



LEXINGTON HOUSING AUTHORITY

MOVING TO WORK

FY2020 Annual Plan

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Creating Affordable Housing Solutions



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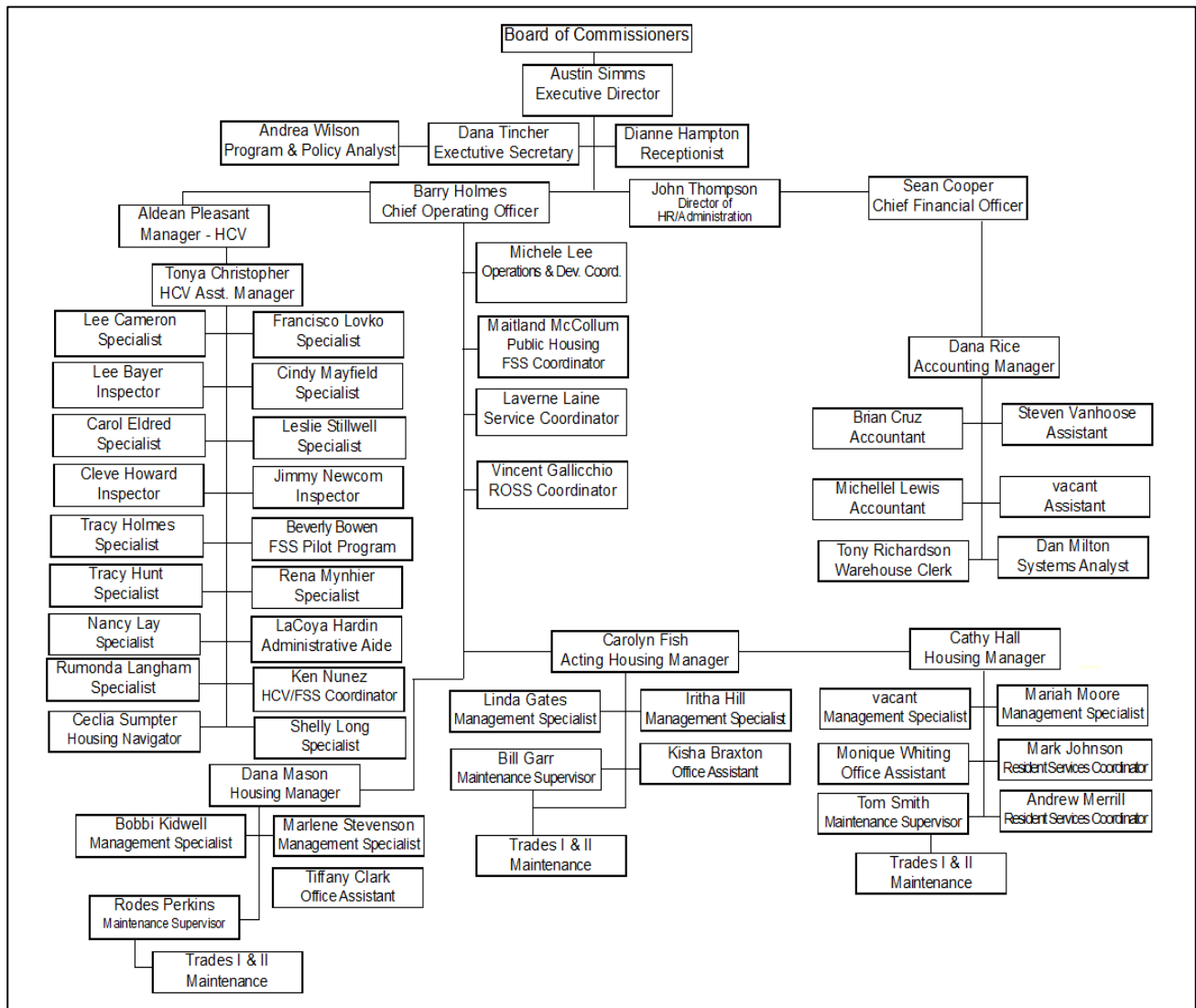


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I. Introduction

The Lexington-Fayette Urban County Housing Authority (LHA) submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011 with the execution of an MTW Agreement between HUD and LHA. In April 2016, HUD extended the agreements of all 39 MTW agencies until 2028. This FY2020 Annual MTW Plan marks the LHA's ninth year in the Demonstration.

The MTW demonstration allows public housing authorities to design and test activities and policies that further at least one of the statutory goals to reduce costs and achieve greater cost effectiveness; encourage self-sufficiency households with children; and, increase housing choices for low-income families.

Overview of Short-Term and Long-Term Objectives

Short Term Objectives

Renovation of Ballard Towers

In March 2018 the LHA was awarded 9% low-income housing tax credits (LIHTC) that will make financing the renovation possible. The \$10.9 million rehabilitation will include new energy efficient windows, new energy efficient bath fixtures and LED lighting fixtures, as well as aesthetically pleasing interiors with new floor finishes, new kitchen cabinets, new entry and interior doors, and an updated paint scheme.

In February 2019 Ballard residents began transferring to vacant units in the Ballard building and the adjacent Connie Griffith Towers elderly high-rise. Rehabilitation of the building will occur in phases by wing and residents have been advised that approximately six months will be required to complete work on their units. Completion of both wings is anticipated in twelve (12) months.

Ballard Apartments (non-MTW units) is an eight-story high rise located in downtown Lexington, with 134 one-bedroom units serving persons aged sixty-two and over. Ballard Place Apartments was originally constructed in 1978 by LHA. The building was most recently rehabilitated in 1999. Eighteen years after that renovation, the building has inefficient plumbing fixtures, lighting, windows, and outdated décor. The old windows lack energy efficiency and are allowing water intrusion; which is causing damage to the units and the building.

LHA Leadership Academy

Developing leaders and leadership qualities is a priority for the LHA. In 2018 the agency introduced the Leadership Academy for LHA employees. The voluntary program was made available to all employees of the Housing Authority. An application process and a supervisor's letter of recommendation were required for consideration. LHA management chose to limit the first class to no more than ten participants. The inaugural class of six LHA employees committed to six months of once-a-month day-long sessions, usually held outside of LHA offices and a finale group project. The group explored topics related to local business, government, law enforcement, social services and the arts. The final project for the class required that class members split into two groups made a presentation of their choosing on a community initiative, non-profit agency or any endeavor that was of interest each group. The presentations were held at the end of the six-month sessions and presented during a staff meeting. The success of the Leadership Academy has led management to offer the program in 2019 and extend it to eight months.

Addressing the Opioid Crisis

Our commitment to addressing the needs of the community at-large include directing rental assistance to those in persons in substance abuse recovery. Lexington has not been immune to the opioid crisis that is affecting communities across the U.S. The HOPE Center, a local organization and long-time partner with the LHA, seeks to address homelessness and substance abuse, is constructing a 48-unit facility that will provide independent living to men in recovery. The LHA has requested in the FY2020 Plan year to offer monthly block grant funding for these units (Activity 12).

