

# LEXINGTON HOUSING AUTHORITY

## FY2020 Moving to Work (MTW) Annual Report

Submitted April 15, 2022



*The Shropshire East*

Creating Affordable Housing Opportunities in Lexington since 1934

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## I. INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (LHA) was designated by the U.S. Department of Housing and Urban Development (HUD) as a High Performer in 2011 prior to entering the Moving to Work (MTW) Demonstration. The LHA submitted a formal application 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. FY2020 marked 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.

The 2016 Consolidated Appropriations Act, Congress authorized the expansion of the Moving to Work (MTW) program to 100 new agencies. The expansion allows more housing authorities to design and test innovative strategies for addressing the affordable housing and service needs of their tenants and local communities. Per the Act, of the 100 PHAs selected under the expanded MTW demonstration:

- No fewer than 50 PHAs shall administer 1,000 or fewer aggregate voucher and public housing units;
- No fewer than 47 PHAs shall administer 1,001-6,000 aggregate voucher and public housing units;
- No more than 3 PHAs shall administer 6,001-27,000 aggregate voucher and public housing units;
- No PHA shall be granted this designation if it administers in excess of 27,000 aggregate voucher and public housing units;
- Five of the PHAs selected shall be agencies with a Rental Assistance Demonstration (RAD) portfolio award that converts a PHA's entire public housing inventory to RAD

The expansion of MTW will include a significant research and evaluation component. Housing agencies will be added to the MTW demonstration as part of a cohort, and each cohort will be directed to enact a specific policy change subject to evaluation by HUD. HUD has created a Research Advisory Committee, including members of HUD, housing experts, and existing MTW agencies, to help determine which policy changes will be enacted and evaluated.<sup>1</sup>

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<sup>1</sup> The Council of Large Public Housing Authorities (CLPHA), CLPHA.org.

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

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

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

## NOTEWORTHY

### HOPE CENTER ENVISION CENTER

In February 2020, HUD officials made a visit to Lexington to announce LHA's long-time affordable housing partner in serving the homeless, the HOPE Center, as an EnVision Center. "Envision Centers serve as platforms of hope and opportunity by providing much needed supportive services that help families achieve self-sufficiency, upward mobility and their version of the American Dream," said



*Austin Simms, LHA Executive Director speaking at the Envision Center Announcement in February 2020.*

Denise Cleveland-Leggett, HUD Southeast Regional Administrator. The programs offered are based on the EnVision Center's four pillars: economic empowerment, educational advancement, health and wellness and character development. The announcement was made at the HOPE Center's Don Ball Campus Center, a brand-new facility unveiled in 2020 that allows them to better accommodate those functions that support the core mission of HUD's Envision program.

## SHORT TERM GOALS

### **RENOVATION OF BALLARD TOWERS**

The \$10.9 million redevelopment of Ballard apartments began in April 2019 and will be completed in 2 phases consisting of 8 floors of apartments on the East & West wings of the building. Phase 1 of the West Wing redevelopment was completed in November of 2019, and Phase 2 of the East Wing of the building is scheduled to be completed in October of 2020.

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

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.

### **LHA LEADERSHIP ACADEMY**

Building on the success of the LHA's inaugural 2018 Leadership Academy, a second session was considered but the onset of COVID-19 made it necessary to suspend the program. Although the Academy was suspended, LHA management continues to seek opportunities for employee professional growth.

### **ADDRESSING THE OPIOID CRISIS**

Lexington's HOPE Center, a local organization and long-time partner with the LHA, seeks to address homelessness and substance abuse, constructed a 48-unit facility that provides independent living to men in recovery. Through our MTW activity #12, LHA provides monthly block grant funding of \$136,928 to provide for 192 rental assistance vouchers to those persons in substance abuse recovery programs at HOPE Center facilities. LHA received approval in the FY2020 MTW Plan to increase voucher funding from 144 to 192 vouchers.

### **VOLUNTARY CONVERSION OF CONNIE GRIFFITH TOWERS**

Voluntary conversion of Connie Griffith Towers Apartments occurred January 6, 2020. For vacant units at conversion and as CGA units become vacant over time, LHA will convert the vacant units to project-based vouchers.

LHA offered all current CGA households who elected 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.

Proposed in the amended FY2020 MTW Annual Plan and approved, Activity #26: Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments gave current residents who were over-income or impacted with additional rent burden following conversion certain protections.

## **COVID-19 PANDEMIC UPDATE**

The COVID-19 pandemic hit the U.S. in March 2020. Work stoppages and job layoffs left many tenants unable to pay rent. On March 27, 2020, the president signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) into law. Section 4024 of the CARES Act imposed a temporary moratorium on evictions. This moratorium went into effect immediately upon the enactment of the CARES Act on March 27, 2020 and lasts for 120 days (through July 24, 2020). On September 4, 2020, the Centers for Disease Control and Prevention (CDC) imposed a nationwide temporary federal moratorium on residential evictions for nonpayment of rent (through 12/31/20). The moratorium was extended several more times with the final extension expiring 10/3/2021. The stated purpose of the order is preventing the further spread of Coronavirus Disease 2019 (COVID-19), specifically by preventing homelessness and overcrowded housing conditions resulting from eviction.<sup>2</sup>

At the outbreak of COVID-19 (coronavirus) in 2020, LHA offices closed March 24 through May 3rd (six weeks) with essential staff only going into the office to complete tasks such as payroll, sorting mail, etc. in limited numbers. During the shutdown maintenance employees worked reduced hours and only responded to emergency work orders. Although staff has returned to work fulltime offices remain closed at the printing of this report.

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<sup>2</sup> Congressional Research Service <https://crsreports.congress.gov>  
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## Long Term Objectives

### **ADDRESSING THE CAPITAL NEEDS DEFICIT**

The LHA is actively working to answer the needs of public housing that is gradually falling into disrepair without adequate funds to repair them. LHA is actively looking to acquire and develop property to provide much needed affordable housing in Lexington. LHA continues to seek funding sources and use the flexibility provided through MTW to add new/rehabilitated affordable housing to our housing stock. LHA continues to investigate options to convert current housing stock through 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 25 MTW activities since entering the program in 2011. The chart on the next page summarizes the LHA's MTW activities. The numbers in the statutory objectives column of the table corresponds with the numbered objectives above.



## Lexington Housing Authority Previously Approved Activities

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	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	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 & FY2016	Closed Out	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014- Significantly Modified	Ongoing	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013	Not Yet Implemented	3
8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013 -FY2014 Significantly Modified	Not Yet Implemented	3
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Yet Implemented	3
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014, FY2020 - Significantly Modified	Ongoing	3
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Yet Implemented	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014 FY2020 - Modified	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	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

**(II) GENERAL OPERATING INFORMATION****ANNUAL MTW REPORT****A. HOUSING STOCK INFORMATION****i. Actual New Project Based Vouchers**

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

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED (Planned*)	NUMBER OF VOUCHERS NEWLY PROJECT-BASED (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Connie Griffith (KY04)	183	32	Leased	No	Elderly high-rise – underwent voluntary conversion
<b>Total:</b> Planned or Actual Newly Project-Based	<b>183</b>	<b>32</b>			

\* Figures in the “Planned” column should match the corresponding Annual MTW Plan.

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

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

Connie Griffith Apartments (CGA) were reoccupied but not at full occupancy following conversion that was complete 1/6/2020. HUD provided tenant protection vouchers that LHA used to provide vouchers to all CGA resident households at the time of conversion. The remaining CGA households may use their voucher at CGA or to move elsewhere. Following conversion, new admission households received PBVs.

**ii. Actual Existing Project Based Vouchers**

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Centre Meadows	206	193	Leased	Yes	Family site underwent RAD in 2014
<b>Total:</b> Planned and Actual Existing Project-Based	<b>206</b>	<b>193</b>			

\* Figures and text in the “Planned” column should match the corresponding Annual MTW Plan.

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

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

Differences between planned and actual existing number of PBVs can be attributed to normal move-in/move-out activity.

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

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR
N/A

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

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

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR
1406-Operations-PHA Wide \$589,221 1408-Management Improvements-PHA Wide Software Upgrade \$123,528 1410-Administration-\$292,572 1430-Fees and Costs-PHA Wide A & E Fees \$128,102 1450/1460 Site Improvement/Dwelling Structures-All Developments-RAD Physical Condition Assessment \$162,886 KY004000001-Lexington South: Roof replacement, site repair/replacement \$334,418 KY004000003-Unnamed: Roof repair, site pavement & dumpster pad repair/replacement \$52,269 KY004000004-Connie Griffith Manor: Elevator upgrade, work-station installation \$449,294 KY004000007-Homownership: Site improvement (parking lot) \$77,705 KY004000009-Russell Cave: Site improvement (parking lot) \$50,508

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

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Actual	NUMBER OF HOUSEHOLDS SERVED** Planned^^	NUMBER OF HOUSEHOLDS SERVED** Actual
MTW Public Housing Units Leased	10524	10344	877	862
MTW Housing Choice Vouchers (HCV) Utilized	26580	31044	2215	2587
Local, Non-Traditional: Tenant-Based	5232	7860	436	655
Local, Non-Traditional: Property-Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
<b>Planned and Actual Totals:</b>	<b>42336</b>	<b>49248</b>	<b>3528</b>	<b>4104</b>

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

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

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

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

Public Housing units were occupied at 94% occupancy rate. LHA staff attributes the difference between planned and actual public housing occupancy to barriers related to the COVID-19 pandemic.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY (NAME and NUMBER)	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Actual	NUMBER OF HOUSEHOLDS SERVED Planned^^	NUMBER OF HOUSEHOLDS SERVED Actual
Tenant-Based	Local, Non-Traditional Use of MTW Funds for HCV Special Partners /Activity #12	5232	7860	436	655
Property-Based	N/A	0	0	0	0
Homeownership	N/A	0	0	0	0
<b>Planned and Actual Totals</b>		<b>5232</b>	<b>7860</b>	<b>436</b>	<b>655</b>

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

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	At the end of FY2020 LHA offices were closed to the public due to COVID-19. Leasing was done but paperwork was completed remotely using email, mail and electronic signature. Some applicants were reluctant to meet face to face to complete the leasing process.
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	N/A

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

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST STATUS (OPEN, PARTIALLY OPEN OR CLOSED)	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Public Housing	Regional Site-Based	2596	Partially Open	Yes
HCV	Community Wide	998	Closed	No

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST STATUS (OPEN, PARTIALLY OPEN OR CLOSED)	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Centre Meadow (RAD/PBV)	PBV Site-Based	1228	Partially Open	Yes
Connie Griffith (PBV)	PBV Site-Base	81	Open	Yes

Please describe any duplication of applicants across waiting lists:

There is duplication across the Public Housing, HCV and PBV waiting lists.

ii. **Actual Changes to Waiting List in the Plan Year**

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

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

**D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS**

i. **75 percent of Families Assisted Are Very Low Income**

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

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	655
<b>Total Local, Non-Traditional Households Admitted</b>	<b>655</b>

ii. **Maintain Comparable Mix**

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

**BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)**

FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
<b>1 Person</b>	421	818	0	1253	34%
<b>2 Person</b>	310	529	0	848	23%
<b>3 Person</b>	298	505	0	811	22%
<b>4 Person</b>	135	313	0	443	12%
<b>5 Person</b>	49	168	0	221	6%

FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
6+ Person	24	72	0	111	3%
TOTAL	1237	2405	0	3687	100%

\* “Non-MTW Adjustments” are defined as factors that are outside the control of the MTW PHA and/or unrelated to the MTW PHA’s local MTW program. An example of an acceptable “Non-MTW Adjustment” would include demographic changes in the community’s overall population. If the MTW PHA includes “Non-MTW Adjustments,” a thorough justification, including information substantiating the numbers given, should be included below. MTW PHAs must continue to adhere to all fair housing obligations as detailed in the MTW Certifications of Compliance.

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

N/A

#### MIX OF FAMILY SIZES SERVED (in Plan Year)

FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	34%	1200	34%	0%
2 Person	23%	811	23%	0%
3 Person	22%	776	22%	0%
4 Person	12%	423	12%	0%
5 Person	6%	212	6%	0%
6+ Person	3%	106	3%	0%
TOTAL	100%	3528	100%	0%

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

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

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

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

N/A

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

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

MTW ACTIVITY (NAME and NUMBER)	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY
Increase Minimum Rent to \$150 Across All Housing Programs/Activity #1	837	Annual earned income of \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year
Housing Choice Voucher Tenant-Based Special Partners Programs/Activity #10	8	Annual earned income of \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year

MTW ACTIVITY (NAME and NUMBER)	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY
Local, Non-Traditional Use of MTW Funds for HCV Special Partners/Activity #12	75	Annual earned income of \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year
Local Self-Sufficiency Admissions and Occupancy Requirements/Activity #13	482	Annual earned income of \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year
	482	<i>(Households Duplicated Across MTW Activities)</i>
	920	<b>Total Households Transitioned to Self-Sufficiency</b>

\* Figures should match the outcome reported for all activities where the goal of increased self-sufficiency is used in Section IV of this Annual MTW Report.



## IMPLEMENTED ACTIVITIES

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

#### i. Plan Year Approved, Implemented, Amended

Approved/FY 2012 – FY 2013 - Implemented/May 1, 2012

Amended/FY2014 – Implemented April 1, 2014

#### ii. Description/Impact/Update

All non-elderly/non-disabled public housing and Housing Choice Voucher (HCV) tenants pay \$150 in minimum rent. The LHA increased the minimum rent to \$150 across all housing programs excluding elderly and/or disabled households and households participating in HCV special partner programs in April 2014.

The COVID-19 pandemic began during the last four months of FY2020 (March – June). Average earned income was up slightly for affected households in public housing and Centre Meadows (Project-Based Voucher site). The average earned income for HCV households was down approximately 20% from the previous year.

During FY2020 LHA provided affordable housing to public housing and HCV program participants serving more than 7,840 household members (head, co-head, spouse, other adults and youth) with an average household size of three (2.74). Household members served was down 10% over the previous year (8,700) as well as a decrease of 11% in Heads of Households served. Head of Household characteristics by program are as follows:

FY2020 LHA Households Characteristics	Public Housing		HCV		HCV/PBV (Centre Meadows)		HCV/PBV (Connie Griffith)		Total Households Served	
	FY2019	FY2020	FY2019	FY2020	FY2019	FY2020	*FY2019	FY2020	FY2019	FY2020
<b>All Households</b>	1,142	846	1,943	1,769	255	213		157	3,340	2,985
<b>AGE</b>										
18-31	295	221	366	232	128	88		0	789	541
32-46	384	326	903	822	70	68		0	1,357	1,216
47-61	211	167	445	417	48	41		1	704	626
62 +	252	132	229	298	9	16		156	490	602
<b>GENDER</b>										
Female	947	730	1,757	1,591	224	186		79	2,928	2,586
Male	195	116	186	178	31	27		78	412	399
<b>RACE</b>										
Black	935	706	1,511	1,379	205	176		96	2,651	2,357
White	201	135	425	381	50	36		60	676	612
American Indian/Alaska Native	3	2	2	4	0	0		0	5	6
Asian	3	2	4	4	0	1		1	7	8
Native Hawaiian/Pacific Islander	0	1	1	1	0	0		0	1	2
<b>ETHNICITY</b>										
Hispanic	11	18	31	32	5	4		3	47	57
Non-Hispanic	1131	828	1,912	1,737	250	209		154	3,293	2,928
<b>Work-Ability</b>										
Work-Able	720	590	1,355	1,165	195	152		0	2,270	1,907
Elderly/Disabled	422	256	588	604	60	61		157	1,070	1,078

\*Connie Griffith was converted from public housing to PBV January 2020.

During FY2020, 108 households ended participation in the public housing program and 365 ended participation in the HCV Program (Section 8). From the previous year, move-outs were up by 2% in the HCV Program and down 31% in the Public Housing Program.

