporting complaints, educating tenants about policies governing/how to initiate hardship requests, or make complaints to management.

In addition to the data provided above in relation to hardship requests and exodus from LHA housing, staff should also track the number, nature of complaints made, provide specific reasons for evictions, and time spent dealing or processing these and related matters. Such records should be an integral part of data submitted for analysis.

Disparate Impact Analysis - Demographics

The purpose of the disparate impact analysis is to ensure that this rent reform initiative does not unintentionally result in and/or create through its implementation a disparate impact on the rent burden faced by protected classes of households by race, color, national origin, disability, age, or gender. The tables below provide snapshots of income (earned/adjusted), and rents paid by households by race/ethnicity, age and gender across five years, beginning in 2013 to current FY 2018, as well as the increased rent burden incurred, if any.

A) Agency - Wide

TABLE 2: ACTIVITY 1 - PROFILE, HEAD OF HOUSEHOLD – 2018 ALL SECTORS

Characteristics	LIPH	HCV	PBV (CentreMeadows)	Total
Households Affected	727	1,231	196	2,154
GENDER				
Female	660	1,138	181	1,979
Male	67	93	15	175
RACE				
Black	607	1,006	163	1,776
White	118	221	32	371
American Indian/Alaska Native	0	1	0	1
Asian	1	2	1	4
Native Hawaiian/Pacific Islander	1	1	0	2
ETHNICITY				
Hispanic	16	26	3	54
Non-Hispanic	711	1,205	193	2,582
AGE				
18-31	307	359	123	789
32-46	313	689	52	1,054
47- 61	107	183	21	311
Average Household Size	3	3.1	2.4	2.8
Excluded: Elderly/Disabled Households				

Across LHA (agency-wide) regardless of sector/unit type (PH, HCV, PBV), the typical household affected by this initiative is headed by a person who is female, black, non-Hispanic aged 32 to 46 years with an average household size of ~3 persons.

A) Public Housing

Who Is the Average Head of Household (affected by Activity 1) in LHA Public Housing?

According to Table 2 above, in 2018 the typical household head was:

- Female
- Black
- Non-Hispanic
- Aged between 18 and 46
- 3 - person household size

This profile has remained more or less the same since the onset of data collection in the MTW program.

TABLE 3: ACTIVITY 1- PH, DISPARATE IMPACT ANALYSIS – BASELINE DATA ETC.

Activity 1: Public Housing																														
Disparate Impact Analysis - Baseline Data																														
Public Housing Population	Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income						Average Gross Rent Payment						Average Increased Rent Burden					
	FT 2013 Baseline	FT 2014	FT2015	FT2016	FT2017	FT2018	FT 2013 Baseline	FT 2014	FT2015	FT2016	FT2017	FT2018	FT 2013 Baseline	FT 2014	FT2015	FT2016	FT2017	FT2018	FT 2013 Baseline	FT 2014	FT2015	FT2016	FT2017	FT2018	FT 2014 Benchmark	FT 2014 Actual	FT2015 Actual	FT2016 Actual	FT2017 Actual	FT2018 Actual
All Households	860	704	768	728	809	727	\$10,512	\$13,263	\$14,367	\$16,112	\$16,782	\$17,229	\$11,197	\$14,478	\$19,388	\$16,389	\$16,667	\$16,641	\$281	\$352	\$487	\$416	\$422	\$420	\$21	\$71	\$206	\$135	\$141	\$139
Gender																														
Female	774	636	700	654	711	660	\$10,610	\$13,392	\$14,388	\$15,593	\$15,982	\$16,864	\$11,245	\$14,588	\$15,617	\$15,966	\$16,133	\$16,477	\$284	\$354	\$399	\$377	\$408	\$416	\$20	\$70	\$115	\$93	\$124	\$132
Male	86	68	68	74	98	67	\$9,623	\$12,649	\$14,156	\$20,326	\$22,589	\$24,277	\$10,764	\$13,447	\$15,680	\$20,133	\$20,538	\$21,630	\$260	\$335	\$267	\$467	\$520	\$542	\$26	\$75	\$7	\$207	\$260	\$282
Race (Multiple selections permitted)																														
Black	677	577	642	606	657	607	\$10,959	\$13,635	\$14,485	\$16,259	\$16,871	\$18,228	\$11,656	\$14,789	\$16,179	\$16,679	\$17,464	\$17,677	\$290	\$358	\$412	\$424	\$441	\$446	\$21	\$68	\$122	\$130	\$151	\$156
White	179	126	118	116	145	118	\$9,267	\$11,668	\$13,910	\$15,645	\$16,527	\$15,287	\$10,022	\$13,199	\$13,400	\$15,011	\$13,341	\$14,127	\$257	\$324	\$347	\$380	\$341	\$359	\$17	\$67	\$90	\$123	\$84	\$102
American Indian / Native Alaskan	4	3	1	1	1	0	\$9,407	\$15,847	\$15,595	\$0	\$0	\$0	\$5,333	\$10,271	\$8,731	\$12,635	\$14,328	\$0	\$116	\$262	\$218	\$316	\$358	\$0	\$34	\$146	\$102	\$200	\$242	-
Asian / Pacific Islander	5	5	5	3	3	1	\$13,170	\$12,172	\$16,777	\$18,919	\$13,151	\$21,288	\$7,930	\$10,810	\$8,820	\$8,923	\$7,524	\$17,988	\$208	\$284	\$222	\$223	\$188	\$450	\$27	\$76	\$14	\$15	\$20	\$242
Native Hawaiian / Other Pacific Islander	4	4	2	2	3	1	\$8,120	\$10,683	\$6,500	\$13,000	\$19,015	\$25,324	\$6,890	\$12,044	\$10,346	\$13,360	\$12,627	\$26,272	\$210	\$365	\$272	\$334	\$316	\$657	\$4	\$95	\$62	\$124	\$106	\$447
Other**	3	-	-	-	\$0	0	-	-	-	-	\$0	-	\$568	-	-	-	-	-	\$83	-	-	-	-	-	\$67	-	-	-	-	-
Ethnicity																														
Non-Hispanic	843	688	752	708	784	711	\$10,514	\$13,254	\$14,135	\$16,093	\$16,745	\$17,745	\$11,245	\$14,510	\$12,609	\$16,009	\$16,788	\$17,073	\$282	\$352	\$417	\$407	\$425	\$431	\$35	\$70	\$135	\$125	\$143	\$149
Hispanic	17	16	16	20	25	16	\$10,411	\$13,627	\$17,075	\$15,181	\$17,948	\$17,379	\$8,788	\$13,099	\$15,222	\$16,197	\$12,855	\$16,332	\$251	\$337	\$359	\$411	\$321	\$408	\$21	\$86	\$108	\$160	\$70	\$157
Age of Head of Household																														
18-31	421	284	310	309	345	307	\$9,284	\$12,198	\$14,939	\$15,486	\$14,886	\$15,804	\$9,320	\$12,473	\$12,571	\$15,999	\$14,859	\$14,862	\$249	\$318	\$322	\$365	\$377	\$377	\$21	\$69	\$73	\$116	\$128	\$128
32-46	292	289	327	309	340	313	\$11,734	\$13,598	\$15,247	\$16,420	\$17,476	\$18,073	\$13,162	\$15,548	\$16,444	\$14,282	\$16,736	\$17,519	\$317	\$379	\$428	\$437	\$423	\$441	\$17	\$82	\$111	\$120	\$106	\$124
47-61	147	131	131	110	124	107	\$11,600	\$14,830	\$14,981	\$18,616	\$20,157	\$22,020	\$12,667	\$16,465	\$20,511	\$19,428	\$21,505	\$21,701	\$365	\$368	\$196	\$504	\$543	\$545	\$27	\$63	\$156	\$199	\$238	\$240
Excluded Households																														
Elderly/Disabled Households	363	358	323	368	406	445	\$971	\$1,341	\$688	\$1,797	\$2,287	\$2,976	\$11,051	\$11,555	\$10,368	\$10,590	\$12,689	\$12,954	\$268	\$267	\$259	\$265	\$319	\$325	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 4: PUBLIC HOUSING - AVERAGE INCOME (EARNED/ADJUSTED)

Public Housing	Heads of Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income					
	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018
All Household	860	704	768	728	809	727	\$10,512	\$13,263	\$14,367	\$16,112	\$16,782	\$17,229	\$11,197	\$14,478	\$19,388	\$16,389	\$16,667	\$16,641
Gender																		
Female	774	636	700	654	711	660	\$10,610	\$13,392	\$14,388	\$15,593	\$15,982	\$16,864	\$11,245	\$14,588	\$15,617	\$15,966	\$16,133	\$16,477
Male	86	68	68	74	98	67	\$9,623	\$12,049	\$14,156	\$20,326	\$22,589	\$24,277	\$10,764	\$13,447	\$15,680	\$20,133	\$20,538	\$21,630
Race (Multiple selections permitted)																		
Black	677	577	642	606	657	607	\$10,959	\$13,635	\$14,485	\$16,259	\$16,871	\$18,228	\$11,656	\$14,789	\$16,179	\$16,679	\$17,464	\$17,677
White	179	126	118	116	145	118	\$9,267	\$11,668	\$13,910	\$15,645	\$16,527	\$15,287	\$10,022	\$13,199	\$13,460	\$15,011	\$13,341	\$14,127
American Indian	4	3	1	1	1	0	\$9,407	\$15,847	\$13,595	\$0	\$0	\$0	\$3,333	\$10,271	\$8,721	\$12,635	\$14,328	\$0
Asian / Pacific	5	5	5	3	3	1	\$13,170	\$12,172	\$16,777	\$18,919	\$13,151	\$21,288	\$7,930	\$10,810	\$8,820	\$8,923	\$7,524	\$17,988
Native Hawaiian	4	4	2	2	3	1	\$8,120	\$10,683	\$6,500	\$13,000	\$19,015	\$25,324	\$6,890	\$12,044	\$10,346	\$13,360	\$12,627	\$26,272
Other**	3	-	-	-	\$0	0	-	-	-	-	-	\$0	\$568	-	-	-	-	-
Ethnicity																		
Non-Hispanic	843	688	752	708	784	711	\$10,514	\$13,254	\$14,135	\$16,093	\$16,745	\$17,745	\$11,245	\$14,510	\$12,669	\$16,009	\$16,788	\$17,073
Hispanic	17	16	16	20	25	16	\$10,411	\$13,627	\$17,075	\$15,181	\$17,948	\$17,379	\$8,798	\$13,099	\$15,222	\$16,197	\$12,855	\$16,332
Age of Head of Household																		
18-31	421	284	310	309	345	307	\$9,284	\$12,198	\$14,939	\$15,486	\$14,886	\$15,804	\$9,320	\$12,473	\$12,571	\$15,999	\$14,859	\$14,862
32-46	292	289	327	309	340	313	\$11,734	\$13,598	\$15,247	\$16,420	\$17,476	\$18,073	\$13,162	\$15,548	\$16,844	\$14,282	\$16,736	\$17,519
47-61	147	131	131	110	124	107	\$11,600	\$14,830	\$14,981	\$18,616	\$20,157	\$22,020	\$12,667	\$16,465	\$20,511	\$19,428	\$21,505	\$21,701
Excluded Households																		
Elderly/Disabled	363	258	323	368	406	445	\$971	\$1,341	\$688	\$1,397	\$2,287	\$2,976	\$11,051	\$11,555	\$10,368	\$10,560	\$12,689	\$12,954

Table 4 shows the average income earned between 2013 and 2018. Two types of income are reported – average gross annual earned income and average total annual adjusted income. Although PH households saw an increase in average gross annual earned income, average annual adjusted income fell by \$26 in 2018 compared to 2017.

With regard to *gross earned income*, all groups fared better on average in 2018 than in 2017, with the exception of Whites and Hispanics.

For *total adjusted income*, which reflects a variety of allowances that increase or decrease per household, the American Indian/Native Alaskan, group fared worse in 2018. The change from \$14,328 to zero in 2018 is likely driver for the overall decrease on average recorded for all households.

Gender

TABLE 5: INCREASED RENT BURDEN BY GENDER OF HEAD OF HOUSEHOLD

Public Housing	Heads of Household						Average Gross Rent Payment						Average Increased Rent Burden					
	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2014 Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual
All Household	860	704	768	728	809	727	\$281	\$352	\$487	\$416	\$422	\$420	\$21	\$71	\$206	\$135	\$141	\$139
Gender																		
Female	774	636	700	654	711	660	\$284	\$354	\$399	\$377	\$408	\$416	\$20	\$70	\$115	\$93	\$124	\$132
Male	86	68	68	74	98	67	\$260	\$335	\$267	\$467	\$520	\$542	\$26	\$75	\$7	\$207	\$260	\$282

Table 5 shows the average gross rent paid by head of households by gender, between 2013 and 2018, and the average increased rent burden for each year. The female/male distribution increased slightly from 88:12 in 2017 to 91:9 in 2018 in favor of females. Both genders saw an increase in average gross rent paid in 2018, with men paying more on average (\$22 versus \$6 for females). This likely reflects the higher income earned by male heads of households in the period under review.

Average rent burden: In 2018, average rent burden was \$132 for female and \$282 for male household heads, up \$8 (females) and \$22 (males) respectively, reflecting the increase in average gross rent paid in that year. For the third year in a row, females paid less rent, and incurred a lower rent burden than men. As posited in earlier reports, probable explanations may include the differences in income by gender.

Continued data collection and analysis is recommended.

Race and Ethnicity

TABLE 6: INCREASED RENT BURDEN BY RACE AND ETHNICITY OF HEAD OF HOUSEHOLD

Public Housing	Heads of Household						Average Gross Rent Payment						Average Increased Rent Burden					
	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2014 Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual
All Household	860	704	768	728	809	727	\$281	\$352	\$487	\$416	\$422	\$420	\$21	\$71	\$206	\$135	\$141	\$139
Race (Multiple selections permitted)																		
Black	677	577	642	606	657	607	\$290	\$358	\$412	\$424	\$441	\$446	\$21	\$68	\$122	\$130	\$151	\$156
White	179	126	118	116	145	118	\$257	\$324	\$347	\$380	\$341	\$359	\$17	\$67	\$90	\$123	\$84	\$102
American Indian	4	3	1	1	1	0	\$116	\$262	\$218	\$316	\$358	\$0	\$34	\$146	\$102	\$200	\$242	-
Asian / Pacific	5	5	5	3	3	1	\$208	\$284	\$222	\$223	\$188	\$450	\$27	\$76	\$14	\$15	-\$20	\$242
Native Hawaiian	4	4	2	2	3	1	\$210	\$305	\$272	\$334	\$316	\$657	\$4	\$95	\$62	\$124	\$106	\$447
Other**	3	-	-	-	\$0	0	\$83	-	-	-	-	-	\$67	-	-	-	-	-
Ethnicity																		
Non-Hispanic	843	688	752	708	784	711	\$282	\$352	\$417	\$407	\$425	\$431	\$35	\$70	\$135	\$125	\$143	\$149
Hispanic	17	16	16	20	25	16	\$251	\$337	\$359	\$411	\$321	\$408	\$21	\$86	\$108	\$160	\$70	\$157

The average gross rent paid by head of households by race/ethnicity, between 2013 and 2018, as well as the average increased rent burden for each year, is presented in Table 6.

Overall, for PH households generally, there was a decrease (albeit very small), in both average gross rent and rent burden compared to the previous year (FY 2017), and a much larger increase compared to benchmark (FY 2014). Considering benchmark values alone, we see still see a significant percentage change (increase) in average rent burden compared to a much smaller change (increase) in average gross rent paid. As stated in the past report, this is worthy of investigation.

Every race and ethnicity recorded an average rent burden significantly higher than the values established at benchmark. This year, Hispanics show a greater rent burden than

Non-Hispanics – probably attributable to factors such as the relatively lower numbers of Hispanic heads of households, even though they paid less rent. By race, White household heads had the least rent burden followed by Blacks.

By race alone, in dollar terms, the highest rent burden was accrued by Native Hawaiian/Other Pacific Islander (NA/OPI), with 322% increase from the year before. This change may be attributed to the more than double average adjusted income reported by this group. As this is a very small group (in fact only one person in 2018), it is important to note the potential impact on value spread.

Also, in 2018 we see a return to the 2016 position where there appeared to be a more negative/disparate effect of the initiative on Hispanics compared to Non-Hispanic groups. Recommendation is to continue to track and observe these trends before any inferences/conclusions can be drawn.

Age

TABLE 7: INCREASED RENT BURDEN BY AGE OF HEAD OF HOUSEHOLD

Public Housing	Heads of Household						Average Gross Rent Payment						Average Increased Rent Burden					
	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013 Baseline	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2014 Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual
All Household	860	704	768	728	809	727	\$281	\$352	\$487	\$416	\$422	\$420	\$21	\$71	\$206	\$135	\$141	\$139
Age of Head of Household																		
18-31	421	284	310	309	345	307	\$249	\$318	\$322	\$365	\$377	\$377	\$21	\$69	\$73	\$116	\$128	\$128
32-46	292	289	327	309	340	313	\$317	\$379	\$428	\$437	\$423	\$441	\$17	\$62	\$111	\$120	\$106	\$124
47-61	147	131	131	110	124	107	\$305	\$368	\$196	\$304	\$343	\$345	\$27	\$63	\$156	\$199	\$238	\$240

Table 7 shows the *average gross rent* paid by head of households by age, between 2013 and 2018, and the *average increased rent burden* for each year. In 2018 overall average rent burden for all PH households, is recorded as \$139. Thus, rent burden fell by a few points. Still, average rent burden in 2018 exceeded benchmark for every age group.

As seen in years past, amongst the three age groups/range represented on the table, those aged 47 to 61 bore the highest rent burden (\$240), followed by those aged 18 to 31 (\$128), and 32 to 46 (\$124) respectively. The higher rent burden for the 47 to 61 group is attributable to the higher income reportedly earned by this group in 2018 (see Table 4), which is in keeping with past trends.

B) HCV

Who Is the Average Head of Household in HCV Housing?

Table 10 shows the demographic breakdown of eligible heads of households (non-elderly/non-disabled).

- Female
- Black
- Non-Hispanic
- 32 – 46 years of age
- 3.1 average household size

This 2018 profile of the average HCV head of household is consistent with 2017 and other annual data previously reported.