Approval Received for Voluntary Conversion of Connie Griffith Towers

In April 2018 the LHA submitted application for Voluntary Conversion of Connie Griffith Manor (Griffith), a 183-unit, 10 story public housing high rise for seniors owned and operated by the LHA. Griffith is connected by a 1-story structure to Ballard, 134-unit high-rise for seniors. LHA received an approval letter June 3, 2019 for the application.

It is anticipated that, subject to fulfillment of all HUD requirements, the result of Griffith's voluntary conversion will be renovated at a cost of approximately \$11 million, assisted by project-based vouchers (PBV) with continued availability to current and future low-income households. Once the property receives approval for tenant-based vouchers for the Griffith public housing units, the LHA will use the authorizations of previously approved activities that address waiving certain PBV rules to complete the conversion.

Upon receipt of the approval letter, LHA formed an ad-hoc committee to plan and execute the voluntary conversion. Steps are underway to establish the LLC with the owner entity to be a limited partnership of which LHA's related entity will be the sole general partner. An application for the tenant-based vouchers is being processed. A regularly scheduled update with HUD has been established. Funding for the renovation is being developed with consideration given to local resources as well as LIHTC. Currently, these activities are anticipated to be completed with 24 months and the award of the tax credits, it that is the ultimate source of funding.

Long Term Objectives

Addressing the Capital Needs Deficit

HUD's recent estimate of a \$26 billion+ deficit for capital improvements to public housing across the country has led the LHA to examine ways to address the problem locally. The LHA is actively working to answer the needs of public housing that is gradually falling into disrepair without adequate funds to repair them. In early 2019 LHA senior staff met with its Board of Commissioners and consultants to discuss funding methods that will transform public housing. Specifically, the possible conversion of some or all 1,097 public housing units to other HUD programs are options HUD is encouraging. Those options are: the Rental Assistance Demonstration (RAD), Voluntary Conversion, Demolition and Disposition and Retention of Assets after a Declaration of Trust (DOT) release.

Craft Local Initiatives to Address Long-Term Needs

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 MTW 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.

To further both the federal and local MTW objectives listed above; the LHA has sought and received HUD approval to implement 22 MTW activities since entering the program in 2011. Below is a chart summarizing the LHA's MTW activities. The numbers in the statutory objectives column of the table corresponds with the numbered objectives above.

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	Ongoing 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	Closed Out FY2018	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)	Ongoing Implemented FY2015	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 Modified FY2020	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 Modified FY2020	Ongoing	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Closed Out FY2016	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Ongoing	1
18	Streamlined HQS Inspection of LHA-Owned/Controlled Property	FY2017	Ongoing	1
19	Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	FY2017	Ongoing	3
20	Assign Project-Based Vouchers To LHA Owned and Controlled Units Without Bid Process	FY2017	Ongoing	3
21	Triennial Certifications For HCV Homeownership Participants (Rent Reform)	FY2017	Ongoing	1
22	HCV Time Limit Pilot Program (Rent Reform)	FY2018	Ongoing	1, 2 & 3
23	Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/ Controlled Properties	FY2018 Amended Plan	Ongoing	1
24	Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/ Controlled Units	FY2019	Not Yet Implemented	1
25	HCV – Allow Excluded Income to Make Units Affordable	FY2020	Ongoing	3
26	Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform)	FY2020 Amended Plan	Proposed	3

II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year

0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Connie Griffith/KY04	183	Voluntary Conversion pending for Connie Griffith.
N/A	0	N/A
N/A	0	N/A

183

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Connie Griffith	183	No	Elderly high-rise – voluntary conversion application pending
N/A	0	N/A	N/A
183		Planned Total Vouchers to be Newly Project-Based	

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Centre Meadows	206	Complete	Yes	Family site renovated in 2014
N/A	0	N/A	N/A	N/A

206

Planned Total Existing Project-Based Vouchers

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
In April 2018 the LHA submitted application for Voluntary Conversion of Connie Griffith Apartments (Griffith), a 183-unit public housing high rise for seniors owned and operated by the LHA. LHA received approval of the application for voluntary conversion of Connie Griffith on June 3, 2019. Griffith is connected by a 1-story structure to Ballard, 134-unit high-rise for seniors. The site will be converted to project-based vouchers.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
Management Improvements -PHA Wide Software Upgrade \$179,182 Administration -Capital Fund Fee \$179,182 Fees and Costs -PHA Wide A & E Fees \$268,774 RPCA-PNA-EA -PHA Wide \$150,000 KY004000001 -Lexington South: Replace front & back storm doors; replace crawl space doors; single-family window replacement; parking lot replace/repair \$207,196 KY004000002 -Lexington West: Tub surround replacement; roof replacement; drainage excavation \$257,761 KY004000003 -Unnamed: Bathroom vanity & cabinet replacement, kitchen cabinet & counter top replacement; doors & window replacement; perimeter fence replacement; retention basin gate replacement; roof & gutter replacement \$184,602 KY004000007 -Homownership: Fence replacement & repair \$43,000 KY004000010 -Bluegrass Apartments: ION Monitoring \$39,501 KY004000013 -Bluegrass Phase III: ION Monitoring \$74,066

B. LEASING INFORMATION**i. Planned Number of Households Served**

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	10524	877
MTW Housing Choice Vouchers (HCV) Utilized	26580	2215
Local, Non-Traditional: Tenant-Based^	5232	436
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	42336	3528

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Local, Non-Traditional Uses of MTW Funds for Special Partners/Activity 12	5232	436
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	Vacant units at Connie Griffith (183 units) are being held for relocation of Ballard residents for rehabilitation and Voluntary Conversion is pending for Connie Griffith.
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION**i. Waiting List Information Anticipated**

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Regional Waiting Lists	3182	Closed	Yes
Housing Choice Voucher	Community Wide	3016	Closed	Yes
PBV	Centre Meadows	629	Closed	Yes
Local, Non-Traditional MTW Assistance	Program Specific	N/A	Open	Yes

Please describe any duplication of applicants across waiting lists:

There is duplication across all available waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

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

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

III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

Activity #26: Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform)

A. Activity Description

i. Description of Proposed Activity

On June 3, 2019, the U.S. Department of Housing and Urban Development (HUD) approved the voluntary conversion of Connie Griffith Apartments (CGA) (a 183-unit elderly building) from a public housing development to Section 8 vouchers. HUD is providing tenant protection vouchers that LHA will use to provide Housing Choice Vouchers (HCV) to all CGA resident households at the time of conversion and to replace vacant units and one unit containing a household that is over-income for HCV. The CGA households may use their HCV at CGA or to move elsewhere.

This activity would provide residents of the CGA rent and eligibility protections post-conversion that they would not have under the HVC program. It is consistent with the information provided during the voluntary conversion process and provides additional tenant protections.