<b>Public Housing EOP Reason</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
Deceased	4	15	13
Eviction writ served / Court Judgement / Non-Payment of Rent	28	59	56
Moved due to rent increase	0	2	1
Move out – Voluntary	30	31	42
Move result of 30-Day notice/Non-Compliance of Lease	8	13	27
Moved to avoid court	3	7	9
Moved without giving notice	13	12	18
Received Section 8 Voucher	22	17	5
<b>TOTAL</b>	<b>108</b>	<b>156</b>	<b>171</b>

<b>HCV EOP Reason</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
*Evicted From Unit	109	76	87
Voluntary Termination	66	68	69
Voucher Expired	13	27	31
Moved Without LHA Approval	41	46	58
Zero HAP	32	37	32
HH Member Engaged in Criminal Activity/ Drug Abuse/Alcohol Abuse	8	11	9
Deceased	44	29	24
Miscellaneous/Unknown	16	23	20
Port-Out	36	40	81
<b>TOTAL</b>	<b>365</b>	<b>357</b>	<b>411</b>

\*Evictions include failure to report true household composition; failure to show for appointment; failure to allow inspection of unit; failure to make payment on overpaid assistance; failure to occupy unit as primary residence; failure to maintain utility service/appliances; and, failure to provide information.

### **Hardships and Annual Reevaluation**

Participants in the LHA's public housing program and HCV rent reform study may request a hardship at any time. An approved hardship may reduce a household's rent portion for an additional interim recertification beyond the normal one-per-year option and may lower the household's TTP (but only as low as the \$150 minimum rent).

In FY2020, five (5) hardship requests were processed for public housing and 28 were processed for HCV. A breakdown on hardship requests is shown in the following table.

<b>Program</b>	<b>Hardship Requests</b>	<b>Approved</b>	<b>Denied</b>
Public Housing	5	3	2
Housing Choice Voucher	28	28	0
Centre Meadows (Project-Based Voucher)	0	0	0
<b>Totals</b>	<b>33</b>	<b>31</b>	<b>2</b>

A Hardship Review Committee reviews hardship requests on a case-by-case basis. The household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:

- The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
- A death has occurred in the family which eliminates a prior source of income; or
- Other circumstances determined to warrant an exemption by the LHA.
- The qualifying financial hardship must be long-term (a minimum of 4 months) and will set the household's Total Tenant Payment (TTP) at 30 percent of current income, but no lower than the minimum rent for up to six (6) months.

### **iii. Actual Non-Significant Changes**

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

### **iv. Actual Changes to Metrics/Data Collection**

The MTW PHA made no planned or unplanned changes or modifications to the metrics given in the Annual MTW Plan in the Plan Year.

### **v. Actual Significant Changes**

There were no significant changes made activity in the Plan Year through an Annual MTW Plan amendment.

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

The start of the pandemic in March 2020 and the subsequent eviction moratorium likely had an effect on earned income. In addition, an unintended consequence of the federal eviction moratorium meant to help people affected by COVID-19 stay in their homes, caused many program participants to stop paying rent.

## HUD STANDARD METRICS

## Activity 1

CE#5: INCREASE RENTAL REVENUE									
UNIT OF MEASURE: Average Gross Rental Revenue of households affected by this policy in dollars (increase)									
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	\$2,576,196 (\$1,612,512) Average Rental Revenue	\$2,888,208 (\$2,017,152)	\$3,490,820 (\$2,109,288)	\$3,637,812 (\$2,676,180)	\$3,671,868 (\$2,803,644)	\$3,466,643 (\$2,769,132)	\$3,532,824 (\$2,034,444) 720 HHs	\$4,277,424 (\$1,999,344) 846 HHs	YES
PBV (Centre Meadows)	\$392,399 (\$290,262) 158 HHs	\$672,684 (\$497,592) 165 HHs	N/A	N/A	\$615,588 (\$390,972)	\$756,456 (\$520,772)	\$675,804 (\$548,766) 195 HHs	\$850,212 (\$415,776) 213 HHs	YES
*HCV	\$6,423,672 HAP (\$348 MCPU) 1,540 HHs	\$6,661,080 HAP (\$381 MCPU) 1,458 HHs	\$7,007,724 HAP (\$441 MCPU) 1,325 HHs	\$7,514,400 HAP (\$483 MCPU) 1,296 HHs	\$10,034,004 HAP (\$536 MCPU) 1,561 HHs	\$7,504,176 HAP (\$508 MCPU) 1,231 HHs	\$8,357,640 (\$514 MCPU) 1,355 HHs	\$11,611,716 (\$547 MCPU) 1,769	YES

\*Should this activity be a success for HCV participants the HAP/CPU paid should decrease, as HCV does not receive rental revenue.

SS#1: INCREASE IN HOUSEHOLD INCOME									
UNIT OF MEASURE: Average Gross Annual Earned Income of non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (increase)									
PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	\$11,487 Average Earned Income of 759 HHs	\$12,857 Expected Average Earned Income of 699 HHs	\$17,209 Actual Average Earned Income of 324 (24%) of 768 HHs	\$19,518 Actual Average Earned Income of 598 (82%) of 728 HHs	\$20,634 Actual Average Earned Income of 658 (81%) of 809 HHs	\$20,807 Actual Average Earned Income of 602 (83%) of 727 HHs	\$22,048 Actual Average Earned Income of 618 (86%) of 720 HHs	\$25,430 Actual Average Earned Income of 478 of 590 Work-Able HHs	YES
PBV (Centre Meadows)	\$15,231 Average Earned Income of 130 (82%) of 158 HHs (2016)	\$18,277 Average Earned Income of 165 HHs	N/A	N/A	\$14,726 Average Earned Income of 140 (75%) of 186 HHs	\$17,264 Average Earned Income of 163 (83%) of 196 HHs	\$18,182 Average Earned Income of 152 (78%) of 195 HHs	\$21,845 Average Earned Income of 112 of 152 Work-Able HHs	YES
HCV	\$8,316 Average Earned Income of 1,540 HHs	\$8,535 Average Earned Income of 1,458 HHs	\$14,597 Average Earned Income of 520 (39%) of 1,325 HHs	\$14,555 Average Earned Income of 844 (65%) of 1,296 HHs	\$15,990 Average Earned Income of 836 (68%) of 1,231 HHs	\$17,807 Actual Average Earned Income of 836 of 1,231 HHs	\$19,115 Actual Average Earned Income of 1,047 (77%) of 1,355 HHs	\$16,774 Actual Average Earned Income of 819 of 1,165 Work-Able HHs	YES
AGENCY-WIDE	\$9,902 2,299 LIPH & HCV HHs	\$10,696 Expected Average Earned Income of 2,157 HHs	\$15,903 Average Earned Income of 844 (71%) of 2,304 HHs	\$17,037 Average Earned Income of 1,442 (71%) of 2,024 HHs	\$17,112 Average Earned Income of 1,726 (67%) of 2,556 HHs	\$18,626 Average Earned Income of 1,634 (76%) of 2,154 HHs	\$19,795 Average Earned Income of 1,817 (80%) of 2,270 HHs	\$21,350 Actual Average Earned Income of 1,409 of 1,907 HHs	YES

## SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS

UNIT OF MEASURE: Category 6 – Heads of Household Reporting Earned Income - non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (increase)

PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	504/759 (66%)	493/699 (71%)	324/768 (42%)	598/728 (82%)	658/809 (81%)	602/727 (83%)	618/720 (86%)	478/590 (81%)	YES
PBV (Centre Meadows)	130/158 (82%) (2016)	165 (100%)	N/A	N/A	140/186 (75%)	163/196 (83%)	152/195 (78%)	112/152 (74%)	NO
HCV	806/1,540 (52%)	789/1,458 (54%)	520/1,325 (39%)	844/1,296 (65%)	964/1,561 (62%)	836/1,231 (68%)	1,047/1,355 (77%)	819/1,165 (70%)	YES
AGENCY-WIDE			844/2,093 (40%)	1,442/2,024 (71%)	1,762/2,556 (69%)	1,601/2,154 (74%)	1,817/2,270 (80%)	1,409/1,907 (74%)	

## HUD STANDARD METRICS

### Activity 1

#### SS#4: HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

UNIT OF MEASURE: Number of households receiving TANF assistance (decrease).

PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	42/759 (6%)	32/699 (5%)	266/768 (35%)	95/728 (13%)	166/809 (21%)	175/727 (24%)	98/720 (14%)	43/590 (7%)	NO
PBV (Centre Meadows)	38/158 (24%) (2016)	0	N/A	N/A	7/186 (4%)	9/196 (5%)	3/195 (1%)	0	YES
HCV	86 (6%)	91 (6%)	58/1,325 (4%)	47(4%)	60/1,561 (4%)	38/1,231 (3%)	33/1,355 (2%)	20/1,165 (2%)	YES
AGENCY-WIDE			324/2,093 (16%)	142/2,024 (7%)	233/2,556 (9%)	222/2,154 (10%)	134/2,270 (6%)	63/1,907 (3%)	

#### SS#3: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS

UNIT OF MEASURE: Category 5 – Heads of Household Reporting No Earned Income - non-elderly, non-disabled, non-special partner program households affected by this policy in dollars (decrease)

PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	255 (34%)	206 (29%)	444 (59%)	130 (22%)	151 (19%)	125 (17%)	102 (14%)	115 (19%)	YES
PBV (Centre Meadows)	28 (18%) (2016)	0	N/A	N/A	46 (25%)	33 (17%)	43 (22%)	40 (26%)	NO
HCV	734 (48%)	669 (46%)	805 (61%)	452 (35%)	597 (38%)	395 (32%)	308 (23%)	612 (53%)	YES
AGENCY-WIDE			1,249/2,093 (60%)	582/2,024 (29%)	794/2,556 (31%)	553/2,154 (26%)	471 (21%)	767 (40%)	

SS#8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY (Self-sufficiency defined as any household with annual earned income of at least \$15,080 = \$7.25 (minimum wage) x 40 hours x 52 weeks)

UNIT OF MEASURE: Number of households with earned income of at least \$15,080 per year (increase).

PROGRAM	BASELINE	BENCHMARK	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	BENCHMARK ACHIEVED?
LIPH (Public Housing)	50	56	220 (29%)	385 (53%)	428 (53%)	399 (55%)	419 (58%)	345/590 (58%)	YES
PBV (Centre Meadows)	72	88	N/A	N/A	58 (31%)	97 (49%)	89 (46%)	76/152 (50%)	YES
HCV	329	408	237 (18%)	373 (29%)	474 (30%)	457 (37%)	625 (46%)	416/1,165 (36%)	YES
AGENCY-WIDE			457	758	960	953 (44%)	1,133/2,270 (49%)	837/1,907 (44%)	

## Activity 1

### Impact Analysis

Metric	Program	FY 2013 Baseline	FY 2014 Benchmark	FY 2014 Actual*	FY2015 Actual	FY2016 Actual	FY2017 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual
# (%) of families paying at least \$150 per month in gross rent / TTP	Public Housing	641 (75%)	860 (100%)	700 (99%)	768 (100%)	728 (100%)	809 (100%)	727 (100%)	720 (100%)	846 (100%)
	HCV	866 (60%)	1,454 (100%)	1,312 (92%)	1,325 (100%)	1,296 (100%)	1,561 (100%)	1,231 (100%)	1,355 (100%)	1,769
	Centre Meadows	N/A	N/A	N/A	N/A	155 (98%)	186 (100%)	196 (100%)	195 (100%)	213
	Agency-Wide	1,507 (65%)	2,314 (100%)	2,012 (94%)	2,093 (100%)	2,024 (100%)	2,556 (100%)	2,154(100%)	2,270 (100%)	2,828
Avg (Median) gross annual earned income reported by families	Public Housing	\$10,512 (\$8,190)	\$10,825 (\$8,425)	\$13,263 (\$12,480)	\$14,368 (\$14,100)	\$16,112 (\$15,611)	\$16,782 (\$15,860)	\$17,229 (\$16,805)	\$17,600 (\$16,101)	\$20,314 (\$18,680)
	HCV	\$8,632 (\$3,000)	\$8,890 (\$3,075)	\$8,626 (\$3,510)	\$8,335 (\$3,157)	\$9,479 (\$6,775)	\$9,875 (\$7,249)	\$12,749 (\$10,530)	\$13,815 (\$12,469)	\$11,792 (\$8,210)
	Centre Meadows	N/A	N/A	N/A	N/A	\$12,532 (\$13,845)	\$11,084 (\$10,288)	\$14,357 (\$14,775)	\$11,827 (\$9,338)	\$16,097 (\$15,034)
	Agency-Wide	\$9,331 (\$6,084)	\$9,605 (\$6,225)	\$10,156 (\$7,540)	\$10,549 (\$8,105)	\$12,796 (\$7,712)	\$12,204 (\$11,069)	\$12,724 (\$11,217)	\$14,845 (\$13,596)	\$14,772 (\$12,064)
Avg (Median) total adjusted annual income reported by families	Public Housing	\$11,197 (\$8958)	\$11,530 (\$9,220)	\$14,478 (\$12,184)	\$14,845 (\$13,215)	\$16,389 (\$15,632)	\$16,667 (\$15,406)	\$16,641 (\$15,336)	\$16,315 (\$14,498)	\$17,715 (\$15,140)
	HCV	\$10,501 (\$8,136)	\$10,815 (\$8,375)	\$10,325 (\$7,736)	\$9,887 (\$7,800)	\$11,328 (\$9,477)	\$9,948 (\$8,316)	\$10,564 (\$9,152)	\$12,368 (\$11,367)	\$11,487 (\$9,608)
	Centre Meadows	N/A	N/A	N/A	N/A	\$13,964 (\$14,574)	\$10,762 (\$8,447)	\$12,629 (\$12,265)	\$11,204 (\$9,134)	\$12,764 (\$10,239)
	Agency-Wide	\$10,760 (\$8,410)	\$11,075 (\$8,650)	\$11,695 (\$9,540)	\$11,701 (\$9,848)	\$13,859 (\$11,960)	\$12,310 (\$10,668)	\$12,382 (\$10,919)	\$13,554 (\$12,377)	\$13,516 (\$11,266)
Avg (Median) monthly gross rent payment / TTP of families	Public Housing	\$281 (\$226)	\$302 (\$226)	\$352 (\$304)	\$229 (\$198)	\$416 (\$391)	\$422 (\$385)	\$420 (\$383)	\$410 (\$363)	\$448 (\$379)
	HCV	\$271 (\$203)	\$306 (\$203)	\$357 (\$269)	\$289 (\$168)	\$314 (\$228)	\$280 (\$203)	\$305 (\$227)	\$339 (\$292)	\$318 (\$237)
	Centre Meadows	N/A	N/A	N/A	N/A	\$355 (\$365)	\$276 (\$211)	\$322 (\$307)	\$289 (\$241)	\$340 (\$256)
	Agency-Wide	\$275 (\$211)	\$305 (\$211)	\$355 (\$278)	\$267 (\$196)	\$365 (\$293)	\$322 (\$265)	\$327 (\$272)	\$357 (\$311)	\$360 (\$280)
# (%) of families requesting hardship exemptions	Public Housing	N/A	11 (5%)	2	0	0	0	6	3	5
	HCV	N/A	29 (5%)	0	0	4	17	10	18	28
	Centre Meadows	N/A	N/A	N/A	N/A	1	0	0	0	0
	Agency-Wide	N/A	40 (5%)	2	0	5	17	16	21	33