TABLE 8: HCV - DISPARATE IMPACT, BASELINE DATA

FY2018 Activity 1: HCV																																	
Disparate Impact Analysis - Baseline Data																																	
HCV Population	Household Size					Average Gross Annual Earned Income												Average Total Annual Adjusted Income					Average TTP						Average Increased Rent Burden				
	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual			
All Household	1,454	1,430	1,325	1,296	1,561	1,231	\$8,632	\$8,626	\$8,335	\$9,479	\$9,875	\$12,575	\$10,501	\$10,325	\$9,887	\$11,320	\$9,948	\$11,302	\$271	\$357	\$289	\$314	\$280	\$385	\$35	\$86	\$18	\$43	\$9	\$34			
Gender																																	
Female	1,404	1,379	1,177	1,167	1,424	1,138	\$8,697	\$8,689	\$8,701	\$9,873	\$9,901	\$12,742	\$10,547	\$10,403	\$10,221	\$11,605	\$10,013	\$11,286	\$273	\$360	\$299	\$322	\$292	\$387	\$34	\$87	\$26	\$49	\$9	\$34			
Male	50	52	148	129	137	93	\$7,995	\$7,487	\$5,424	\$5,917	\$9,666	\$9,482	\$8,958	\$9,254	\$7,146	\$8,824	\$9,281	\$9,996	\$237	\$271	\$207	\$246	\$268	\$274	\$47	\$34	-\$30	-\$9	\$31	\$37			
Race (Multiple selections permitted)																																	
Black	1,183	1,180	962	1,036	1,266	1,005	\$8,942	\$8,811	\$8,975	\$10,066	\$10,519	\$12,959	\$10,707	\$10,444	\$10,205	\$11,809	\$10,213	\$11,302	\$279	\$360	\$297	\$325	\$286	\$389	\$34	\$81	\$18	\$46	\$7	\$30			
White	277	275	359	297	287	221	\$7,501	\$7,558	\$5,816	\$7,221	\$8,046	\$10,816	\$9,341	\$9,865	\$8,995	\$9,431	\$8,096	\$10,290	\$242	\$341	\$256	\$275	\$259	\$267	\$38	\$99	\$14	\$31	\$8	\$45			
American Indian	5	4	2	2	4	1	\$6,208	\$6,940	\$3,029	\$3,329	\$9,324	\$10,206	\$7,354	\$7,557	\$12,092	\$8,279	\$17,215	\$10,540	\$189	\$221	\$323	\$224	\$462	\$706	\$34	\$32	\$109	\$35	\$273	\$599			
Asian / Pacific	-	-	0	0	2	2	-	-	-	-	\$2,126	\$12,489	-	-	-	\$5,939	\$10,128	-	-	-	-	\$223	\$107	-	-	-	-	-	\$244	\$94			
Native Hawaiian	1	2	3	1	2	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$11,668	\$0	\$0	\$436	\$178	\$166	\$463	\$129	\$0	\$436	\$178	\$166	\$463	-\$258			
Other**	1	-	-	-	-	-	\$22,260	-	-	-	08 EF7	-	\$0	-	-	-	-	-	\$50	-	-	-	-	-	\$100	-	-	-	-	-			
Ethnicity																																	
Non-Hispanic	1,438	1,410	1,262	1,274	1,526	1,205	\$8,654	\$8,685	\$5,753	\$9,481	\$9,917	\$12,618	\$10,475	\$10,294	\$8,648	\$11,316	\$10,000	\$11,325	\$271	\$359	\$240	\$314	\$281	\$388	\$35	\$85	-\$31	\$43	\$10	\$37			
Hispanic	16	20	63	22	35	26	\$10,022	\$10,156	\$7,345	\$9,640	\$8,060	\$9,995	\$12,096	\$12,466	\$9,082	\$12,006	\$7,719	\$5,542	\$366	\$394	\$257	\$313	\$254	\$386	\$21	\$88	-\$49	\$7	-\$52	-\$116			
Age of Head of Household																																	
18-31	497	386	329	289	412	359	\$8,258	\$7,821	\$8,593	\$9,458	\$8,701	\$11,449	\$9,035	\$8,513	\$8,558	\$9,801	\$8,768	\$9,900	\$237	\$297	\$261	\$287	\$255	\$276	\$42	\$60	\$24	\$50	\$18	\$39			
32-46	759	824	711	741	850	689	\$9,251	\$9,351	\$9,159	\$10,379	\$10,958	\$13,695	\$11,774	\$11,499	\$11,120	\$12,407	\$10,899	\$11,898	\$302	\$392	\$318	\$337	\$296	\$320	\$29	\$90	\$16	\$35	-\$6	\$18			
47-61	198	220	285	266	229	183	\$7,579	\$7,324	\$6,083	\$7,018	\$8,324	\$10,427	\$9,238	\$9,104	\$8,344	\$9,982	\$9,648	\$11,296	\$242	\$328	\$246	\$282	\$275	\$312	\$38	\$86	\$4	\$40	\$33	\$70			
Excluded Households																																	
Elderly/Disabled	1,196	717	983	789	623	769	\$1,810	\$1,203	\$732	\$1,208	\$1,584	\$1,446	\$8,879	\$10,225	\$9,549	\$9,087	\$9,786	\$10,540	\$227	\$320	\$240	\$238	\$243	\$266	N/A	N/A	N/A	N/A	N/A	N/A			

TABLE 9: HCV, HEADS OF HOUSEHOLD, AVG. GROSS ANNUAL EARNED/AVG TOTAL ANNUAL ADJUSTED INCOME

HCV Population	Heads of Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income					
	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual
All Household	1,454	1,430	1,325	1,296	1,561	1,231	\$8,632	\$8,626	\$8,335	\$9,479	\$9,875	\$12,573	\$10,501	\$10,325	\$9,887	\$11,328	\$9,948	\$11,202
Gender																		
Female	1,404	1,378	1,177	1,167	1,424	1,138	\$8,697	\$8,669	\$8,701	\$9,873	\$9,901	\$12,742	\$10,547	\$10,403	\$10,231	\$11,605	\$10,013	\$11,288
Male	50	52	148	129	137	93	\$7,995	\$7,497	\$5,424	\$5,917	\$9,606	\$9,402	\$8,958	\$8,254	\$7,146	\$8,824	\$9,281	\$9,599
Race (Multiple selections permitted)																		
Black	1,183	1,160	962	1,036	1,266	1,006	\$8,942	\$8,811	\$8,975	\$10,066	\$10,319	\$12,950	\$10,787	\$10,444	\$10,205	\$11,809	\$10,213	\$11,392
White	277	275	358	257	287	221	\$7,561	\$7,938	\$5,816	\$7,221	\$8,046	\$10,816	\$9,341	\$9,805	\$8,595	\$9,431	\$8,696	\$10,298
American Indian	5	4	2	2	4	1	\$6,298	\$4,940	\$5,029	\$3,329	\$9,324	\$28,288	\$7,354	\$7,557	\$12,892	\$8,279	\$17,215	\$31,540
Asian / Pacific	-	-	0	0	2	2	-	-	-	-	\$2,126	\$12,480	-	-	-	-	\$5,930	\$20,128
Native Hawaiian	1	2	3	1	2	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$11,668	\$0
Other**	1	-	-	-	-	-	\$22,260	-	-	-	#REF!	-	\$0	-	-	-	-	-
Ethnicity																		
Non-Hispanic	1,438	1,410	1,262	1,274	1,526	1,205	\$8,654	\$8,605	\$5,753	\$9,481	\$9,917	\$12,618	\$10,475	\$10,294	\$8,648	\$11,316	\$10,000	\$11,325
Hispanic	16	20	63	22	35	26	\$10,432	\$10,156	\$7,345	\$9,641	\$8,060	\$9,995	\$12,096	\$12,466	\$9,082	\$12,006	\$7,719	\$5,542
Age of Head of Household																		
18-31	497	386	329	289	482	359	\$8,258	\$7,821	\$8,593	\$9,456	\$8,701	\$11,449	\$9,035	\$8,513	\$8,558	\$9,801	\$8,768	\$9,900
32-46	759	824	711	741	850	689	\$9,231	\$9,351	\$9,150	\$10,379	\$10,958	\$13,695	\$11,774	\$11,499	\$11,120	\$12,407	\$10,699	\$11,898
47-61	198	220	285	266	229	183	\$7,579	\$7,324	\$6,003	\$7,016	\$8,324	\$10,427	\$9,238	\$9,104	\$8,344	\$9,982	\$9,648	\$11,206
Excluded Households																		
Elderly/Disability	1,196	717	983	709	623	709	\$1,810	\$1,203	\$732	\$1,269	\$1,584	\$1,446	\$8,879	\$10,225	\$9,549	\$9,007	\$9,706	\$10,540

For all HCV households, average income (earned and adjusted), in 2018 was the highest compared to every year since this activity began. Average rent burden was also lower than benchmark by \$1.

Gender

TABLE 10: HCV - AVERAGE INCREASED RENT BURDEN BY GENDER

HCV Population	Heads of Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income						Average TTP						Average Increased Rent Burden					
	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2013 Baseline	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	Benchmark	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual
All Household	1,454	1,430	1,325	1,296	1,561	1,231	\$8,632	\$8,626	\$8,335	\$9,479	\$9,875	\$12,573	\$10,501	\$10,325	\$9,887	\$11,328	\$9,948	\$11,202	\$271	\$337	\$289	\$334	\$290	\$305	\$33	\$86	\$18	\$43	\$9	\$34
Gender																														
Female	1,404	1,378	1,177	1,167	1,424	1,138	\$8,697	\$8,669	\$8,701	\$9,873	\$9,901	\$12,742	\$10,547	\$10,403	\$10,231	\$11,605	\$10,013	\$11,288	\$273	\$360	\$299	\$322	\$302	\$307	\$34	\$87	\$26	\$49	\$9	\$34
Male	50	52	148	129	137	93	\$7,995	\$7,497	\$5,424	\$5,917	\$9,606	\$9,402	\$8,958	\$8,254	\$7,146	\$8,824	\$9,281	\$9,599	\$237	\$271	\$207	\$246	\$208	\$274	\$47	\$34	-\$30	-\$31	\$31	\$37

FY '14 = benchmark

In 2018, rent burden for females was the same as established for benchmark, while lower for males than benchmark. However, for both, these values were higher than in the previous year, with females showing the largest increase in rent burden (from \$9 to \$34). The flip flop in rent burden in favor of first males then females, was eliminated in 2018, with both genders showing close values, despite the higher average incomes reported by female household heads.

Race and Ethnicity

TABLE 11: HCV - AVERAGE INCREASED RENT BURDEN BY RACE/ETHNICITY

HCV Population	Head of Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income						Average TTP						Average Increased Rent Burden					
	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2014 Benchmark	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual
All Households	1,454	1,430	1,325	1,296	1,561	1,231	\$8,632	\$8,626	\$8,335	\$9,479	\$9,875	\$12,573	\$10,501	\$10,325	\$9,887	\$11,328	\$9,948	\$11,262	\$271	\$357	\$289	\$314	\$260	\$305	\$35	\$86	\$18	\$43	\$9	\$34
Race (Hispanic selection permitted)																														
Black	1,383	1,380	962	1,036	1,266	1,006	\$8,942	\$8,811	\$8,975	\$10,066	\$10,319	\$12,950	\$10,787	\$10,444	\$10,205	\$11,809	\$10,213	\$11,392	\$279	\$360	\$297	\$325	\$286	\$309	\$34	\$81	\$18	\$46	\$7	\$30
White	277	275	358	257	287	221	\$7,581	\$7,938	\$5,816	\$7,221	\$8,640	\$10,816	\$9,341	\$9,805	\$8,595	\$9,431	\$8,696	\$10,298	\$242	\$341	\$256	\$273	\$259	\$287	\$38	\$99	\$14	\$31	\$8	\$45
American Indian	5	4	2	2	4	1	\$6,288	\$4,940	\$5,029	\$3,329	\$9,324	\$29,286	\$7,354	\$7,557	\$12,182	\$8,279	\$17,215	\$31,540	\$189	\$221	\$323	\$238	\$402	\$788	\$34	\$32	\$189	\$35	\$273	\$599
Asian / Pacific	-	-	0	0	2	2	-	-	-	-	\$2,120	\$12,480	-	-	-	-	\$5,930	\$20,120	-	-	-	-	\$223	\$317	-	-	-	-	\$244	\$94
Native Hawaiian	1	2	3	1	2	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,264	\$7,104	\$6,624	\$11,668	\$0	\$0	\$456	\$178	\$160	\$403	\$170	\$0	\$456	\$178	\$166	\$403	\$286
Other**	1	-	-	-	-	-	\$22,268	-	-	-	\$8,821	-	\$0	-	-	-	-	-	\$50	-	-	-	-	-	\$188	-	-	-	-	-
Ethnicity																														
Non-Hispanic	1,438	1,430	1,262	1,274	1,526	1,205	\$8,654	\$8,665	\$5,753	\$9,481	\$9,917	\$12,618	\$10,475	\$10,294	\$8,648	\$11,316	\$10,080	\$11,253	\$271	\$356	\$289	\$314	\$281	\$308	\$35	\$85	\$-51	\$43	\$10	\$37
Hispanic	16	20	63	22	35	26	\$10,432	\$10,156	\$7,345	\$9,641	\$8,660	\$9,995	\$12,096	\$12,466	\$9,082	\$12,066	\$7,719	\$5,542	\$366	\$394	\$257	\$311	\$254	\$190	\$21	\$88	\$-69	\$7	\$-52	\$-116

Table 11 shows the average increase in rent burden incurred by head of households by race/ethnicity, between 2014 (benchmark) and 2018. The average increased rent burden for all households jumped from \$9 in the previous year, the lowest since implementation of this activity, to \$34. With the exception of Asian/Pacific Islander and NA/OPI, all other races saw an increase in debt burden, the highest being by the AI/NA due to income reported. Hispanics had a significantly lower rent burden than non-Hispanics.

Unlike in 2017 and 2016, the Native Hawaiian/Other Pacific Islander (NA/OPI) group reported the lowest increased rent burden. NA/OPI, constitutes a very negligible portion of the population (one person). The rent burden for these minority groups may be attributed to a number of factors including, the lack of earned income if/where reported, the number of households in these groups compared to the majority. Thus, changes for one household can exaggerate outcomes for that group.

Age

TABLE 12: INCREASED RENT BURDEN BY AGE

HCV Population	Head of Household						Average Gross Annual Earned Income						Average Total Annual Adjusted Income						Average TTP						Average Increased Rent Burden					
	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2013 Baseline	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual	FT 2014 Benchmark	FT 2014 Actual	FT 2015 Actual	FT 2016 Actual	FT 2017 Actual	FT 2018 Actual
All Households	1,454	1,430	1,325	1,296	1,561	1,231	\$8,632	\$8,626	\$8,335	\$9,479	\$9,875	\$12,573	\$10,501	\$10,325	\$9,887	\$11,328	\$9,948	\$11,262	\$271	\$357	\$289	\$314	\$260	\$305	\$35	\$86	\$18	\$43	\$9	\$34
Age of Head of Household																														
18-31	497	386	329	289	482	359	\$8,258	\$7,821	\$8,593	\$9,458	\$8,701	\$11,449	\$9,895	\$8,513	\$8,558	\$9,801	\$8,768	\$9,980	\$237	\$297	\$261	\$287	\$295	\$270	\$42	\$60	\$24	\$50	\$18	\$39
32-44	759	824	711	741	850	689	\$9,351	\$9,351	\$9,159	\$10,379	\$10,959	\$13,695	\$11,774	\$11,499	\$11,120	\$12,447	\$10,699	\$11,899	\$362	\$342	\$318	\$337	\$296	\$329	\$29	\$99	\$16	\$35	\$-6	\$19
45-61	198	220	205	266	229	183	\$7,579	\$7,234	\$6,983	\$7,014	\$8,324	\$10,627	\$9,238	\$9,104	\$8,344	\$9,982	\$9,648	\$11,286	\$242	\$328	\$246	\$282	\$275	\$312	\$38	\$86	\$4	\$40	\$33	\$70
Excluded Households																														
Elderly/Disabled	1,196	717	883	709	623	709	\$1,800	\$1,203	\$732	\$1,289	\$1,584	\$1,446	\$8,879	\$10,225	\$9,549	\$9,087	\$9,786	\$10,540	\$227	\$320	\$240	\$239	\$243	\$266	N/A	N/A	N/A	N/A	N/A	N/A

2014* = BENCHMARK

Table 12 reports inter alia, the average gross annual earned income by age of head of households, and the average increased rent burden between 2014 and 2018. It shows that for every age group, average rent burden households increased compared to 2017. In particular, 47 to 61-year olds on average had the highest rent burden even though the 32 to 46-year olds had higher incomes (earned and adjusted).

Thus, as seen before among the three age groups/range represented on the table, those aged 47 – 61 show the highest rent burden. Continued tracking and investigation of factors contributing to this difference should help exclude the existence or potential for disparity for the 47 – 61 age group.

C) Project Based Vouchers (PBV) - Centre Meadows

Who Is the Average Head of Household in PBV (CENTRE MEADOWS) Housing?