Currently 169 elderly (62 and over) residents occupy CGA and 168 will receive HCV on the conversion date. Of the affected households, 168 have annual incomes less than 80% of Area Median Income (AMI) and are eligible for a HCV based on income. Of the 169, 28 pay a flat rent of \$337 or \$438 under the public housing program. Of these 28,

- 18 have a total tenant payment (TTP, typically 30 percent of the family's adjusted income) less than the CGA gross rent (\$650), but more than the flat rent that they currently pay, and thus conversion to HCV would cause additional rent burden
- Seven (7) have a TTP that exceeds both the payment standard (\$705) the HCV gross rent at CGA (\$650), and thus would be at zero assistance and ineligible for a HCV
- Two (2) have a TTP that is less than the payment standard but exceeds the CGA gross rent, and thus would be ineligible to stay at CGA with a HCV
- One (1) is over-income for the HCV program, with an annual gross income that exceeds 80% of AMI. The over-income household may remain at CGA as an unassisted household, with the same rent protections as other households. The LHA will not include this unassisted unit in the rent reasonableness determinations for CGA units.

Conversion is scheduled for December 1, 2019. For vacant units at conversion and as CGA units become vacant over time, LHA intends to convert the vacant units to project-based vouchers.

LHA will offer current CGA households who choose to move with their HCV by June 30, 2020, a moving expense allowance of \$900, which is the amount the U.S. government has determined is reasonable for moves from apartments with three rooms of furniture (from the Uniform Relocation Assistance & Real Properties Acquisition Policies Act table). A household instead could choose to be reimbursed for reasonable actual costs but would have to have receipts or other evidence for these costs and demonstrate that they are reasonable. Such costs would not include refundable utility deposits or expenses for moving outside Fayette County. Residents who choose to move with their HCV after June 30, 2020 would not be provided moving expense payments.

Proposed Rent and Eligibility Protections

The LHA will offer current CGA households the following protections applicable to their HCV:

- For a household currently paying public housing flat rent, their HCV rent will remain at the current flat rent for the next two years;
- After the two years, LHA will phase rent increases over five years to the lower of the TTP or the then-current reasonable rent, minus \$1 so that some subsidy remains payable for all units except the unassisted unit;
- The phased rent increase is estimated to range between a \$42 and \$63 increase each year (depending on which flat rent the family pays now). At the fifth year the rent would increase to bring the resident to current contract/gross rent (see example below);

Flat Rent	Year 3 Increase	Year 4 Increase	Year 5 Increase	Year 6 Increase	Year 7 Increase
\$337	\$61/\$398	\$63/\$461	\$63/524	\$63/\$587	*\$63/\$650
\$438	\$42/\$480	\$42/\$522	\$43/\$565	\$43/\$608	*\$42/\$650
*subject to change if reasonable rent increases between year 3 and 7.					

- All households' initial rental payments will be based on their most recent recertification at the time of conversion. Tenants will be recertified on their regular 3-year schedule.
- Current CGA households that meet HCV program requirements may move with their HCV at any time, with proper notice under their HCV leases.

Related clarification regarding planned use of MTW single fund flexibility

The LHA's fiscal 2020 MTW Annual Plan indicated in the Sources and Uses description of planned use of MTW Single Fund Flexibility that the LHA could use public housing cash reserves for a number of projects, including but not limited to "possible tax credit funding and source of funds to meet rehab needs for Connie Griffith Towers voluntary conversion from public housing to PBV." As part of its use of MTW Single Fund Flexibility, the LHA expects to use public housing capital funds in that manner—notably for the completion of an elevator renovations contract that was bid prior to the voluntary conversion but for which work will be completed after the voluntary conversion. The LHA will report on that expenditure as appropriate in its MTW Annual Reports.

ii. MTW Statutory Objective

The approval of this activity will permit the LHA to waive certain rent and eligibility requirements for households who occupy units at CGA at voluntary conversion and to modify the rent reasonableness determination process. This activity will increase housing choice for CGA households.

iii. Implementation Schedule

LHA will offer current CGA households the protections and implement the modification in the rent reasonableness process upon conversion to HCV – December 1, 2019.

B. Activity Metrics

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of elderly CGA households at or below 80% AMI that would lose assistance or need to move (decrease)	0 Households losing assistance/moving prior to implementation of the activity.	28 Expected households losing assistance/moving after implementation of the activity.	TBD Actual households losing assistance/moving after implementation of the activity.	TBD Whether the outcome meets or exceeds the benchmark.
Data source: Emphasys software program and staff reporting.				

C. Cost Implication

This activity is designed to offer protection to households at CGA who otherwise would be faced with increased rent burden or become ineligible for subsidy because of the voluntary conversion action. The subsidy cost to LHA initially, or reduced rent

in the case of the unassisted over-income household will be \$78,504 annually and will become minimal after the seven (7)-year period of reduced rents.

D. Need/Justification for MTW Flexibility

- i. MTW Authorizations (references are to Section 8(o) or 16 of the U.S. Housing Act of 1937 and 24 CFR Part 982 or 24 CFR Part 5 as indicated; some cited authorizations may not be needed)

MTW Agreement Attachment C, Section D.1.c., provision for a reexamination program that differs from the program currently mandated by law and regulations—Sec.8 (o)(5), 982.516; possibly needed to continue to apply LHA's previously-approved recertification schedule, including to new participants in the HCV program.

Sec. D.2.a., provision for policy to establish payment standards, rents or subsidy levels that differ from law or regulations—Sec. 8(o) (1), (2), (3), (10), (13)(H-I), 982.508, 982.503 and 982.518; needed to apply proposed rent changes.

Sec. D.2.c., authorization to develop a local process to determine rent reasonableness; supports exclusion of the unassisted unit at CGA housing the household that is over-income for HCV from the CGA rent reasonableness determination.

Sec. D.3.b., provision for verification of family income and composition that differs from current law or regulations, 982.516, 982 Subpart E—possibly needed to continue to apply LHA's previously-approved recertification schedule, including to new participants in the HCV program.

E. Rent Reform Information

i. Impact Analysis

- (1) Impact. The proposed activity impacts household rent/tenant share only in a manner that adds tenant protections. For households who would remain eligible for HCVs but whose rents would increase on conversion, the proposed activity would hold rents at their current levels for two years and phase up to the lower of their TTP or \$1 below the then-current gross rents over an additional five years. For households whose incomes do not exceed 80% of AMI but otherwise would make them ineligible for HCV because their TTPs would equal or exceed the gross rent,, the proposed activity would retain household rents at a level that assures continued HCV eligibility by retaining \$1 of subsidy.
- (2) Implementation and tracking. The implementation schedule is indicated above. This is a discrete universe of twenty-eight (28) households, which will

be tracked separately in LHA's systems. Thus, any unintended consequences/impacts can be identified easily.