## Activity 1

## Public Housing Disparate Impact Analysis – Table 1

Public Housing Work-Able Population	Heads of Household			Average Gross Annual Earned			Average Total Annual Adjusted			Average Gross Rent Payment			Average Increased Rent Burden			
	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	
	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	
All Work-Able Households	727	720	590		\$17,229	\$18,924	\$20,314	\$16,641	\$16,315	\$17,715	\$420	\$410	\$448	\$139	\$129	\$38
Gender															\$0	
	660	654	534	\$16,864	\$18,443	\$19,275	\$16,477	\$15,976	\$16,966	\$416	\$402	\$430	\$132	\$118	\$28	
	67	66	56	\$24,277	\$23,978	\$30,223	\$21,630	\$19,669	\$24,865	\$542	\$491	\$624	\$282	\$231	\$133	
Race (Multiple selections permitted)																
	607	614	492	\$18,228	\$19,094	\$20,439	\$17,677	\$16,479	\$18,076	\$446	\$414	\$457	\$156	\$124	\$43	
	118	102	94	\$15,287	\$17,729	\$19,496	\$14,127	\$15,257	\$16,003	\$359	\$386	\$404	\$102	\$129	\$18	
	0	3	2	\$0	\$18,682	\$21,773	\$0	\$12,098	\$12,394	\$0	\$302	\$306	-	-	\$4	
Asian / Pacific Islander	1	1	1	\$21,288	\$37,440	\$15,808	\$17,988	\$36,000	\$14,368	\$450	\$900	\$359	\$242	\$692	-\$541	
	1	0	1	\$25,324	-	\$37,656	\$26,272	-	\$15,068	\$657	-	\$377	\$447	-	-	
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Ethnicity																
	711	711	573	\$17,745	\$18,891	\$20,335	\$17,073	\$16,293	\$17,655	\$431	\$410	\$447	\$149	\$128	\$37	
	16	9	17	\$17,379	\$21,586	\$19,629	\$16,332	\$18,016	\$19,762	\$408	\$450	\$500	\$157	\$199	\$50	
Age of Head of Household																
	307	277	208	\$15,804	\$16,519	\$19,136	\$14,862	\$13,383	\$15,519	\$377	\$337	\$394	\$128	\$88	\$57	
	313	325	279	\$18,073	\$19,299	\$19,911	\$17,519	\$17,007	\$17,928	\$441	\$428	\$453	\$124	\$111	\$25	
	107	118	103	\$22,020	\$23,541	\$23,599	\$21,701	\$21,289	\$21,574	\$545	\$534	\$543	\$240	\$229	\$9	
Excluded Households																
	445	422	256	\$2,976	\$2,860	\$3,711	\$12,954	\$11,246	\$13,727	\$325	\$283	\$345	N/A	N/A	N/A	

## Activity 1

## Housing Choice Voucher Program Disparate Impact Analysis – Table 2

	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average TTP			Average Increased Rent Burden		
	FY2018 Actual	FY2019 Actual	FY2020 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual
HCV Population															
All Work-Able Households	1,231	1,355	1,165	\$12,573	\$14,770	\$11,792	\$11,202	\$13,815	\$11,487	\$305	\$339	\$318	\$34	\$68	-\$21
Gender															
Female	1,138	1,272	1,088	\$12,742	\$14,856	\$11,873	\$11,288	\$14,096	\$11,624	\$307	\$343	\$321	\$34	\$70	-\$22
Male	93	83	77	\$9,402	\$13,454	\$13,560	\$9,599	\$9,516	\$9,546	\$274	\$285	\$276	\$37	\$48	-\$9
Race (Multiple selections permitted)															
Black	1,006	1,112	966	\$12,950	\$15,140	\$11,803	\$11,392	\$14,268	\$11,568	\$309	\$345	\$320	\$30	\$66	-\$25
White	221	238	194	\$10,816	\$12,986	\$11,601	\$10,298	\$11,579	\$10,943	\$287	\$309	\$305	\$45	\$67	-\$4
American Indian / Native Alaskan	1	2	3	\$28,288	\$28,022	\$18,877	\$31,540	\$27,242	\$21,933	\$788	\$650	\$527	\$599	\$461	-\$123
Asian / Pacific Islander	2	2	2	\$12,480	\$15,229	\$14,317	\$20,128	\$13,789	\$9,246	\$317	\$345	\$231	\$94	\$122	-\$114
Native Hawaiian / Other Pacific Islander	1	1	0	\$0	\$0	\$0	\$0	\$7,584	\$6,144	\$150	\$166	\$154	-\$286	\$166	-\$12
Other**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ethnicity															
Non-Hispanic	1,205	1,326	1,141	\$12,618	\$14,840	\$11,757	\$11,325	\$12,422	\$11,490	\$308	\$340	\$318	\$37	\$69	-\$22
Hispanic	26	29	24	\$9,995	\$11,576	\$13,449	\$5,542	\$9,921	\$11,351	\$190	\$309	\$316	-\$116	\$3	\$7
Age of Head of Household															
18-31	359	338	219	\$11,449	\$12,585	\$11,400	\$9,900	\$9,525	\$7,977	\$276	\$283	\$249	\$39	\$46	-\$34
32-46	689	800	747	\$13,695	\$16,060	\$12,440	\$11,898	\$13,766	\$12,212	\$320	\$365	\$333	\$18	\$63	-\$32
47-61	183	217	199	\$10,427	\$13,416	\$10,672	\$11,206	\$11,498	\$12,627	\$312	\$330	\$337	\$70	\$88	\$7
Excluded Households															
Elderly/Disabled	709	588	604	\$1,446	\$1,614	\$1,320	\$10,540	\$10,240	\$10,875	\$266	\$271	\$275	N/A	N/A	N/A



## Activity 1

## Centre Meadows (Project-Based Voucher) Disparate Impact Analysis – Table 3

Centre Meadows Population	Heads of Household			Average Gross Annual Earned Income			Average Total Annual Adjusted Income			Average Gross Rent Payment			Rent Burden		
	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020
Work-Able Households	196	195	152	\$14,357	\$14,172	\$16,097	\$12,629	\$11,827	\$12,674	\$322	\$289	\$340	-\$33	-\$66	\$51
Gender															
Female	181	181	142	\$14,268	\$14,310	\$16,380	\$12,351	\$12,020	\$12,493	\$314	\$284	\$336	-\$38	-\$68	\$52
Male	15	14	10	\$15,441	\$12,398	\$12,074	\$15,981	\$9,336	\$13,918	\$410	\$352	\$407	\$23	-\$35	\$55
Race (Multiple selections permitted)															
Black	163	164	133	\$14,513	\$13,570	\$16,504	\$12,409	\$11,046	\$12,524	\$316	\$284	\$340	-\$41	-\$73	\$56
White	32	31	18	\$13,458	\$17,356	\$13,983	\$13,620	\$11,997	\$13,604	\$346	\$316	\$350	\$4	-\$26	\$34
American Indian / Native Alaskan	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	0	1	\$17,803	\$0	\$0	\$16,843	\$0	\$5,620	\$421	\$0	\$150	\$14	\$0	\$150
Native Hawaiian / Other Pacific Islander	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other**	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity															
Non-Hispanic	193	191	150	\$14,365	\$14,095	\$15,951	\$12,602	\$11,649	\$12,554	\$321	\$288	\$337	-\$30	-\$63	\$49
Hispanic	3	4	2	\$13,840	\$17,854	\$27,013	\$14,395	\$14,873	\$18,962	\$363	\$342	\$625	-\$269	-\$290	\$283
Age of Head of Household															
18-31	123	117	82	\$14,677	\$12,131	\$15,383	\$11,825	\$11,822	\$10,504	\$304	\$260	\$293	-\$43	-\$87	\$33
32-46	52	58	52	\$14,548	\$18,621	\$16,757	\$13,297	\$12,168	\$16,552	\$333	\$337	\$427	-\$30	-\$26	\$90
47-61	21	20	18	\$12,014	\$13,213	\$17,654	\$15,683	\$10,872	\$10,582	\$397	\$322	\$306	\$4	-\$71	-\$16
Excluded Households															
Elderly/Disabled Households	57	56	61	\$870	\$674		\$9,816	\$9,326	\$12,764	\$246	\$260	\$314	N/A	N/A	N/A

## **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**

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 FY2020 815 landlords were rated, with 98% (797) assigned the 2-Star Rating; 2% (17) assigned the 3-Star Rating and only one landlord assigned the 1-Star Rating.

The number of inspections were down from the previous two years. There was a 34% drop in inspections from FY2019 to FY2020. It should be noted that the last four month of FY2020 (March – June) the COVID-19 pandemic caused inspections to be greatly reduced. FY2020 is the closest LHA has come to reaching the benchmark 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.

## HUD STANDARD METRICS

### Activity 5

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher					
CE #1: Agency Cost Savings					
Unit of Measurement: Total cost of task in dollars (decrease).					
*Baseline	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>\$32,868</b> <b>2,739</b> Initial and Annual Inspections \$24.00 per hour times 30 minutes to complete an inspection.	<b>\$16,440</b> <b>1,370</b> Initial and Annual Inspections @ \$24.00 per hour times 30 minutes to complete an inspection.	<b>\$25,296</b> <b>2,108</b> Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	<b>\$28,476</b> <b>2,373</b> Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	<b>\$18,888</b> <b>1,574</b> Initial and Annual Inspections @ \$24 per hour X 30 minutes to complete an inspection.	No
Data Source: Emphasys					

Activity 5) Streamlined HQS Inspection Policy for Housing Choice Voucher					
CE #2: Staff Time Savings					
Unit of Measurement: Total time to complete the task in staff hours (decrease).					
Baseline	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>1370 hours</b> <b>2,739</b> Inspections@ 30 minutes each	<b>685 hours</b> <b>1,370</b> Inspections @ 30 minutes each	<b>1,054 hours</b> <b>2,108</b> Inspections @ 30 minutes each	<b>1,187 hours</b> <b>2373</b> Inspections @ 30 minutes each	<b>787 hours</b> <b>1,574</b> Inspections @ 30 minutes each	No
Data Source: Emphasys					

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

### i. Plan Year Approved, Implemented, Amended

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

### ii. Description/Update

Through MTW Activity 10, three social service agencies provide stable tenant-based voucher assistance and special services to specific populations. New Vista, Community Action Council (CAC) and Arbor Youth Services are the special partner programs receiving the flexibility of this activity. New Vista receives 22 tenant-based vouchers and provides wraparound services for persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services. Community Action Council (CAC) receives seven tenant-based vouchers and provides case management to youth aging out of foster care. Arbor Youth Services receives three vouchers to help 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.

LHA sees the services that these providers offer in the community are vital to reaching some of the most vulnerable families in need of affordable housing. Although utilization has not reached 100%, LHA is committed to offer assistance to these populations. See the utilization comparisons below.

Provider	Vouchers Allotted			Vouchers Utilized		
	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020
Community Action Council	10	10	7	3	4	2
New Vista	25	22	22	25	25	18
Arbor Youth Services			3	N/A	N/A	3
<b>Totals</b>	<b>35</b>	<b>32</b>	<b>32</b>	<b>28</b>	<b>29</b>	<b>23</b>

### iii. Actual Non-Significant Changes

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

### iv. Actual Changes to Metrics/Data Collection

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

### v. Actual Significant Changes

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

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

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

## HUD STANDARD METRICS

### Activity 10

CE #4: Increase in Resources Leveraged					
CE #4: Increase in Resources Leveraged					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
\$44,892 New Vista - \$35,292 CAC - \$9,600	New Vista - \$35,292 CAC - \$48,000 Arbor Youth - \$19,476	New Vista – \$117,412 CAC – \$21,614	New Vista – \$122,786 CAC - \$28,740	New Vista - \$116,856 CAC - \$12,984 Arbor Youth Services - \$19,476	No
Data Source: Special Partner Reporting					

Activity 10 – HCV Tenant-Based Special Partner Programs					
SS #3: Increase in Positive Outcomes in Employment Status					
Unit of Measurement –Employment Status: Category 5 Unemployed (reporting no earned income)					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
New Vista -2 CAC - 1	0	New Vista – 2 CAC – 3	New Vista – 21 CAC - 1	New Vista – 16 CAC – 0 Arbor Youth Services - 2	NO
Data Source: Special Partner Reporting					

Activity 10 – HCV Tenant-Based Special Partner Programs					
SS4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement – Number of households affected by Activity #10 receiving TANF assistance (decrease).					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
New Vista – 4 CAC - 0	17	New Vista – 5 CAC – 1	New Vista – 6 CAC – 2	New Vista - 4 CAC - 2 Arbor Youth Services - 3	YES
Data Source: Special Partner Reporting					

Activity 10 – HCV Tenant-Based Special Partner Programs					
SS8: Households Transitioned to Self-Sufficiency					
Unit of Measurement – Number of households transitioned to self-sufficiency (increase).					
For this activity, self-sufficiency is defined as any household that has earned income of at least <sup>1</sup> \$15,080 per year.					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
New Vista – 2 CAC - 0	35	New Vista – 3 CAC – 1	New Vista – 3 CAC – 0	New Vista - 4 CAC - 1 Arbor Youth Services - 3	YES
<sup>1</sup> \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year					
Data Source: Special Partner reporting.					

## HUD STANDARD METRICS

### Activity 10

Activity 10 – HCV Tenant-Based Special Partner Programs					
HC #5: Increase in Resident Mobility					
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
26	32	New Vista – 25 CAC – 3	New Vista – 25 CAC – 4	New Vista - 18 CAC - 1 Arbor Youth Services - 3	NO
Data Source: Special Partner reporting.					
Activity 10 – HCV Tenant-Based Special Partner Programs					
SS #1: Increase in Household Income					
Unit of Measurement – Average earned income of households affected by this policy in dollars (increase).					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
Bluegrass.org - \$8,600 CAC- \$3,600	\$15,080	New Vista – \$11,689 CAC – \$4,297	New Vista –\$11,113 CAC – \$12,019	New Vista - \$10,293 CAC - \$5,000 Arbor Youth Services - \$5,496	NO
Data Source: Special Partner Reporting					

Activity 10 – HCV Tenant-Based Special Partner Programs					
HC #3: Decrease in Wait List Time					
Unit of Measurement – Average applicant time on wait list in months (decrease).					
Baseline (FY2017)	Benchmark	FY2018	FY2019	FY2020	Benchmark Achieved?
3 months	3 months	New Vista – 0 CAC – 0	New Vista – 0 CAC – 0	New Vista - 0 CAC - 0 Arbor Youth Services - 0	YES
Data Source: Special Partner reporting					

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

### i. Plan Year Approved, Implemented, Amended

Activity Proposed, Approved, and Implemented in FY 2014

### ii. Description/Update

The Housing Authority provides monthly rental subsidy to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 436 families with special needs. These agencies serve individuals with mental illness and/or substance abuse issues; individuals recently released from prison or jail; families in need of financial literacy, credit management, and homeownership resources; single parents enrolled full-time in higher education; and homeless individuals and families.

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

The following social service providers are serving program participants for the number of vouchers allotted, with some providers serving as much as 50% more than the allotted vouchers – 655 families were served during FY2020. The HOPE Center's vouchers were increased from 144 to 192 through approval of the FY2020 Plan. The LHA funded \$136,928 monthly to the participating providers. These providers are expected to serve a minimum of 436 participants.