The demographic breakdown of eligible heads of PBV households (non-elderly/non-disabled), in 2018 is as follows:

- Female
- Black
- Non-Hispanic
- 18 – 31 years of age
- 2.4 household size

TABLE 13: PBV (CENTRE MEADOWS) - DISPARATE ANALYSIS, BASELINE & 2018 DATA

Disparate Impact Analysis - Baseline Data														
Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY2017	FY2018
All Household	158	174	196	\$12,532	\$12,672	\$14,357	\$13,964	\$12,001	\$12,629	\$355	\$303	\$322	-\$52	-\$33
Gender														
Female	144	154	181	\$12,561	\$12,363	\$14,268	\$13,819	\$11,930	\$12,351	\$352	\$302	\$314	-\$50	-\$38
Male	14	20	15	\$12,239	\$13,806	\$15,441	\$15,457	\$12,548	\$15,981	\$387	\$314	\$410	-\$73	\$23
Race (Multiple selections permitted)														
Black	129	143	163	\$12,126	\$12,491	\$14,513	\$14,067	\$12,318	\$12,409	\$357	\$312	\$316	-\$45	-\$41
White	28	30	32	\$14,237	\$13,539	\$13,458	\$13,407	\$10,670	\$13,620	\$342	\$267	\$346	-\$75	\$4
American Indian	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific	1	1	1	\$17,233	\$12,492	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14
Native Hawaiian	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	156	172	193	\$12,356	\$12,535	\$14,365	\$13,819	\$12,099	\$12,602	\$351	\$306	\$321	-\$45	-\$30
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,395	\$632	\$89	\$363	-\$543	-\$269
Age of Head of Household														
18-31	107	118	123	\$12,438	\$12,260	\$14,677	\$13,582	\$11,684	\$11,825	\$347	\$293	\$304	-\$54	-\$43
32-46	37	43	52	\$12,671	\$13,004	\$14,548	\$14,402	\$13,048	\$13,297	\$363	\$326	\$333	-\$37	-\$30
47-61	14	13	21	\$12,883	\$15,313	\$12,014	\$16,252	\$12,928	\$15,683	\$393	\$323	\$397	-\$70	\$4
Excluded Households														
Elderly/Disabled	45	42	57	\$487	\$659	\$870	\$11,679	\$10,962	\$9,816	\$292	\$274	\$246	N/A	N/A

2018 is the second year for which data has been collected and presented. Rent burden increased for EVERY group, the opposite of what occurred in 2017.

Gender

TABLE 14: PBV (CM) – AVERAGE RENT BURDEN BY GENDER OF HOUSEHOLD HEAD

Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY2017	FY2018
All Household	158	174	196	\$12,532	\$12,672	\$14,357	\$13,964	\$12,001	\$12,629	\$355	\$303	\$322	-\$52	-\$33
Gender														
Female	144	154	181	\$12,561	\$12,363	\$14,268	\$13,819	\$11,930	\$12,351	\$352	\$302	\$314	-\$50	-\$38
Male	14	20	15	\$12,239	\$13,806	\$15,441	\$15,457	\$12,548	\$15,981	\$387	\$314	\$410	-\$73	\$23
Elderly/Disabled	45	42	57	\$487	\$659	\$870	\$11,679	\$10,962	\$9,816	\$292	\$274	\$246	N/A	N/A

In 2018, the average gross annual income for all households increased in by about 13% (\$1,685) compared to 2017. 1% (\$140). Female household heads earned less than males (both gross annual and annual adjusted income).

With regard to rent paid in 2017 and 2018 respectively, average gross rent for female household heads (\$302; \$314) was less than for males (\$314; \$3410), due most likely to the higher average total annual adjusted income of male household heads.

Generally household heads incurred relatively low levels of increase in rent burden in 2018, with most like. For instance, females reported a rent burden of -\$38 (compared to -\$50) previously. Males went from -\$73 to \$23.

Race and Ethnicity

TABLE 15: PBV (CM) – AVERAGE RENT BURDEN BY RACE/ETHNICITY OF HOUSEHOLD HEAD

Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY2017	FY2018
All Household	158	174	196	\$12,532	\$12,672	\$14,357	\$13,964	\$12,001	\$12,629	\$355	\$303	\$322	-\$52	-\$33
Race (Multiple selections permitted)														
Black	129	143	163	\$12,126	\$12,491	\$14,513	\$14,067	\$12,318	\$12,409	\$357	\$312	\$316	-\$45	-\$41
White	28	30	32	\$14,237	\$13,539	\$13,458	\$13,407	\$10,670	\$13,620	\$342	\$267	\$346	-\$75	\$4
American Indian	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific	1	1	1	\$17,233	\$12,492	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14
Native Hawaiian	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	156	172	193	\$12,356	\$12,535	\$14,365	\$13,819	\$12,099	\$12,602	\$351	\$306	\$321	-\$45	-\$30
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,395	\$632	\$89	\$363	-\$543	-\$269
Excluded Households														
Elderly/Disabled	45	42	57	\$487	\$659	\$870	\$11,679	\$10,962	\$9,816	\$292	\$274	\$246	N/A	N/A

About 83% of PBV household heads were Black, and about 98.5% non-Hispanic. Whites made up about 16%, and Asian/Pacific Islander (A/PI) 0.5%. In terms of race, A/PI had the highest average gross annual earned and adjusted income in 2018.

They also had the highest average gross rent payment of \$421, reflecting the higher income earned and also resulting in the highest rent burden by race and ethnicity.

In contrast to 2017 and 2016, the current year saw a fall in the earned income for Hispanics, although annual adjusted income went up. This group also paid the second

highest rent by race and ethnicity but had the least rent burden (-\$269), compared to all the others.

There is no indication at this time of a compelling case of disparate impact by race and/or ethnicity.

Age

TABLE 16: PBV (CM) - AVERAGE RENT BURDEN BY AGE OF HEAD OF HOUSEHOLD

Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY 2016	FY2017	FY2018	FY2017	FY2018
All Household	158	174	196	\$12,532	\$12,672	\$14,357	\$13,964	\$12,001	\$12,629	\$355	\$303	\$322	-\$52	-\$33
Age of Head of Household														
18-31	107	118	123	\$12,438	\$12,260	\$14,677	\$13,582	\$11,684	\$11,825	\$347	\$293	\$304	-\$54	-\$43
32-46	37	43	52	\$12,671	\$13,004	\$14,548	\$14,402	\$13,048	\$13,297	\$363	\$326	\$333	-\$37	-\$30
47-61	14	13	21	\$12,883	\$15,313	\$12,014	\$16,252	\$12,928	\$15,683	\$393	\$323	\$397	-\$70	\$4
Excluded Households														
Elderly/Disable	45	42	57	\$487	\$659	\$870	\$11,679	\$10,962	\$9,816	\$292	\$274	\$246	N/A	N/A

Heads of household aged between 47 and 61 did not report the highest average gross annual income in 2018, in contrast to 2017 and 2016. This group did however report the highest annual adjusted income of the three age groups. They also paid the highest average gross rent in 2018, as well as incurred the highest rent burden (\$4). This is curious since rent paid in both years (2016 = \$393 and 2018 = \$397) was very similar, yet there is a significant difference in the resultant rent burden incurred.

It is not clear at this time that any of the age groups is unduly impacted by this activity.

This is the second year for which data is available, continued data collection and monitoring is recommended, with a review of any trends (both positive and negative) as they occur overtime.

Resident Survey - Findings

A resident survey was not conducted for the year under review, however one is planned for Fall 2018 and again in Spring 2019. This year, LHA pulled a random sample of 40 households from HCV and LIPH units for analysis, presented below.

Random Housing Sample - Findings:

This year, LHA pulled a random sample of records of 20 work-able households from LIPH units for analysis, presented below. A key purpose was to get a more nuanced insight into the profile of an average household, see how that compares to the general profile and findings presented in these annual reports, as well provide the opportunity

to obtain other information that might shed light on these households, including household size, composition, and receipt of assistance.

Profile

Household heads in 20 number sample were predominantly:

Female - (Female =13)

Black - (Black = 17; White = 3)

Non-Hispanic - (=20)

Aged - 32 (average of sample)

Thus, the sample confirms the general profile of household heads in PH.

Employment Status

According to the data obtained from this random sample, 16 of the heads of households reported being employed compared to four who reported no employment. This amounts to 80%, which is higher than average reported for PH in this report. The data also shows that of the 20 records reviewed, 16 are shown as being currently housed, while 4 were not.

TTP/Flat Rent; Rent

Records also provide information on TTP/Flat rent and rent payments of the selected Looking at TTP/Flat rent, the least payment by any household was \$150 per month (2 of the 20), which is in accord with Activity One's goal of a minimum \$150 rent agency-wide.

TTP/FLAT RENT PAYMENT - ACROSS SAMPLE	
Least	\$150
Average	\$366
Highest	\$648

A different picture emerges when actual rent paid is considered - i.e. less utilities allowance:

RENT PAYMENT - ACROSS SAMPLE	
Least	\$20
Average	\$237
Highest	\$493

It is worth noting in considering the least rent paid, that this does not impact the \$150 minimum because in practice, the amount for utilities is money which LHA would have had to disburse.

Income

Records provide data regarding income - annual earned, annual adjusted, as well as imputed.

INCOME - ACROSS SAMPLE			
	Earned	Adjusted	Imputed
Least	\$0*	\$3,498	\$0**
Average	\$14,469	\$15,744	\$1455
Highest	\$37,605	\$34,485	\$12,206

*Reported by 4 households ** Reported by 15 households

At \$14,469, average annual income is thus lower among the sample than the \$15,080 established by LHA for self-sufficiency. It is worth noting that 45% (9 of the 20) of households report annual earned income in excess of \$15,080. Taken together this information may be useful to inform decision-making and practices regarding movement to self-sufficiency for the general population.

Other information derived from the data

These include household composition and size, and forms of assistance received by households.

- a. Household size: The smallest household comprised of the household head alone (2 of 20) - 10% of the sample. The average household size included 3 persons = 30%, while the largest household comprised of 6 persons = 10%.
- b. House size (No. of bedrooms): Most of the sample had homes with 3 bedrooms (14 or 70%), 0.5% - one household had 4 bedrooms, while 10% (2 people) had one-bedroom homes.
- c. Household members (adults vs non-adults): Of the 20 households sampled, only 3 (15%) had an adult *other than the head of household* in residence. This is an interesting fact because a long-held question has always been who exactly contributes to earned income per household, as the data collection process did not allow this type of discrimination. As such, it was difficult to determine or make assumptions about sources of household income - for instance when evaluating movement to self-sufficiency for a household. This data from the 20 households seems to indicate that heads of households are likely the only working adults. If that is the case, then a clearer connection may be possible between MTW activities by LHA which for instance seek to impact employment status, self-sufficiency and the outcomes reported by heads of households.

No. of persons < Age 18 Years in the household/ No. of Households	
# of people < Age 18	# of Households Affected
0	2
1	4
2	6
3	4
4	3
5	1

No. of persons > Age 18 in the household/ No. of Households	
# of Adults	# of Households Affected
0	17
1	3

- d. Assistance received: Forms of assistance received by some households in the sample included the following: deductions, food stamps, unemployment benefits, and child support.
- i. The amount of deduction received differed across households. There were households that received no deductions (least = 0), the average deduction recorded was \$2,659, while the highest was \$9,120.
 - ii. Of all the households sampled, only 35% (7) receive food stamps. A question that is raised here might be the degree to which this data speaks to the issue of financial ability and /or need of households?
 - iii. Most of the households sampled (18) do not receive unemployment. Of the two that do, one receives \$6,448 while the other receives \$7,020. Again, considering the goals of self-sufficiency this high number of non-recipients of unemployment can be considered a positive.

Finally, some households reported receiving child support. Interestingly enough, although 85% of households reported having children, only 25% (5) answered “yes” to receiving child support. The lowest amount received being \$1608 compared to the highest at \$3,958. A key question here might be why the number reporting child support is so low. Does this capture the true reality, or do other factors come into play that impact child support assistance decisions by household heads?

ASSISTANCE RECEIVED - ACROSS SAMPLE				
	Deductions	Food Stamps	Unemployment	Child Support
Least	\$0	\$0	\$0*	\$0
Average	\$2,659	\$1,645	\$673**	\$652.4**
Highest	\$9,120	\$7,680	\$7020	\$3,958

*18 households

** Based on total numbers

- e. Late fee occurrence: The information provided by this data raised both interest and questions. Of the sample of 20 households provide, all but one had paid late fees in 2018, (the one exception being a relatively new tenant, who took up residence in April 2017). Most of the chronic late fee payers have been LHA tenants for at least 8 years. Of the other 19, seven paid late fees of \$25, nine out of 12 months.

Patterns of late fee payment vary - for instance, a new tenant (started February 2018), had paid late fees in two of the five months in which she was a resident. The tenant with the lowest rent (\$20 - eligible to pay lowest rent of \$150, less utility allowance), also paid the \$25 late fee seven out of twelve months - a sum greater than actual rent she owed. Also, another tenant whose rent was \$131, paid late fees nine out of 12 months.

These patterns raise a number of questions given that \$25 is arguably a significant amount of money for most if not all of the sampled households. One question goes to the reason for these late payments, and whether or not these fees constitute just part of the expected payment each month. If so, it raises further questions about rent affordability as well as individual choice in financial priorities or decision-making.

# LATE FEE PAYMENTS ACROSS SAMPLE	
# of Months Late	# of Households
9-12	7
5-8	5
1-4	7
0	1

Although not generalizable in statistical terms, the provision of this sample for review provides more of an insight about PH households that is informative. For one, it confirms the profile of households (race, ethnicity, gender). At the very least, it has given some support for the notion that sources of earned income are likely attributable to household heads alone, confirmed the \$150 minimum rent payment, and furthermore provides food for thought for LHA's consideration as it strives towards its self-sufficiency goals for households.

Conclusion and Recommendations

The rent reform Activity 1 – that seeks to increase minimum rent for work-able households across all housing programs, is a key initiative for LHA. and its tenants. The scope of its impact and probable implications for both LHA and tenants continues to be important. Outcomes for Activity 1 indicate maintenance and a staying of the course in 2018.

Successes and challenges/opportunities for improvement still pervade.

Goals realized – A number of goals were met in 2018. For the fourth year in a row, LHA has successfully continued to maintain 100% tenant participation in the now established minimum \$150 rent agency-wide.

Agency-wide a reevaluation of how rental revenues are calculated resulted from the acknowledgement of the error in computing HCV rent as revenues to LHA. As a result, benchmarks for this activity have been reviewed, and a new metric added which best accords with practice. Going forward it will be important to see how well this change reflects practice and its impact on data collection, analysis as well as outcomes.

The possible “dampening” effect attributed to the addition of PBV to the analyses last year appears reduced in 2018. LHA managed to meet benchmarks for PBV in a number of metrics including increase in rental income for LHA, and transitioning households to self-sufficiency.

In 2018 LHA was successful agency-wide in achieving its bench mark in relation to other metrics such as increasing household income, and the number of households reporting positive outcomes in employment status.

2018 continued the upward trend in numbers of eligible (work-able) households since the inception of the initiative.

Consequently, Activity 1 continues to show progress towards realization of stated goals of increasing agency revenues, promoting self-sufficiency for tenants for instance through improvements in employment status, and increases in earned income.

Probable Challenges/Opportunities - Some issues deserving of further investigation, monitoring or evaluation are identified below.

Despite the progress made with PBV, there are still areas /gaps that need minding. These include areas where LHA failed to achieve PBV benchmarks such as increasing household income for families in this sector, positive changes in employment status/reporting of earned income. Also, this year, LHA struggled with TANF - only managing to achieve benchmark in relation to HCV units alone. The preceding are key

measures because they speak to the issue of moving tenants/clients to self-sufficiency – a major goal of participation in the MTW demonstration program.

To restate a position taken last year, it is early days yet, but LHA should if it has not already done so, consider whether, and/or to what extent the barriers faced by the former Pimlico unit tenants continue to be in operation here. Continued monitoring and the passage of time will be necessary to determine PBV contributions to, role in, and effect on agency-wide outcomes.

Given the changes made to reflect and properly account for the non-generation of rental revenue to LHA from HVC units, it is recommended that the new metrics be tracked in order to see how they might impact outcomes and analysis.

The number of household heads reporting no earned income decreased in 2018 in all sectors (PH, HCV, PBV), even though only the decreases in PH and HCV were sufficient to achieve benchmark. However, considering the increase recorded in 2017, this is a favorable overall direction for LHA. This is another metric to be watched.

Agency-wide, LHA data indicates about a 5% increase over the previous year in the number of household heads who reported earned income in 2018. In fact, every sector showed an increase in comparison to 2017. All but PBV achieved benchmark. To date, PBV has failed to come close to its stated benchmark of 100% heads reporting earned income. It is recommended that LHA review the feasibility of its 100% benchmark for PBV, especially if future data does not register clear movement toward this goal.

The issue of number of households on TANF is another to watch. Again, agency-wide LHA failed to meet benchmark on this metric, although successful in HCV sector. TANF, earned income, positive employment status, etc. are all key metrics to follow because of their ability to shed light on the success or otherwise of efforts to move residents to self-sufficiency.

For the current year under review, LHA provided data on hardship requests, as well as categorizations of circumstances that precipitate tenants to leave LHA Housing. As stated earlier this is a good first step. However, more specific information about these issues (e.g. reason for move out) etc., will be more informative and useful for planning and decision-making.

No data was provided for initiative related complaints, it is not known if there were none, or if the data was not available – a clear distinction should be made. There were 16 hardship requests in 2018. The reduction in requests from HCV is good – as long as we can ascertain that this is driven by positive factors and not caused by lack of awareness of the process. We know the percentage granted, but not the reason for the petitions denied. This information would also be useful in affording transparency to

the process. Also, the increase in hardship requests in the PH sector (6 this year), should also be monitored.

Because of the potential of hardship request and tenant complaints to help shed light on the impact of Activity 1, on household experience and perceptions, it is imperative to continue to track these two-metrics overtime, and agency-wide.

Another challenge to be reviewed relates to “move outs”, which affected 662 households in 2018. As stated in earlier reports in addition to tracking numbers, it is useful to understand why tenants leave LHA – in particular to explore any possible links to hardship requests, or prior tenant complaint relative to/arising from this initiative. It would also be helpful to provide demographic information for those who move out, for disparate impact analysis.

Recognizing the challenges regarding feasibility and depending on circumstances of move out, again, the use of exit interviews/surveys, etc. whenever possible is recommended.

There is no doubt that Activity 1 is well established and standing the test of time. Strategic data collection and analysis will ensure that the key questions regarding how well its execution meets stated MTW Demonstration Project goals, whether its continued implementation creates a disparate effect on any tenant populations, and how households perceive the activity and or its impact, are answered.

Attention to issues related to disparate impact on protected groups (identification, avoidance and/or amelioration) continue to be important goals to keep in play.

Opportunities: 2018 – areas to watch and monitor. As these generally remain same as in 2017 – this is restated from the previous report.

a. Disparate impact and gender?

Head of household profile remains similar to previous years, in favor of females. Avoidance of undue (be it male or female) gender-related increases in rent burden continue to be a priority. Due to the mixed message emerging from a review of the data going back to its inception, it is not clear at this time if this is a concern, thus continued monitoring and evaluation is recommended.

b. Disparate impact and age?