- (3) Numerical analysis. Twenty-eight (28) households will be affected by receiving more favorable rent and/or eligibility treatment than they otherwise would receive in the HCV program. For the eighteen (18) households who otherwise would remain eligible for HCV, their rents would be reduced by up to \$311 monthly by the two-year rent freeze. During the five years thereafter, this amount would be phased out. For the nine (9) households who otherwise would become ineligible for HCV because their TTPs relative to gross rents would result in zero housing assistance,, they would remain eligible and their rents would be affected in the same manner as the other affected residents (reduced by \$1 after the phase-in if needed to retain subsidy).
- (4) Review plan. LHA will review the impact of this activity annually to determine whether unintended consequences indicate that it should be changed.

ii. Hardship Case Criteria

Because the affected households all are being charged rent less than their TTP, LHA does not expect hardship cases. Once the five-year rent phase-up period begins, however, LHA will entertain hardship claims related to the phased rent increases on an individual claim basis. Claims could be made to the Director of HCV, indicating the basis for the hardship claim. A successful hardship claim would need to be based on extraordinary circumstances, such as demonstrated extraordinary and temporary household living or other expenses.

iii. Description of Annual Reevaluation

The LHA annually will examine the situation of the twenty-eight (28) affected households to ensure that there are not unintended consequences of their eligibility or rent treatment that would call for a change in the activity.

iv. Transition Period

Because the activity will allow the affected households to retain eligibility for subsidy and their current rent levels for two years, no transition period is necessary.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted Implemented Activities

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

i. Plan Year Approved, Implemented, Amended

Activity_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/Update

All non-elderly/non-disabled public housing and Housing Choice Voucher (HCV) tenants pay \$150 in minimum rent. The LHA increased the minimum rent to \$150 across all housing programs (Section 8 & 9) excluding elderly and/or disabled households and households participating in HCV special partner programs in April 2014. The initiative promotes self-sufficiency by encouraging heads-of-household to work, while raising much-needed revenue.

This activity is ongoing and based on FY2018 reporting, the average earned income across all programs was up approximately 9% from \$17,112 in 2017 to \$18,626 in 2018. Agency-wide, households (excluding elderly, disabled and special partner program households) reported earned income as follows:

Households Reporting Earned Income			
FY2015	FY2016	FY2017	FY2018
844 of 2,093 HHs	1,442 of 2,024 HHs	1,762 of 2,556 HHs	1,601 of 2,154 HHs
40%	71%	69%	74%

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned 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. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

Activity_Proposed FY 2012 – FY 2013 Plan /Significantly Modified FY2014 Plan/Implemented FY2015

ii. Description/Update

The LHA has modified the inspection intervals for HCV landlords based on a star-rating system. Landlords are assigned a star-rating between one and three based on inspection history, failed inspections, abatements and complaint inspections. New landlords to the program are assigned a 2-Star Rating until historical data can be compiled. A 3-Star Rating allows for 30 months between HQS inspections; a 2-Star Rating allows for 24 months between inspections; and, a 1-Star Rating requires an HQS inspection every 12-months. This policy requires that at-risk/problematic properties be inspected more frequently, and compliant properties have longer between inspections. This activity is ongoing. During FY2018 over 800 landlords were rated, with 91% (780) assigned the 2-Star Rating; 8% (72) assigned the 3-Star Rating and less than 1% (4) assigned the 1-Star Rating.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 13: Local Self-Sufficiency Admissions and Occupancy Requirements

i. Plan Year Approved, Implemented, Amended

Activity proposed/approved FY2014; A technical amendment submitted January 14, 2016 and approved January 20, 2016

ii. Description/Update

The majority of the LHA's housing stock are designated as Self-Sufficiency (SS) I or Self-Sufficiency (SS) II housing which requires households at these sites to work 20-hours (SS I units) or 37.5-hours (SS II units) per week depending on the site. If the household loses employment, they are subject to rent based on imputed income at 20 or 37.5 hours, multiplied by the federal minimum wage for 52 weeks. The LHA's PBV site, Centre Meadows (CM), a 206-unit family site, is included in this activity and households at CM are required to work at least 20 hours per week or households are subject to imputed income for those households not working; 878

public housing units are designated as SS I or II. Elderly and disabled households are excluded from this activity and families who lose income through no fault of their own may submit a hardship request. This activity is ongoing.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 14: Rent Reform: Elimination of Earned Income Disallowance

i. Plan Year Approved, Implemented, Amended

Activity Proposed, Approved, and Implemented – FY2015 Plan

i. Description/Update

LHA staff proposed to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV disabled households. Federal regulations mandate the exclusion of earnings for public housing households for an individual family member or HCV disabled household for a maximum of 24 consecutive months with an overall lifetime limit of 48-months. No public housing or HCV disabled household receive the EID and no new program participants may receive the EID. Elimination of the EID calculation has been successful in reducing the administrative burden of monitoring household members receiving the EID and tracking employment. This activity is ongoing.

ii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iii. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

Activity proposed/approved FY2014; A technical amendment submitted January 14, 2016; approved January 20, 2016, and re-proposed in the FY2020 Plan

ii. Description/Update

Providing HCV rental assistance to special partners that provide social services in the community is crucial to addressing the unique issues of at-risk populations. Proposed in FY2012 – 2013 and amended in FY2014, the LHA currently provides voucher assistance to a maximum of 32 participants for the Bluegrass.org and Community Action Council (CAC). Bluegrass.org (22 vouchers) provides wraparound services for persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services. CAC (10 vouchers) provides case management to Foster Care youth aging out of the system. The LHA would like to offer voucher funding to one additional special partner program that provides social services in Lexington. Voucher funding is requested for:

Arbor Youth Services will be provided funding for three (3) vouchers, thereby reducing CAC's funding from ten (10) to seven (7) units. CAC has not leased the maximum ten units since the activity as implemented. Arbor Youth Services helps youth who are between 22 and 24 years of age who are experiencing homelessness transition into housing. This activity permits the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance. While LHA hopes the majority of these families will subsequently seek unsubsidized housing in the private market, these households will also be eligible to apply for public housing or another HCV voucher (including Family Self-Sufficiency vouchers) through the Authority's normal application procedures. The LHA will report on this activity in the next annual Plan.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

This activity was initially proposed in the FY2012- 2013 Annual Plan and modified in FY2014 and FY2020

ii. Description/Update

The LHA re-proposes this activity in accordance with reporting requirements due to significant modification. This activity was initially proposed in the FY2012-2013 Annual Plan and modified in FY2014.

The Housing Authority provides a fixed 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. HCV staff has signed Memoranda of Understanding (MOUs) in with each special partner program.

During FY2020, the LHA proposes to increase funding for a special partner program – the HOPE Center, that provides monthly block grant funding for 144 for persons who have substance abuse problems and are in need of voluntary or court-mandated treatment. In a response to the opioid crisis, the LHA plans to increase block grant funding for an additional 48 units for a new facility under construction and operated by the HOPE Center that will house addicts in recovery. The facility is scheduled to open in May 2019. The additional units will initially receive funding of \$12,936 per month for \$155,232 annually. Currently the HOPE Center receives \$41,889 per month for 144 units. The LHA provides monthly block grant funding for 388 voucher units to eight (8) special partner programs (see the following table).