Special Partner Program	Households Served	# of Vouchers	Families Served FY2017	Families Served FY2018	Families Served FY2019	Families Served FY2020
Canaan House	Individuals who have been diagnosed with mental illness	17	17	17	19	12
Greenhouse 17	Victims of domestic violence, dating violence, sexual assault and stalking	25	24	24	26	39
Hope Center	Persons who have substance abuse problems and are in need of voluntary or court-mandated treatment	192	317	291	304	348
New Beginnings	Individuals who have been diagnosed with a mental illness	29	33	30	30	32
Oasis Rental Assistance	Families in need of financial literacy, credit management and homeownership resources	30	36	32	36	33
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80	123	113	115	114
Serenity Place (Chrysalis House)	Parents with children: who have recently been released from jail or are homeless	40	54	53	53	52
Urban League	Elderly	23	22	22	23	25
<b>Totals</b>		<b>436</b>	<b>626</b>	<b>582</b>	<b>606</b>	<b>655</b>

**iii. Actual Non-Significant Changes**

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

**iv. Actual Changes to Metrics/Data Collection**

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

**v. Actual Significant Changes**

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

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

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

**HUD STANDARD METRICS****Activity 12**

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners					
*SS7: Increase in Agency Rental Revenue					
Unit of Measure – Housing Assistance Payment (HAP) savings in dollars (decrease).					
Baseline	Benchmark	FY2018 Outcome	FY2019 Outcome	FY2020 Outcome	Benchmark Achieved?
\$335 monthly per unit cost	\$224 monthly per unit cost	\$223 monthly per unit cost	\$282 monthly per unit cost	\$343 monthly per unit cost	No
Data Source: Special Partner reporting.					

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners					
SS8: Households Transitioned to Self-Sufficiency					
Unit of Measure – Number of households transitioned to self-sufficiency (increase).					
For this activity, self-sufficiency is defined as any household that has earned income of at least <sup>1</sup> \$15,080 per year.					
Baseline	Benchmark	FY2018 Outcome	FY2019 Outcome	FY2020 Outcome	Benchmark Achieved?
28	40	32	43	75	YES
<sup>1</sup> \$15,080 = Federal minimum wage (\$7.25/hour) x 40-hour work week x 52 weeks of work per year					
Data Source: Special Partner reporting.					



**HUD STANDARD METRICS****Activity 12**

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners					
HC #5: Increase in Resident Mobility					
Unit of Measurement – Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.					
Baseline (FY2017)	Benchmark	FY2018 Outcome	FY2019 Outcome	FY2020 Outcome	Benchmark Achieved?
198	238	166	166	136	NO
Data Source: Special Partner reporting.					

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners					
HC #6: Increase in Homeownership Opportunities					
Unit of Measurement – Number of households that purchased a home as a result of the activity (increase).					
Baseline (FY2017)	Benchmark	FY2018 Outcome	FY2019 Outcome	FY2020 Outcome	Benchmark Achieved?
0	0	0	0	0	YES
Data Source: Special Partner reporting.					

Activity 12) Local, Non-Traditional Use of MTW Funds for Special Partners					
HC #7: Households Assisted by Services that Increase Housing Choice					
Unit of Measurement – Number of households receiving services aimed to increase housing choice (increase).					
Baseline (FY2017)	Benchmark	FY2018 Outcome	FY2019 Outcome	FY2020 Outcome	Benchmark Achieved?
626	640	582	606	655	YES
Data Source: Special Partner reporting.					

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

### i. Plan Year Approved, Implemented, Amended

Proposed FY 2014

Technical Amendment January 14, 2016

### ii. Description/Update

Impose a minimum earned income calculation for work able, non-elderly, non-disabled families, including full-time students, residing at self-sufficiency units or Centre Meadows regardless of employment status.

The number of work-able households reporting earned income was down significantly for SSI and II and Centre Meadows households over the previous year however average earned income increased by 10%. LHA staff attributes the decrease largely to COVID-19 related issues of the last four months of FY2020 (March – June 2020). Many households were affected by the pandemic, resulting in loss of income due to layoffs or substantial cut in hours. The imputed income calculation was suspended for households who lost employment due to COVID-19 and affected households were allowed to pay the minimum rent of \$150.

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

Units	Average Annual Earned Income			Households Reporting Earned Income		
	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020
SSI & II	\$21,166	\$22,552	\$25,069	539	643	459
Centre Meadows	\$17,264	\$18,182	\$21,845	163	152	112
	Households Reporting No Earned Income			Households Receiving TANF		
	FY2018	FY2019	FY2020	FY2018	FY2019	FY2020
SSI & II	96	79	302	130	73	43
Centre Meadows	33	43	40	9	3	0

**FY2020 Characteristics of SSI, SSII and Center Meadows Work-Able Households**

Households	SSI	SSII	Centre Meadows	Total
Total	217	305	152	674
<b>Gender</b>				
Female	193	279	142	614
Male	24	26	10	60
<b>Race</b>				
Black	181	251	133	565
White	34	52	18	104
Asian	1	0	1	2
Native Hawaiian/Pacific Islander	0	1	0	1
American Indian / Alaska Native	1	1	0	2
<b>Ethnicity</b>				
Hispanic	6	9	2	17
Non-Hispanic	211	296	150	657
<b>AGE</b>				
18-31	66	107	82	255
32-46	101	153	52	306
47-61	50	45	18	113

**iii. Actual Non-Significant Changes**

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

**iv. Actual Changes to Metrics/Data Collection**

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

**v. Actual Significant Changes**

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

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

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

## HUD STANDARD METRICS

## Activity 13

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements								
SS #1: INCREASE IN HOUSEHOLD INCOME								
UNIT OF MEASURE: Average earned income of households affected by this policy in dollars (increase).								
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Outcome 2019	Outcome 2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	\$12,800 Average gross annual earned income from 648 non-elderly/non-disabled households as of June 30, 2013	Expected average gross annual earned income from 639 non-elderly/non-disabled households as of June 30, 2015	Actual average gross annual earned income from 542 of 646 non-elderly/non-disabled households as of June 30, 2016	Actual average gross annual earned income from 568 of 683 non-elderly/non-disabled households as of June 30, 2017	Actual average gross annual earned income from 539 of 635 non-elderly/non-disabled households as of June 30, 2018	Actual average gross annual earned income from 564 of 643 non-elderly/non-disabled households as of June 30, 2019	Actual average gross annual earned income from 421 of 522 non-elderly/non-disabled households as of June 30, 2019	YES
	\$12,800	\$13,704	\$18,151	\$21,397	\$21,166	\$22,552	\$25,602	
CENTRE MEADOWS (PBV)	Average annual earned income from 119 of 144 non-elderly/non-disabled households as of June 30, 2016	Expected average annual earned income from 165 non-elderly/non-disabled households as of June 30, 2017	Actual average annual earned income from non-elderly/non-disabled households as of June 30, 2016	Actual average annual earned income from 140 non-elderly/non-disabled households as of June 30, 2017	Actual average annual earned income from 163 of 196 non-elderly/non-disabled households as of June 30, 2018	Actual average annual earned income from 152 of 195 non-elderly/non-disabled households as of June 30, 2019	Actual average annual earned income from 112 of 152 non-elderly/non-disabled households as of June 30, 2020	YES
	\$15,231	\$18,277	N/A	\$14,727	\$17,264	\$18,182	\$21,846	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements								
SS #1: INCREASE IN HOUSEHOLD INCOME								
Category 6: Other (Heads of Household Reporting Earned Income).								
	Baseline	Benchmark	Outcome FY2016	Outcome FY2017	Outcome FY2018	Outcome 2019	Outcome 2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2015	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2020	No
	303	628	542	568	539	643	421	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2020	No
	130	165	N/A	140	163	152	112	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements								
SS #1: INCREASE IN POSITIVE OUTCOMES IN EMPLOYMENT STATUS								
Category 5: Unemployed Heads of Household (Reporting No Earned Income)								
	Baseline	Benchmark	FY2016	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2015	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2020	No
	95 of 628	0	104	115	96	79	101	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse report earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report no earned income as of June 30, 2020	No
	28 of 158	0	N/A	46	33	43	40	

## HUD STANDARD METRICS

### Activity 13

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements									
SS #4: NON-ELDERLY/NON-DISABLED HOUSEHOLDS REMOVED FROM TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)									
	Baseline	Benchmark	FY2015	FY2016	FY2017	FY2018	2019	2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2013	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2020	No
	26	20	187	81	135	130	73	43	
CENTRE MEADOWS (PBV)	Non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2016	Expected non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2015	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse report receive TANF as of June 30, 2016	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2017	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2018	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2019	Actual non-elderly/non-disabled households where the head/co-head/co-head/spouse receive TANF as of June 30, 2020	YES
	38	0	N/A	N/A	7	9	3	0	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements								
SS #6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS								
Unit of Measure – Average amount of Section 8 and/or Section 9 subsidy per household affected by this policy in dollars (decrease)								
	Baseline	Benchmark	FY2016	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2015	Expected average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2018	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2019	Actual average amount of Section 8 and/or Section 9 subsidy per non-elderly/non-disabled household as of June 30, 2020	No
	\$2,921 (\$243 MPUC)	\$2,191 (\$183 MPUC)	\$3,017 (\$251 MPUC)	\$2,783 (\$233 MPUC)	\$2,696 (\$225 MPUC)	\$2,415 (\$201 MPUC)	\$3,460 (\$288 MPUC)	
CENTRE MEADOWS (PBV)	Average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household affected by this policy in dollars as of June 30, 2016	Expected average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2016	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2017	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2018	Actual average amount of Section 8 and/or 9 subsidy per non-elderly/non-disabled household as of June 30, 2019	Actual average amount of Section 8 and/or Section 9 subsidy per non-elderly/non-disabled household as of June 30, 2020	No
	\$399	\$299	N/A	\$5,543 (\$462 MPUC)	\$5,361 (\$447 MPUC)	\$5,636 (\$478 MPUC)	\$5,388 (\$449 MPUC)	

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements								
SS #7: INCREASE IN AGENCY RENTAL REVENUE PER MONTH								
Unit of Measure – PHA rental revenue in dollars (increase).								
	Baseline	Benchmark	FY2016	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	PHA rental revenue prior to implementation of Activity #13 as of June 30, 2015	Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2018	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2019	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2020	Yes
	\$134,619	\$193,851	\$278,328	\$233,777	\$288,887	\$248,198	\$311,587	
CENTRE MEADOWS (PBV)	PHA rental revenue prior to implementation of Activity #13 as of June 30, 2016	Expected PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2016	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2017	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2018	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2019	Actual PHA rental revenue after implementation of Activity #13 as of June 30, 2020	No
	\$392,700 (\$32,700 monthly)	\$672,684 (\$56,057 monthly)	N/A	\$519,803 (\$43,317 monthly)	\$520,772 (\$43,398 monthly)	\$417,350 (\$34,779 monthly)	\$620,604 (\$51,717 monthly)	

## HUD STANDARD METRICS

### Activity 12

Activity 13: Rent Reform - Local Self-Sufficiency Admissions and Occupancy Requirements									
SS #8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY									
The LHA define self-sufficiency as any household that has earned income of at least \$15,080 per year.									
Number of households transitioned to self-sufficiency (increase). Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.									
	Baseline	Benchmark	Outcome FY2015	Outcome FY2016	Outcome FY2017	Outcome FY2018	Outcome 2019	Outcome 2020	Benchmark Achieved?
SSI/SSII (PUBLIC HOUSING)	Non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2013	Expected non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2018	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2019	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2020	Yes
	48	58	314	364	372	368	393	307	
CENTRE MEADOWS (Pw)	Non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Expected non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2015	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2016	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2017	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2018	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2019	Actual non-elderly/non-disabled households where the head of household meets the definition of self-sufficiency as of June 30, 2020	No
	72	88	N/A	N/A	58	97	89	75	

### Activity 13

### Impact Analysis

Metric	Program	*FY 2013 Baseline	**FY2014 Benchmark	***FY2014 Actual	FY2015 Actual	FY2016 Actual	FY2017 Actual	FY2018 Actual	FY2019 Actual	FY2020 Actual	Data Source
Imputed minimum annual earned income	SSI	N/A	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	\$14,138	U.S. Dept. of Labor, Federal Minimum Wage
	SSII	N/A	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	\$7,540	\$7,540	\$7,540	\$7,540	\$7,540	
Avg. (Median) gross annual earned income reported by families	SSI	\$16,555 (\$16,653)	\$18,457 (\$16,653)	\$18,140 (\$17,503)	\$19,270 (\$18,761)	\$20,695 (\$20,898)	\$21,620 (\$21,039)	\$21,580 (\$19,864)	\$25,194	\$26,385 (\$24,778)	WinTen2/Emphasys
	SSII	\$11,012 (\$10,460)	\$13,497 (\$10,460)	\$12,486 (\$11,700)	\$12,926 (\$12,896)	\$14,193 (\$14,040)	\$15,031 (\$14,022)	\$16,168 (\$15,708)	\$17,005	\$16,567 (\$15,652)	
	Centre Meadows	\$3,395 (\$0)	Exempt	Site Vacant	Site Vacant	\$12,532 (\$13,845)	\$11,084 (\$10,288)	\$14,357 (\$14,775)	\$14,172	\$16,097 (\$15,034)	
# (%) of families reporting no annual earned income	SSI	44 (21%)	0 (0%)	46 (22%)	43 (19%)	22 (11%)	21 (10%)	22 (5%)	17 (6%)	28 (13%)	WinTen2/Emphasys
	SSII	118 (28%)	0 (0%)	93 (23%)	95 (24%)	82 (19%)	94 (20%)	74 (35%)	62 (13%)	73 (24%)	
	Centre Meadows	98 (67%)	0 (0%)	Site Vacant	Site Vacant	28 (18%)	46 (25%)	33 (17%)	43 (28%)	40 (26%)	
# (%) of families reporting annual earned income less than the minimum imputed earned income	SSI	61(29%)	0 (0%)	54 (26%)	36(16%)	28 (14%)	48 (24%)	50 (24%)	43 (20%)	62 (29%)	WinTen2/Emphasys
	SSII	159 (38%)	0 (0%)	130 (33%)	22 (6%)	41 (9%)	24 (5%)	98 (23%)	82 (19%)	87 (29%)	
	Centre Meadows	\$4,340 (\$2,400)	Exempt	Site Vacant	Site Vacant	31 (20%)	16 (9%)	46 (24%)	57 (29%)	56 (37%)	
Avg. (Median) total adjusted annual income reported by families	SSI	\$16,431 (\$14,652)	\$18,333 (\$16,246)	\$18,882 (\$16,744)	\$19,512 (\$17,508)	\$21,025 (\$19,532)	\$20,853 (\$19,331)	\$19,090 (\$18,060)	\$20,303 (\$20,544)	\$20,783 (\$19,240)	WinTen2/Emphasys
	SSII	\$12,101 (\$11,184)	\$14,587 (\$13,148)	\$13,953 (\$11,708)	\$13,381 (\$12,114)	\$15,082 (\$14,456)	\$15,282 (\$14,223)	\$16,566 (\$14,813)	\$15,452 (\$13,735)	\$15,339 (\$13,000)	
	Centre Meadows	\$4,340 (\$2,400)	Exempt	Site Vacant	Site Vacant	\$13,964 (\$14,574)	\$10,762 (\$8,447)	\$12,629 (\$12,265)	\$11,204 (\$9,134)	\$12,765 (\$10,239)	
Avg. (Median) monthly gross rent payment of families	SSI	\$380 (\$387)	\$427 (\$407)	\$426 (\$419)	\$493 (\$438)	\$531 (\$488)	\$524 (\$484)	\$479 (\$452)	\$508 (\$514)	\$523 (\$481)	WinTen2/Emphasys
	SSII	\$297 (\$281)	\$358 (\$330)	\$345 (\$293)	\$342 (\$305)	\$384 (\$361)	\$385 (\$356)	\$416 (\$371)	\$386 (\$344)	\$390 (\$325)	
	Centre Meadows	\$179 (\$150)	Exempt	Site Vacant	Site Vacant	\$355 (\$365)	\$276 (\$211)	\$322 (\$307)	\$289 (\$241)	\$340 (\$256)	
# (%) of families requesting hardship exemption	SSI	N/A	21 (10%)	0	0	0	0	4	1	3	WinTen2/Emphasys/Property Manager Log
	SSII	N/A	42 (10%)	0	0	0	0	1	2	2	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	0	0	0	0	0	
# (%) of families granted hardship exemption	SSI	N/A	11 (5%)	0	0	0	0	2	1	2	WinTen2/Emphasys/Property Manager Log
	SSII	N/A	21 (5%)	0	0	0	0	0	1	1	
	Centre Meadows	N/A	Exempt	Site Vacant	Site Vacant	0	0	0	0	0	