The 47 to 61 age group continues to bear the highest rent burden. This may reflect the higher income reportedly earned compared to other age groups. Continued monitoring is recommended for confirmation, and/or to identify other potential drivers for this increased rent burden.

c. Disparate impact and ethnicity?

2018 data indicates a different picture than was seen in 2017 – again, signals are mixed. In the absence of clear trends, continued monitoring is recommended especially if the number of Hispanic households increases.

Currently, this group forms a very small percentage of the LHA tenant population, and time will tell if that will change with demographic shifts in the population.

d. *Resident Survey?*

Not included in the 2018 report, as a survey was not conducted. Recommend periodic administration of same, or other modality to measure resident perceptions and satisfaction.

e. Random Housing Sample: The random sample of 20 households was a good starting point in 2018. For future iterations, consider increasing the size of the sample, and also including samples from other sectors such as HCV for review.

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

ACTIVITY THIRTEEN

Local self-sufficiency admissions and occupancy requirements activity

Excludes households whose head/co-head is elderly/disabled.

Description: Rent reform activity requiring work-able heads of households (co-heads, or spouses) including full-time students at LHA's Self-Sufficiency (SS) and Centre Meadows (CM) sites to work a minimum number of hours, or be subject to imputed income as follows:

TABLE 17: IMPUTED INCOME

Program	Minimum Hours	Hourly Rate	Current Annual Imputed Income
Self-Sufficiency Level 1	37.5	Federal Minimum Wage	$7.25 \times 37.5 \times 52 = \$14,138$
Self-Sufficiency Level 2	20	Federal Minimum Wage	$\$7.25 \times 20 \times 52 = \$7,540$
Centre Meadows	20	Federal Minimum Wage	$\$7.25 \times 20 \times 52 = \$7,540$

Date of implementation FY2014

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

To that end, LHA:

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

LHA definition of “work activity” includes:

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

2018 Additional notes/updates:

No significant changes or modifications since 2016.

With the exception of Centre Meadows (PBV site), all baselines and metrics for this activity were established in FY 2015, so two years of historical data now exists.

In 2018, LHA had a total of 1052 units that were eligible for this activity including, Public Housing units in Self-sufficiency I (286), Self-Sufficiency II (668), and Centre Meadows (253).

Number of households affected by this initiative and rent reform activity, in 2018:
683 households (occupied, non-elderly/non-disabled)

Breakdown of numbers of eligible households by type of unit:

Self-Sufficiency 1 (SSI) = 211/286 Units

Self-Sufficiency II = 424/668)

Total (SSI & SSII): Units = 635

Centre Meadows Units (CM): Consists of 206 units, of which 196 households (occupied units, non-elderly/non-disabled) are affected by this initiative and rent reform activity.

Thus Activity 13 affects a total of 831 households (635 – SS I/II units; 196 CM units)

Increase self-sufficiency of residents/tenants

To measure this goal, the following metrics were used –

- a. *increase in household income;*
- b. *increase in positive outcomes in employment status;*
- c. *number of households requesting hardship exemption,*
- d. *decrease in number of households on TANF, and*
- e. *number of households transitioned to self-sufficiency.*

Increase in Household Income

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

SSI/II benchmark (2015):

Expected average gross annual earned household income = \$13,704

qualifying households = 639

Previous year average gross annual earned household income = \$21,397

qualifying households = 683

CM benchmark (2016):

Expected average gross annual earned household income = \$18,277

qualifying households = 165

Previous year average gross annual earned household income = \$14,727

qualifying households = 140

SS I/II: In 2018, 539 (out of 635 = 85%) qualifying households reported actual average gross annual earned income of \$21,116. Compared to the previous year, this indicates an average decrease of about \$281 per qualifying household. It must be noted however that a higher percentage of households (85%) in 2018 reported earned income than in 2017 (83%). Reported average earned income is \$7,462 more than benchmark of \$13,704 (based on 639 households).

Thus, LHA's goal of an increase in household income was achieved in 2018. In addition, the number of households reporting earned income grew by 2% over the preceding year. With 85% of households earning higher incomes compared to benchmark and

baseline respectively, the reported increase is a positive outcome for this metric despite being less than in 2017.

CM: This is the third year of occupancy since the site reopened as PBV in December 2015.

Out of 196 qualifying households, 163 reported actual average earned income of \$17,264 in 2018. Although an increase on the previous year as well as baseline, this amount was still approximately 6% less than benchmark (\$18,277), and for similar number of households (165 vs 163 at benchmark). Ultimately, because average actual earned income is less than benchmark, LHA failed to meet its goal on this metric.

Increase positive outcomes in employment status

This metric is addressed by reviewing the increase in number of heads of household reporting earned income in 2018:

SSI/II benchmark (2016):

Expected number of heads of household reporting earned income = 628

Previous year, number of heads of household reporting earned income = 568

CM benchmark (2017):

Expected number of heads of household reporting earned income = 165

Previous year, number of heads of household reporting earned income = 140

SSI/II: 2018 marks the third year of data collection for this metric. 539 heads of households reported actual earned income, 29 less than in 2017 and in particular 89 less than benchmark. Consequently, LHA did not achieve benchmark on this metric. Another useful way to compute this metric is by a review of the number of heads of households who reported *no* earned income - a total of 96 in 2018. This is the lowest number reported since 2016, and almost mirrors baseline value of 95.

LHA failed to achieve benchmark on this metric since 2018 values are still in excess of the zero benchmark for this metric. It is clear from the foregoing that success in this metric requires increasing the actual number as well as overall percentage of households reporting earned income. It is hoped that the decrease in numbers reporting no earned income in 2018 sets a new trend for the future.

CM: 2018 provides the second year of data for this category with 163 heads of households reporting actual earned income. As this falls short of benchmark (165) by two, technically LHA failed to achieve benchmark.

Similar to the process for SSI/II above, a consideration of the number of heads of households who reported no earned income in 2018, provides another way to review

this metric. Data indicates that 33 heads of household reported *no* earned income in 2018, compared to baseline (28), and the benchmark of zero (0), set by LHA. Thus, by either approach, LHA failed to obtain positive outcomes on this metric. However as noted for SSI/II above, the reduction in numbers of those reporting no earned income – from 46 in 2017 to 33 in 2018, is a good step in the right direction.

Number of Households Requesting Hardship Exemption

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

SSI/II benchmark (2015):

Expected number of hardship requests (SSI) = 21 (or 10% of households)

Expected number of hardship requests (SSII) = 42 (or 10% of households)

Previous year, number of hardship requests (SSI) = 0

Previous year, number of hardship requests (SSII) = 0

CM benchmark (2015):

Expected number of hardship requests = Exempt

Previous year, number of hardship requests = 0

SS I/II: FY 2018

Number of hardship requests (SSI) = 4

Number of hardship requests (SSII) = 1

For the first time in five years of data collection, a total of five (5) requests for hardship exemption was reported for 2018 for both SSI and SSII. Of that number, 40% (two from SSI) of the requests were granted. These values are still lower than benchmark, but it is useful to understand drivers of hardship requests for households. It is recommended that this metric continued to be tracked and monitored, as well as reasons for which requests are granted or denied for future review. The hardship review committee should be involved and assist with this process.

CM: No hardship requests reported in 2018, and there is no historical data for comparison. It is recommended that this metric continued to be tracked and monitored, for review in FY 2019.

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

SSI/II benchmark (2015):

Expected number of household with heads receiving TANF = 20

Previous year, number of household with heads receiving TANF = 135

CM benchmark (2017):

Expected number of household with heads receiving TANF = 0

Previous year, number of household with heads receiving TANF = 7

SS I/II: In 2018, the number of households receiving TANF was 130, contrary to LHA benchmark (20), which reflects an expectation of decrease. Even though this number shows a slight reduction from 2017 values, it is still far in excess of benchmark as well as baseline values.

Thus, LHA failed to achieve benchmark. This discrepancy in expectation and actual performance, especially the magnitude of difference is a cause for concern. It will be important to review this metric and continue to track/monitor data going forward.

CM: In 2018, a total of 9 household heads reported receiving TANF. Although lower than baseline (38), it exceeds the benchmark value of zero set in 2016. Thus, LHA failed to achieve the goal for this metric.

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

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

Number of Households Transitioned to Self-Sufficiency

SSI/II benchmark (2015):

Expected number of households where head is meeting the definition of self-sufficiency
= 58

Previous year, number of households where head is meeting the definition of self-sufficiency = 372

CM benchmark (2017):

Expected number of households where head is meeting the definition of self-sufficiency
= 88

Previous year, number of households where head is meeting the definition of self-sufficiency = 58

SS I/II: 2018 saw a reversal in the 3-year trend of increase in this metric. LHA reports that there were 368 households (down four from 2017) where the head of household (head/co-head/spouse) met the definition of self-sufficiency (i.e. earned income > \$15,080 per year). Notwithstanding the slight dip in numbers, LHA realized a positive

outcome on this metric as the 2018 number is significantly higher than both benchmark (58) and baseline (48). This outcome is still a huge success for the agency.

One issue which continues to limit the usefulness of this metric in understanding potential impact and outcomes relates to the ability to disaggregate/identify specific sources of and contributors to household income. This is necessary to facilitate a better understanding of what drives the outcomes, and to inform policy and practice.

Reduce costs (increase revenues)

To measure this goal, the following metrics were used –

- a. reduce per unit subsidy costs for participating households,
- b. increase agency rental revenues, as well as
- c. a cost-benefits assessment of this activity for LHA

Reduce per unit subsidy costs for participating households

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

SSI/II benchmark (2015):

Expected average amount of Section 8 and/or Section 9 subsidy = \$2191/\$183 per household, per month.

Previous year, average amount of Section 8 and/or Section 9 subsidy = \$2,783/\$233 per household, per month.

CM benchmark (2017):

Expected average amount of Section 8 and/or Section 9 subsidy = \$299 per household, per month.

Previous year, average amount of Section 8 and/or Section 9 subsidy = \$5,543/\$462 per household, per month.

SS I/II: According to 2018 data given, the average subsidy paid per household was \$2,696 (or \$225 MPUC), compared to benchmark value of \$2191 (\$183 MPUC). This continues for another year the decrease begun in 2017 and is less than values at baseline. However as average subsidy exceeded benchmark, LHA failed to meet this metric.

CM: Similarly, average subsidy per household decreased in 2018 compared to 2017. This subsidy reported per household as \$5,361 (\$447 MPUC), was however higher than both baseline (\$399) and benchmark (\$299). As a result, LHA failed to achieve a

positive outcome on this metric. Continued data collection and monitoring is advised, especially as tracking for this metric is still in its infancy.
Recommend continue to track and monitor data for review post FY 2018.

Increase agency rental revenues

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

SSI/II benchmark (2015):

Expected PHA rental revenue = \$193,851

Previous year, PHA rental revenue = \$233,777

CM benchmark (2017):

Expected PHA rental revenue = \$672,684

Previous year, PHA rental revenue = \$519,803

SS I/II: A total of \$288,887 was realized by PHA as rental revenue in 2018. This represented an almost 24% increase in agency revenue for LHA compared to 2017, and 49% more than benchmark. Consequently, LHA met its goal on this metric.

CM: Baseline = Post implementation of Activity 13 in 2016, benchmark was set in 2017 as \$672,684. In 2018, PHA rental revenue saw a slight increase of \$969 (or 0.19%) over the previous year, 2017. However, because that increase was not enough to meet benchmark values, PHA failed to meet this metric.

This metric had mixed outcomes for LHA. For SS1/SSII PH units, the agency was able to exceed benchmark by very clear margins. On the other hand, with regard to Centre Meadows PBV units LHA fell short of benchmark.

Agency-wide, looking at both PH and PBV units, average rental revenue in 2018 was \$3,564 per year or \$297 per unit. In the previous year 2017, net rental revenue was \$3,211 per year/\$268 per unit. Thus, LHA saw an average increase in rental revenue to the tune of about \$29 per unit in 2018 compared to the previous year.

Recommend continue to track and monitor data for review in FY 2019.

Cost-benefits assessment

Two measures are considered –

a) total rent revenue (gross/net), as well as

b) dollar value of staff time spent processing hardship requests.

a) Following from the above, which looked at rental revenue we know that SSI/SSII (PH) rental revenue exceeded benchmark, while Centre Meadows(PBV) fell short. Taken together (i.e. SSI/II and CM), LHA saw an overall decrease in rental revenue in 2018 to the magnitude of about \$56,876 when compared to benchmark year. That said, it must be noted that the agency still collected more revenue than at baseline at both SSI/II and CM units. This at least indicates some positive benefit for the agency

b) Dollar value of staff time spent processing hardship requests.
SSI/SSII together reported a total of 5 hardship requests in 2018, two of which were granted. In order to calculate the dollar value of staff time spent processing requests it is necessary to have information on the per hour cost of staff time, plus the duration of processing time.

Per LHA estimates, each hardship request process takes about an hour of staff time at a cost of \$35 (CM), and \$28 (SSI & SSII).

$$\text{SSI/II} - 5 \text{ hardship requests} \times \$28 = \$140$$

Although there are costs to LHA for processing hardship requests, the importance of providing this avenue for households to seek redress cannot be overstated. Rather than focus on a reduction of the number of hardship requests as a cost savings exercise, the emphasis should be shifted to ways to make the process more efficient (if possible), or alleviate causes of hardship requests that might fall under the agency's purview. It is recommended that this metric continue to be tracked and reported to monitor developments in both sectors.

Disparate Impact Analysis – Demographics

The purpose of the disparate impact analysis is to ensure that this rent reform initiative does not unintentionally result in/create through its implementation, a disparate impact on the rent burden faced by protected classes of households by race, color, national origin, disability, age, or gender. The tables below provide snapshots of average annual income (earned/adjusted), and average gross rent (monthly) paid by households by race/ethnicity, and gender from inception in FY2013, to current FY2018, and any increased rent burden incurred.

A) Self-Sufficiency I Units

TABLE 18: SELF-SUFFICIENCY I - DISPARATE IMPACT ANALYSIS, BASELINE DATA

Activity 13: Self-Sufficiency I																								
Disparate Impact Analysis - Baseline Data																								
Self-Sufficiency I Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden			
	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	210	230	206	204	211	\$16,431	\$19,512	\$20,595	\$20,853	\$19,090	\$16,555	\$19,270	\$21,365	\$21,620	\$21,580	\$380	\$402	\$531	\$524	\$479	\$82	\$151	\$144	\$99
																								\$0
Gender																								\$0
Female	201	222	194	191	196	\$16,399	\$19,512	\$20,483	\$20,334	\$18,781	\$16,525	\$19,270	\$20,782	\$21,129	\$20,942	\$378	\$402	\$518	\$511	\$472	\$84	\$140	\$133	\$94
*Male	9	8	12	13	15	\$17,154	\$17,513	\$29,783	\$28,476	\$23,124	\$17,228	\$16,659	\$30,800	\$28,837	\$29,915	\$426	\$407	\$745	\$725	\$569	\$41	\$319	\$299	\$143
Race (Multiple selections permitted)																								
Black	170	193	169	170	175	\$16,581	\$20,390	\$21,254	\$21,606	\$19,296	\$16,281	\$19,365	\$21,505	\$22,795	\$21,860	\$387	\$477	\$538	\$544	\$484	\$90	\$151	\$157	\$97
White	39	34	34	32	35	\$17,164	\$15,215	\$20,580	\$16,660	\$17,855	\$18,048	\$19,494	\$21,394	\$20,586	\$20,071	\$365	\$475	\$515	\$421	\$446	\$110	\$150	\$56	\$81
American Indian / Native Alaskan	1	0	0	0	0	\$5,184	\$36,874	\$0	\$0	\$0	\$29,827	\$0	\$0	\$0	\$0	\$130	\$550	\$0	\$0	\$0	\$0	\$0	\$0	\$0
**Asian / Pacific Islander	2	0	2	1	0	\$10,090	\$19,512	\$12,084	\$12,356	\$0	\$20,313	\$19,259	\$19,726	\$21,252	\$0	\$278	\$493	\$302	\$309	\$0	\$215	\$24	\$31	\$0
Native Hawaiian / Other Pacific Islander	0	1	1	1	1	\$0	\$15,771	\$15,376	\$26,320	\$26,272	\$0	\$0	\$0	\$0	\$25,324	\$0	\$394	\$384	\$658	\$657	\$394	\$384	\$264	\$657
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity																								
Non-Hispanic	204	220	198	197	205	\$16,511	\$19,761	\$21,029	\$20,851	\$19,109	\$16,508	\$19,310	\$21,471	\$21,647	\$21,615	\$381	\$500	\$531	\$524	\$479	\$119	\$150	\$143	\$98
Hispanic	6	10	8	7	6	\$13,711	\$19,512	\$20,916	\$20,931	\$18,450	\$18,145	\$19,259	\$18,738	\$20,862	\$20,361	\$351	\$493	\$523	\$523	\$461	\$172	\$172	\$172	\$110
Age of Head of Household																								
18-31	88	82	72	83	85	\$13,189	\$16,002	\$16,582	\$14,483	\$15,135	\$13,760	\$15,519	\$17,752	\$16,872	\$17,582	\$312	\$401	\$422	\$368	\$383	\$89	\$110	\$56	\$71
32-46	88	106	100	90	92	\$17,554	\$22,041	\$22,175	\$23,436	\$19,473	\$17,177	\$21,210	\$21,821	\$23,844	\$21,814	\$405	\$555	\$558	\$587	\$487	\$150	\$153	\$182	\$82
47-61	34	42	34	31	34	\$21,916	\$24,141	\$27,050	\$30,411	\$27,940	\$22,179	\$21,697	\$27,678	\$27,877	\$30,941	\$489	\$607	\$681	\$761	\$695	\$118	\$192	\$272	\$206
Excluded Households																								
Elderly/Disabled Households	35	36	48	46	75	\$15,369	\$15,174	\$14,449	\$23,140	\$18,399	\$4,429	\$3,892	\$5,031	\$6,283	\$6,768	\$343	\$358	\$361	\$426	\$461	N/A	N/A	N/A	N/A
*Data for males is skewed due to one income being three times that of the average.																								
** Data for Asian/Pacific Islander households is incorrect for FY2015 as there were no households of that race for 2015.																								