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 16: HCV Rent Reform Study

i. Plan Year Approved, Implemented, Amended

Approved, and Implemented – FY2015

ii. Description/Update

In July of 2018 the LHA saw the first triennial recertifications for the HCV Rent Reform study group participants. The policy substitutes triennial recertification of a households' income for annual recertification and it is not necessary for study group participants to report increases in income. The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD.

HCV staff reports that the following update following the first triennial certification in July 2018: 13 Study Group participants have achieved zero HAP and 103 increases in income in the Study Group. As reported in the FY2018 MTW Annual Plan, HCV Rent Reform Study participation is 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

LHA staff is encouraged by the preliminary outcomes to date. 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.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 17: Limit Interim Re-examinations for Public Housing Households**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2016

ii. Description/Update

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

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 18: Streamline HQS Inspection of LHA-Owned/Controlled Property**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA's Housing Choice Voucher (HCV) inspectors perform HQS inspections of LHA-owned property or affiliates that receive HCV assistance rather than a third-party inspector. Prior to proposal of this activity HCV inspectors from other jurisdictions perform HQS inspections on LHA-owned properties or affiliates, which slows the leasing process. In cases where the property is a tax credit entity, the property is being inspected by LHA public housing management staff in addition to an HQS inspection. This activity is ongoing and HCV staff believes this authority allows for more efficient use of staff time and unit turn around has been expedited.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

Proposed, Approved and Implemented FY2017

ii. Description/Update

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

To date, four participants are housed through this program.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval to select existing and new LHA owned/managed property for project-based voucher assistance without a competitive bid process. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project. The LHA may project-base its own new construction projects during FY2019 and this flexibility will have a positive impact for the agency and the clients we serve.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 21: Triennial Recertifications for HCV Homeownership Participants**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval to implement reexaminations every three (3) years for Housing Choice Voucher (HCV) Homeownership households by conducting income reexaminations every three (3) years. Triennial recertification has proved successful for HCV elderly disabled on fixed incomes. Staff sees minimal changes in income for the homeownership households in the Housing Choice Voucher program. This activity is ongoing. The elimination of these annual certifications has allowed for more time for HCV specialist to devote to other programs. The LHA currently has 30 homeownership participants.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 22: Rent Reform: Housing Choice Voucher Time Limit Pilot Program**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2018

ii. Description/Update

The Lexington Housing Authority received approval in the FY2018 Plan 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 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

At the close of FY2018 (June 30, 2018) the one voucher was issued but had not leased a unit. Currently, 15 participants are under lease and one is waiting to pass HQS inspection. 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. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

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

i. Plan Year Approved, Implemented, Amended

Proposed and Approved FY2018, FY2018 Amendment Proposed in January 2018, Approved March 2018

ii. Description/Update

The LHA performs rent reasonableness determinations on all property owned or managed by the LHA. This initiative aims to eliminate the administrative work and cost of acquiring an independent entity to perform rent reasonableness determinations on LHA owned-controlled units. Eliminating the independent entity will improve administrative efficiencies, eliminate confusion for the voucher participant, and improves the response time for performing inspections. The LHA began using this authority upon approval and has experienced no issues since implementation.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 25: HCV – Allow Excluded Income to Make Units Affordable

i. Plan Year Approved, Implemented

Proposed and Approved FY2020

ii. Description/Update

At the time initial occupancy, if the gross rent is greater than the payment standard for the family, the family's monthly share may not exceed 40% of the family's monthly adjusted income (MAI). The LHA's goal is to allow maximum resident choice in the voucher program by allowing the use of federally-mandated excluded income in determining unit affordability.

The LHA's calculation of allowable rent burden will use gross income, including excluded income. Staff has determined that many times the gross rent is greater than the payment standard for the family and the MAI dictates that they are not eligible for a unit because of a rent burden beyond the 40% cap. Allowing the use of

excluded income, the 40% rent burden cap would in most cases not be exceeded, and the household would be eligible for the unit. The LHA will report the number of households utilizing this activity in the next annual report.

vi. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

vii. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

viii. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activities Not Yet Implemented

Activity #7: Public Housing Acquisition Without Prior Approval

Approval Dates: FY2012-2013 Plan

Description

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.

All acquired properties will meet HUD's site selection requirements. Approval from the local HUD office will be sought when a pending real estate acquisition deviates from the selection requirements. Copies of all required forms and appraisals will be maintained at the Authority's main office. After acquisition, all required documentation will also be provided to the HUD field office so HUD officials can ensure that site selection requirements were met and establish records for these new public housing properties in the agency's data systems.

i. Update

The LHA did not acquire any public housing properties during where it was necessary to implement this activity.

ii. Timeline for Implementation

The LHA will develop a timeline for this activity during FY 2020 should the Authority decide to acquire public housing units or land for the development of public housing.

- iii. Explanation of any non-significant changes or modifications to the activity since it was approved
The LHA does not anticipate any non-significant changes or modifications to this activity during FY2019.

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

Approval Dates: FY2012-2013 Plan, FY2014 (modified)

Description

Appian Hills needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site's 27 four-bedroom homes.

LHA continues to work diligently to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority.

- i. Update
Should HUD issue a NOFA during FY 2019 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.
- ii. Timeline for Implementation
Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activity #9: Development of Project-Based Voucher Units at 800 Edmond St.

Approval Dates: FY2012-2013 Plan

Description

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

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

- ii. **Timeline for Implementation**
The LHA will develop a timeline for this activity during the Plan year should the Authority decide to develop the Edmond Street property.
- iii. **Explanation of any non-significant changes or modifications to the activity since it was approved**
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

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

Approval Dates: FY2012-2013 Plan, FY2014 (modified)

Description

Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Towers (non-MTW units which are attached to an LHA-owned public housing site, Connie Griffith Towers, serving low-income, elderly households) require significant emergency capital repairs. MTW funds would only be used if the LHA does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Towers no more than \$300,000 in emergency funds in total.

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.

- i. **Update**
Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a tax-credit entity until October 20, 2015 when the property exited tax credit compliance and is now solely owned by the Ballard, LLC, an LHA controlled entity. The LHA is weighing the possibility of Voluntary Conversion for Connie Griffith Towers and continues to seek a funding mechanism for Ballard Towers.
- ii. **Timeline for Implementation**
The LHA will develop a timeline for this activity during the Plan year should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.
- iii. **Explanation of any non-significant changes or modifications to the activity since it was approved**
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activity 24: Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/Controlled Units

Approval Date: FY2019

Description

The Lexington Housing Authority will eliminate the project-based voucher Choice Mobility option to offer assistance for families who elect to move after one year of occupancy in LHA-owned/controlled project-based voucher units (24 CFR 983.261). The LHA is mindful of the overwhelming need for affordable housing and sees the benefit of offering tenant-based rental assistance to families on the waiting list while continuing to assist families who are currently housed and receiving rental assistance in PBV units. This activity will aid in reducing a family's time on the waiting list. This activity does not apply to RAD units, reasonable accommodation instances or Violence Against Women (VAWA) cases.