## SSI Households Disparate Impact Analysis (Activity 13) – Table 1

Activity 13: Self Sufficiency I																				
Disparate Impact Analysis - Baseline Data																				
Self-Sufficiency I Population	Heads of Household				Average Total Annual Adjusted Income				Average Gross Annual Earned Income				Average Gross Rent Payment				Average Increased Rent Burden			
	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020
All Non-Elderly/Non-Disabled Households																				
	204	211	218	217	\$20,853	\$19,090	\$20,303	\$20,783	\$21,620	\$21,580	\$20,303	\$26,385	\$524	\$479	\$508	\$523	\$144	\$99	128	\$15
Gender																				
	191	196	204	193	\$20,334	\$18,781	\$20,105	\$19,847	\$21,129	\$20,942	\$24,658	\$24,928	\$511	\$472	\$503	\$500	\$133	\$94	\$125	\$31
	13	15	14	24	\$28,476	\$23,124	\$23,184	\$28,310	\$28,837	\$29,915	\$33,383	\$38,104	\$725	\$569	\$580	\$706	\$299	\$143	\$154	\$11
Race (Multiple selections permitted)																				
	170	175	183	181	\$21,606	\$19,296	\$20,778	\$21,793	\$21,795	\$21,860	\$25,614	\$26,537	\$544	\$484	\$519	\$548	\$157	\$97	\$132	\$35
	32	35	33	34	\$16,660	\$17,855	\$17,120	\$15,811	\$20,586	\$20,071	\$22,838	\$25,905	\$421	\$446	\$428	\$395	\$56	\$81	\$63	-\$18,000
	0	0	1	1	\$0	\$0	\$22,778	\$13,536	\$0	\$0	\$19,682	\$25,972	\$0	\$0	\$569	\$338	\$0	\$0	\$439	0
Asian / Pacific Islander	1	0	1	1	\$12,356	\$0	\$36,000	\$14,368	\$21,252	\$0	\$37,440	\$15,808	\$309	\$0	\$900	\$359	\$31	\$0	\$622	0
	1	1	0	0	\$26,320	\$26,272	\$0	\$0	\$25,324	\$23,324	\$0	\$0	\$658	\$667	\$0	\$0	\$264	\$657	0	0
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity																				
	197	205	216	211	\$20,851	\$19,109	\$20,240	\$20,530	\$21,647	\$21,615	\$25,161	\$26,311	\$524	\$479	\$506	\$516	\$143	\$98	\$125	\$10
	7	6	2	6	\$20,931	\$18,450	\$27,060	\$29,686	\$20,862	\$20,361	\$28,787	\$28,984	\$523	\$461	\$677	\$742	\$172	\$110	\$326	\$65
Age of Head of Household																				
	83	85	70	60	\$14,483	\$15,135	\$16,646	\$19,170	\$16,872	\$17,582	\$21,984	\$28,001	\$368	\$383	\$416	\$482	\$56	\$71	\$104	\$66
	90	92	106	107	\$23,436	\$19,473	\$20,088	\$19,808	\$23,844	\$21,814	\$23,550	\$23,728	\$587	\$487	\$502	\$497	\$182	\$82	\$97	-\$5,100
	31	34	42	50	\$30,411	\$27,940	\$26,940	\$24,883	\$27,877	\$30,941	\$34,693	\$29,619	\$761	\$695	\$674	\$628	\$272	\$206	\$185	-\$46,000
Excluded Households																				
	46	75	64	65	\$23,140	\$18,399	\$15,051	\$16,947	\$6,283	\$6,768	\$8,693	\$6,820	\$426	\$461	\$379	\$426	N/A	N/A	N/A	N/A

## SSII Households Disparate Impact Analysis (Activity 13) – Table 2

Self-Sufficiency II Population			Disparate Impact Analysis - Baseline Data																											
			Heads of Household				Average Total Annual Adjusted Income				Average Gross Annual Income								Average Gross Rent Payment								Average Increased Rent Burden			
			FY2017	FY2018	FY2019	FY2020	FY2013	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020	



## Centre Meadows Households Disparate Impact Analysis (Activity 13) – Table 3

Activity 13: Centre Meadows																								
Disparate Impact Analysis																								
Centre Meadows Population	Heads of Household					Average Gross Annual Earned Income					Average Total Annual Adjusted Income					Average Gross Rent Payment					Rent Burden			
	FY 2016 Baseline	FY2017	FY2018	FY2019	FY2020	FY 2016 Baseline	FY2017	FY2018	FY2019	FY2020	FY2016 Baseline	FY2017	FY2018	FY2019	FY2020	FY2016 Baseline	FY2017	FY2018	FY2019	FY2020	FY2017	FY2018	FY2019	FY2020
All Non-Elderly/Non-Disabled Households	138	186	196	195	152	\$12,532	\$11,084	\$14,357	\$14,172	\$16,097	\$13,964	\$10,762	\$12,629	\$11,827	\$12,765	\$355	\$276	\$322	\$289	\$340	-\$79	-\$33	-\$66	\$51
Gender																								
Female	144	171	181	181	142	\$12,561	\$11,083	\$14,268	\$14,309	\$16,380	\$13,819	\$10,719	\$12,351	\$12,020	\$12,557	\$352	\$275	\$314	\$284	\$336	-\$77	-\$38	-\$68	\$52
Male	14	15	15	14	10	\$12,239	\$11,098	\$15,441	\$12,398	\$12,074	\$15,457	\$11,257	\$15,981	\$11,992	\$15,717	\$387	\$281	\$410	\$352	\$407	-\$106	\$23	-\$35	\$55
Race (Multiple selections permitted)																								
Black	129	157	163	164	133	\$12,126	\$10,678	\$14,513	\$13,571	\$16,504	\$14,067	\$10,847	\$12,409	\$11,170	\$12,808	\$357	\$279	\$316	\$284	\$340	-\$78	-\$41	-\$73	\$56
White	28	28	32	31	18	\$14,237	\$13,324	\$13,458	\$17,556	\$13,983	\$13,407	\$10,437	\$13,620	\$15,387	\$12,840	\$342	\$264	\$346	\$316	\$350	-\$78	\$4	-\$26	\$34
American Indian / Native Alaskan	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	1	1	1	0	1	\$17,233	\$12,238	\$17,803	\$0	\$0	\$16,273	\$6,580	\$16,843	\$0	\$5,620	\$407	\$164	\$421	\$0	\$150	-\$243	\$14	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Ethnicity																								
Non-Hispanic	156	184	193	191	150	\$12,356	\$10,939	\$14,365	\$14,095	\$15,951	\$13,819	\$10,841	\$12,602	\$13,673	\$12,602	\$351	\$278	\$321	\$288	\$337	-\$73	-\$30	-\$63	\$49
Hispanic	2	2	3	4	2	\$26,232	\$24,482	\$13,840	\$17,855	\$27,013	\$25,272	\$3,540	\$14,395	\$11,146	\$24,975	\$632	\$89	\$363	\$342	\$625	-\$543	-\$269	-\$290	\$283
Age of Head of Household																								
18-31	107	124	123	117	82	\$12,438	\$10,820	\$14,677	\$12,131	\$15,383	\$13,582	\$10,263	\$11,825	\$10,778	\$10,494	\$347	\$266	\$304	\$260	\$293	-\$81	-\$43	-\$87	\$33
32-46	37	45	52	58	52	\$12,671	\$11,986	\$14,548	\$18,621	\$17,391	\$14,042	\$10,715	\$13,297	\$11,311	\$16,912	\$363	\$270	\$333	\$337	\$427	-\$93	-\$30	-\$26	\$90
47-61	14	17	21	20	18	\$12,883	\$10,624	\$12,014	\$13,213	\$15,609	\$16,252	\$14,526	\$15,683	\$13,596	\$11,127	\$393	\$363	\$397	\$322	\$306	-\$30	\$4	-\$71	-\$16
Excluded Households																								
Elderly/Disabled Households	45	42	57	60	61	\$487	\$1,617	\$870	\$674	\$1,311	\$11,679	\$10,207	\$9,816	\$9,326	\$12,448	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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

### i. Plan Year Approved, Implemented, Amended

Proposed/Implemented FY 2015

### ii. Description/Update

LHA staff proposed to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV households. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months was difficult to track because households don't always report when employment status starts and stops. In addition, many who received the benefit quit their jobs at the end of the two-year exclusion to avoid an increase in the household rent. For those reasons and the administrative burden, the LHA proposed to eliminate the EID calculation.

This activity has achieved the anticipated result to eliminate the burdensome task of tracking the employment starts and stops of the 23 households that were receiving EID. Currently no new households receive the EID. During FY2020, two (2) of the 23 households that formerly received EID continue to receive housing assistance.

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

### iii. Actual Non-Significant Changes

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

### iv. Actual Changes to Metrics/Data Collection

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

### v. Actual Significant Changes

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

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

There have been no challenges in achieving benchmarks for this activity.

## HUD STANDARD METRICS

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination						
CE#3: Decrease in Error Rate of Task Execution						
Unit of Measurement – Average error rate in completing a task as a percentage (decrease).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved
25%	0%	0%	0%	0%	0%	Yes
Data Source: Emphasys, staff interviews; staff logs						

### Activity 14

Activity 14 - Rent Reform - Earned Income Disregard (EID) Elimination								
CE #5: Increase in Agency Rental Revenue								
Unit of Measurement - Rental revenue in dollars (increase).								
Baseline	Benchmark	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>Rental revenue prior to implementation of the activity</b>	Expected rental revenue after implementation of the activity	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$68,544 (\$35,964)	\$96,474	\$26,112	\$49,896	\$8,820	\$8,196 *\$49,812	\$0 *\$39,228	\$0 *\$11,136	NO
<b>Sum total gross (net) annual rental revenue from 23 households receiving EID as of June 30, 2013</b>	Expected sum total net annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total net annual rental revenue from 23 rental households no longer receiving EID as of June 30, 2015	Actual sum total net annual rental revenue from 19 rental households no longer receiving EID as of June 30, 2016	Actual sum total net annual rental revenue from 10 rental households no longer receiving EID as of June 30, 2017	Actual sum total net annual rental revenue from 4 rental households no longer receiving EID as of June 30, 2018	Actual sum total net annual rental revenue from 4 rental households no longer receiving EID as of June 30, 2019	Actual sum total net annual rental revenue from 2 rental households no longer receiving EID as of June 30, 2020	those former EID recipients to determine if there is an increase or

\*LHA tracks HAP paid by those former EID recipients to determine if there is an increase or

decrease in HAP.

A decrease in HAP would indicate a savings for the LHA.

#### Impact: Assessing Costs and Benefits

Metric	FY 2014 Baseline	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual
*Total number EID Households (continue to receive assistance)	23	19	19	10	10	8	2
Dollar value of staff time spent processing EID	\$452	0	0	0	0	0	0
Avg. gross annual earned income reported by EID families	\$6,570	\$6,915	\$7,990	\$8,238	\$10,564	\$6,796	\$4,809
Average total gross annual income reported by families	\$11,586	\$11,982	\$14,783	\$13,517	\$11,177	\$14,214	\$14,565
Average gross rent (TTP)	\$248	\$287	\$287	\$312	\$383	\$194	\$345
# (%) Estimated cost savings from eliminating EID	0	\$452	\$452	\$452	\$452	\$452	\$452

## Activity 16 – HCV Rent Reform Study

### i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2015

### ii. Description/Update

The HUD-commissioned HCV Rent Reform Study is now in the second triennial certification schedule. The Study sets forth alternative rent calculation and recertification strategies for the study group and traditional HCV rent calculation and recertification schedules apply to the control group. During the three-year recertification schedule until a household's next recertification date, any increase in earnings it achieves will not cause the amount of rent and utilities it pays to go up.

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

Households were enrolled to either the study or control group in July 2015. Initially 516 households were assigned to the control group and 513 assigned to the study group. In FY2020, 200 households remained in the study group and 176 remained in the control group. Average HAP paid for control group households - \$563 and \$556 for the study group which indicates more household income in the study group because less HAP was paid.

RRS Group	Household Count	Avg. HAP to Owner	Annual Certifications	Interim Certifications
Control	176	\$563	176	324
Study	200	\$556	1	171
<b>Totals</b>	<b>376</b>		<b>177</b>	<b>495</b>

### iii. Actual Non-Significant Changes

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

### iv. Actual Changes to Metrics/Data Collection

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

### v. Actual Significant Changes

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

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

Most benchmarks have been achieved that deal with time to complete certifications, interims. FY2020 marks the start of the second triennial for the study.

## HUD STANDARD METRICS

## Activity 16

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Annual Certification	<b>YEAR 1: \$18,879</b> <b>YEAR 2: \$18,879</b> <b>YEAR 3: \$18,879</b> <b>TOTAL: \$56,637</b>	<b>YEAR 1: \$18,879</b> <b>YEAR 2: \$0</b> <b>YEAR 3: \$0</b> <b>SAVINGS: \$37,758</b>	<b>FY2016: 510/\$13,754.70</b> <b>FY2017: 3/\$80.91</b> <b>FY2018: 0/\$0</b> <b>FY2019: 365/\$9,844.05</b> <b>FY2020: 1/\$26.97</b>	<b>YEAR 1: YES</b> <b>YEAR 2: NO</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>YEAR 5: YES</b>
	<ul style="list-style-type: none"> <li>• <b>Cost per Annual Certification - \$26.97</b></li> <li>• <b>700 - Study Group Participants</b></li> <li>• <b>Hard cost (mail and reproduction costs) - .72</b></li> <li>• <b>Staff Cost per hour - \$26.25</b></li> <li>• <b>1 hour - Average time spent per annual certification</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Cost per annual recertification after implementation of activity - \$26.97</b></li> <li>• <b>700 - Study Group Participants</b></li> </ul>	Actual cost of Annual Certification  <b>YEAR 1:</b> <b>510 x \$26.97 = \$13,754.70</b> <b>YEAR 2:</b> <b>3 x \$26.97 = \$80.91</b> <b>YEAR 3:</b> <b>0 x \$26.97 = \$0</b> <b>YEAR 4:</b> <b>365 x 26.97 = \$9,844.05</b> <b>YEAR 5: 1 x \$26.97 = \$26.97</b>	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Interim Certification	<b>YEAR 1: \$15,624.70</b> <b>YEAR 2: \$15,624.70</b> <b>YEAR 3: \$15,624.70</b> <b>TOTAL: \$46,874.10</b>	<b>YEAR 1: \$11,488.75</b> <b>YEAR 2: \$0</b> <b>YEAR 3: \$0</b> <b>TOTAL: \$11,488.75</b>	<b>FY2016: \$3,729</b> <b>FY2017: \$3,243</b> <b>FY2018: \$1,943</b> <b>FY2019: \$3,033</b> <b>FY2020: \$1,437</b>	<b>YES</b>
	<ul style="list-style-type: none"> <li>• <b>Cost per Interim Certification = \$13.13</b></li> <li>• <b>1.7 average number of interims per household (HH) per year</b></li> <li>• <b>times 700 Study Group participants</b></li> </ul> <b>Cost per Interim Certification - \$13.13 is equal to:</b> <ul style="list-style-type: none"> <li>• <b>Average time to perform an interim - .50 hours</b></li> <li>• <b>times the average cost per staff hour - \$26.25 per hour</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Cost per Interim Certification - \$13.13</b></li> <li>• <b>1.25 average number of interims per HH per year 700 Study Group participants</b></li> </ul> <b>Cost per Interim Certification - \$13.13 is equal to:</b> <ul style="list-style-type: none"> <li>• <b>Average time to perform an interim - .50 hours</b></li> <li>• <b>times the average cost per staff hour - \$26.25 per hour</b></li> </ul>	Actual cost of Interim Certification <b>FY2016:</b> <b>284 interims - .63 average time to perform an interim</b>  <b>FY2017:</b> <b>247 interims - .69 average time to perform an interim</b>  <b>FY2018:</b> <b>148 interims -.52 average time to perform an interim</b>  <b>FY2019</b> <b>231 interims - .64 average time to perform an interim</b>  <b>FY2020:</b> <b>171 interims - .64 average time to perform an interim</b>  <ul style="list-style-type: none"> <li>• <b>Times cost per interim certification = \$13.13</b></li> </ul>	