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

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

Profile, Heads of households

- Female
- Black
- Non-Hispanic
- 32 -46 years old

Gender

Table 19: SSI – Gender

Self-Sufficiency I Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden			
	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	210	230	206	204	211	\$16,431	\$19,512	\$20,595	\$20,853	\$19,090	\$16,555	\$19,270	\$21,365	\$21,620	\$21,580	\$380	\$402	\$531	\$524	\$479	\$82	\$151	\$144	\$99
																								\$0
Gender																								\$0
Female	201	222	194	191	196	\$16,399	\$19,512	\$20,483	\$20,334	\$18,781	\$16,525	\$19,270	\$20,782	\$21,129	\$20,942	\$378	\$402	\$518	\$511	\$472	\$84	\$140	\$133	\$94
*Male	9	8	12	13	15	\$17,154	\$17,513	\$29,783	\$28,476	\$23,124	\$17,228	\$16,659	\$30,800	\$28,837	\$29,915	\$426	\$407	\$745	\$725	\$569	\$41	\$319	\$299	\$143

Continuing a trend where women far exceed men as head of households, females constituted about 93% of heads of household. There were two more male household heads in 2018 (15) compared to 2017 (13) versus five more females in 2018 (196) compared to 191 in 2017. Relative to 2017, average gross rent payment decreased for both genders, with males seeing a larger decrease (\$156) than females (\$39). This is reflected in the average rent burden which fell for both males and females in 2018, compared to the previous year, albeit still higher than in 2015, and significantly much higher for males.

For the third year in a row, male household heads report a higher average increased rent burden. As with past years, this has been attributed to higher incomes earned by male household heads. Also, LHA information suggests that data for males may be skewed due to an outlier income, reported as thrice the average income. Continued tracking and monitoring is recommended.

Race/Ethnicity

TABLE 20: SSI - RACE/ETHNICITY

Self-Sufficiency I Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden			
	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY 2013	FY2015	FY2016	FY2017	FY2018	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	210	230	206	204	211	\$16,431	\$19,512	\$20,595	\$20,853	\$19,090	\$16,555	\$19,270	\$21,365	\$21,620	\$21,580	\$380	\$462	\$531	\$524	\$479	\$82	\$151	\$144	\$99
Race (Multiple selections permitted)																								
Black	170	193	169	170	175	\$16,581	\$20,390	\$21,254	\$21,606	\$19,296	\$16,281	\$19,365	\$21,505	\$21,795	\$21,860	\$387	\$477	\$538	\$544	\$484	\$90	\$151	\$157	\$97
White	39	34	34	32	35	\$17,164	\$15,215	\$20,580	\$16,660	\$17,855	\$18,048	\$19,494	\$21,394	\$20,586	\$20,071	\$365	\$475	\$515	\$421	\$446	\$110	\$150	\$56	\$81
American Indian / Native Alaskan	1	0	0	0	0	\$5,184	\$36,874	\$0	\$0	\$0	\$29,827	\$0	\$0	\$0	\$0	\$130	\$550	\$0	\$0	\$0	\$0	\$0	\$0	\$0
**Asian / Pacific Islander	2	0	2	1	0	\$10,090	\$19,512	\$12,084	\$12,356	\$0	\$20,313	\$19,259	\$19,726	\$21,252	\$0	\$278	\$493	\$302	\$309	\$0	\$215	\$24	\$31	\$0
Native Hawaiian / Other Pacific Islander	0	1	1	1	1	\$0	\$15,771	\$15,376	\$26,320	\$26,272	\$0	\$0	\$0	\$25,324	\$25,324	\$0	\$394	\$384	\$658	\$657	\$394	\$384	\$264	\$657
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

The racial groups with the three highest rent burdens in 2018 were a) Native Hawaiian/ Other Pacific Islander (\$657), b) Black (\$97) and White (\$81) – same as in 2017. The other races reported \$0 rent burden. The largest increase was experienced by the Native Hawaiian/Other Pacific Islander group, while Black and Asian Pacific Islander household heads reported reductions in rent burden in 2018.

Hispanic heads had a higher rent burden than non-Hispanic, plus their rent burden decreased for the first time to \$110 after being \$172 for three years.). Higher rent burden appears to reflect higher gross rent payment, which in turn reflects income earned. For instance, among racial groups, Native Hawaiian/Other Pacific Islander reported the highest income in 2018. In 2017, it appeared that Black households might be at risk of an undue burden due to increases overtime, but in 2018 rent burden fell for this group. This underscores the necessity to keep a careful eye on rent burden for all groups, and its relation to rent paid and income earned.

Age

TABLE 21: SSI - AGE

Self-Sufficiency I Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden				
	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018
All Non-Elderly/Non-Disabled Households	210	230	206	204	211	\$16,431	\$19,512	\$20,595	\$20,853	\$19,090	\$16,555	\$19,270	\$21,365	\$21,620	\$21,580	\$380	\$462	\$531	\$524	\$479	\$82	\$151	\$144	\$99	
Age of Head of Household																									
18-31	88	82	72	83	85	\$13,189	\$16,002	\$16,582	\$14,483	\$15,135	\$13,700	\$15,519	\$17,752	\$16,872	\$17,582	\$312	\$401	\$422	\$368	\$383	\$89	\$110	\$56	\$71	
32-46	88	106	100	90	92	\$17,354	\$22,040	\$22,175	\$23,436	\$19,473	\$17,177	\$21,210	\$21,821	\$23,844	\$21,814	\$405	\$555	\$558	\$587	\$487	\$150	\$153	\$182	\$82	
47-61	34	42	34	31	34	\$21,916	\$24,141	\$27,050	\$30,411	\$27,940	\$22,179	\$21,697	\$27,678	\$27,877	\$30,941	\$489	\$607	\$681	\$761	\$695	\$118	\$192	\$272	\$206	

For the third consecutive year, 47 – 61year old household heads incurred the highest rent burden of all age groups. This group also reported the highest gross rent payment in each of the five years for which data was presented, as well as the highest income (both earned and adjusted). Rent burden decreased for the 32 – 46 group, and to a lesser extent for the 47 -61 group. The only age group to see an increase in rent burden in 2018 was the 18 – 31 age group.

It would appear that generally, there is a correlation between rent burden, rent paid, and income, as such an age-related disparate effect is not supported at this time.

B) Self-Sufficiency II Units

TABLE 22: SELF SUFFICIENCY II – DISPARATE IMPACT BASELINE DATA

Activity 13: Self-Sufficiency II																											
Disparate Impact Analysis - Baseline Data																											
Self-Sufficiency II Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden						
	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018	FY 2013	FY 2015	FY 2016	FY 2017	FY 2018		
All Non-Elderly/Non-Disabled Households	419	398	440	479	424	\$16,431	\$13,381	\$15,182	\$15,282	\$16,556	\$11,012	\$12,926	\$14,936	\$15,031	\$16,168	\$297	\$342	\$384	\$385	\$416	\$45	\$87	\$88	\$119			
Gender																											
Female	379	362	389	430	382	\$11,813	\$13,112	\$14,680	\$14,904	\$15,953	\$10,848	\$12,679	\$14,269	\$14,276	\$15,626	\$294	\$336	\$372	\$375	\$401	\$42	\$78	\$81	\$107			
Male	40	36	51	49	42	\$15,238	\$16,092	\$19,014	\$18,602	\$22,040	\$13,450	\$15,412	\$20,023	\$21,663	\$21,100	\$340	\$402	\$475	\$465	\$551	\$62	\$135	\$125	\$211			
Race (Multiple selections permitted)																											
Black	351	256	376	401	365	\$12,244	\$15,160	\$15,455	\$15,731	\$16,957	\$11,051	\$17,463	\$14,870	\$14,646	\$16,156	\$300	\$385	\$391	\$396	\$335	\$85	\$91	\$96	\$35			
White	71	59	63	76	58	\$11,594	\$11,881	\$13,334	\$13,318	\$14,008	\$11,363	\$10,910	\$15,291	\$16,940	\$16,160	\$289	\$305	\$341	\$334	\$292	\$16	\$52	\$45	\$3			
American Indian / Native Alaskan	1	0	0	0	0	\$5,400	\$0	\$0	\$0	\$0	\$7,800	\$0	\$0	\$0	\$0	\$135	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
Asian / Pacific Islander	1	1	1	1	1	\$5,400	\$16,344	\$16,344	\$0	\$17,988	\$7,800	\$17,304	\$17,304	\$18,200	\$21,288	\$135	\$409	\$409	\$0	\$362	\$274	\$274	\$0	\$227			
Native Hawaiian / Other Pacific Islander	3	1	0	1	0	\$9,186	\$4,920	\$0	\$0	\$0	\$10,826	\$13,000	\$0	\$21,320	\$0	\$230	\$150	\$0	\$0	\$0	\$-80	\$0	\$0	\$0			
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
Ethnicity																											
Non-Hispanic	415	394	435	469	415	\$12,129	\$13,381	\$15,150	\$15,442	\$16,566	\$11,057	\$12,926	\$14,898	\$14,922	\$16,149	\$298	\$305	\$383	\$389	\$416	\$7	\$85	\$91	\$118			
Hispanic	4	4	5	10	9	\$13,246	\$11,277	\$17,964	\$7,781	\$16,081	\$15,145	\$13,846	\$18,247	\$20,133	\$16,982	\$332	\$310	\$449	\$195	\$402	\$-22	\$117	\$-137	\$70			
Age of Head of Household																											
18-31	223	176	207	227	191	\$10,494	\$11,935	\$13,915	\$14,139	\$15,091	\$10,459	\$12,541	\$14,390	\$13,381	\$15,186	\$268	\$306	\$355	\$357	\$380	\$38	\$87	\$89	\$112			
32-46	137	173	174	191	173	\$13,416	\$14,256	\$15,479	\$15,532	\$17,143	\$11,295	\$13,491	\$15,026	\$15,781	\$16,456	\$321	\$363	\$391	\$399	\$429	\$42	\$70	\$78	\$108			
47-61	59	49	59	61	60	\$15,397	\$15,489	\$18,743	\$18,756	\$19,527	\$13,044	\$12,318	\$16,585	\$18,826	\$18,466	\$360	\$397	\$469	\$469	\$493	\$37	\$109	\$109	\$133			
Excluded Households																											
Elderly/Disabled Households	153	154	240	201	244	\$10,372	\$10,355	\$11,075	\$12,805	\$13,122	\$597	\$513	\$936	\$1,990	\$1,856	\$260	\$259	\$277	\$323	\$329	N/A	N/A	N/A	N/A			

Profile - SSII Household heads are predominantly:

- Female
- Black
- non-Hispanic
- Age 18 and 31

- Same as in previous years.

Gender

TABLE 23: SSII - GENDER

Self-Sufficiency II Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden			
	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	419	398	440	479	424	\$16,431	\$13,381	\$15,182	\$15,282	\$16,556	\$11,012	\$12,926	\$14,936	\$15,031	\$16,168	\$297	\$342	\$384	\$385	\$416	\$45	\$87	\$88	\$119
Gender																								
Female	379	362	389	430	382	\$11,813	\$13,112	\$14,680	\$14,904	\$15,953	\$10,848	\$12,679	\$14,269	\$14,276	\$15,626	\$294	\$336	\$372	\$375	\$401	\$42	\$78	\$81	\$107
Male	40	36	51	49	42	\$15,238	\$16,092	\$19,014	\$18,602	\$22,040	\$13,450	\$15,412	\$20,023	\$21,663	\$21,100	\$340	\$402	\$475	\$465	\$551	\$62	\$135	\$125	\$211

Continuing a trend in which women far exceed men as head of households, in 2018 females made up 90% of heads of household. Number of males actually fell again in 2018, and while females saw a decrease, this group was still overwhelmingly more in number than their male counterparts. Average gross rent payment increased for both genders, as did income. Overall, male heads of household reported average higher rent burden, higher income, and average increased rent burden.

Race/Ethnicity

TABLE 24: SSII - RACE/ETHNICITY

Self-Sufficiency II Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden			
	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	419	398	440	479	424	\$16,431	\$13,381	\$15,182	\$15,282	\$16,556	\$11,012	\$12,926	\$14,936	\$15,031	\$16,168	\$297	\$342	\$384	\$385	\$416	\$45	\$87	\$88	\$119
Race (Multiple selections permitted)																								
Black	351	256	376	401	365	\$12,244	\$15,160	\$15,455	\$15,731	\$16,957	\$11,051	\$17,463	\$14,870	\$14,646	\$16,156	\$300	\$385	\$391	\$396	\$335	\$85	\$91	\$96	\$35
White	71	59	63	76	58	\$11,594	\$11,881	\$13,534	\$13,318	\$14,008	\$11,363	\$10,910	\$15,291	\$16,940	\$16,160	\$289	\$305	\$341	\$334	\$292	\$16	\$52	\$45	\$3
American Indian / Native Alaskan	1	0	0	0	0	\$5,400	\$0	\$0	\$0	\$0	\$7,800	\$0	\$0	\$0	\$0	\$135	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	1	1	\$5,400	\$16,344	\$16,344	\$0	\$17,988	\$7,800	\$17,304	\$17,304	\$18,200	\$21,288	\$135	\$409	\$409	\$0	\$362	\$274	\$274	\$0	\$227
Native Hawaiian / Other Pacific Islander	3	1	0	1	0	\$0,186	\$4,920	\$0	\$0	\$0	\$10,826	\$13,000	\$0	\$21,320	\$0	\$230	\$150	\$0	\$0	\$0	-\$80	\$0	\$0	\$0
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity																								
Non-Hispanic	415	394	435	469	415	\$12,129	\$13,381	\$15,150	\$15,442	\$16,566	\$11,057	\$12,926	\$14,898	\$14,922	\$16,149	\$298	\$305	\$383	\$389	\$416	\$7	\$85	\$91	\$118
Hispanic	4	4	5	10	9	\$13,246	\$11,277	\$17,964	\$7,781	\$16,081	\$15,145	\$13,846	\$18,247	\$20,133	\$16,982	\$332	\$310	\$449	\$195	\$402	-\$22	\$117	-\$137	\$70

In 2018, the race with the greatest increase in average rent burden was Asian/Pacific Islander (one household), which went from \$0 in 2017 to \$227 in 2018. This group also paid highest rent and reported highest income in 2018. Black households saw a 64% decrease compared to the previous year, while the decrease for White households was about 93%. All others reported \$0 in the same period.

Both Hispanics and non – Hispanics saw increases in rent burden in 2018. For non-Hispanics, 2018 marked four (4) years in a row of increases to rent burden paid. They

also had highest rent payment, highest adjusted income, but lower earned income compared to 2017.

There does not appear to be one consistent pattern or trend here. As indicated in the previous report, continued tracking is recommended to see what patterns and/trends if any emerge and solidify over time.

Age

TABLE 25: SSII - AGE

Self-Sufficiency II Population	Heads of Household					Average Total Annual Adjusted Income					Average Gross Annual Earned Income					Average Gross Rent Payment					Average Increased Rent Burden				
	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018	FY2013	FY2015	FY2016	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	419	398	440	479	424	\$16,431	\$13,381	\$15,182	\$15,282	\$16,556	\$11,012	\$12,926	\$14,936	\$15,031	\$16,168	\$297	\$342	\$384	\$385	\$416	\$45	\$87	\$88	\$88	\$119
Age of Head of Household																									
18-31	223	176	207	227	191	\$10,494	\$11,935	\$13,915	\$14,139	\$15,091	\$10,459	\$12,541	\$14,390	\$13,381	\$15,186	\$268	\$306	\$355	\$357	\$380	\$38	\$87	\$89	\$89	\$112
32-46	137	173	174	191	173	\$13,416	\$14,256	\$15,479	\$15,532	\$17,143	\$11,295	\$13,491	\$15,026	\$15,781	\$16,456	\$321	\$363	\$391	\$399	\$429	\$42	\$70	\$78	\$78	\$108
47-61	59	49	59	61	60	\$15,397	\$15,489	\$18,743	\$18,756	\$19,527	\$13,044	\$12,318	\$16,585	\$18,826	\$18,466	\$360	\$397	\$469	\$469	\$493	\$37	\$109	\$109	\$109	\$133

Average rent burden increased for all age groups in 2018. Secondly, 2018 continued the pattern of average rent burden seen in previous years. For instance, the oldest age group 47 – 61 has had the highest rent burden in the past three years. This group also paid the highest rent and reported the highest income in the same period when compared to the two other age groups. As surmised in other reports, the highest rent burden experienced by the 47 to 61 possibly reflects both higher income and rent paid, rather than a disparate effect of implementation of Activity 13.

C) Centre Meadows

TABLE 26: CENTRE MEADOWS - DISPARATE IMPACT ANALYSIS, BASELINE DATA

Activity 13: Centre Meadows																
Disparate Impact Analysis																
Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden			
	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2017	FY2018		
All Non-Elderly/Non-Disabled Households	158	186	196	\$12,532	\$11,084	\$14,357	\$13,964	\$10,762	\$12,629	\$355	\$276	\$322	-\$79	-\$33		
Gender																
Female	144	171	181	\$12,561	\$11,083	\$14,268	\$13,819	\$10,719	\$12,351	\$352	\$275	\$314	-\$77	-\$38		
Male	14	15	15	\$12,239	\$11,098	\$15,441	\$15,457	\$11,257	\$15,981	\$387	\$281	\$410	-\$106	\$23		
Race (Multiple selections permitted)																
Black	129	157	163	\$12,126	\$10,678	\$14,513	\$14,067	\$10,847	\$12,409	\$357	\$279	\$316	-\$78	-\$41		
White	28	28	32	\$14,237	\$13,324	\$13,458	\$13,407	\$10,437	\$13,620	\$342	\$264	\$346	-\$78	\$4		
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Asian / Pacific Islander	1	1	1	\$17,233	\$12,238	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14		
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Ethnicity																
Non-Hispanic	156	184	193	\$12,356	\$10,939	\$14,365	\$13,819	\$10,841	\$12,602	\$351	\$278	\$321	-\$73	-\$30		
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,395	\$632	\$89	\$363	-\$543	-\$269		
Age of Head of Household																
18-31	107	124	123	\$12,438	\$10,820	\$14,677	\$13,582	\$10,263	\$11,825	\$347	\$266	\$304	-\$81	-\$43		
32-46	37	45	52	\$12,671	\$11,986	\$14,548	\$14,042	\$10,715	\$13,297	\$363	\$270	\$333	-\$93	-\$30		
47-61	14	17	21	\$12,883	\$10,624	\$12,014	\$16,252	\$14,526	\$15,683	\$393	\$363	\$397	-\$30	\$4		
Excluded Households																
Elderly/Disabled Households	45	42	57	\$487	\$1,617	\$870	\$11,679	\$10,207	\$9,816	N/A	N/A	N/A	N/A	N/A		

Centre Meadows Profile – Household heads are predominantly:

- Female
- Black
- Non-Hispanic
- Age 18 and 31

- Same as in previous years.