- i. Update
The LHA currently does not own or control any project-based voucher (PBV units) that are eligible for this initiative. The LHA is considering conversion of public housing units that may allow for use of this initiative.
- ii. Timeline for Implementation
The LHA will develop a timeline for this activity during the Plan year should the Authority convert or acquire any PBV units.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved.
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activities on Hold

N/A

Closed Out Activities

Activity #2 - Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents (Closed out FY2014)

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

Activity #3 - Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households Approved Implemented FY2012-2013 Plan, Modified FY2014 (Closed out FY2018)

PIH Notice 2016-05 Streamlining Rule allows for all PHAs to adopt triennial recertifications. The LHA received approval to discontinue reporting on standard metrics for this activity in the MTW FY18 Plan.

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

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

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

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

Activity #15 - Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent Approved/Implemented FY2015 (Closed out FY2016)

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

V. SOURCES AND USES OF MTW FUNDS

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$6,821,736
70600	HUD PHA Operating Grants	\$24,002,410
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,823,417
71100+72000	Interest Income	\$31,647
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$280,964
70000	Total Revenue	\$33,260,174

ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,662,475
91300+91310+92000	Management Fee Expense	\$1,823,417
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,932,574
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,729,540
95000 (95100+95200+95300+95500)	Total Protective Services	\$377,021
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$659,605
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$319,184
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$19,254,867
97400	Depreciation Expense	\$1,653,723
97500+97600+97700+97800	All Other Expense	\$469,111
90000	Total Expenses	\$34,881,517

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

Variance is Depreciation Expense budgeted surplus for year.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
<p>The LHA will use single-fund fungibility by transferring excess cash reserves from Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/2019 per our audited report to be utilized for a number of projects. Those projects would include but not limited to: development of land adjacent to our recently development of 11 units at Glen Arvin Avenue; Ballard Towers, a senior designated high-rise that has been awarded 9% tax credits which may need additional funding for cost overruns related to the renovation; possible tax credit funding and source of funds to meet rehab needs for Connie Griffith Towers voluntary conversion from public housing to PBV. In addition, this flexibility may be necessary to take advantage of existing or new construction development opportunities as well as resident programs that promote self-sufficiency. Continued professional development of staff is important as demonstrated with our recent implementation of the Leadership Academy. The agency has begun a review of our entire portfolio to consider options under the asset repositioning plan to full advantage of our single-fund fungibility.</p>

B. LOCAL ASSET MANAGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

Yes

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

No

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

No

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

The LHA is not implementing a LAMP.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**i. Description of RAD Participation**

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
<p>The Lexington Housing Authority (LHA) applied for participation in the United States Department of Housing & Urban Development's (HUD) Rental Assistance Demonstration in October of 2012. On December 14, 2012, the LHA was notified of approval of the application for conversion of 206 public housing units at Pimlico Apartments to Project Based Vouchers (PBV). LHA fulfilled its obligation to remove 206 dwelling units from KY004000012 Pimlico Apartments in the Inventory Management System / PIH Information Center (IMS/PIC) which were converted to RAD Project Based Vouchers. The dwelling units consisted</p>

of the following: 44 one-bedroom units, 128 two-bedroom units, and 34 three-bedroom units. LHA acknowledges that the removal of the identified units from IMS/PIC was a material requirement and condition of HUD's approval of its Rental Assistance Demonstration (RAD) application for the project.

- *RAD Conversion Commitment 2nd Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014*
- *RAD Conversion Commitment Final Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014*
- *RAD Post-Closing Corrective Amendment issued by HUD on April 5, 2018*

The renovated site is now known as Centre Meadows with rents subsidized by HCV (Housing Choice Voucher) assistance. Renovation began March 4, 2014 and by June 30, 2016 the overall project was 100% complete and all 206 dwelling units had been leased & occupied.

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

No

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

N/A

VI. ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.

RESOLUTION TO APPROVE AND SUBMIT THE AMENDED FY2020 MTW ANNUAL PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR APPROVAL

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

WHEREAS, in compliance with the MTW Agreement, the fiscal year 2020 MTW Annual Plan was approved by the LHA Board of Commissioners on April 18, 2019; and

WHEREAS, a new activity, Activity 26: Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform), has been added to the FY2020 MTW Annual Plan that will provide protections to displaced residents of Connie Griffith Apartments as a result of LHA action (voluntary conversion); and

WHEREAS, the amended Plan states the LHA's intention to use public housing capital funds with MTW single fund fungibility to complete an elevator renovations contract for Connie Griffith that was bid prior to the voluntary conversion to Project-Based Vouchers; and

WHEREAS, LHA invited comment on the amended Plan through notices posted on its website and advertised in the local newspaper and social media allowing for a 30-day comment period (October 4 through November 4, 2019) with a public hearing held on October 21, 2019; and

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

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the amended FY2020 MTW Annual Plan is approved and that the Executive Director, Austin J. Simms, is hereby authorized to submit this Annual Plan to the U.S. Department of Housing and Urban Development for approval.


Joan Whitman
Chairperson, Board of Commissioners

11-6-2019
Date

**RESOLUTION TO APPROVE THE LEXINGTON HOUSING AUTHORITY'S FY 2020
MOVING TO WORK ANNUAL PLAN**

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

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

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

WHEREAS, the LHA's FY2019 MTW Annual Plan was approved by HUD on August 1, 2018, as submitted on July 24, 2018, effective through June 30, 2019; and

WHEREAS, LHA has proposed one new activity in the FY 2020 MTW Annual Plan that will serve to increase housing choices for low-income families ; and

WHEREAS, the LHA has re-proposed two previously approved MTW activities to increase housing choice for at-risk populations; and

WHEREAS, a Board Resolution approving the proposed FY 2020 MTW Annual Plan and required Certifications of Compliance that must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from March 11, 2019 through April 11, 2019 for the public to comment on the Plan, and has conducted a Public Hearing on March 26, 2019 to discuss the proposed Annual Plan before its submission to HUD,

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2020 MTW Annual Plan, effective July 1, 2019 through June 30, 2020, is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.


Joan Whitman

Chairperson, Board of Commissioners

April 18, 2019

Date

OMB Control Number: 2557-0216

Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2019), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Lexington-Fayette Urban County Housing Authority

KY004

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Austin J. Simms

Executive Director

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

April 18, 2019

DATE

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

B. DOCUMENTATION OF PUBLIC PROCESS

The beginning and end dates of when the Annual MTW Plan was made available for public review and the dates, location and number of attendees of public hearings must be provided. HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the Standard MTW Agreement (or successor MTW Agreement).



Lexington Housing Authority

PUBLIC HEARING

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

MONDAY, OCTOBER 21, 2019 @ 5:30 PM

**BALLARD-GRIFFITH APARTMENTS
BALLARD DINING ROOM
650 TOWER PLAZA**

SUBJECTS TO BE DISCUSSED:

- 1) PROPOSED AMENDMENT TO THE FY 2020 MOVING TO WORK (MTW) ANNUAL PLAN
- 2) REVISIONS TO THE HOUSING CHOICE VOUCHER (SECTION 8) ADMINISTRATIVE PLAN

Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding: 1) Proposed Amendment to the FY 2020 Moving to Work (MTW) Annual Plan and, 2) Revisions to the Housing Choice Voucher (Section 8) Administrative Plan.