## HUD STANDARD METRICS

## Activity 16

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost per Streamlined Interim Certification	<b>YEAR 1: \$6,433.70</b> <b>YEAR 2: \$6,433.70</b> <b>YEAR 3: \$6,433.70</b> <b>TOTAL: \$19,301.10</b>	<b>YEAR 1: \$3,214.40</b> <b>YEAR 2: \$3,214.40</b> <b>YEAR 3: \$3,214.40</b> <b>SAVINGS: \$9,643.20</b>	<b>YEAR 1: \$4,996</b> <b>YEAR 2: \$4,345</b> <b>YEAR 3: \$2,603</b> <b>YEAR 4: \$4,063</b> <b>YEAR 5: \$2,015</b>	YES
	<ul style="list-style-type: none"> <li>• <b>Cost per Interim - \$13.13</b></li> <li>• average number of interims per household per year <b>.7/500 per year</b></li> <li>• <b>700</b> the number of Study Group participants</li> </ul> <p><b>Cost per Interim</b> is equal to:</p> <ul style="list-style-type: none"> <li>• Average time to perform an interim - <b>.50 hours</b></li> <li>• <i>times</i> the average cost per staff hour - <b>\$26.25</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Cost per Streamlined Interim - \$6.56</b></li> <li>• average number of interims per household per year <b>.7/500 per year</b></li> <li>• <b>700</b> the number of Study Group participants</li> </ul> <p><b>Cost per Streamlined Interim</b> is equal to:</p> <ul style="list-style-type: none"> <li>• <b>\$6.56</b></li> <li>• Average time to perform an interim - <b>.25</b></li> <li>• <i>times</i> average cost per staff hour - <b>\$26.25</b></li> </ul>	<p>Actual cost of Streamlined Interim Certification</p> <p>FY2016: 284 interims FY2017: 247 interims FY2018: 148 interims FY2019: 231 interims FY2020: 171 interims</p> <ul style="list-style-type: none"> <li>• <b>Cost per Streamlined Interim - \$17.59</b></li> <li>• average number of interims per household per year</li> <li>• Number of Study Group participants</li> <li>• <b>Cost per Streamlined Interim is equal to: \$17.59</b></li> <li>• Average time to perform an interim - <b>.67 hours (40 minutes)</b></li> <li>• <i>times</i> average cost per staff hour - <b>\$17.59</b></li> </ul>	Explanation to be provided
ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost of Rent Calculation	<b>YEAR 1: \$13,781</b> <b>YEAR 2: \$13,781</b> <b>YEAR 3: \$13,781</b> <b>TOTAL: \$41,343</b>	<b>YEAR 1: \$9,187.50</b> <b>YEAR 2: \$0</b> <b>YEAR 3: \$0</b> <b>TOTAL: \$9,187.50</b> <b>SAVINGS: \$32,155.50</b>	<b>FY2016: \$13,387.50</b> <b>FY2017: \$78.75</b> <b>FY2018: \$0</b> <b>FY2019: \$9,607.50</b> <b>FY2020: \$26.25</b>	<b>YEAR 1: NO</b> <b>YEAR 2: NO</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>YEAR 5: YES</b>
	<p>Baseline is equal to:</p> <ul style="list-style-type: none"> <li>• Current time to perform rent calculation <b>.75 hours</b></li> <li>• <i>times</i> the average cost per staff hour <b>\$26.25</b></li> <li>• <i>times</i> the number of Study Groups <b>700 =</b></li> </ul> <p><b>\$13,781.25</b></p> <p><b>Cost of Rent Calculation</b> is equal to:</p> <ul style="list-style-type: none"> <li>• Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>.50</b></li> <li>• <i>plus</i> the "Cost to Determine Adjusted Income - <b>.25 hours</b></li> </ul>	<p>Benchmark is equal to:</p> <ul style="list-style-type: none"> <li>• Current time to perform rent calculation <b>.50 hours</b></li> <li>• <i>times</i> the average cost per staff hour <b>\$26.25</b></li> <li>• <i>times</i> the number of Study Groups <b>700 =</b></li> </ul> <p><b>\$9,187.50</b></p> <p><b>Cost of Rent Calculation</b> is equal to:</p> <ul style="list-style-type: none"> <li>• Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>.50</b></li> <li>• <i>plus</i> the "Cost to Determine Adjusted Income - <b>0 hours</b></li> </ul>	<p>Actual cost of Rent Calculation</p> <ul style="list-style-type: none"> <li>• Current time to perform rent calculation <b>1 hour</b></li> <li>• <i>times</i> the average cost per staff hour <b>\$26.25</b></li> <li>• <i>times the number of Study Group</i></li> </ul> <p><b>FY2016: 510</b> rent calculations <b>FY2017: 3</b> rent calculations <b>FY2018: 0</b> rent calculations <b>FY2019: 366</b> rent calculations <b>FY2020: 1</b> rent calculation</p> <p><b>Cost of Rent Calculation</b> is equal to:</p> <ul style="list-style-type: none"> <li>• Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>1 hour</b></li> <li>• <i>plus</i> the "Cost to Determine Adjusted Income - <b>0 hours</b></li> </ul>	

## HUD STANDARD METRICS

## Activity 16

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total cost of task prior to implementation of the activity.	Expected cost of task after implementation of the activity.	Actual cost of the task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost to Determine Income from Assets	<b>YEAR 1: \$4.59</b> <b>YEAR 2: \$4.59</b> <b>YEAR 2: \$4.59</b> <b>TOTAL: \$13.77</b>	<b>YEAR 1: \$0</b> <b>YEAR 2: \$0</b> <b>YEAR 2: \$0</b> <b>TOTAL SAVINGS: \$13.77</b>	<b>YEAR 1: \$0</b> <b>YEAR 2: \$0</b> <b>YEAR 3: \$0</b> <b>YEAR 4: \$0</b> <b>YEAR 5: \$0</b>	<b>YEAR 1: YES</b> <b>YEAR 2: YES</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>TOTAL: YES</b>
	<b>Cost to determine income from assets equals:</b> <ul style="list-style-type: none"> <li>Average time to verify asset, calculate income, perform quality control - <b>.25 hours</b></li> <li>times the cost per staff hour - <b>\$26.25</b></li> <li>Times the percent of households with income from assets valued at <b>\$5,000</b> - <b>0.001%</b></li> <li>times the number of study participants – <b>700</b></li> </ul>	<b>Cost to determine income from assets equals:</b> <ul style="list-style-type: none"> <li>Average time to verify asset, calculate income, perform quality control - <b>.25 hours</b></li> <li>times the cost per staff hour - <b>\$26.25</b></li> <li>Times the percent of households with income from assets valued at <b>\$25,000</b> - <b>0%</b></li> <li>times the number of study participants – <b>700</b></li> </ul>	Actual cost to determine income from assets	
ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost of task prior to implementation of the activity	Expected cost of task after implementation of the activity	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Cost to Determine Utility Allowance	<b>YEAR 1: \$4,593.75</b> <b>YEAR 2: \$4,593.75</b> <b>YEAR 3: \$4,593.75</b> <b>TOTAL: \$13,781.25</b>	<b>YEAR 1: \$4,593.75</b> <b>YEAR 2: \$0</b> <b>YEAR 3: \$0</b> <b>TOTAL: \$4,593.75</b> <b>SAVINGS: \$9,187.50</b>	<b>FY2016: \$3,346</b> <b>FY2017: \$20</b> <b>FY 2018: \$0</b> <b>FY2019: \$2,401</b> <b>FY2020: \$7</b> <b>TOTAL COST: \$5,766.24</b>	<b>YES</b> <b>NO</b> <b>YES</b> <b>YES</b> <b>YES</b> <b>TOTAL SAVINGS: \$12,608.76</b>
	<b>Cost per utility allowance equals:</b> <ul style="list-style-type: none"> <li>Time to Determine Utility Allowance - <b>.25</b></li> <li>Times the average cost per staff hour - <b>\$26.25</b></li> <li>times the number of study participants <b>700</b></li> </ul> <b>Time to Determine Utility Allowance</b> is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - <b>.25</b>	<b>Cost per utility allowance equals:</b> <ul style="list-style-type: none"> <li>Time to Determine Utility Allowance - <b>.25</b></li> <li>Times the average cost per staff hour - <b>\$26.25</b></li> <li>times the number of study participants <b>700</b></li> </ul> <b>Time to Determine Utility Allowance</b> is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - <b>.25</b>	<b>YEAR 1: 510</b> Study Group Participants  <b>YEAR 2: 3</b> Study Group Participants  <b>YEAR 3: 0</b> Study Group Participants  <b>YEAR 4: 366</b> Study Participants  <b>YEAR 5: 1</b> Study Group Participant	

## HUD STANDARD METRICS

## Activity 16

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time to Determine Utility Allowance	<b>YEAR 1: 175</b> <b>YEAR 2: 175</b> <b>YEAR 3: 175</b> <b>TOTAL: 525 hours</b>	<b>YEAR 1: 175</b> <b>YEAR 2: 0</b> <b>YEAR 3: 0</b> <b>TOTAL: 175 hours</b> <b>SAVINGS: 350</b>	<b>YEAR 1: 127.50</b> <b>YEAR 2: .75</b> <b>YEAR 3: 0</b> <b>YEAR 4: 91.50</b> <b>YEAR 5: .25</b>	<b>YEAR 1: YES</b> <b>YEAR 2: NO</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>YEAR 5: YES</b> <b>TOTAL</b>
	Baseline is equal to: • <b>Time to Determine Utility Allowance - .25</b> • <i>times</i> the number of Study Group <b>700</b> <b>Time to Determine Utility Allowance</b> is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - <b>.25</b>	Benchmark is equal to: • <b>Time to Determine Utility Allowance - .25</b> • <i>times</i> the number of Study Group <b>700</b> <b>Time to Determine Utility Allowance</b> is equal to: Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied - <b>.25</b>	Actual Time to Determine Utility Allowance  <b>Year 1 - 510</b>  <b>Year 2 - 3</b>  <b>Year 3 - 0</b>  <b>Year 4 - 366</b>  <b>Year 5 - 1</b>	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time To Complete Annual Certification	<b>YEAR 1: 700 hours</b> <b>YEAR 2: 700 hours</b> <b>YEAR 2: 700 hours</b> <b>TOTAL: 2,100 hours</b>	<b>YEAR 1: 700 hours</b> <b>YEAR 2: 3.75 hrs</b> <b>YEAR 3: 0 hours</b> <b>SAVINGS: 1,400 hours</b>	<b>YEAR 1: 637.50 hrs.</b> <b>YEAR 2: 3.75 hrs.</b> <b>YEAR 3: 0 hrs.</b> <b>YEAR 4: 457.50 hrs.</b> <b>YEAR 5: 1 hour</b>	<b>YEAR 1: YES</b> <b>YEAR 2: NO</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>YEAR 5: YES</b>
	<b>Time to Complete Annual Certification – 1 hour</b> • <i>times</i> the number of the Study Group – <b>700</b>  <b>Time to Complete Annual Certification</b> is equal to: • Average time spent to schedule, interview and verify - <b>.75 hours</b>  • <i>plus</i> the average time spent to conduct quality control of the annual certification - <b>.25 hours</b>	<b>Time to Complete Annual Certification – 1 hour</b> • <i>times</i> the number of the Study Group – <b>700</b>  <b>Time to Complete Annual Certification</b> is equal to: • Average time spent to schedule, interview and verify - <b>.75 hours</b>  <i>plus</i> the average time spent to conduct quality control of the annual certification - <b>.25 hours</b>	<b>Actual Time to Complete Annual Certification</b> is equal to: • Average time spent to schedule, interview and verify - <b>1 hour</b> • <i>times</i> the number of the Study Group – <b>Year 1 – 510</b> <b>Year 2 – 3</b> <b>Year 3 – 0</b> <b>Year 4 – 366</b> <b>Year 5 - 1</b> <i>plus</i> the average time spent to conduct quality control of the annual certification - <b>.25 hours</b>	



## HUD STANDARD METRICS

## Activity 16

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time To Determine Tenant Rent	<b>YEAR 1: 525 hours</b> <b>YEAR 2: 525 hours</b> <b>YEAR 3: 525 hours</b> <b>TOTAL: 1,575 hours</b>	<b>YEAR 1: 350 hours</b> <b>YEAR 2: 0</b> <b>YEAR 3: 0</b> <b>SAVINGS: 1,225 hours</b>	<b>YEAR 1: 765 hours</b> <b>YEAR 2: 4.5 hours</b> <b>YEAR 3: 0</b> <b>YEAR 4: 366 hours</b> <b>YEAR 5: .50 hours</b>	YES
	The Baseline is equal to: • <b>Time to Determine Tenant Rent .75 times the number of Study Group – 700 = 525 hours</b>  <b>Time to Determine Tenant Rent</b> is equal to: • Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>.50 hours</b> • <b>plus Time to Determine Adjusted Income .25 hours = .75 hours</b>	Benchmark is equal to: • <b>Time to Determine Tenant Rent .50 times the number of Study Group – 700 = 350 hours</b>  <b>New Time to Determine Tenant Rent</b> is equal to: • Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>.50 hours</b> • <b>plus Time to Determine Adjusted Income 0 hours = .50 hours</b>	Actual time to complete Determine Tenant Rent • <b>Time to Determine Tenant Rent 1 HOUR times the number of Study Group =</b>  <b>Year 1 – 510 hours</b> <b>Year 2 = 3 hours</b> <b>Year 3 = 0 hours</b> <b>Year 4 = 366 hours</b> <b>Year 5 = .50 hours</b>  <b>New Time to Determine Tenant Rent</b> is equal to: • Average time for documenting, recording, calculating, verifying and quality control for all income sources <b>.50 hours</b> • <b>plus Time to Determine Adjusted Income = .50 hours</b>	

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Time to Determine Income from Assets	<b>YEAR 1: 0.175 hours</b> <b>YEAR 2: 0.175</b> <b>YEAR 3: 0.175</b> <b>TOTAL: 0.5 hours</b>	<b>YEAR 1: 0</b> <b>YEAR 2: 0</b> <b>YEAR 3: 0</b> <b>TOTAL: 0</b> <b>SAVINGS: 0.5 hours</b>	<b>YEAR 1: 0</b> <b>YEAR 2: 0</b> <b>YEAR 3: 0</b> <b>YEAR 4: 0</b> <b>YEAR 5: 0</b> <b>TOTAL: 0</b> <b>SAVINGS: 0.5 hours</b>	<b>YEAR 1: YES</b> <b>YEAR 1: YES</b> <b>YEAR 3: YES</b> <b>YEAR 4: YES</b> <b>YAR 5: YES</b> <b>TOTAL: 0</b>
	Baseline is equal to: • <b>Time to Determine Income from Assets over \$5,000 - .25 hours</b> • times percent of households with income from assets over \$5,000 = <b>.001%</b> • <b>times the number of Study Group 700</b>	Benchmark is equal to: • <b>Time to Determine Income from Assets over \$25,000 - .25 hours</b> • times percent of households with income from assets over \$25,000 = <b>0%</b> • <b>times the number of Study Group 700</b>	Actual Time to Determine Income from Assets	

## HUD STANDARD METRICS

### Activity 16

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

ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY				
SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average Earned Income of Non-Elderly Non-disabled Households	\$16,140	\$16,463	*YEAR 1 = N/A Year 2 = N/A Year 3 = \$14,209 Year 4 = \$12,470 YEAR 5 = \$12,467	NO
	Baseline is equal to: Average Earned Income of Non-elderly Non-disabled Households of Study Group	Benchmark is equal to: Annual increase of 2% in the Average Earned Income of Non-Elderly Non-disabled Households of Study Group	Average Earned Income of Non-Elderly Non-disabled Households of Study Group	

## HUD STANDARD METRICS

<b>ACTIVITY 16) HOUSING CHOICE VOUCHER RENT REFORM STUDY</b>				
<b><i>SS #3: Increase in Positive Outcomes in Employment Status</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
(1) Employed	41%/287	43%/301	<b>FY2018: *257</b> <b>Year 4: 259 (71%)/366</b> <b>YEAR 5: 130 (65%)/200</b>	YES
(5) Unemployed	55%/385	53%/371	<b>FY2018: *93</b> <b>Year 4: 106 (30%)/366</b> <b>YEAR 5: 70 (35%)/200</b>	YES
*In previous years LHA did not have a report that would pull employment status of the Study Group. In FY2019 and FY2020 data was available for the employment status of Study Group participants.				