Gender

TABLE 27: CM - GENDER

Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	158	186	196	\$12,532	\$11,084	\$14,357	\$13,964	\$10,762	\$12,629	\$355	\$276	\$322	-\$79	-\$33
Gender														
Female	144	171	181	\$12,561	\$11,083	\$14,268	\$13,819	\$10,719	\$12,351	\$352	\$275	\$314	-\$77	-\$38
Male	14	15	15	\$12,239	\$11,098	\$15,441	\$15,457	\$11,257	\$15,981	\$387	\$281	\$410	-\$106	\$23

Similar to others affected by this activity, women far exceed men as head of households. In 2017 compared to the previous year, the number of females increased by ~20% (144 to 171), while the number of males only increased by one (from 14 to 15). Average rent decreased for both genders, with difference such as it is probably reflective of income.

Rent burden data is presented for the first time in this report.

Women dominate as heads of household, same as in every other category as well as year reviewed. 2018 is no different. The number of males began as 14 in 2016 and stayed at 15 in both 2017 and 2018. For females however, the numbers went from 144 (2016), to 171 (2017), to 181 in 2018. Except in 2016, men reported higher average annual earned income than women; also had higher adjusted income and paid higher rents than their female counterparts in every year for which data is presented.

Rent burden data for 2018 indicates an overall negative burden for all eligible households. Rent burden for males went up to \$23, while for women it increased from -\$77 to -\$33.

Race/Ethnicity

TABLE 28: CM - RACE/ETHNICITY

Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	158	186	196	\$12,532	\$11,084	\$14,357	\$13,964	\$10,762	\$12,629	\$355	\$276	\$322	-\$79	-\$33
Race (Multiple selections permitted)														
Black	129	157	163	\$12,126	\$10,678	\$14,513	\$14,067	\$10,847	\$12,409	\$357	\$279	\$316	-\$78	-\$41
White	28	28	32	\$14,237	\$13,324	\$13,458	\$13,407	\$10,437	\$13,620	\$342	\$264	\$346	-\$78	\$4
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	\$17,233	\$12,238	\$17,803	\$16,273	\$6,580	\$16,843	\$407	\$164	\$421	-\$243	\$14
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity														
Non-Hispanic	156	184	193	\$12,356	\$10,939	\$14,365	\$13,819	\$10,841	\$12,602	\$351	\$278	\$321	-\$73	-\$30
Hispanic	2	2	3	\$26,232	\$24,482	\$13,840	\$25,272	\$3,540	\$14,395	\$632	\$89	\$363	-\$543	-\$269

Asian/Pacific Islander (A/PI) category paid the highest rent in 2018 (\$421), followed by White (\$346), and Black (\$316) heads of household. So Asian/Pacific Islander and

White household heads had average rent payments higher than average for all households. A/PI also reported the highest income in 2018 and had the highest rent burden (\$14), compared to other races.,

Looking at ethnicity, Non-Hispanics paid on average more than Hispanics in 2017 – again, a reversal of 2016 data where Hispanics paid the highest rent across all categories (\$632 vs. \$89 in 2017). It should be noted that although average rent went up for both groups, and more so for Hispanics in 2018, these rates were still less than recorded at baseline.

Looking at ethnicity, unlike the previous year, Hispanics paid higher average gross rent (\$363) than non-Hispanics (\$321). Hispanics also earned more income yet had a lower rent burden (-\$269 vs. -\$30).

Age

TABLE 29: CM - AGE

Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden	
	FY 2016 Baseline	FY2017	FY2018	FY 2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2016 Baseline	FY2017	FY2018	FY2017	FY2018
All Non-Elderly/Non-Disabled Households	158	186	196	\$12,532	\$11,084	\$14,357	\$13,964	\$10,762	\$12,629	\$355	\$276	\$322	-\$79	-\$33
Age of Head of Household														
18-31	107	124	123	\$12,438	\$10,820	\$14,677	\$13,582	\$10,263	\$11,825	\$347	\$266	\$304	-\$81	-\$43
32-46	37	45	52	\$12,671	\$11,986	\$14,548	\$14,042	\$10,715	\$13,297	\$363	\$270	\$333	-\$93	-\$30
47-61	14	17	21	\$12,883	\$10,624	\$12,014	\$16,252	\$14,526	\$15,683	\$393	\$363	\$397	-\$30	\$4

Average gross rent increased for all age groups in 2018, unlike the decrease reported in 2017. As with other sections above, we find the 47 to 61 age group paying the highest in rent (all three years including 2018). This group also had the highest average annual adjusted income, but the lowest average annual earned income in 2018. The highest rent burden (\$4) was incurred by this group in contrast to 32 – 46 (-\$30) and the 18 – 31 (-\$43) age groups respectively.

Generally, for CM (PBV), rent burden was relatively low on all categories (gender, race/ethnicity, and age) compared to SSI/SSII (PH).

Conclusion and Recommendations

Activity 13, like Activity 1 before it, continues to be a key initiative for LHA in its participation in the MTW Demonstration program. Its implementation supports LHA

to achieve stated goals for this housing population. Being mindful of the potential to expose one or more groups to unintended and/or disparate impact or undue effects is central to success of these initiatives. In all situations above, there are currently no triggers of alarm, as generally there appears to be some correlation between income earned, rent paid and degree of rent burden incurred.

For instance, consider the oldest of age groups (47 -61), which consistently appears in most cases to have highest income levels, rents paid, and also rent burdens.

Further, Centre Meadows (PBV) report a lot of negative values across all categories in terms of assessed rent burdens, relative to other units. This is in line with its performance in other instances and the challenges faced by its residents, who might be more in need of housing assistance etc. This sector is somewhat newer to the activity/initiative's implementation, having been added in 2016 and a longer period of data collection may provide greater clarity.

A review across multiple years show an ebb and flow, mixed results and reversal of emerging patterns from one year to another. As a result, it is difficult to pin down an immediate cause for concern or early warning signals regarding the creation of disparate impacts by this initiative/through its implementation.

Continued tracking and monitoring of metrics, review of data collected, and longitudinal data analysis will help us better identify and understand how, if at all the implementation of this activity interacts with elements of race/ethnicity, gender, and age to produce outcomes. Longitudinal data collection will be helpful to determine what patterns if any, become apparent across these categories, as well as across sites. Such understanding and information will be a useful mechanism to avoid or address any disparate impact. To this end therefore, ongoing tracking/review of metrics, data reconciliation, monitoring and analysis is recommended as long as implementation continues.

ACTIVITY FOURTEEN

Rent Reform – Elimination of Earned Income Disallowance (EID).

Date of implementation FY 2015

A reduction in costs, enhancement of stewardship of resources, as well as promotion of effectiveness in federal expenditures are the overarching goals of this initiative/activity.

The elimination of non-value adding administrative practices and the streamlining of processes that impede staff productivity, help achieve this purpose. Through this activity, LHA seeks to eliminate an administrative practice, with minimal return on investment of staff time and agency resources.

Changes and Modifications/Metrics: No changes to baseline, or benchmarks during Plan year

One metric -related change during Plan year – CE #5 Rental Revenue, HCV Only.

Important note: This year LHA instituted an important change to one of the metrics for this activity. Previously, the metric increase in agency rental revenue included a calculation of rental income/revenues received from HCV units. However, as no rental revenue is received from HCV, LHA will now track HAP paid on behalf of EID participants. Housing Assistance Payments (HAP), which LHA may pay for participants in these units is a better measure. An increase in these payments reduces LHA revenues, while a decrease increases revenues. Thus, it is more expedient and correct to track and analyze annual HAP and monthly cost per HCV unit (MCPU). Beginning this year 2018, for HCV only, CE# 5 metric will decrease in HAP/monthly per unit cost.

At onset of implementation of this initiative only 23 households met eligibility criteria to receive the EID agency-wide. By 2016, this number reduced to 19, as four of those households left LHA housing.

For the year under review (FY2018), 11 of the 23 households that were recipients of EID remain: 4 in public housing units, and 6 in the Housing Choice Voucher (HCV) program. No new households can receive EID.

Reduce costs (increase revenues)

To measure this goal the following metrics were used from both public housing (PH) and Housing Choice Voucher (HCV) households.

- Increase in agency rental revenue
- Decrease in error rate of task execution & Staff time savings
- Agency cost savings

Increase in agency rental revenue

Benchmark: expected rental revenue post activity implementation = \$96,474

(Note implications of change to metric calculation for CE#5)

Previous year: actual rental revenue =\$8, 820

Public Housing – EID recipients: Two (2) in 2018

Number of remaining PH households =2.

Net rental revenue received by LHA in 2018 amounted to \$8,196. Compared to benchmark established this is a significant shortfall to LHA resulting in a failure to meet stated/desired goal on this metric. The impact of the change in the way in which this metric is calculated – i.e. exclusion of HCV on the previously calculated benchmark must be considered. Given the removal of HCV units, it is recommended that benchmark be revised to more accurately represent the current state.

Number of remaining HCV households = 9.

Net rental revenue received by LHA in 2018 amounted to \$0, as it does not collect rent on HCV units which go to private landlords. That said, LHA incurred \$49,812 in HAP to EID households in 2018. This amounts to an expense rather than revenue generation for LHA and so negatively impacts overall finances. This is the first year in which the impact of HAP is introduced in the analysis of LHA expenses and revenues. It will be important to track this new metric – reduction in HAP payments – going forward.

Also, as stated in the previous year, it is still relevant to consider factors such as the impact of the reduction in number of affected households on revenues - generally. This is the likely explanatory or contributory factor

Decrease in error rate of task execution and Staff time savings

- # of EID households in 2018 = 11 (9 = HCV; 2 = PH)
- Staff hourly rate at FY2014 dollars = \$19.65
 - o (\$197 x 11 households = \$216.15 in 2018)
- Error rate: Benchmark = 25%
-

Similar to previous years (beginning in 2015), LHA achieved benchmark on this metric since data records a 0% error of task execution in 2018. Thus, this is now the fourth year during which estimated error rate of 25% previously encountered in the process of tracking residents' employment status has been eliminated.

As in those years prior, dollar value of staff time spent processing EID in 2018 was \$0. Imputing a Staff hourly rate x 11 hours indicates a processing time of one hour per household. Based on this calculation, LHA saved approximately \$216 in 2018.

Ultimately, both result in a potential return to staff (and LHA) of time and costs. These resources can then be applied to other tasks and purposes.

Agency Cost Savings

In 2018, implementation of this initiative allowed LHA to eliminate potential task costs of \$216. Each of the past 3 years has seen an improvement compared to \$452 (2013 baseline). This savings allowed LHA to achieve benchmark on this metric.

Disparate Impact Analysis – Demographics

As reported both in 2016 and 2017, for practical purposes, there is no benefit to conducting a disparate analysis for Activity #14 as LHA indicates that there are no longer any households receiving EID at this time, and there are relatively little (or no), changes to income.

TABLE 30: EID HOUSEHOLDS - BASELINE DATA

Activity 14: EID Households																			
Disparate Impact Analysis - Baseline Data																			
EID Households	Heads of Household				Average Gross Annual Eaned Income				Average Total Gross Annual Income				Average TTP				Change in Rent Burden		
	FY 2014	FY2015	FY2016	FY2017	FY2014	FY 2015	FY2016	FY2017	FY2014	FY 20115	FY2016	FY2017	FY2014	FY 2015	FY2016	FY2017	FY2015	FY2016	FY2017
All Households	23	19	19	10	\$11,680	\$7,990	\$7,990	\$15,574	\$18,387	\$14,783	\$14,783	\$12,437	\$248	\$287	\$287	\$333	\$39	\$0	
Gender																			
Female	21	18	18	10	\$12,402	\$7,990	\$8,434	\$15,574	\$18,624	\$14,617	\$14,617	\$12,437	\$234	\$287	\$287	\$333	\$53	\$0	
Male	2	1	1	0	\$4,102	\$0	\$0	\$0	\$15,901	\$17,764	\$17,764	\$0	\$400	\$296	\$296	\$0	-\$104	\$0	
Race (Multiple selections permitted)																			
Black	16	14	14	9	N/A	\$7,990	\$8,538	\$15,574	N/A	\$15,363	\$15,363		\$226	\$302	\$302	\$353	\$72	\$0	
White	5	4	4	1	N/A	\$7,990	\$5,936	\$0	N/A	\$12,385	\$12,385		\$298	\$240	\$240	\$150	\$58	\$0	0
American Indian / Native Alaskan	1	0	0	0	N/A	\$0	\$0	\$0	N/A	\$0	\$0		\$417	\$0	\$0	\$0	\$155		0
Asian / Pacific Islander	1	1	1	0	N/A	\$16,248	\$16,248	\$0	N/A	\$16,248	\$16,248		\$189	\$262	\$262	\$0	\$0	\$0	0
Native Hawaiian / Other Pacific Islander	0	0	0	0	N/A	\$0	\$0	\$0	N/A	\$0	\$0		\$0	\$0	\$0	\$0	\$0	\$0	0
Other**	0	0	0	0	N/A	\$0	\$0	\$0	N/A	\$0	\$0		\$0	\$0	\$0	\$0	\$0	\$0	0
Age of Head of Household																			
18-31	7	5	5	2	\$15,873	\$7,693	\$7,693		\$20,412	\$12,333	\$12,333		\$210	\$206	\$206		-\$4	\$0	
32-46	7	5	5	2	\$14,938	\$10,315	\$10,315		\$21,781	\$14,997	\$14,997		\$243	\$263	\$263		\$20	\$0	
47-61	5	5	4	1	\$6,894	\$9,348	\$9,348		\$14,398	\$18,937	\$18,937		\$332	\$347	\$347		\$15	\$0	
62+	6	4	5	5	\$4,623	\$4,875	\$4,875		\$13,889	\$13,696	\$13,696		\$220	\$344	\$344		\$124	\$0	

“**No rental revenue is available for the six former EID HCV households and rental revenue for public housing households from FY2015 through FY2017 do not meet the benchmark for this activity.” – Source LHA

Conclusion and Recommendations

As stated in the previous report, this initiative appears to have reached (or is approaching) the end of its utility and should be wrapped up when the number of impacted households reaches zero.

As a cost saving and administrative burden reducing initiative, it has clearly been successful by eliminating staff costs and time necessary for processing EID (rent calculations, tracking resident employment status etc.)

However, the question of potential to impact increase in agency rental revenue still remains, as we consider the number of households from which to collect income. This is especially true in light of change to metric CE#5, which properly eliminates HCV units, as well as the fact that the expected reduction in number of affected households overtime, even though the number increased from 10 in 2017 to 11 in 2018.

The following actions are recommended:

- a. That tracking of this initiative be continued until affected households cease to exist.
- b. Recalculate benchmark for increase in agency rental to reflect exclusion of HCV on the previously calculated benchmark
- c. Tracking of HAP and financial impact on LHA be instituted and monitored.
- d. Tracking of demographic data, and disparate analysis be continued
- e. Recognize the closing out status of this activity and its impact on achieving the goal of the increasing agency rental revenue.

Final note - LHA has stated that it will monitor the FY2019 outcomes to determine if metrics should be re-evaluated/revised.

ACTIVITY SEVENTEEN

Limit Interim Re-examinations for Public Housing Households

Excluding elderly and disabled households.

Date of proposal/approval and subsequent implementation = FY 2016

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

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

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

Reduce costs (increase revenues)

To measure this goal the following metrics were used -

- *Agency cost savings*
- *Staff time savings*
- *Increase in agency rental revenue - for public housing (PH)*

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

To measure this goal, the following metrics were used –

- *Increase in household income*
- *Increase in positive outcomes of employment status*
- *Removal from TANF*
- *And households transitioned to self-sufficiency cost savings*
- *Staff time savings, increase in agency rental revenue - for public housing (PH).*

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

Agency cost savings

2016 Benchmark: *Number of re-certifications ≤ to 330*
 Total cost in dollars < to \$4,333

Previous year: *Number of re-certifications = 342*
 Total cost in dollars = \$4,491

The 2016 report presented the calculation upon which this metric is based as follows:
Time taken to complete an interim re-certification (.50) multiplied by the hourly rate of the management specialist completing the task (\$26.25), multiplied by the number of interim re- certifications completed.

$$.50 \times \$26.25 \times \text{\#of re-certs}$$

Through this initiative, LHA sought to reduce the number of interims from 661 to 330, resulting in a lower cost of \$4,333, which became the benchmark for this activity. Set on the basis of 661 interims, baseline was calculated as: $\$13.13 \times 661 = \8679 .

A total of 282 interim re-examinations were completed in 2018, in Public Housing. Using this formula LHA calculated the total cost as $\$13.13 \times 282 = \$3,703$. This is lower than both baseline (\$8,678) and benchmark value of \$4,333. Consequently, LHA was able to achieve benchmark.

Recommendation: This is the second year of data collection, and the first time LHA has achieved benchmark for this metric.

Given the positive impact and the infancy of this initiative, LHA should continue to track and monitor data.

Staff time savings (Decrease costs)

2016 Benchmark: *Total task completion time < 165 hours*
 Total # of interims = 330

Previous year: *Total task completion time = 171 hours*
 Total # of interims = 342

Decreasing the total time taken to complete the task of interim re-examination in staff hours, is a useful mechanism for costs savings, as long as it does not undermine effectiveness.

This measure was first considered in 2017, and unfortunately LHA failed to meet the benchmark. However, in 2018, 141 staff hours were spent conducting 282 interim re-certifications. Compared to previous years, LHA succeeded in reducing the total number of staff hours used to complete required tasks, and thus achieved benchmark on this metric.

Recommendation: Continue efforts to track the actual time spent completing each task of re-examination and consider a review of the process for possible ways to improve efficiency and save staff time.