There will be a public hearing on **Monday, October 21, 2019 at 5:30 PM at Ballard-Griffith Apartments (Ballard Dining Room)**, located at 650 Tower Plaza, Lexington, Kentucky, 40508. The subject of the meeting will be amendment to the FY2020 MTW Annual Plan to propose a new activity that will offer current residents of the Connie Griffith Apartments rent and eligibility protections post-voluntary conversion under the Housing Choice Voucher (HVC) program, and; modifications to the Housing Choice Voucher (Section 8) Administrative Plan as a result of the new activity.

The LHA welcomes public comment regarding these changes from October 4 –November 4, 2019. Complete copies of the affected documents (and a summary of proposed changes to each) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office and LHA Satellite Offices or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060.

LHA Public Housing or HCV (Section 8) participants who require transportation to the public hearing, please see your housing specialist or manager in advance to schedule.

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

Friday, October 4, 2019
Lexington Herald-Leader

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Legals & Public Notices

Invitation for Bid-Notice is hereby given by the Lexington-Fayette Urban County Government that proposals will be received until 2:00 P.M., local time on 10/22/2019 in Central Purchasing, 200 E Main St, Rm 338, Lexington, KY for: Bid 89-2019 U.K. C. D. E Trunk Sewer. This procurement will be subject to Consent Decree Requirements. Additional information on obtaining specifications can be found at <https://lexington.ky.lionwave.net> or by calling (859) 258-3320.

0004189646-01

Notice is given under KRS 376.455 by Ambrose Crump of the intent to sell a Lex 844, a Bobcat Trackhoe, a paint sprayer and a walk-behind saw after 7 days following this Notice. Equipment Concepts, Inc. and TSP Masonry may have an interest in this equipment. If you have questions, please call 859-721-2100.

0004405768-01

Notice of Shareholders' Meeting to Vote on Combination

THE FIRST NATIONAL BANK OF JACKSON

Shareholders' Meeting

Notice is given that, pursuant to call of its directors, a special meeting of the shareholders of The First National Bank of Jackson will be held at its banking house at 1126 Main Street, Jackson, Kentucky 41339 in the city of Jackson, state of Kentucky, on Friday, October 18, 2019, at 10:00 a.m., to consider and determine by vote whether an agreement to merge the bank and FBJ Interim Bank, Inc., located in the city of Vancuburg, state of Kentucky, under the provisions of the laws of the United States, shall be ratified and confirmed, and to vote upon any other matters incidental to the proposed merger of the two institutions. A copy of the agreement, approved by a majority of the directors of each of the two institutions, providing for the merger, is on file at the institution and may be inspected during business hours.

/s/ Phillip J. Sheffel

0004789441-01

Legals & Public Notices

PUBLIC HEARING AND ANNOUNCEMENT
Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding: 1) Proposed Amendment to the FY 2020 Moving to Work (MTW) Annual Plan and, 2) Revisions to the Housing Choice Voucher (Section 8) Administrative Plan.

A public hearing will be held on Monday, October 21, 2019 at 5:30 PM at Ballard-Griffith Apartments (Ballard Dining Room), located at 450 Tower Plaza, Lexington, KY 40508. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be amendment to the FY2020 MTW Annual Plan proposing a new activity that will offer current residents of the Connie Griffith Apartments rent and eligibility protections post-voluntary conversion under the Housing Choice Voucher (HVC) program, and modifications to the Housing Choice Voucher (Section 8) Administrative Plan as a result of the new activity.

LHA welcomes public comment regarding these changes from October 4 - November 4, 2019. A complete copy of the affected documents are posted on the LHA website (www.lexha.org), is available for public viewing at LHA's Central Office, LHA satellite offices, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

0004407763-01

Public Notice of Business Combination

Notice is given that application has been made to the Office of the Comptroller of the Currency, 340 Madison Avenue, Fifth Floor, New York, NY 10173-0002 for consent to merge The First National Holding Company of Jackson, 1126 Main Street, Jackson, KY 41339, into The First National Bank of Jackson, 1126 Main Street, Jackson, KY 41339, and thereafter, to merge FBJ Interim Bank, Inc., 10 Second Street, Vancuburg, KY 41179, into The First National Bank of Jackson, 1126 Main Street, Jackson, KY 41339. The above described mergers are part of a multiple step business combination transaction in which The First National Bank of Jackson, 1126 Main Street, Jackson, KY 41339, will be merged with and into Citizens Deposit Bank and Trust, Inc., 10 Second Street, Vancuburg, KY 41179.

It is contemplated that the main/home offices and branch offices of the above named banks will continue to operate.

This notice is published pursuant to 12 USC 1828(c) and 12 CFR 5. Anyone may submit written comments on this application by October 25, 2019 to: Director of District Licensing, 340 Madison Avenue, Fifth Floor, New York, NY 10173-0002.

The public may find information regarding this application, including the date of the end of the public comment period, in the OCC Weekly Bulletin at www.occ.gov. Requests for a copy of the public file on the application should be made to the Director of District Licensing.

0004789632-01

The Urban County Board of Adjustment will hold a public hearing on Monday, October 14, 2019, at 1:30 p.m., Council Chambers, 2nd floor, Government Center Building, 200 East Main Street, Lexington, KY, in order to hear comments about the following:

1. PLN-BOA-19-00060: FAYETTE COUNTY LOCAL DEVELOPMENT CORPORATION - requests variances within the defined Infill & Redevelopment area in a Planned Neighborhood Residential (R-3) zone, at 754 & 756 Florence Ave.
2. PLN-BOA-19-00061: FAYETTE COUNTY LOCAL DEVELOPMENT CORPORATION - requests a variance within the defined Infill & Redevelopment area in a Planned Neighborhood Residential (R-3) zone, at 364 Corral Street.
3. PLN-BOA-19-00072: VIKTOR CHEPAK - requests a variance in a Planned Neighborhood Residential (R-3) zone, at 2804

Page 41 of 53

LHA Public Hearing
Sign-In Sheet
5:30 p.m. – Monday, October 21, 2019

Name	Address	Email Address/Phone #
William Pleasant	LHA	Pleasantw@kentucky
Tanya Christopher	LHA	christopher@kentucky
LeRoy Hill	LHA	John@y.alfon
Edna Hill		
Mary Sagar	LHA	
Ellie S. Byrd		
Victoria Wilkerson		
Ross Marie Yenson	LHA	
Jewel W. Brown		
John Jackson	LHA	
Barry Sims	LHA	
Caron Morayn	650 Tower Plaza Apt #1015	
Margaret H. Brooks	650 Tower Plaza F15	
Desletta Bowles	650 Tower Plaza apt 99 1015	
Betty Hutchinson	650 Tower Plaza 615	859-447-8453
Kenneth D. Wilkerson	#909	859-367-0529