### Activity 16

#### Hardship Analysis

<b>Rent Reform Study Hardship Requests</b>			
<b>YEAR</b>	<b>REQUESTS</b>	<b>APPROVED</b>	<b>DENIED</b>
<b>FY2016</b>	<b>12</b>	<b>10</b>	<b>2</b>
<b>FY2017</b>	<b>15</b>	<b>14</b>	<b>1</b>
<b>FY2018</b>	<b>10</b>	<b>8</b>	<b>2</b>
<b>FY2019</b>	<b>18</b>	<b>17</b>	<b>1</b>
<b>FY2020</b>	<b>28</b>	<b>28</b>	<b>0</b>
<b>TOTALS</b>	<b>83</b>	<b>77</b>	<b>6</b>

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

### **i. Plan Year Approved, Implemented, Amended**

Proposed/Implemented FY 2016

### **ii. Description/Update**

Interim reductions in the rent portion are limited to one per household between regularly scheduled re-examination periods. For households who are not elderly or disabled, interim adjustments are limited as follows:

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

This activity is ongoing. FY2020, 213 interims were reported, down from the previous year's 306 interims. Average earned income of work-able households was up slightly over the previous year's \$22,048 (FY2019) to \$25,430/13% (FY2020).

LHA sees this activity as successful with a 68% decrease in interims compared to baseline numbers. The reduction in interims and increase in earned income indicates that the intended outcome of this activity to eliminate excessive interims has been effective.

### **iii. Actual Non-Significant Changes**

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

### **iv. Actual Changes to Metrics/Data Collection**

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

### **v. Actual Significant Changes**

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

## HUD STANDARD METRICS

### Activity 17

<b>CE #1: Agency Cost Savings</b>						
<b>Unit of Measurement</b> Total cost of task in dollars (decrease).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>\$8,679</b> $\$26.25 \times .50 = \$13.13$ per interim X 661 Interims Management Specialist hourly rate x time to do an interim	<b>\$4,333</b> $\$13.13 \times 330$ Interims	<b>\$4,491</b> $\$13.13 \times 342$ Interims	<b>\$3,703</b> $\$13.13 \times 282$ Interims	<b>\$4,018</b> $\$13.13 \times 306$ Interims	<b>\$2,797</b> $\$13.13 \times 213$ Interims	YES
Data Source: Emphasys						

<b>SS #1: Increase in Household Income</b>						
<b>Unit of Measurement</b> Average earned income of households affected by this policy in dollars (increase).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>\$19,518</b> Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	<b>\$22,446</b> Expected average earned income of households affected by this policy prior to implementation of the activity.	<b>\$20,634</b> Actual Average Earned Income of 658 of 809 HHs	<b>\$20,807</b> Actual Average Earned Income of 602 of 727 HHs	<b>\$22,048</b> Actual Average Earned Income of 618/720 HHs	<b>\$25,430</b> Actual Average Earned Income of 478/590 HHs	NO

<b>CE #2: Staff Time Savings</b>						
<b>Unit of Measurement</b> Total time to complete the task in staff hours (decrease).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>330.5 hours</b> 661 interims x 30 minutes	<b>165 hours</b> 330 interims	<b>171 hours</b> 342 interims	<b>141 hours</b> 282 interims	<b>153 hours</b> 306 Interims	<b>106.5 hours</b> 213 Interims	YES
Data Source: Emphasys						

<b>SS #3: Increase in Positive Outcomes in Employment Status</b>							
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>							
<b>Unit of Measurement</b> Report the following information separately for each category:	Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
(6a) Other – Households reporting earned income	<b>598</b> Actual head(s) of households reporting earned income prior to implementation of the activity.	<b>878</b> Expected head(s) of households reporting earned income after implementation of the activity.	<b>658</b> Actual HHs reporting earned income as of June 30, 2017	<b>602</b> Actual HHs reporting earned income as of June 30, 2018	<b>618</b> Actual HHs reporting earned income as of June 30, 2019	<b>475</b> Actual HHs reporting earned income as of June 30, 2020	NO
(6b) Other – Households with no earned income	<b>130</b> Head(s) of with no earned income prior to implementation of the activity.	<b>0</b> Expected head(s) of households with no earned income after implementation of the activity.	<b>151</b> Actual HHs reporting no earned income as of June 30, 2017	<b>125</b> Actual HHs reporting no earned income as of June 30, 2018	<b>102</b> Actual HHs reporting no earned income as of June 30, 2019	<b>115</b> Actual HHs reporting no earned income as of June 30, 2020	NO

## HUD STANDARD METRICS

### Activity 17

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>						
<b>Unit of Measurement</b>						
Number of households receiving TANF assistance (decrease).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>95</b> Households receiving TANF prior to implementation of the activity.	<b>0</b> Expected number of households receiving TANF after implementation of the activity (number).	<b>166</b>	<b>175</b>	<b>98</b>	<b>43</b>	<b>NO</b>

<b>CE #5: Increase in Agency Rental Revenue</b>						
<b>Unit of Measurement</b>						
Rental revenue in dollars (increase).						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>\$3,637,812 (\$2,676,180)</b> Rental revenue prior to implementation of the activity.	<b>\$4,387,366 (\$3,227,589)</b> Expected rental revenue after implementation of the activity.	<b>\$3,671,868 (\$2,803,644)</b> Actual rental revenue after implementation	<b>\$3,466,643 (\$2,769,132)</b> Actual rental revenue after implementation	<b>\$3,532,824 (\$2,034,444)</b> Actual rental revenue after implementation	<b>\$4,277,424 (\$1,999,344)</b> Actual rental revenue after implementation	<b>NO</b>

<b>SS #8: Households Transitioned to Self Sufficiency</b>						
<b>Unit of Measurement</b>						
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
<b>385</b> Households transitioned to self-sufficiency (Households with the head of household/co-head or spouse annually earning \$15,080 or more) prior to implementation of the activity.	<b>589</b> Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	<b>428</b>	<b>399</b>	<b>419</b>	<b>345</b>	<b>NO</b>

**Impact Analysis – Activity 17****Impact: Encouraging non-disabled/non-elderly adult household members to maintain employment**

<b>Metric</b>	<b>Baseline FY 2016</b>	<b>Benchmark FY2017</b>	<b>FY2017</b>	<b>FY2018</b>	<b>FY2019</b>	<b>FY2020</b>
# of Households affected by this policy	728	809	809	727	720	590
# of Interims	661	330	342	282	306	213
Avg gross annual earned income reported by families	\$16,112	\$19,334	\$16,782	\$17,229	\$18,924	\$25,430
# (%) of families reporting no annual earned income	130	0	151	125	102	115
# (%) of families reporting annual earned income	598	493	658	602	618	475
Avg total adjusted annual income reported by families	\$19,518	\$20,634	\$16,667	\$16,641	\$16,315	\$17,715
Avg monthly gross rent payment of families	\$416	\$422	\$422	\$420	\$410	\$448
# (%) of families requesting hardship exemption	0	0	0	6	3	5
# (%) of families granted hardship exemption	0	0	0	2	2	3

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

### i. Plan Year Approved, Implemented, Amended

Activity Proposed and Implemented FY2017

### ii. Description/Update

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

In FY2020, 33 households were homeownership participants, an increase of two households from the previous year. Seven (7) homeownership households had earned income averaging \$25,359 and 18 households are elderly and/or disabled. Earned income increased to \$25,359 from the previous year's \$19,645 and adjusted income decreased 29% over the previous fiscal year.

See the summary of earnings and adjusted income:

Year	Participants	Average Annual Earned Income	Average Adjusted Income	Annual Certifications	Interim Certifications
FY2016	31	\$16,050	\$19,927		
FY2017	30	\$18,808	\$19,478		
FY2018	28	\$14,904	\$14,808	12	22
FY2019	31	\$19,645	\$24,540	9	22
FY2020	33	\$25,359	\$17,501	2	19

### iii. Actual Non-Significant Changes

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

### iv. Actual Changes to Metrics/Data Collection

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

### v. Actual Significant Changes

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

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

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



## HUD STANDARD METRICS

### Activity 21

C2: Staff Time Savings						
Unit of Measure: Cost Per Annual Certification						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
Total Time to Complete the Task in Staff Time (decrease)  <b>31 hours</b> • 1 hour staff time to complete annual certification  • 31 Annual Certifications	Total Cost of task prior to implementation of the activity (in hours).  Year 1: <b>31 hours</b> Year 2: <b>0 hours</b> Year 3: <b>10 hours</b>	Actual cost of task after implementation of the activity (in dollars).				Whether the outcome meets or exceeds the benchmark.  <b>YES</b>
		Year 1: <b>30 hours</b>	Year 2: <b>12 hours</b>	Year 3: <b>9 hours</b>	Year 4: <b>2 hours</b>	

CE1: Agency Cost Savings						
Unit of Measure: Cost Per Annual Certification						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved?
Total Cost of Task in Dollars  -Cost Per Annual Certification = <b>\$28.53</b> x 31 Annual Certs = <b>\$884.43</b> -1 hour – Avg. time to complete Annual Cert  -Staff Hourly Costs <b>\$27.78</b>  -Hard Costs Per Certification <b>.75¢</b> (mail, paper, copies, etc.)	Total Cost of task prior to implementation of the activity (in dollars).  Year 1: <b>\$884.73</b> Year 2: <b>\$0</b> Year 3: <b>\$285.30</b>	Actual cost of task after implementation of the activity (in dollars).				Whether the outcome meets or exceeds the benchmark.  <b>YES</b>
		Year 1: 30 Certs x \$28.53 = <b>\$855.90</b>	Year 2: 12 Certs x \$28.53 = <b>\$342.36</b>	Year 3: 9 Certs x \$28.53 = <b>\$256.77</b>	Year 4: 2 Certs x \$28.53 <b>\$57.06</b>	

CE5: Increase Agency Rental Revenue						
Unit of Measure: Housing Assistance Payment (HAP) savings (decrease)						
Baseline	Benchmark	FY2017	FY2018	FY2019	FY2020	Benchmark Achieved
Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue prior to implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).				Whether the outcome meets or exceeds the benchmark.
<b>\$154,860</b>	<b>\$154,860</b>	<b>\$147,588</b>	<b>\$152,352</b>	<b>\$156,168</b>	<b>\$172,665</b>	

## Activity 21 – Impact Analysis

HCV Homeownership Households (FY2019)	Heads of Household				Average Total Annual Adjusted Income				Average Gross Annual Earned Income				Average Gross Rent Payment			
	FY2016	FY2017	FY2018	FY2019	FY2016	FY2017	FY2018	FY2019	FY2016	FY2017	FY2018	FY2019	FY2016	FY2017	FY2018	FY2019
					Baseline				Baseline				Baseline			
<b>Total Households</b>	31	28	28	31	\$19,927	\$19,478	\$14,808	\$24,540	\$16,050	\$18,808	\$14,904	\$19,645	\$956	\$908	\$1,098	\$757
<b>Gender</b>																
Female	29	27	26	28	\$20,414	\$19,772	\$15,198	\$25,743	\$17,157	\$19,479	\$15,186	\$21,749	\$966	\$919	\$1,004	\$771
Male	2	1	2	3	\$12,865	\$11,238	\$9,744	\$13,316	\$0	\$0	\$11,237	\$0	\$817	\$626	\$783	\$635
<b>Race (Multiple selections permitted)</b>																
Black	24	24	23	25	\$20,351	\$20,399	\$14,949	\$25,467	\$17,795	\$20,454	\$16,787	\$21,377	\$963	\$916	\$1,019	\$784
White	7	4	5	6	\$18,476	\$15,055	\$14,160	\$20,680	\$10,069	\$10,905	\$7,800	\$12,428	\$932	\$873	\$816	\$646
American Indian / Native Alaskan	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asian / Pacific Islander	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Native Hawaiian / Other Pacific Islander	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	0	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<b>Ethnicity</b>																
Non-Hispanic	31	28	28	31	\$19,927	\$19,478	\$14,808	\$24,540	\$16,050	\$18,808	\$14,904	\$19,645	\$498	\$895	\$1,098	\$757
Hispanic	0	0	0	0	0	0	0	\$0	\$0	\$0	\$0		\$0	\$0	\$0	
<b>Age of Head of Household</b>																
18-31	1	0	2	2	\$57,580	\$0	\$9,781	\$25,841	\$63,340	\$0	\$15,552	\$32,483	\$1,019	\$0	\$1,363	\$829
32-46	16	18	12	15	\$22,782	\$23,116	\$20,801	\$33,814	\$21,348	\$24,821	\$26,314	\$30,216	\$1,020	\$925	\$1,101	\$825
47-61	10	7	10	10	\$15,259	\$14,021	\$11,766	\$15,530	\$8,240	\$9,010	\$4,982	\$8,116	\$895	\$896	\$848	\$677
62 and Over	4	3	4	4	\$10,764	\$9,168	\$6,952	\$11,642	\$2,688	\$3,584	\$5,153	\$2,405	\$838	\$840	\$848	\$668

## Activity 22 – HCV Time Limit Pilot Program (Rent Reform)

### i. Plan Year Approved, Implemented, Amended

Approved/FY2018, Implemented/April 2018

### ii. Description/Update

The LHA's Time Limit Pilot program for HCV new admissions second year of implementation had 22 participants with four ending participating during the year. The Pilot Program aims 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 are 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

Case management is a key component to the success of this initiative. Pilot program participants are required to meet with the case manager at least once quarterly. The case manager recommends resources to help each individual participant work toward their goals that include career planning, job retention skills and steps to job advancement, credit and debt management, adult education services and referrals, etc.

### Hardship Requests

During FY2020, two hardship requests were made for reductions in income and both were approved.

**iii. Actual Non-Significant Changes**

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

**iv. Actual Changes to Metrics/Data Collection**

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

**v. Actual Significant Changes**

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

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

LHA believes that benchmarks will be met after the first complete 3-year certification schedule.

**HUD STANDARD METRICS****Activity 22**

CE #1: Agency Cost Savings				
Unit of Measure: Total Cost of Annual Certification in dollars				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Cost of certifications prior to implementation of the activity.	Expected cost of task after implementation of the activity.	Actual cost of task after implementation of the activity (in dollars) as of June 30, 2019.	Actual cost of task after implementation of the activity (in dollars) as of June 30, 2020.	Whether the outcome meets or exceeds the benchmark.
Cost per Annual Certification \$26.97 X 25 maximum participants	Cost per Annual Certification \$26.97 X 25 maximum participants divided by 3 (years)	22 Annual Certifications	0 Annual Certification	Yes
\$674	\$225	\$593	\$0	
Data Source: Emphasys Software and staff feedback.				