Plan for review in FY 2019.

It can be argued that refining processes to maximize efficiency and remove potential redundancies augur well for timesaving in how work is done. LHA should consider other possible pathways for reducing number of interim re-certifications requested and/or staff time spent on processing same.

Increase in agency rental revenue

2016 Benchmark: Expected rental revenue post implementation = \$4,387,366

Previous year: Expected rental revenue post implementation = \$3,671,868

2018 is the second year of implementation of this activity. Unfortunately for the second year in a row, LHA again failed to achieve benchmark as actual rental revenues in 2018 (\$3,466,643) was lower than in 2017, and almost 21 % less than benchmark.

Recommendation: Last year it was noted that 2017 outcome in dollars was closer to baseline value than the benchmark as set. This year that value is even farther from benchmark, and again relatively closer to baseline. Despite it being early days in the data collection process, reviewing rationale for benchmark value is useful.

Continue to track data, and plan for review in FY 2019.

Increase in household income

2016 Benchmark: Average earned income of affected households =\$22,446

Previous year: Average earned income of affected households =\$20,634

In 2018, the average income of almost 83% of affected households was \$20, 807. This was \$173 more than the average income reported by about 82% of affected households in 2017. At this value, average earned income for households in 2018 was 7.3% less than benchmark so LHA failed to deliver on this metric. Still, it will be informative to see if next year shows an increase beyond the \$173 recorded this year, and a movement closer to benchmark values.

It is recommended that LHA continue to track this metric, with a view to reporting on outcome data in FY2019.

Increase in positive outcomes in employment status

2016 Benchmark: Number of households reporting earned income =100%

Previous year: Number of households reporting earned income = 80% (658/809)

2016 Benchmark: Number of households reporting NO earned income = 0%

Previous year: Number of households reporting NO earned income ~ 19% (151/809)

Several measures are relevant here, so this metric is computed by separately considering:

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

1. *Households reporting earned income:* 727 households were eligible for this activity in 2018. Of that number, 602 (83%) reported actual earned income as of June 30, 2018. Thus, LHA failed to achieve this benchmark (100%). It was however a 3% improvement on 2017 performance.
2. *Households with no earned income:* Another way to check positive outcomes in employment status of household heads is to consider the actual number that reported earning no income in 2017(= 151) and compare this to baseline (=130 pre-implementation in 2016), as well as LHA's established benchmark (0 = expected number of heads of households reporting no earned income post implementation). LHA did not achieve benchmark on this metric as the actual number of affected household heads exceeded both benchmark as well as baseline. Conversely, 125 (17%) households reported no earned income in 2018. This was less than baseline as well as the 19% reported in 2017, but still more than the zero percent benchmark established by LHA. Benchmark not achieved.

Recommendation: 2018 was still an improvement on the previous year as well as baseline, and a longer period of data collection may be necessary to enable meaningful review/or see where the trend goes (increase or decrease). Monitoring percentages rather than actual or raw numbers gives a better way to compare across years, and varying numbers of eligible households.

Continue to track data, and plan for review in FY 2019. Also, consider a review of the income patterns of households to help verify the feasibility of a benchmark value of zero for households reporting no earned income.

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

2016 Benchmark: Number of households receiving TANF assistance = 0

Previous year: Number of households receiving TANF assistance = 166

For this metric LHA has established as desirable a goal of zero households that are still recipients of Temporary Assistance for Needy Families (TANF). Success therefore requires that no household be recipients of TANF in 2018. At the minimum, a positive outcome would reflect a decrease in number in 2018, e.g. compared to baseline. Baseline established at time of implementation was 95.

The number of households receiving TANF 175/727 (24%), was more than the 21% reported for 2017, as well as 13% at baseline. Thus, since we see a gradual increase in numbers of household on TANF, LHA failed to achieve this benchmark.

Recommendation: Continue to track data, and plan for review in FY 2019.

Last year, recommendation included that LHA monitor and track TANF recipients to determine benefits recidivism levels – in other words, quantify how many are new versus return recipients. In addition, and as noted above LHA might be well served to check and verify how realistic or feasible the goal of a zero benchmark is for this population, as well as identifying factors that contribute to increase rather than decrease in TANF recipients.

Number of households transitioned to self-sufficiency

2016 Benchmark: Expected number of households transitioned to self-sufficiency = 589

Self-sufficiency = Income \geq \$15,080 per year

Previous year: Actual number of households transitioned to self-sufficiency = 428

This metric seeks to measure an increase in the number of households transitioned to self-sufficiency, as an outcome of this initiative. Per definition provided earlier, a household is considered as transitioned to self-sufficiency if the head/co-head or spouse, earns \$15,080 or more per year. Prior to implementation, 385 households were reported as meeting this criterion. LHA set as benchmark post-implementation, a goal of at least 589 households transitioning to self-sufficiency.

2018 data indicates that 399 out of the 727 (55%) households transitioned to self-sufficiency as defined. In terms of percentage of underlying population, this outcome

was better than 2017 (53%), but worse than benchmark (73% or 589/809). Since benchmark was not achieved, LHA had a negative outcome for LHA on this key metric.

2018 is the second-year post-implementation. As stated in the previous year's report it is early days yet to draw conclusions about this initiative, and LHA's performance against established benchmarks. Review/analysis may benefit from a longer period before impact/trend is identifiable.

It must be noted that similar to 2017, LHA failed to achieve any positive outcomes on any of the metrics associated with this activity. Again, it is suggested that this activity be reviewed on the previously identified grounds restated from 2017 report below:

- a. Revisit the feasibility of established benchmarks against baseline values prior to implementation. Are benchmark values overestimated, realistic?
- b. Review the logic model undergirding this activity/initiative. For instance, it is not clear how families are incentivized to remain in employment, or the success of such incentives.
- c. Consider overall relevance or appropriateness of this activity in terms of its ability to deliver on the goals set by LHA.

Recommendation: Continue to track data, and plan for review in FY2019. Also, for the metric - *Number of households transitioned to self-sufficiency* - considering percentage each year rather than the number of households, is more effective for comparative analysis over time.

In considering the appropriateness of this activity to meet the goals for which it was designed LHA could also consider the sufficiency or benefit of any movement/increase to self-sufficiency - in other words, is this desirable or sufficient, or is any value that is at least better than baseline to be considered as a positive outcome, even if benchmark is not achieved?

Disparate Impact Analysis - Demographics

Note: The data presented for this activity are same as/derived from those for Activity One. As such the conclusions drawn with regard to disparate impact are same/similar. Edited table showing relevant period only, is reposted for the reader's convenience.

TABLE 31: ACTIVITY 17 - LIMIT INTERIM RECERTIFICATIONS, PUBLIC HOUSING*

Disparate Impact Analysis - Baseline Data															
Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Average Increased Rent Burden		
	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2014 Benchmark	FY2017 Actual	FY2018 Actual
All Household	860	809	727	\$10,512	\$16,782	\$17,229	\$11,197	\$16,667	\$16,641	\$281	\$422	\$420	\$21	\$141	\$139
Gender															
Female	774	711	660	\$10,610	\$15,982	\$16,864	\$11,245	\$16,133	\$16,477	\$284	\$408	\$416	\$20	\$124	\$132
Male	86	98	67	\$9,623	\$22,589	\$24,277	\$10,764	\$20,538	\$21,630	\$260	\$520	\$542	\$26	\$260	\$282
Race (Multiple selections permitted)															
Black	677	657	607	\$10,959	\$16,871	\$18,228	\$11,656	\$17,464	\$17,677	\$290	\$441	\$446	\$21	\$151	\$156
White	179	145	118	\$9,267	\$16,527	\$15,287	\$10,022	\$13,341	\$14,127	\$257	\$341	\$359	\$17	\$84	\$102
American Indian	4	1	0	\$9,407	\$0	\$0	\$3,333	\$14,328	\$0	\$116	\$358	\$0	\$34	\$242	-
Asian / Pacific	5	3	1	\$13,170	\$13,151	\$21,288	\$7,930	\$7,524	\$17,988	\$208	\$188	\$450	\$27	-\$20	\$242
Native Hawaiia	4	3	1	\$8,120	\$19,015	\$25,324	\$6,890	\$12,627	\$26,272	\$210	\$316	\$657	\$4	\$106	\$447
Other**	3	\$0	0	-	\$0	-	\$568	-	-	\$83	-	-	\$67		
Ethnicity															
Non-Hispanic	843	784	711	\$10,514	\$16,745	\$17,745	\$11,245	\$16,788	\$17,073	\$282	\$425	\$431	\$35	\$143	\$149
Hispanic	17	25	16	\$10,411	\$17,948	\$17,379	\$8,798	\$12,855	\$16,332	\$251	\$321	\$408	\$21	\$70	\$157
Age of Head of Household															
18-31	421	345	307	\$9,284	\$14,886	\$15,804	\$9,320	\$14,859	\$14,862	\$249	\$377	\$377	\$21	\$128	\$128
32-46	292	340	313	\$11,734	\$17,476	\$18,073	\$13,162	\$16,736	\$17,519	\$317	\$423	\$441	\$17	\$106	\$124
47-61	147	124	107	\$11,600	\$20,157	\$22,020	\$12,667	\$21,505	\$21,701	\$305	\$543	\$545	\$27	\$238	\$240
Excluded Households															
Elderly/Disable	363	406	445	\$971	\$2,287	\$2,976	\$11,051	\$12,689	\$12,954	\$260	\$319	\$325	N/A	N/A	N/A

*Includes Center Meadows

Profile – Household heads affected by Activity #17, are predominantly:

- Female
- Black
- Non-Hispanic
- Age 18 and 46 (18 to 31 =307; 32 to 46 = 313)

This is similar to previous years.

Gender

TABLE 32: ACTIVITY 17 - GENDER

Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Average Increased Rent Burden		
	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2014 Benchmark	FY2017 Actual	FY2018 Actual
All Household	860	809	727	\$10,512	\$16,782	\$17,229	\$11,197	\$16,667	\$16,641	\$281	\$422	\$420	\$21	\$141	\$139
Gender															
Female	774	711	660	\$10,610	\$15,982	\$16,864	\$11,245	\$16,133	\$16,477	\$284	\$408	\$416	\$20	\$124	\$132
Male	86	98	67	\$9,623	\$22,589	\$24,277	\$10,764	\$20,538	\$21,630	\$260	\$520	\$542	\$26	\$260	\$282

More of the same: Pattern in 2018 remains the same as previous years with women far exceeding men as head of households (660 vs. 67). Average income (gross and adjusted), rent, as well as rent burden increased for both genders in 2018. Mirroring 2017, male household heads reported higher values than females: average gross income (\$24,277 vs.\$16,864), average annual adjusted incomes (\$21,630 vs. \$16,477), average gross payment (\$542 vs, \$416), as well as higher rent burden (\$282 vs. \$132).

So far, and in keeping with previous years, higher rent burden, and higher rent paid by male household heads seem predicated on income rather than gender bias.

Race/Ethnicity

TABLE 33: ACTIVITY 17 - RACE/ETHNICITY

Public Housing	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Average Increased Rent Burden		
	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2013 Baseline	FY2017	FY2018	FY 2014 Benchmark	FY2017 Actual	FY2018 Actual
All Household	860	809	727	\$10,512	\$16,782	\$17,229	\$11,197	\$16,667	\$16,641	\$281	\$422	\$420	\$21	\$141	\$139
Race (Multiple selections permitted)															
Black	677	657	607	\$10,959	\$16,871	\$18,228	\$11,656	\$17,464	\$17,677	\$290	\$441	\$446	\$21	\$151	\$156
White	179	145	118	\$9,267	\$16,527	\$15,287	\$10,022	\$13,341	\$14,127	\$257	\$341	\$359	\$17	\$84	\$102
American Indian	4	1	0	\$9,407	\$0	\$0	\$3,333	\$14,328	\$0	\$116	\$358	\$0	\$34	\$242	-
Asian / Pacific	5	3	1	\$13,170	\$13,151	\$21,288	\$7,930	\$7,524	\$17,988	\$208	\$188	\$450	\$27	-\$20	\$242
Native Hawaiian	4	3	1	\$8,120	\$19,015	\$25,324	\$6,890	\$12,627	\$26,272	\$210	\$316	\$657	\$4	\$106	\$447
Other**	3	\$0	0	-	\$0	-	\$568	-	-	\$83	-	-	\$67		
Ethnicity															
Non-Hispanic	843	784	711	\$10,514	\$16,745	\$17,745	\$11,245	\$16,788	\$17,073	\$282	\$425	\$431	\$35	\$143	\$149
Hispanic	17	25	16	\$10,411	\$17,948	\$17,379	\$8,798	\$12,855	\$16,332	\$251	\$321	\$408	\$21	\$70	\$157

In 2018, the sole Native Hawaiian/Other Pacific Islander household reported the highest average gross as well as adjusted income, highest average gross rent, and had the highest rent burden. Average rent burden increased for all groups (race and ethnicity), with the exception of American Indian/Native Alaskan who are not represented in the 2018 numbers.

Looking at race alone, a review of income reported, rent paid appears in line with size of rent burden. For instance, both top two in terms of income, also pay the top two highest rents, and report the top two highest rent burdens in 2018. However, when ethnicity is considered, there appears to be some disadvantage/disparity for Hispanics. For instance, this group had lower incomes (whether adjusted or gross), pay less rent when compared to Black households, yet report a higher (or almost same) rent burden as Black heads of households. The same holds when Hispanics are compared to Non – Hispanics generally. This is a change from the previous year when average rent burden appeared to reflect the difference in average total adjusted annual income, etc.

Age

TABLE 34: ACTIVITY 17 - AGE

Public Housing Population	Household Heads		Avg. Gross Earned Income		Average Total Annual Adjusted Income		Avg. Gross Rent Payment		Average Increased Rent Burden	
	FY2016	FY2017	FY2016	FY2017	FY2016	FY2017	FY2016	FY2017	FY2016 Actual	FY2017 Actual
All Households	728	809	\$16,112	\$16,782	\$16,389	\$16,667	\$416	\$422	\$135	\$141
Age of Head of Household										
18-31	309	345	\$15,486	\$14,886	\$15,999	\$14,809	\$365	\$377	\$116	\$128
32-46	309	340	\$16,420	\$17,476	\$16,282	\$16,736	\$437	\$423	\$120	\$106
47-61	110	124	\$18,616	\$20,157	\$19,428	\$21,505	\$504	\$543	\$199	\$238
Excluded Households										
Elderly Disabled Households	368	406	\$1,397	\$2,287	\$10,560	\$12,689	\$265	\$119	N/A	N/A

The oldest age group (47 to 61) as in the past reported the highest average incomes (gross/adjusted), paid highest rent, and reported highest rent burden. Those 32 to 46 reported the highest increase in rent burden from \$106 in 2017 to \$124 in 2018. They also reported the second highest average incomes and gross rent for this period. An interesting group to look at is those household heads aged between 18 and 31 – the youngest group. In 2018 at \$128, the average rent burden was unchanged from the previous year. Yet though this group paid the lowest rent of all three age groups, and earned the lowest income, the rent burden in 2018 was \$4 higher than for the 32 to 46 group (see Table 34 above). With the exception of this group, the higher rent burden seemed to reflect higher incomes earned and gross rent paid.

Generally, it does not appear that Activity 17 has created any disparate impact on any of the protected groups.

However, a note should be made about the Hispanic group as well as the age group 18 to 31, whose numbers seem to run counter to the relationship between income, rent and rent burden seen for other groups. It is probably too early to declare a disparate effect for this groups. The recommendation from last year regarding the benefit of collecting multi-year data for proper analysis is even more relevant.

So too, the importance of continued attention to the issue of potential disparate impact, and consistent data tracking and review.

ACTIVITY TWENTY-ONE

Triennial Certifications for HCV Homeownership Participants

Rent Reform Activity Proposed and Implemented FY2017

Goal: The stated goals for the implementation of this initiative/activity is to reduce the administrative burden of annual certifications for Homeownership households by conducting income reexaminations every three (3) years. Also, to increase agency cost savings.

Target population: 31 homeownership households in the Housing Choice Voucher program.

Rationale: (a) Minimal changes to income have been recorded overtime, hence query need for certifications, and (b) By eliminating these annual certifications, free up time for LHA staff who deal with this issue, such as the HCV Specialist. Time thus gained can then be put toward other administrative tasks.

Status at baseline: Update

Prior to program implementation, there were 31 active HCV homeowner participants in 2016, of which 11 were disabled households.

Status at FY 2018: Update

There were 28 active HCV homeowner participants in 2018. Three of these left during the period under review, reducing the total to twenty-five active participants. Participants included eleven (11) without earned income, and twelve (12) disabled or elderly.

For this activity, selected metrics include the following:

- Agency cost savings
- Staff time savings
- Increase agency rental revenue

Agency cost savings - Metrics

Number of annual certifications

Average task completion time = 1 hour

Staff hourly costs = \$27.78

Hard costs per certification = .75 cents (mail, copies, paper, etc.)

E.g. 2016: Total = Cost per annual certification + hard costs X # of certifications

$$\$27.78 + .75 \times 31$$

Agency cost savings

- *Baseline: Total cost of task in dollars = \$884.43 per year*
- *Benchmark: Expected cost of task at implementation = \$884.43 every 3 years*
 - o *Year 1 = \$884.43*
 - o *Year 2 = \$0*
 - o *Year 3 = \$0*

Previous year (FY2017) Outcome: Actual cost of task post implementation

2017 Total = Cost per annual certification + hard costs x # of certifications

$$\$27.78 + .75 \times 30 = \$855.90$$

In 2017 the actual cost of implementation of this activity was \$855.90 in Year 1, with an expectation of \$0 in Years 2 and 3 respectively. Benchmark achieved in 2017, with years 2 & 3 (2018 and 2019), as yet to be determined. LHA saved \$29 dollars in year one due to the reduction in number of households requiring certifications. Assuming no certifications per activity in 2018 and 2019, the potential savings could be in the region of about \$1,800 over 3 years.