LHA Public Hearing
Sign-In Sheet

5:30 p.m. - Monday, October 21, 2019

Name	Address	Email Address/Phone #
Austin Simms	300 West 13th Ave. Colorado	Simms@lha.org
Andrea Wilson	LHA	N/A
Benjamin Wilson		
Ralph Gray	LHA	N/A
Deanna Edwards	LHA	Raylat@lha.org
Billy Todd	LHA	N/A
Korner Baker		C 12
Ken Reed	LHA	
W. H.aney	LHA	602
Theresa Gray	work	
Ellen Syca	LHA 3-121	
Priscilla Robert	650 ^{Towers} Suite 618	
Susan Robert (boy)	903-714	
Anna Mason	LHA	M
Deborah Murt	1006	
Greg Vane	911	

LHA Public Hearing

Sign-In Sheet

5:30 p.m. – Monday, October 21, 2019

[illegible]

LHA Public Hearing

Sign-In Sheet

5:30 p.m. – Monday, October 21, 2019

[illegible]

LHA Public Hearing Questions/Responses October 21, 2019

1. What is meant by higher rent?

Andrea Wilson responded: Tenants who are currently paying flat rent may pay a higher rent after two years, based on their income.

2. What will it [rent] go up to?

Andrea Wilson responded: For those people on flat rent after two years increases will be phased in over a five-year period.

3. Will you add on to that?

Andrea Wilson responded: Yes, increases will be added each year to the contract rent/gross rent. Staff estimates the increase to be between \$42 and \$63 per year.

4. How come people on flat rent don't receive a voucher?

Aldean Pleasant responded: Everyone will receive a voucher.



PUBLIC HEARING

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

TUESDAY, MARCH 26th, 2019 @ 5:30 PM

**LHA CENTRAL OFFICE
300 W. NEW CIRCLE RD**

SUBJECTS TO BE DISCUSSED:

- 1) PROPOSED FY 2019 MOVING TO WORK (MTW) ANNUAL PLAN
- 2) REVISIONS TO THE PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY
- 3) REVISIONS TO THE HOUSING CHOICE VOUCHER (SECTION 8) ADMINISTRATIVE PLAN

Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding: 1) Proposed FY 2020 Moving to Work (MTW) Annual Plan; 2) Revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP), and; 3) Revisions to the Housing Choice Voucher (Section 8) Administrative Plan.

There will be a public hearing on **Tuesday, March 26th, 2019 at 5:30 PM at LHA's Central Office**, located at 300 W. New Circle Rd, Lexington, Kentucky, 40505. The subject of the meeting will be the proposed FY 2020 MTW Annual Plan that includes one new activity and two re-proposed activities; proposed modifications to the Public Housing ACOP, and; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan.

The LHA welcomes public comment regarding these changes from March 11 –April 11, 2019. Complete copies of the affected documents (and a summary of proposed changes to each) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060.

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

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

Lexington Herald-Leader

Sunday, March 10, 2019

Legals & Public Notices

PUBLIC HEARING AND NOTICE
 Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) the proposed FY 2020 Moving to Work (MTW) Annual Plan; 2) revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP); and 3) revisions to the Housing Choice Voucher (Section 8) Administrative Plan, and; 4) revisions to the Public Housing Maintenance Fee Schedule. The public hearing will be held on Tuesday, March 26, 2019 at 5:30 PM at LHA's Central Office, located at 300 W. New Circle Rd., Lexington, KY 40503. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2020 MTW Annual Plan that includes one new activity and two re-proposed activities; proposed modifications to the Public Housing ACOP; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan; and revisions to the Public Housing Maintenance Fee Schedule. LHA welcomes public comment regarding these changes from March 11 - April 11, 2019. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5068. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

8867 (11/11/18)

**LHA Public Hearing
Sign-In Sheet**

5:30 p.m. – Tuesday, March 26, 2019

Name	Address	Email Address/Phone #
<u>Cathy Hall</u>	<u>LHA</u>	<u>haddo@lexha.org</u>
<u>Andrea Wilson</u>	<u>LHA</u>	<u>wilsona@lexha.org</u>
<u>Carolee Fish</u>	<u>LHA</u>	<u>fishc@lexha.org</u>
<u>Bill Ginn</u>	<u>LHA</u>	<u>ginnb@lexha.org</u>
<u>[Signature]</u>	<u>LHA</u>	<u>NoelMISB@LEXHA.ORG</u>
<u>Aldine Pleasant</u>	<u>LHA</u>	<u>pleasanta@lexha.org</u>
<u>SEAN LEE</u>	<u>LHA</u>	<u>seanlee@lexha.org</u>
<u>Nickie C. Lee</u>	<u>LHA</u>	<u>leem@lexha.org</u>
<u>Dana Mason</u>	<u>LHA</u>	<u>masond@lexha.org</u>
<u>Austin Simms</u>	<u>LHA</u>	<u>simmsa@lexha.org</u>
<u>[Signature]</u>	<u>LHA</u>	



PUBLIC HEARING MEETING AGENDA
5:30 p.m. Tuesday, March 26, 2019
LHA Central Office Conference Room

- Introductions
- Overview
- Review of FY2020 MTW Annual Plan New Activities
- Review of ACOP/Admin Plan Revisions
- Review of Maintenance Fee Schedule for LHA-Owned/Controlled/Managed Properties
- Questions/Comment Period
- Adjournment

DISCLOSURE OF LOBBYING ACTIVITIES Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)			Approved By: OMB 0348-0048
1. Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing & Urban Development		7. Federal Program Name/Description: Moving to Work Demonstration Program CFDA Number, if applicable:	
8. Federal Action Number, if known:		9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i> Lehighes-Pavette Urban Community Housing Authority does not pursue lobbying activities.		b. Individuals Performing Services (including address if different from No. 10a) <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which interest was previously the basis when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature:  Print Name: Amanda J. Shuman Title: Executive Director Telephone No.: (899) 281-5368 Date: 07/09/2019	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-87)	

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Lexington-Fayette Urban County Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)

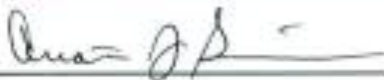
Name of Authorized Official

Austin J. Simms

Title

Executive Director

Signature



Date (mm/dd/yyyy)

07/08/2019

Previous edition is obsolete

Form HUD-50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

C. Planned and Ongoing Evaluations

Dr. Amanda Soka leads oversight of the MTW program evaluation process, with an overall mandate to assess, monitor and report on the effects of the LHA's MTW initiatives. Dr. Soka is an independent consultant, who is currently employed by the University of Arizona, College of Public Health, Community Environment & Policy Department. Dr. Soka served as lead evaluator of the LHA's MTW program when the LHA entered the Demonstration in 2011. At that time, she was employed by Kentucky State University but has since left the university.

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

Rent Reform Study (Activity 16)

The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD.



LEXINGTON HOUSING AUTHORITY

Creating Affordable Housing Solutions