CE #2: Staff Time Savings				
Unit of Measure: Total time to complete the task in staff hours (decrease)				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Total staff time dedicated to the task prior to implementation of the activity.	Expected total staff time dedicated to the task after implementation of the activity.	Actual total staff time dedicated to the task after implementation of the activity as of June 30, 2019	Actual total staff time dedicated to the task after implementation of the activity as of June 30, 2020	Whether the outcome meets or exceeds the benchmark.
1 hour X 25 Annual Certifications = 25 hours annually	1 hour X 8 Annual Certifications = 8 hours annually	1 hour X 22 Annual Certifications = 22 hours annually	0 Annual Certifications	Yes
Data Source: Staff interviews.				

CE #5: Increase in Agency Rental Revenue				
Unit of Measure: Rental revenue in dollars (increase).				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved?
*Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
0	\$180,000 Expected HAP Payments after implementation of activity (in dollars).	\$106,200 HAP Payments	\$111,602 HAP Payments	Yes
*There is no rental revenue as the LHA is not the landlord however, HAP payments to the landlord can be tracked. A decrease in HAP would indicate activity success.				
Data Source: Emphasys Software and staff feedback.				

## HUD STANDARD METRICS

### Activity 22

SS #1: Increase in Household Income				
Unit of Measure: Average earned income of households affected by this policy in dollars (increase).				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy after implementation of the activity (in dollars).	Actual average earned income of households affected by this policy after implementation (in dollars) as of June 30, 2019.	Actual average earned income of households affected by this policy after implementation (in dollars) as of June 30, 2020.	Whether the outcome meets or exceeds the benchmark.
<b>\$10,667</b> (avg. earned income of non-elderly/non-disabled households during FY2017)	<b>\$14,138</b> <b>(37.5 hours per week X (minimum wage) X 52 weeks)</b>	<b>\$18,368</b> Average earned income of households affected by this policy after implementation (in dollars).	<b>\$20,701</b> Average earned income of households affected by this policy after implementation (in dollars).	<b>Yes</b>
Data Source: Emphasys Software				

SS #3: Increase in Positive Outcomes in Employment				
Unit of Measure: Number of employed head of household, co-head or spouse affected by this policy.				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Head(s) of households, co-heads or spouses employed prior to implementation of the activity. This number may be zero.	Expected head(s) of households, co-heads or spouses employed after implementation of the activity.	Actual head(s) of households, co-heads or spouses employed after implementation of the activity as of June 30, 2019.	Actual head(s) of households, co-heads or spouses employed after implementation of the activity as of June 30, 2020.	Whether the outcome meets or exceeds the benchmark.
<b>0</b>	<b>25</b>	<b>22</b>	<b>20</b>	<b>No</b>
Data Source: Emphasys Software and staff feedback.				

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measure: Number of households receiving TANF assistance (decrease) affected by this policy.				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Households receiving TANF assistance prior to implementation of the activity. This number may be zero.	Expected number of households receiving TANF assistance after implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
<b>0</b>	<b>12</b>	<b>4</b>	<b>7</b>	<b>Yes</b>
Data Source: Emphasys Software				

SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measure: Number of households transitioned to self-sufficiency (increase) affected by this policy.				
The LHA defines self-sufficiency as a participant that is able to supply for their own needs with a reduced need for subsidy with an earned income of state or federal minimum wage (whichever is higher); at 37.5 hours per week; for 52 weeks.				
Baseline	Benchmark	FY2019	FY2020	Benchmark Achieved
Households receiving TANF assistance prior to implementation of the activity. This number may be zero.	Expected number of households receiving TANF assistance prior to implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Actual number of households receiving TANF after to implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
<b>0</b>	<b>12</b>	<b>14</b>	<b>16</b>	<b>Yes</b>
Data Source: Emphasys Software				

## IMPACT ANALYSIS – Activity 22

HCV Pilot Program Population	Heads of Household FY2019	Average Gross Annual Earned Income	Avg. Total Annual Adjusted Income	Avg. Total Tenant Payment (TTP)		Heads of Household FY2020	Average Gross Annual Earned Income	Avg. Total Annual Adjusted Income	Avg. Total Tenant Payment (TTP)
<b>All Households</b>	22	\$18,368	\$16,795	\$393		22	\$20,701	\$16,002	\$348
<b>Gender</b>									
Female	19	\$18,546	\$16,766	\$393		20	\$21,182	\$16,028	\$365
Male	3	\$17,238	\$16,978	\$364		2	\$25,328	\$15,787	\$368
<b>Race</b>									
Black	18	\$17,899	\$16,971	\$396		19	\$20,643	\$17,089	\$376
White	4	\$20,477	\$16,002	\$382		3	\$27,919	\$15,308	\$299
American Indian/ Native Alaskan	0	\$0	\$0	\$0		0	0	0	0
Asian/Pacific Islander	0	\$0	\$0	\$0		0	0	0	0
Other	-	-	-	-		-	-	-	-
<b>Ethnicity</b>									
Non-Hispanic	22	\$18,368	\$16,795	\$393		22	\$20,701	\$16,002	\$348
Hispanic	0	\$0	\$0	\$0		0	0	0	0
<b>Age of Head of Household</b>									
18-31	18	\$17,744	\$16,174	\$379		16	\$20,288	\$15,190	\$349
32-46	4	\$21,176	\$19,590	\$457		6	\$21,991	\$10,205	\$348
47-61	0	\$0	\$0	\$0		0	0	0	0
<b>Excluded Households</b>									
Elderly	-	-	-	-		-	-	-	-

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

### **i. Plan Year Approved, Implemented, Amended**

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

### **ii. Description/Update**

The LHA received HUD approval to perform all rent reasonableness determinations on all Housing Choice Voucher (HCV) tenant and project-based units that are owned or managed by the LHA. The scheduling time required to secure a third-party entity required 5 to 7 days lead time as opposed to LHA staff being able to respond in less than 24 hours.

In addition to eliminating the third-party provider, LHA has opted to use GoSection8.com, an on-line service that assists landlords and public housing agencies by maintaining the largest and most accurate listing of voucher program rentals currently available in every market in the U.S. The time it takes to perform rent reasonableness determinations with the on-line service has been reduced from 8 hours to 30 minutes. The use of GoSection8.com has made it possible for LHA to improve administrative efficiencies, eliminate confusion for the voucher participant, and improve the response time for performing inspections.

LHA HCV staff did not complete any rent reasonableness determinations for LHA owned/managed properties during FY2020. A total of 331 inspections were performed during the time period, July 1, 2019, through June 30, 2020. The last four months of FY2020 the COVID-19 pandemic caused inspections to be suspended and/or greatly reduced.

### **iii. Actual Non-Significant Changes**

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

### **iv. Actual Changes to Metrics/Data Collection**

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

### **v. Actual Significant Changes**

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

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

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

## HUD STANDARD METRICS

### Activity 23

CE1 Agency Cost Savings					
Unit of Measure: Total cost of rent reasonableness determinations in dollars (decrease).					
Baseline	Benchmark	Outcome (FY2018)	Outcome (FY2019)	Outcome (FY2020)	Benchmark Achieved
Cost of rent reasonableness determinations prior to implementation of the activity (in dollars).	Expected cost of rent reasonableness determinations after implementation of the activity (in dollars).	Actual cost of rent reasonableness determinations after implementation of the activity (in dollars).			Whether the outcome meets or exceeds the benchmark.
<b>\$750.00 per unit</b> Cost per rent reasonableness determination performed by third-party vendor	<b>*\$48.00 per unit</b> Cost per rent reasonableness determination performed by LHA HCV staff	<b>*\$48 per unit</b> Cost per rent reasonableness determination performed by LHA HCV staff	<b>\$9.25 per unit</b> Cost per rent reasonableness determination performed by LHA HCV staff	<b>\$0</b> Cost per rent reasonableness determination performed by LHA HCV staff	<b>YES</b>
*This is the current salary per hour for LHA HCV inspectors. Data is based on staff interviews and Emphasys software.					

CE2 Staff Time Savings					
Unit of Measure: Total time to complete reasonableness determinations in staff hours (decrease).					
Baseline	Benchmark	Outcome (FY2018)	Outcome (FY2019)	Outcome (FY2020)	Benchmark Achieved
Total staff time dedicated to the task prior to implementation of the activity.	Expected total staff time dedicated to the task after implementation of the activity.	Actual total staff time dedicated to the task after implementation of the activity.			Whether the outcome meets or exceeds the benchmark.
<b>7 days/168 hours</b> to schedule and complete rent reasonableness determinations performed by third-party vendor.	<b>1 day/24 hours</b> to complete rent reasonableness determinations performed by LHA HCV staff.	<b>1 day/24 hours</b> to complete rent reasonableness determinations performed by LHA HCV staff.	<b>4 hours</b> to complete rent reasonableness determinations performed by LHA HCV staff.	<b>0 hours</b> to complete rent reasonableness determinations performed by LHA HCV staff	<b>YES</b>



**Activity 25: HCV – Allow Excluded Income to Make Units Affordable****i. Plan Year Approved, Implemented, Amended**

Activity Proposed and Implemented 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. Examples of excluded income are:

- Domestic Volunteer Services Act
- Workforce Investment Act of 1998
- Payments received for Foster Children or Foster Adults
- Kinship Guardian Assistance Payments (Kin-GAP)
- Adoption Assistance Payments in excess of \$480 per adopted child
- Developmental Disability Care Payments

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.

LHA's HCV staff applied the flexibility of the activity for four (4) family's when their unit choice would have been unaffordable without counting excluded income. This activity gives HCV families added opportunity in choosing where they want to live.

**iii. Actual Non-Significant Changes**

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

**iv. Actual Changes to Metrics/Data Collection**

A benchmark was established for the HUD Standard Metric HC #5 - Increase in Resident Mobility.

**v. Actual Significant Changes**

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

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

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

## HUD STANDARD METRICS

### Activity 25

<b>Activity 25: HCV – Allow Excluded Income to Make Units Affordable</b>			
<b>HC #4: Displacement Prevention</b>			
Unit of Measure: Number of households at or below 80% AMI that would lose assistance or need to move (decrease).			
<b>Baseline FY2020</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Households losing assistance/moving prior to implementation of the activity (number).  0	Expected households losing assistance/ moving after implementation of the activity (number).  0	Actual households losing assistance/ moving after implementation of the activity (number).  0	Whether the outcome meets or exceeds the benchmark.  <b>YES</b>

<b>Activity 25: Waive 40% Rent Burden Cap for HCV</b>			
<b>HC #5: Increase in Resident Mobility</b>			
Unit of Measure: Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).			
<b>Baseline</b>	<b>Benchmark</b>	<b>FY2020</b>	<b>Benchmark Achieved?</b>
Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.  0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).  8	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).  4	Whether the outcome meets or exceeds the benchmark.  <b>No</b>

## **B. NOT YET IMPLEMENTED ACTIVITIES**

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

Activity Proposed and Approved - FY 2012-2013 Plan

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. This relief will apply only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.

#### Update

The LHA did not acquire properties during FY2020 where it was necessary to implement this activity. The LHA will develop a timeline for this activity should the Authority decide to acquire public housing units or land for the development of public housing.

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

Activity Proposed and Approved - FY 2012-2013 Plan

Activity Significantly Modified in FY2014

LHA continues to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority. Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.

#### Update

The LHA did not seek funding for this activity during FY2020. The LHA does not know when funding resources will be available for implementation of this activity.

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

Activity Proposed and Approved – LHA's FY2012-FY2013

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

The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed on project-based voucher developments. Current project-based voucher rules limit percentage of project-based units to 25% of the units in the development. The LHA plans to project-base 100% of the units at this site.

#### Update

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

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

Activity Proposed/Approved in FY2012-2013 Plan

Activity Revised in FY2014 Plan/Revision Approved in FY2014

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

#### Update

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

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

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

Activity Proposed and Approved FY2017

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

#### Update

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

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

Activity Proposed and Approved -FY2019

The Lexington Housing Authority received approval to 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.

Update

This activity has not yet been implemented due to the majority of the leaseholders at Connie Griffith (elderly-designated PBV) who moved following conversion from public housing to PBV utilized tenant protection vouchers offered due to the conversion. There were no requests for Choice Mobility in FY2020 due to the voluntary conversion completion effective January 6, 2020.

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**C. ACTIVITIES ON HOLD**

N/A

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## **D. ACTIVITIES CLOSED OUT**

**Activity #2 – Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents** (Approved/Implemented – FY2012-2013; Closed out FY2014)

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

**Activity #4 - HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy** (Plan Year Activity Approved and Implemented FY2012-2013; Closed out FY2015)

**Activity #6 - Biennial Housekeeping Inspection Policy for Public Housing Residents** (Plan Year Activity Approved and Implemented FY2012-2013; Closed out FY2014)

**Activity #15 – Limit HCV Landlord Rent Increases to the Least of 2%, HUD Fair Market Rent (FMR), or the Comparable Rent** – (Plan Year Activity Approved and Implemented FY2015; Closed out FY2016)

OMB Approval No. 2577-0216 (exp. 3/31/2024)

**(V) PLANNED APPLICATION OF MTW FUNDS****ANNUAL MTW REPORT****A. FINANCIAL REPORTING****i. Available MTW Funds in the Plan Year**

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

**ii. Expenditures of MTW Funds in the Plan Year**

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

**iii. Describe Application of MTW Funding Flexibility**

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding 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 (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

**APPLICATION OF "MTW FUNDING" FLEXIBILITY**

During the fiscal year ended 6-30-2019 the Lexington Housing Authority (LHA) was in a period of transition. This was because our first tax credit entity Ballard Place, LLC had ended and then merged back into the LHA portfolio in a prior year. During FYE 6-30-19 Ballard entered the second tax credit deal and became Ballard Apartments, LLC. In anticipation of the rehabilitation of Ballard, units were held at both Ballard as well as Connie Griffith our adjacent senior high rise which was a Low Income Housing site. A major rehabilitation was also in early stages for Connie Griffith with the addition of an elevator and window replacement for the entire Connie Griffith building. Steps were being taken to secure funding for the rehab for Connie Griffith via our Section 8 (HCV) Reserves both held at LHA as well as our HCV HUD Held Reserves.

**B. LOCAL ASSET MANAGEMENT PLAN****i. Did the MTW PHA allocate costs within statute in the Plan Year?**

Yes

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

No

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

No

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

LHA did not implement a LAMP

form HUD 50900: (V) Sources and Uses of MTW Funds (3/2021)

## **VI. ADMINISTRATIVE**

### **A. REVIEWS, AUDITS AND INSPECTIONS**

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

LHA completed and submitted the annual financial audit to the REAC system through the financial data schedule by 3/03/2021. MCM CPAs & Advisors LLP conducted the audit with no findings.

### **B. EVALUATION RESULTS**

Dr. Amanda Sokan 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. Sokan is an independent consultant, who is currently employed by the University of Arizona, College of Public Health, Community Environment & Policy Department. Dr. Sokan served as lead evaluator of the LHA's MTW program when the LHA entered the Demonstration in 2011. LHA will provide evaluation of LHA's FY2020 rent reform activities under separate cover.



**C. MTW STATUTORY REQUIREMENT CERTIFICATION****CERTIFICATION OF COMPLIANCE WITH REGULATIONS  
MOVING TO WORK ANNUAL REPORT**

Acting on behalf of the Public Housing Agency (PHA) listed below, as its authorized PHA official, I approve the submission of the Annual Moving to Work Report for the PHA fiscal year July 1, 2019 through June 30, 2020.

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

Lexington-Fayette Urban County Housing Authority  
PHA Name

KY004

PHA Number/HA Code

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

Austin J. Simms  
Name of Authorized Official

Executive Director  
Title

  
Signature

April 15, 2022  
Date

**D. MTW ENERGY PERFORMANCE CONTRACT FLEXIBILITY DATA**

**N/A**