The expected cost of implementation of this activity in 2018 was \$855.90 in Year 1, with an expectation of \$0 in Years 2 and 3 respectively. However, actual cost of implementation reflected a total of 12 annual certifications which were completed PLUS 22 interim certifications. Thus, cost of implementation was as follows:

- *2018: Expected cost of task at implementation = \$855.90 every 3 years*
 - o *Year 1(2017) = actual = \$855.90*
 - o *Year 1 (2017) = benchmark = \$884.43*
 - o *Year 2 (2018) = expected = 0, actual = \$342.36*
 - o *Year 3 (2019) = expected \$0, actual = \$TBD*

Benchmark achieved in 2017 (as Year 1) because actual cost of \$855.90 was less than benchmark value of \$884.43. However, Year 2 (2018) saw an increase in requests for interim certifications –LHA staff completed 12 interim certifications, resulting in

additional costs of \$342.36 for the year instead of zero. As such LHA failed to achieve benchmark for year 2. Year 3 (2019), is yet to be determined.

Staff time savings - Metrics

Number of annual certifications (certs.)

Average task completion time = 1 hour

- *Baseline: # annual certs. x 1 hr. per year - 2016 = 31 hrs. x 3 yrs. = 93 hours*
- *Benchmark: Expected task completion time = 31 hours every 3 years*
 - o *Year 1 = 31*
 - o *Year 2 = 0*
 - o *Year 3 = 0*

In 2017 (Year 1) the actual time it took LHA staff to complete certifications was 30 hours, with an expectation of zero hours in Years 2 and 3 respectively. Benchmark achieved in 2017. However, the 12 hours spent in 2018 (year 2) was more than the zero expected, so LHA failed to achieve benchmark on this item. Year 3 (2019) is yet to be determined.

LHA staff saved 3 hours in year one due to the reduction in number of households requiring certifications. Assuming no certifications per Activity 21 are completed in 2019, the potential savings could be in the region of 48 hours over 3 years. Alternatively, if any certifications occur in 2019, that will reduce the savings achieved.

Increase agency rental revenue - Metrics

Rental revenue in dollars

- *Baseline: Rental revenue before implementation = \$154,860*
- *Benchmark: Expected rental revenue = \$154,860*

In 2017 the rental revenue was \$147,588. Compared to benchmark rental revenue was 5% less due to a \$7,272 shortfall. Because of this shortfall, LHA failed to achieve benchmark on this measure.

In 2018 actual rental revenue realized was \$152,352, \$2,508 less than benchmark (\$154,860), amounting to a shortfall of about 1.6%. Because of this shortfall, LHA failed to achieve benchmark on this measure.

The starting premise for Activity 21 according to LHA projections was that the move from annual to triennial recertification would be efficient because in practice, changes to income that trigger recertification are minimal. Also, LHA identified as another benefit of this activity the potential for time savings which staff can channel towards other tasks and duties as necessary.

On the basis of these, this activity holds promise for LHA in the attainment of the goals of reducing administrative costs and staff time savings. However, when interim certifications occur in years 2 and 3, they undermine the rationale for and efficacy of this activity as a cost saving mechanism for LHA. It will be prudent for LHA to investigate and/or review the interim recertification, whilst considering the following questions:

- Do they have to do the interims/are these necessary?
- What is driving the interims – e.g. habit, reporting, something else??

Notwithstanding, Activity 21 still holds promise as a cost saver for LHA, either by eliminating certification as per original plan (years 1 & 2), or by at least reducing the number of certifications, and by extension staff time in doing so.

Recommendation: Although LHA lost revenue in 2017 and 2018 (compared to benchmark), at this time available data is for Years 1 and 2 only, and there is no actual data on year 3 of the three-year cycle.

For a full picture, LHA will need to collect and report on data from all three years before any preliminary conclusions can be made regarding the efficacy of this initiative. Also, as a reminder, a review of the propriety of including a metric on rental revenue is suggested, especially in light of the strong link or tie to number of participating households, rather than activities resulting from the certification process per se.

Disparate Impact Analysis – Demographics

HCV Homeownership Households	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned Income			Average Gross Rent Payment		
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018
				Baseline			Baseline			Baseline		
Total Households	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$956	\$908	\$1,098
Gender												
Female	29	27	26	\$20,414	\$19,772	\$15,198	\$17,157	\$19,479	\$15,186	\$966	\$919	\$1,004
Male	2	1	2	\$12,865	\$11,238	\$9,744	\$0	\$0	\$11,237	\$817	\$626	\$783
Race (Multiple selections permitted)												
Black	24	24	23	\$20,351	\$20,399	\$14,949	\$17,795	\$20,454	\$16,787	\$963	\$916	\$1,019
White	7	4	5	\$18,476	\$15,055	\$14,160	\$10,069	\$10,905	\$7,800	\$932	\$873	\$816
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity												
Non-Hispanic	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$498	\$895	\$1,098
Hispanic	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Age of Head of Household												
18-31	1	0	2	\$57,580	\$0	\$9,781	\$63,340	\$0	\$15,552	\$1,019	\$0	\$1,363
32-46	16	18	12	\$22,782	\$23,116	\$20,801	\$21,348	\$24,821	\$26,314	\$1,020	\$925	\$1,101
47-61	10	7	10	\$15,259	\$14,021	\$11,766	\$8,240	\$9,010	\$4,982	\$895	\$896	\$848
62 and Over	4	3	4	\$10,764	\$9,168	\$6,952	\$2,688	\$3,584	\$5,153	\$838	\$840	\$848

TABLE 35: ACTIVITY 21 - HCV HOMEOWNERSHIP HOUSEHOLDS

Profile – In 2018, household heads affected by Activity #21, were predominantly:

- Female
- Black
- Non-Hispanic
- Age 32 - 46
 - This is similar to profiles for previous years.

Gender

TABLE 36: ACTIVITY 21 - HCV, GENDER

HCV Homeownership Households	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned Income			Average Gross Rent Payment		
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018
				Baseline			Baseline			Baseline		
Total Households	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$956	\$908	\$1,098
Gender												
Female	29	27	26	\$20,414	\$19,772	\$15,198	\$17,157	\$19,479	\$15,186	\$966	\$919	\$1,004
Male	2	1	2	\$12,865	\$11,238	\$9,744	\$0	\$0	\$11,237	\$817	\$626	\$783

At this point, it is expected that the number of women will exceed men as head of households (26 vs. 2). For the second consecutive year, both genders saw declines in average total annual adjusted income compared to 2016. However, average gross annual earned income went up for males from \$0 to over \$11,000 in 2018, while females showed a 22% decrease compared to 2017. For both groups, average gross rent paid increased in 2018 – for males by 25% and females by 9.25%.

Again, this data supports the assumption that income rather than gender bias appears to be the driver for higher rent paid by females, and thus any higher rent burden.

Race/Ethnicity

TABLE 37: ACTIVITY 21 – HCV, RACE/ETHNICITY

HCV Homeownership Households	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned Income			Average Gross Rent Payment		
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018
				Baseline			Baseline			Baseline		
Total Households	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$956	\$908	\$1,098
Race (Multiple selections permitted)												
Black	24	24	23	\$20,351	\$20,399	\$14,949	\$17,795	\$20,454	\$16,787	\$963	\$916	\$1,019
White	7	4	5	\$18,476	\$15,055	\$14,160	\$10,069	\$10,905	\$7,800	\$932	\$873	\$816
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity												
Non-Hispanic	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$498	\$895	\$1,098
Hispanic	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Participating households represented two races only – Black and White. In 2018, the majority of these households were Black, up to 82% from about 77% in the previous year. White households constituting the remainder 18%. As in previous years, all participants were non-Hispanic. Average income – both adjusted and gross - decreased for both groups, with a larger magnitude of decrease reported by Blacks. Average gross rent paid decreased for White households by about 7%, but increased for Black households by 11%, despite the reported decrease in incomes. Although this situation bears tracking/monitoring, it is still more likely that amount of rent paid is a function of the number (volume) of Black households, and income earned rather than a disparate impact on Black versus White households.

Age

TABLE 38: ACTIVITY 21 - HCV, AGE

HCV Homeownership Households	Heads of Household			Average Total Annual Adjusted Income			Average Gross Annual Earned Income			Average Gross Rent Payment		
	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018	FY2016	FY2017	FY2018
				Baseline			Baseline			Baseline		
Total Households	31	28	28	\$19,927	\$19,478	\$14,808	\$16,050	\$18,808	\$14,904	\$956	\$908	\$1,098
Age of Head of Household												
18-31	1	0	2	\$57,580	\$0	\$9,781	\$63,340	\$0	\$15,552	\$1,019	\$0	\$1,363
32-46	16	18	12	\$22,782	\$23,116	\$20,801	\$21,348	\$24,821	\$26,314	\$1,020	\$925	\$1,101
47-61	10	7	10	\$15,259	\$14,021	\$11,766	\$8,240	\$9,010	\$4,982	\$895	\$896	\$848
62 and Over	4	3	4	\$10,764	\$9,168	\$6,952	\$2,688	\$3,584	\$5,153	\$838	\$840	\$848

Percentage of households in 2018 by age group:

$$18 - 31 = 7\%; 32 - 46 = 43\%; 47 - 61 = 36\%; 62+ = 14\%$$

Households with heads aged 32 to 46, have generally reported higher average incomes (with one exception in 2016), and paid the highest rent since inception of this activity, and same is true in 2018.

Activity 21 includes a fourth age group of persons 62 years of age and older. This group continues to be most financially challenged in 2018. It also tends to pay the least average rent. However, although rent amount paid has been fairly stable, it is arguably still relatively high given the low income reported by this group. As noted in the previous report, it is again recommended that rent payment to income ratio be monitored, for potential to cause increased/undue hardship.

With regard to disparate effects, there are no clear or definite patterns due to the recent nature of this activity's implementation. But comments regarding the 62+ group should be noted. It is recommended that LHA continue to track data and monitor metrics for this activity.

ACTIVITY TWENTY- TWO

Housing Choice Voucher Time Limit Pilot Program - NEW

Rent Reform Activity Proposed and Implemented FY2019

Goal: This activity is designed as a pilot to test the feasibility of time-limited housing assistance for work-able households in the HCV program. The stated goals for the implementation of this initiative/activity include the following: increase agency cost savings, reduce HAP payments, and promote self-sufficiency for participating households.

Target population: Work-able new admissions to the HCV program. Elderly households are exempt.

Duration: Five years, with possible 2 - year extension.

Rationale: To encourage self-sufficiency through employment and case management without having to report increases in income on a three-year recertification schedule. Per LHA, the time limit and reduced subsidy adds another dimension that is not required in the traditional HCV program.

Status at baseline (2018): Update

Activity/project is at pre-implementation stage. LHA reports some challenges in getting program set up including participant recruitment and determination of suitability, length of the enrollment process, there has been no lease up to date.

Selected metrics for this activity include the following:

- Agency cost savings
 - CE#1 - Total cost of annual certification in dollars (decrease)
- Staff time savings
 - CE#2 - Total time to complete task in staff hours (decrease)
- Increase agency rental revenue
 - CE#5 - Rental revenue in dollars (increase)

- Increase in household income
 - SS#1: Average earned income of households affected by policy in dollars (increase)
- Increase in positive outcomes in employment
 - SS#3: Number of employed head of household, co-head or spouse affected by this policy
- Households removed from TANF
 - SS#4: Number of households receiving TANF assistance (decrease)
- Households transitioned to self-sufficiency
 - SS#8: Number of households transitioned to self-sufficiency (increase)

NOTE: LHA reports that enrollment is yet to be complete. Their goal is to complete same and have data to report by FY 2019 report. As a result, there are currently no metrics to track or present.

A presentation of baseline and benchmark values for HUD standard metrics applicable to this activity is provided below for informational purpose only.

CE#1 - Agency cost savings - Metrics

Measure: Total cost of annual certifications

Baseline: Cost of certifications prior to activity implementation

$$= \text{Cost per annual certification} \times \text{maximum number of participants}$$

$$(\$26.97) \qquad (25)$$

$$= \$674$$

Benchmark: Cost per annual certification X maximum number of participants/3 years
= \$225

2018: No outcomes as yet. Follow up in 2019

CE#2 - Staff time savings - Metrics

Measure: Total time to task in staff hours

Baseline: 1-hour X 25 annual certifications = 25 hours annually

Benchmark: 1-hour X 8 annual certifications = 8 hours annually

2018: No outcomes as yet. Follow up in 2019

CE#5 - Increase agency rental revenue - Metrics

Measure: Rental revenue in dollars

Baseline: Rental revenue prior to activity implementation (in dollars) = \$0*

* see HAP explanation

Benchmark: Expected rental revenue after implementation of the activity (in dollars)
= \$180,000 (Expected HAP payments after implementation of activity (in dollars))

2018: No outcomes as yet. Follow up in 2019

Recommendation: Due to the fact that HCV does not provide rental revenues for LHA, CE#% is redundant and should be replaced, with effect from FY 2019.

Suggested: Add as new goal, *Decrease or reduction of agency costs/expenses*. Relevant metric can then be changed to *Reduction in HAP payments to households*.

SS#1 - Increase in household income - Metrics

Measure: Average earned income of households affected by policy in dollars (increase)

Baseline: Average earned income of affected households prior to activity implementation (in 2017) = \$10,667

Benchmark: Expected average earned income of households affected by policy
37.5 hours per week X (minimum wage) X 52 weeks

2018: No outcomes as yet. Follow up in 2019

SS#3 - Increase in positive outcomes in employment - Metrics

Measure: Number of employed head of household, co-head or spouse affected by this policy

Baseline: Head of household, co-head or spouse employed prior to activity implementation = \$0

Benchmark: Expected number of heads of household, co-head or spouse employed prior to activity implementation = 25

2018: No outcomes as yet. Follow up in 2019

SS#4 - Households removed from Temporary Assistance for Needy Families (TANF) - Metrics

Measure: Number of households receiving TANF assistance prior to implementation of this activity

Baseline: Households receiving TANF assistance prior to implementation of this activity implementation = 0

Benchmark: Expected number of households receiving TANF assistance prior to implementation of this activity = 12

2018: No outcomes as yet. Follow up in 2019

SS#8 - Households transitioned to self-sufficiency - Metrics

Measure: Number of households transitioned to self-sufficiency prior to implementation of this activity

Baseline: Households receiving TANF assistance prior to implementation of this activity implementation = 0

Benchmark: Expected number of households receiving TANF assistance prior to implementation of this activity = 12

2018: No outcomes as yet. Follow up in 2019

Disparate Impact Analysis

Unavailable at this time.

Deferred to 2019, post enrollment and implementation of activity.

Closing Comments

LHA has recorded another year of the MTW Demonstration program, with the continued implementation of a variety of activities (#1, 13, 14, 17, and 21), as well as the debut of a new activity (#22).

Generally, review of these activities indicates a mixture of outcomes – mostly positive for LHA in terms of benchmarks achieved as well as progress made towards stated goals.

For instance, notable benchmarks achieved include the continued maintenance of a minimum \$150 rent agency-wide. PH and HCV units achieving benchmark in increasing percentage of employable households and increases in earned income (Activity#1).

Even where benchmarks were not achieved, LHA saw some positive movement towards desired goals. For example, in Activity #1, LHA reports average increase in rent revenues per household, and increase in revenues despite decrease in number of households; in Activity #17 although LHA failed to achieve the benchmark relating to the number of households reporting earned income, it still recorded a 3% improvement on previous numbers (2017) - this growth, even though little is a trend in the right direction. Given factors like the challenges facing this population (wages, income, rent

affordability), the implication and relationship of indices like increase in household income, ability to pay rent, improved employment status of households, etc., is positive for movement to self-sufficiency.

The challenges faced by PBV units vis-à-vis meeting benchmarks carried over in most part to 2018., and so constitutes an area still to watch and monitor. Other areas to address or opportunities for improvement exist. For instance, for Activity #17 which deals with interim recertification, LHA needs to consider other modalities to manage costs through processes that reduce the number of re-certifications, and/or staff time processing same.

Disparate impact analysis conclusions: So far, no problem areas or patterns have been established, but there are areas that benefit from continued watch and monitoring. One such area is ethnicity – which appears to be the exception to the correlation or association between income, rent paid and rent burden, and so indicate a possible disparity. For instance, in Activity #17, Hispanics paid less rent, had lower incomes, compared to say Blacks who had lower incomes, paid less rent, and reported higher or similar rent burdens.

Generally, across activities, age and race did not appear to create a disparate impact from activity implementation (See e.g. Activity#13, #21). With regard to gender, women constitute the majority of household heads. Men were more likely to earn a higher income, and pay higher rent on average, thus as with other groups, explain the higher rent burden sometimes incurred.

Other areas to watch: Metrics, issues relating to hardship requests and complaints.

Metrics – In this report, LHA reported the revision of the metric for increase in revenues to properly reflect that HCV units do not contribute to agency rental revenues. Instead, LHA will track Housing Assistance Payments (HAP), and effect of increase or decrease on agency expenses/finances. This change will help provide a more accurate picture of rental revenues, allow LHA track reduction in HAP, and any effects on financial viability.

To this end three recommendations are proffered:

- a) That HCV units be removed from calculations and presentation of agency rental revenue data.
- b) That a new metric – *reduction in agency expenses* – be used to capture agency performance regarding HAP, and reported separately (See Activity #1)
- c) LHA consider a review and recalculation of benchmarks, and how they were determined for metrics affected by this change.

Hardship requests: Per LHA, households whose hardship request is denied continue to pay the rent based on their income or imputed income or they face eviction. Housing managers often refer these households to social service agencies and organizations that will help them pay their rent. It is recommended that LHA track and provide such post-denial data for analysis.

Complaints: It would appear that management teams have not provided information regarding complaints by residents. Like hardship request, complaints provide information on resident perspective and experience and so provide useful data. For instance, the number of resident requests for a hearing should be tracked.

Wrap up of activities, when due – It is recommended that LHA periodically review activities for continued viability or relevance, and to determine if wrap up or closure is necessary. An example is Activity #14 – which should be closed out when affected households cease to exist. Also, for activities in closing out status, it is important to recognize any impact/implications of that status on achieving the stated goals.

Finally, provision of the Random Housing sample for analysis was useful in giving more clarity as to the profile of agency households. It is recommended that a larger sampling of households (≥ 30), be conducted to allow generalizability of findings. Also, LHA has pledged to continue periodic survey of residents – this is laudable.

All in all, LHA continues to make positive strides towards goals of the MTW Demonstration Program.